



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant
DATE: October 11, 2005
RE: Guardian Automotive Products, Inc. / 113-21320-00024
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 approval 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) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER-MOD.dot 1/10/05



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

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Indianapolis, Indiana 46204
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Lester Barancin
Guardian Automotive Products, Inc.
860 W. US Rt. 6
Ligonier, IN 46767

October 11, 2005

Re: **133-21320-00024**
First Minor Permit Revision to FESOP
No.: **113-19112-00024**

Dear Mr. Barancin:

Guardian Automotive Products, Inc. was issued a permit on October 15, 2004, for an automotive window panel with PVC trim manufacturing operation. A letter requesting a revision to this permit was received on June 17, 2005. Pursuant to the provisions of 326 IAC 2-8-11.1 a minor permit revision to this permit (FESOP 113-19112-00024) is hereby approved as described in the attached Technical Support Document.

The applicant is proposing to increase the throughput of their laminating operations from 200 parts per hour to 275 parts per hour.

Pursuant to 326 IAC 2-6.1-6, the federally enforceable state operating permit shall be revised by incorporating the minor permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. For your convenience, the entire revised federally enforceable state operating permit, with all modifications made to it, is being provided.

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 Jenny Acker, at (800) 451-6027, and ask for Jenny Acker or extension 2-8253, or dial (317) 232-8253.

Sincerely,

Original Signed By:
Nisha Sizemore, Section Chief
Permits Branch
Office of Air Quality

Attachments

JLA

cc: File - Noble County
Noble County Health Department
Air Compliance Section Inspector – Doyle Houser
Compliance Branch
Administrative and Development Section



Mitchell E. Daniels, Jr.
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Thomas W. Easterly
 Commissioner

100 North Senate Avenue
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**FEDERALLY ENFORCEABLE STATE
 OPERATING PERMIT (FESOP)
 OFFICE OF AIR QUALITY**

**Guardian Automotive Products, Inc.
 860 W. US Rt. 6,
 Ligonier, IN 46767**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; and denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 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.: F113-19112-00024	
Issued by: Original Signed by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: October 15, 2004 Expiration Date: October 15, 2009
First Minor Permit Revision No.: F113-21320-00024	Conditions Affected: C.1 Sections Affected A.2, A.3, and D.1
Issued by: Original Signed By: Nisha Sizemore, Section Chief Office of Air Quality	Issuance Date: October 11, 2005 Expiration Date: October 15, 2009

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions **A.1** through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates an automotive window panel with PVC trim manufacturing operation.

Authorized individual:	Plant Manager
Source Address:	860 W. US Rt. 6, Ligonier, IN 46767
Mailing Address:	same as above
General Source Phone:	(260) 894-9337
SIC Code:	3231
Source Location Status:	Noble
Source Status:	Attainment for all criteria pollutants Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) One (1) Laminated Windshield Silkscreen Operation, consisting of the following:
 - (1) Two (2) Laminated Windshield (LW) silkscreen operations, constructed in 1991 and 1999, using an automated application method each with an overall maximum capacity of 150.7 parts per hour of automotive LW window panels and one silkscreen operation exhausting to stacks identified as J-1, J-2, and J-3 and other silkscreen operation exhausting to stack identified as J-4;
 - (2) One (1) Laminated Windshield (LW) silver (Ag) silkscreen operations, constructed in 1991, using an automated application method with a maximum capacity of 51.7 parts per hour of automotive LW window panels and exhausting to the interior of the building;
 - (3) One (1) ultrasonic cleaning operation for the preparation of stainless steel buttons that are used to attach mirrors to windshields, constructed in 2001, with a maximum capacity of two (2) gallons of cleaner per day and exhausting to the interior of the building;
 - (4) One (1) Dowanol Roller Application operation, constructed in 1991, with an overall maximum capacity of 275 parts per hour of automotive LW window panels and exhausting to the interior of the building;
 - (5) Two (2) Diatomaceous Earth Applicators for the LW lines, constructed in 1999, using an automated application method with an overall maximum capacity of 275 parts per hour of automotive LW window panels;

- (b) One (1) Tempered Glass Silkscreen Operation, consisting of the following:
 - (1) Two (2) Tempered Glass (TG) silkscreen lines, constructed in 1991 and 1999, using an automated application method with a maximum capacity of 130.2 parts per hour of automotive TG window panels and one silkscreen line exhausting to stacks identified as I-1, I-2, and I-3 and other silkscreen line exhausting to stack identified as I-4;
 - (2) Two (2) Tempered Glass (TG) silver (Ag) silkscreen lines, constructed in 1991 and 1999, using an automated application method with a maximum capacity of 130.2 parts per hour of automotive TG window panels and exhausting to the interior of the building;
- (c) One (1) Tempered Glass PVC Encapsulations Operation, consisting of the following:
 - (1) Five (5) TG PVC encapsulation robotic wiping applicators, identified as Booth Nos. 2-6 and constructed in 1997 through 2000, each with a maximum capacity of 55 parts per hour (1,945 pounds per hour) of automotive window panels with PVC trim (overall maximum 275 parts per hour), and each applicator connected to a manifold which is exhausted through stack P-1;
 - (2) Five (5) TG injection molding presses, identified as Presses Nos.2-6 and constructed in 1997 through 2000, each with a maximum capacity of 55 parts per hour (1,945 pounds per hour) of automotive window panels with PVC trim (overall maximum 275 parts per hour); and each connected to a manifold which is exhausted through stack P-1;
- (d) One (1) Poly Vinyl Butyral Interlayer operation, identified as the White Room, constructed in 1991 with a maximum capacity of 200 parts per hour of automotive windshields and exhausting to the interior of the building;
- (e) One (1) tempering line, identified as tempering line #3, to be constructed by 2005 with a maximum capacity of 480 parts per hour (5,876 pounds per hour) of automotive window panels and exhausting through stack I-5;
- (f) One (1) priming cell, identified as priming cell #1, to be constructed by 2005 with a maximum capacity of 240 parts per hour of automotive window panels and exhausting through stack P-1;
- (g) One (1) priming cell, identified as priming cell #2, to be constructed by 2005 with a maximum capacity of 240 parts per hour of automotive window panels and exhausting through stack P-2;
- (h) One (1) priming cell, identified as priming cell #3, to be constructed by 2005 with a maximum capacity of 275 parts per hour of automotive window panels and exhausting through stack P-2; and
- (i) One (1) priming cell, identified as priming cell #4, to be constructed by 2005 with a maximum capacity of 240 parts per hour of automotive window panels and exhausting through stack P-2.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million (10,000,000) Btu per hour:
 - (1) Four (4) natural gas-fired space heaters, each with heat input rate of 2.25 MMBtu/hr, respectively;
 - (2) Four (4) natural gas-fired make-up heaters, each with heat input rate of 3.35 MMBtu/hr, respectively;
 - (3) Seven (7) natural gas-fired space heaters, each with heat input rate of 0.097, 0.097, 0.097, 0.12, 0.071, 0.071, and 0.12 MMBtu/hr, respectively;
 - (4) One (1) humidification boiler having a heat input rate of 0.21 MMBtu/hr;
- (b) The following VOC and HAP storage containers:
 - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons:
 - (A) Two (2) No. 2 diesel fuel storage tanks, each having a capacity of 260 and 250 gallons, respectively;
 - (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids:
 - (A) Totes, drums and steel buckets used to store isopropyl alcohol, H-939-C safe solvent cleaner, black frit paint, dowanol, adhesive, catalyst and clear and black primers;
- (c) Refractory storage not requiring air pollution control equipment;
- (d) Equipment used exclusively for the following:
 - (1) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases;
- (e) Machining where an aqueous cutting coolant continuously floods the machining interface;
- (f) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6:
 - (1) Four (4) part washers, constructed in 1991 and each having a capacity of 14 gallons;
- (g) Cleaners and solvents characterized as follows:
 - (1) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;
- (h) Closed loop heating and cooling systems;

- (i) Infrared cure equipment;
- (j) Noncontact cooling tower systems with either of the following:
 - (1) Two (2) forced and induced draft cooling tower systems not regulated under a NESHAP;
- (k) Quenching operations used with heat treating processes;
- (l) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
- (m) Heat exchanger cleaning and repair;
- (n) Paved and unpaved roads and parking lots with public access;
- (o) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;
- (p) Emergency generators as follows:
 - (1) Diesel generators not exceeding 1600 horsepower:
 - (A) One (1) standby generator, constructed in 1991 with a maximum heat input rate of 142 HP; and
- (q) Other emergency equipment as follows:
 - (1) Stationary fire pumps:
 - (A) One (1) fire pump, constructed in 1991 with a maximum fuel consumption capacity of 9.2 gal/hr.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

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

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

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 FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

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

B.3 Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5]

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

B.4 Enforceability [326 IAC 2-8-6]

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

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

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 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

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 2-8-4(5)(D)]

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

B.8 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1 when furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 52, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204
- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

The PMP extension notification does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.13 Emergency Provisions [326 IAC 2-8-12]

- (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 2-8-12.
- (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 describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and IDEM Northern Regional Office 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 No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

IDEM Northern Regional Office Telephone No.: 1-800-753-5519 or 574-245-4870
IDEM Northern Regional Office Facsimile No.: 574-245-4877

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

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 2-8-4(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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 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.
- (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 material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP 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 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.

- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, IN 46204

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
 - (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

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 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the

deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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
Indianapolis, Indiana 46204
- Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without 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 2-8-11.1 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
Indianapolis, Indiana 46204
- 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 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(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 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(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 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (d) 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.19 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-17-3-2] [IC 13-17-3-2] [IC13-30-3-1]

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

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) 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 317-233-4320 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Credible Evidence [326 IAC 2-8-4(3)] [326 IAC 2-8-5] [62 FR 8314]

Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.

B.24 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

- (a) The requirements to obtain a permit revision under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction work is suspended for a continuous period of one (1) year or more.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

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

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

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

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

C.6 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).

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **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 to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

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

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

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

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

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

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

The ERP does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

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

The response action documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).
- (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 Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.18 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

EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) Laminated Windshield Silkscreen Operation, consisting of the following:
- (1) Two (2) Laminated Windshield (LW) silkscreen operations, constructed in 1991 and 1999, using an automated application method each with an overall maximum capacity of 150.7 parts per hour of automotive LW window panels and one silkscreen operation exhausting to stacks identified as J-1, J-2, and J-3 and other silkscreen operation exhausting to stack identified as J-4;
 - (2) One (1) Laminated Windshield (LW) silver (Ag) silkscreen operations, constructed in 1991, using an automated application method with a maximum capacity of 51.7 parts per hour of automotive LW window panels and exhausting to the interior of the building;
 - (3) One (1) ultrasonic cleaning operation for the preparation of stainless steel buttons that are used to attach mirrors to windshields, constructed in 2001, with a maximum capacity of two (2) gallons of cleaner per day and exhausting to the interior of the building;
 - (4) One (1) Dowanol Roller Application operation, constructed in 1991, with an overall maximum capacity of 275 parts per hour of automotive LW window panels and exhausting to the interior of the building;
 - (5) Two (2) Diatomaceous Earth Applicators for the LW lines, constructed in 1999, using an automated application method with an overall maximum capacity of 275 parts per hour of automotive LW window panels;
- (b) One (1) Tempered Glass Silkscreen Operation, consisting of the following:
- (1) Two (2) Tempered Glass (TG) silkscreen lines, constructed in 1991 and 1999, using an automated application method with a maximum capacity of 130.2 parts per hour of automotive TG window panels and one silkscreen line exhausting to stacks identified as I-1, I-2, and I-3 and other silkscreen line exhausting to stack identified as I-4;
 - (2) Two (2) Tempered Glass (TG) silver (Ag) silkscreen lines, constructed in 1991 and 1999, using an automated application method with a maximum capacity of 130.2 parts per hour of automotive TG window panels and exhausting to the interior of the building;
- (c) One (1) Tempered Glass PVC Encapsulations Operation, consisting of the following:
- (1) Five (5) TG PVC encapsulation robotic wiping applicators, identified as Booth Nos. 2-6 and constructed in 1991, each with a maximum capacity of 55 parts per hour (1,945 pounds per hour) of automotive window panels with PVC trim (overall maximum 275 parts per hour), and each applicator connected to a manifold which is exhausted through stack P-1;

Facility Description [326 IAC 2-8-4(10)]:

- (2) Five (5) TG injection molding presses, identified as Presses Nos.2-6 and constructed in 1997 through 2000, each with a maximum capacity of 55 parts per hour (1,945 pounds per hour) of automotive window panels with PVC trim (overall maximum 275 parts per hour); and each connected to a manifold which is exhausted through stack P-1;
- (d) One (1) Poly Vinyl Butyral Interlayer operation, identified as the White Room, constructed in 1991 with a maximum capacity of 200 parts per hour of automotive windshields and exhausting to the interior of the building;
- (e) One (1) tempering line, identified as tempering line #3, to be constructed by 2005 with a maximum capacity of 480 parts per hour (5,876 pounds per hour) of automotive window panels and exhausting through stack I-5;
- (f) One (1) priming cell, identified as priming cell #1, to be constructed by 2005 with a maximum capacity of 240 parts per hour of automotive window panels and exhausting through stack P-1;
- (g) One (1) priming cell, identified as priming cell #2, to be constructed by 2005 with a maximum capacity of 240 parts per hour of automotive window panels and exhausting through stack P-2;
- (h) One (1) priming cell, identified as priming cell #3, to be constructed by 2005 with a maximum capacity of 275 parts per hour of automotive window panels and exhausting through stack P-2;
- (i) One (1) priming cell, identified as priming cell #4, to be constructed by 2005 with a maximum capacity of 240 parts per hour of automotive window panels and exhausting through stack P-2; and
- (j) Four (4) part washers, constructed in 1991 and each having a capacity of 14 gallons.

(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 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4] [326 IAC 2-2]

The total combined VOC input to the LW Black Silkscreen Operations, LW Silver Silkscreen Operations, LW Dowanol Application, TG Black Silkscreen Operations, TG Silver Silkscreen Operations, TG PVC Encapsulations Operations, Diatomaceous Earth Operations, Tempering Line #3 and Priming Cells #1 - #4 shall be limited to 98.7 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. This is based on the VOC input of the black frit paint, solvent cleaner, silver coating, adhesives clear and black primers, and VOC solvents input to the units excluding the waste VOC materials.

Compliance with the above condition shall limit the source-wide potential to emit VOC, including the potential to emit of insignificant activities, to less than one-hundred (100) tons per 12 consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70), and 326 IAC 2-2 (PSD), are not applicable to the source.

D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4] [326 IAC 2-4.1-1]

- (a) The input of any single HAP to the LW Black Silkscreen Operations, LW Silver Silkscreen Operations, LW Dowanol Application, TG Black Silkscreen Operations, TG Silver Silkscreen Operations, TG PVC Encapsulations Operations, Diatomaceous Earth Operations, Tempering Line #3 and Priming Cells #1 - #4 shall be limited to 9.81 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month.
- (b) The input of all combined HAPs to the LW Black Silkscreen Operations, LW Silver Silkscreen Operations, LW Dowanol Application, TG Black Silkscreen Operations, TG Silver Silkscreen Operations, TG PVC Encapsulations Operations, Diatomaceous Earth Operations, Tempering Line #3 and Priming Cells #1 - #4 shall be limited to 24.8 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month.

Compliance with these limitations shall make the requirements of 326 IAC 2-7 (Part 70) not applicable to the source. Compliance with these conditions shall also make the Maximum Achievable Control Technology (MACT) requirements of 326 IAC 2-4.1-1 not applicable to the facilities.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to MSOP Significant Permit Revision No. 113-12574-00024 the Best Available Control Technology (BACT) for the two (2) Diatomaceous Earth Applicators for the LW lines have been determined to be no control device with the following work practice standards:

- (a) The diatomaceous earth, isopropyl alcohol and water mixtures will be prepared in batches in a closed mixing chamber. One batch per shift will be used at each laminated windshield line;
- (b) Application will be done with applicators in a closed chamber and will be electronically controlled to spray only when glass is in position.
- (c) Manifold spray applicators will be used in close proximity to the glass to minimize over spray. Two manifolds will be used for short edge leading lines and four manifolds will be used for long edge leading lines;
- (d) Spectrophotometer readings will be taken and recorded every ½ hours to control and minimize the application;
- (e) Implementation of electrically charged bands to impart a negative charge to one piece of glass and positive charge to the other. When put together these charges will reduce slippage between parts which reduces the amount of powder and associated alcohol required;
- (f) Glass parts will be heated to 100-150 degrees F or higher. This will allow the powder (diatomaceous earth) to dry more effectively and will minimize the amount of alcohol needed;
- (g) Weekly preventive maintenance will be done on the system. Aircaps that control the spray pattern are changed out daily. Spray nozzles will be changed at a maximum of every two weeks and applicators will be changed out at least monthly; and
- (h) Use of isopropyl alcohol, as well as VOC delivered to the two (2) Diatomaceous Earth Applicators for the LW lines shall be limited such that the potential to emit (PTE) VOC from the two (2) Diatomaceous Earth Applicators for the LW lines shall be limited to 17.84 tons per twelve (12) consecutive months.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee of four (4) part washers shall:

- (a) Equip the cleaner with a cover;

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

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

- (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.1.6 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the part washers and any control devices.

Compliance Determination Requirements

D.1.7 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC and HAPs content and usage limitations contained in Conditions D.1.1, D.1.2 and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAPs data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, D.1.2 and D.1.3, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Conditions D.1.1 and D.1.3 and the HAPs usage limit established in Condition D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC and HAPs content (weight percent) of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

- (3) The volume weighted VOC content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC and HAPs usage for each month;
 - (6) The weight of VOCs and HAPs emitted for each compliance period;
 - (7) The total waste VOC materials generated during each month;
 - (8) The spectrophotometer readings taken every half (1/2) hour for the two (2) Diatomaceous Earth Applicators;
 - (9) Continuous records of the temperature of glass parts during diatomaceous earth application; and
 - (10) Records of the weekly preventive maintenance performed on the two (2) Diatomaceous Earth Applicators. The records shall also include the dates of replacement of aircaps, spray nozzles and applicators.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1, D.1.2 and D.1.3 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million (10,000,000) Btu per hour:
 - (1) One (1) humidification boiler having a heat input rate of 0.21 MMBtu/hr.

(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 2-8-4(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitation for facilities specified in 326 IAC 6-2-1 (d)), the particulate emissions from the 0.21 MMBtu per hour heat input boiler shall be limited to 0.6 pounds per MMBtu heat input.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Guardian Automotive Products, Inc.
Source Address: 860 W. US Rt. 6, Ligonier, IN 46767
Mailing Address: Same as above
FESOP No.: F113-19112-00024

**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)_____
- Affidavit (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 BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Guardian Automotive Products, Inc.
Source Address: 860 W. US Rt. 6, Ligonier, IN 46767
Mailing Address: Same as above
FESOP No.: F113-19112-00024

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- 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
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

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

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

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

Page 2 of 2

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

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: Guardian Automotive Products, Inc.
Source Address: 860 W. US Rt. 6, Ligonier, IN 46767
Mailing Address: Same as above
FESOP No.: 113-19112-00024
Facility: LW Black Silkscreen Operations, LW Silver Silkscreen Operations, LW Dowanol Application, TG Black Silkscreen Operations, TG Silver Silkscreen Operations, TG PVC Encapsulations Operations, Diatomaceous Earth Operations, Tempering Line #3 and Priming Cells #1 - #4
Parameter: Worst-case single HAP
Limit: Less than 9.81 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Single HAP Usage This Month	Single HAP Usage Previous 11 Months	12 Month Total Single HAP Usage
Month 1			
Month 2			
Month 3			

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

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

FESOP Quarterly Report

Source Name: Guardian Automotive Products, Inc.
 Source Address: 860 W. US Rt. 6, Ligonier, IN 46767
 Mailing Address: Same as above
 FESOP No.: 113-19112-00024
 Facility: LW Black Silkscreen Operations, LW Silver Silkscreen Operations, LW Dowanol Application, TG Black Silkscreen Operations, TG Silver Silkscreen Operations, TG PVC Encapsulations Operations, Diatomaceous Earth Operations, Tempering Line #3 and Priming Cells #1 - #4
 Parameter: Combined HAPs
 Limit: Less than 24.8 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Combined HAPs Usage This Month	Combined HAPs Usage Previous 11 Months	12 Month Combined HAPs Usage
Month 1			
Month 2			
Month 3			

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

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

FESOP Quarterly Report

Source Name: Guardian Automotive Products, Inc.
Source Address: 860 W. US Rt. 6, Ligonier, IN 46767
Mailing Address: Same as above
FESOP No.: 113-19112-00024
Facility: LW Black Silkscreen Operations, LW Silver Silkscreen Operations, LW Dowanol Application, TG Black Silkscreen Operations, TG Silver Silkscreen Operations, TG PVC Encapsulations Operations, Diatomaceous Earth Operations, Tempering Line #3 and Priming Cells #1 - #4
Parameter: Volatile Organic Compounds (VOC)
Limit: 98.7 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Total VOC Usage This Month	Total VOC Usage Previous 11 Months	12 Month Total VOC Usage
Month 1			
Month 2			
Month 3			

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

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

FESOP Quarterly Report

Source Name: Guardian Automotive Products, Inc.
Source Address: 860 W. US Rt. 6, Ligonier, IN 46767
Mailing Address: Same as above
FESOP No.: 113-19112-00024
Facility: Two (2) Diatomaceous Earth Applicators for the LW Line
Parameter: Volatile Organic Compounds (VOC)
Limit: 17.84 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Total VOC Usage This Month	Total VOC Usage Previous 11 Months	12 Month Total VOC Usage
Month 1			
Month 2			
Month 3			

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

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

FESOP Quarterly Report

Source Name: Guardian Automotive Products, Inc.
Source Address: 860 W. US Rt. 6, Ligonier, IN 46767
Mailing Address: Same as above
FESOP No.: 113-19112-00024
Facility: Priming Cell #3
Parameter: Volatile Organic Compounds (VOC)
Limit: 24 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Total VOC Usage This Month	Total VOC Usage Previous 11 Months	12 Month Total VOC Usage
Month 1			
Month 2			
Month 3			

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

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Guardian Automotive Products, Inc.
Source Address: 860 W. US Rt. 6, Ligonier, IN 46767
Mailing Address: Same as above
FESOP No.: 113-19112-00024

Months: _____ to _____ Year: _____

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<p><input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Quality**

Technical Support Document (TSD) for a
Minor Permit Revision to a
Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name:	Guardian Automotive Products, Inc.
Source Location:	860 W. US Rt. 6, Ligonier, IN 46767
County:	Noble
SIC Code:	3231
Operation Permit No.:	113-19112-00024
Operation Permit Issuance Date:	October 15, 2004
Minor Permit Revision No.:	113-21320-00024
Permit Reviewer:	Jenny Acker

The Office of Air Quality (OAQ) has reviewed a modification application from Guardian Automotive Products, Inc. (Guardian) relating to the operation of an automotive window panel with PVC trim manufacturing operation.

History

On June 17, 2005, Guardian Automotive Products, Inc., submitted an application to the OAQ requesting to increase the throughput of their lamination operations from 200 parts per hour to 275 parts per hour. Guardian Automotive Products, Inc., was issued a FESOP (113-19112-00024) on October 15, 2004.

Existing Approvals

The source has been operating under FESOP 113-19112-00024 issued on October 15, 2004 with an expiration date of October 15, 2009.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

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

An administratively complete application for the purposes of this review was received on June 21, 2005.

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 3).

Potential to Emit of the Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit 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, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential to Emit (tons/yr)
PM	0
PM-10	0
SO ₂	0
VOC	12.27
CO	0
NO _x	0

HAPs	Potential to Emit (tons/yr)
Methyl Methacrylate	Neg.
Glycol Ethers	Neg.
Methanol	0.38
Toluene	0.76
Methyl Ethyl Ketone	1.39
Other	Neg.
Total	2.53

Potential to Emit After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential To Emit (tons/year)							
	PM	PM-10	SO ₂	VOC	CO	NO _x	Single HAP	Combined HAPs
LW Silkscreen Operations	-	-	-	<98.70 (<17.84)	-	-	< 10	<25
TG Silkscreen Operations	-	-	-		-	-		
TG PVC Encapsulations Operations	-	-	-		-	-		
Tempering Line #3	-	-	-		-	-		
Priming Cells #1	-	-	-		-	-		
Priming Cells #2	-	-	-		-	-		
Priming Cells #3	-	-	-		-	-		
Priming Cells #4	-	-	-		-	-		
Diatomaceous Earth Operations	-	-	-	-	-			
Insignificant Activities ⁽³⁾	1.4	1.4	0.66	1.29	10.51	18.77	Neg.	Neg.
Total Emissions	0	0	0	<100 ⁽¹⁾	0	0	<10 ⁽²⁾	<25 ⁽²⁾

(1) Input VOC usage limits are based on permit Condition D.1.1 and D.1.3(h).
 (2) The worst-case single HAP with an uncontrolled potential to emit greater than 10 tons/year. Input usage limits are based on permit Condition D.1.2.
 (3) Source has four (4) part washers that reuse the H-939-C solvent discarded from ultrasonic cleaning operation and hence VOC emissions are already included in LW silkscreen operations.

County Attainment Status

The source is located in Noble County.

Pollutant	Status
PM-2.5	Attainment
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Noble County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Noble County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions.
- (c) Noble County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Justification for Revision (this is to explain the permit revision cite)

The FESOP is being modified through a Minor Permit Revision. This revision is being performed pursuant to 326 IAC 2-8-11.1(d)(4)(D) which applies to modifications that would have a potential to emit of less than twenty-five (25) tons per year and greater than or equal to five (5) tons per year of volatile organic compounds (VOC) where the use of air pollution control equipment is not required to comply with 326 IAC 2-8.

Federal Rule Applicability

- (a) The requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60.390, Subpart MM) are not included in the permit since the source is not an automobile or light-duty truck assembly plant.
- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart IIII are not included in the permit since the source is not an automobile or light-duty truck assembly plant, and it is not a major source of HAPs after federally enforceable limits.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart MMMM are not included in the permit since this regulation is applicable to surface coating of miscellaneous metal parts or products, as described in 40

CFR 63.3881 (a)(1). This regulation does not apply to this source since the source does not apply coating to any metal parts or products, and it is not a major source of HAPs after federally enforceable limits.

State Rule Applicability – Entire Source

326 IAC 2-6 (Emission Reporting)

This source is located in Noble County and the source is not required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program. Additionally, the source has no lead emissions. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

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

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

State Rule Applicability – Individual Facilities

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

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of the combination of HAPs, and is constructed or reconstructed after July 27, 1997, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT).

The Permittee shall limit the source-wide PTE of any single HAP and combined HAPs to less than 10 and 25 tons per year, respectively, to satisfy the requirements of 326 IAC 2-8 (FESOP). Therefore, the source will not have the potential to emit of 10 and 25 tons per year for a single HAP and combined HAPs, respectively, and the requirements of 326 IAC 2-4.1-1 do not apply.

326 IAC 2-8-4 (FESOP)

This source is subject to 326 IAC 2-8-4 (FESOP). The total combined VOC input to the LW Black Silkscreen Operations, LW Silver Silkscreen Operations, LW Dowanol Application, TG Black Silkscreen Operations, TG Silver Silkscreen Operations, TG PVC Encapsulations Operations, Diatomaceous Earth Operations, Tempering Line #3 and Priming Cells #1 - #4 shall be limited to 98.7 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month.

The source-wide worst-case single HAP and combined HAPs input to the LW Black Silkscreen Operations, LW Silver Silkscreen Operations, LW Dowanol Application, TG Black Silkscreen Operations, TG Silver Silkscreen Operations, TG PVC Encapsulations Operations, Diatomaceous Earth Operations, Tempering Line #3 and Priming Cells #1 - #4 shall be limited to 9.81 tons and 24.8 tons per twelve (12) consecutive month period, respectively, with compliance demonstrated at the end of each month. Therefore, the requirements of 326 IAC 2-7 do not apply.

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

326 IAC 6-3-2 for surface coating is not applicable to any facility at this source since there are no particulate emissions from any surface coating facility.

326 IAC 8-1-6 (General Reduction Requirements)

The two (2) Diatomaceous Earth Applicators shall continue to be limited to less than 17.84 tons of VOC per twelve (12) consecutive month period with compliance demonstrated at the end of each month.

326 IAC 8-2-2 (Automobile and light duty truck coating operations)

326 IAC 8-2-2 (Automobile and light duty truck coating operations) establishes emission limitations for automobile and light duty truck surface coating operations which include all passenger car or passenger car derivatives capable of seating twelve (12) or fewer passengers and any motor vehicle rated at 3,864 kilograms (eight thousand five hundred (8,500 pounds) gross weight or less which are designed primarily for the purpose of transportation or are derivatives of such vehicles. No facility at this source applies prime and topcoat coatings on automobile and light duty truck bodies, hoods, fenders, cargo boxes, doors and grill opening panels. Hence, 326 IAC 8-2-2 does not apply to any facility.

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

326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) is applicable to metal surface coating operations. No facility at this source performs metal surface coating. Hence, 326 IAC 8-2-9 does not apply to any facility.

Testing Requirements

While IDEM may require compliance testing at any specific time to determine if the source is in compliance with an applicable limit or standard, compliance testing is not required for this approval. Compliance testing is not required since compliance with the VOC content and usage limitations is determined using the formulation data supplied by the coating manufacturer.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period. There are no compliance monitoring requirements applicable to this approval.

Proposed Changes

1. The mailing address of IDEM, Office of Air Quality (OAQ) has changed. All references in the permit to "100 North Senate Ave, Post Office Box 6015, Indianapolis, Indiana 46206-6015" have been changed to "100 North Senate Ave, Indianapolis, Indiana 46204".

2. The 326 IAC 6-3 revisions that became effective on June 12, 2002 were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP; therefore, the requirements of the previous version of 326 IAC 6-3-2 are no longer applicable to this source. Condition C.1 has been revised to remove (1) which contained these requirements.

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour ~~[40 CFR 52 Subpart P]~~[326 IAC 6-3-2]

- ~~(1) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions 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.~~
- (2) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

3. Addendum to the Technical Support Document for FESOP No.: 113-19112-00024, issued on October 15, 2004, addressed the applicability of condition D.1.1(b). IDEM, OAQ responded that condition D.1.1(b) was not required and would be removed. However, condition D.1.1(b) inadvertently remained upon issuance of F133-19112-00024. Therefore, condition D.1.1 has been modified as follows:

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4][326 IAC 2-2]

- (a) The total combined VOC input to the LW Black Silkscreen Operations, LW Silver Silkscreen Operations, LW Dowanol Application, TG Black Silkscreen Operations, TG Silver Silkscreen Operations, TG PVC Encapsulations Operations, Diatomaceous Earth Operations, Tempering Line #3 and Priming Cells #1 - #4 shall be limited to 98.7 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. This is based on the VOC input of the black frit paint, solvent cleaner, silver coating, adhesives clear and black primers, and VOC solvents input to the units excluding the waste VOC materials.
- ~~(b) The Permittee shall limit the VOC input to the Priming Cell #3 to twenty four (24) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. This is based on the VOC input of the adhesives, clear and black primers and VOC solvents input to the units excluding the waste VOC materials.~~

4. The lamination operation throughput will increase from 200 parts per hour to 275 parts per hour.

Conditions A.2(a)(4), A.2(a)(5), and A.2(h) have been have been revised as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) One (1) Laminated Windshield Silkscreen Operation, consisting of the following:
- (4) One (1) Dowanol Roller Application operation, constructed in 1991, with an overall maximum capacity of ~~200~~ **275** parts per hour of automotive LW window panels and exhausting to the interior of the building;

- (5) Two (2) Diatomaceous Earth Applicators for the LW lines, constructed in 1999, using an automated application method with an overall maximum capacity of ~~200~~ **275** parts per hour of automotive LW window panels;
- (h) One (1) priming cell, identified as priming cell #3, to be constructed by 2005 with a maximum capacity of ~~240~~ **275** parts per hour of automotive window panels and exhausting through stack P-2; and

Section D.1(a)(4) and (5) and D.1(h) has been have been revised as follows:

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) Laminated Windshield Silkscreen Operation, consisting of the following:
 - (4) One (1) Dowanol Roller Application operation, constructed in 1991, with an overall maximum capacity of ~~200~~ **275** parts per hour of automotive LW window panels and exhausting to the interior of the building;
 - (5) Two (2) Diatomaceous Earth Applicators for the LW lines, constructed in 1999, using an automated application method with an overall maximum capacity of ~~200~~ **275** parts per hour of automotive LW window panels;
- (h) One (1) priming cell, identified as priming cell #3, to be constructed by 2005 with a maximum capacity of ~~200~~ **275** parts per hour of automotive window panels and exhausting through stack P-2;

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

Conclusion

The operation of this Minor Permit Revision shall be subject to the conditions of the attached proposed Minor Permit Revision No. 113-21320-00024.

Appendix A: Emissions Calculations**Summary**

Company Name: Guardian Automotive Products, Inc.
Address City IN Zip: 860 West U.S. 6, Ligonier, IN 46767
Permit Number: 113-21320
Plant ID: 113-00024
Reviewer: Jenny Acker
Date: 10/11/2005

Uncontrolled Potential Emissions (tons/year)								
Emissions Generating Activity								
Pollutant	LW Silkscreen Ops	TG Silkscreen Ops	TG PVC Encapsulations Ops (Booths 2-6)	Diatomaceous Earth Ops	Tempering Line #3	Priming Cells #1-#4 ⁽¹⁾	Insignificant Activities ⁽²⁾	TOTAL
PM	0.00	0.00	0.00	0.00	0.00	0.00	1.40	1.40
PM10	0.00	0.00	0.00	0.00	0.00	0.00	1.40	1.40
SO2	0.00	0.00	0.00	0.00	0.00	0.00	0.66	0.66
NOx	0.00	0.00	0.00	0.00	0.00	0.00	18.77	18.77
VOC	12.45	8.47	9.06	24.53	16.67	67.72	1.29	140.19
CO	0.00	0.00	0.00	0.00	0.00	0.00	10.51	10.51
total HAPs	0.00	0.00	4.55	0.00	0.00	71.88	neglegible	76.42
worst case single HAF	0.00	0.00	(MEK) 3.00	0.00	0.00	(MEK) 9.55		(MEK) 9.55
Total emissions based on rated capacity at 8,760 hours/year.								
Controlled Potential Emissions (tons/year)								
Emissions Generating Activity								
Pollutant	LW Silkscreen Ops	TG Silkscreen Ops	TG PVC Encapsulations Ops (Booths 2-6)	Diatomaceous Earth Ops	Tempering Line #3	Priming Cells #1-#4 ⁽¹⁾	Insignificant Activities ⁽²⁾	TOTAL
PM	0.00	0.00	0.00	0.00	0.00	0.00	1.40	1.40
PM10	0.00	0.00	0.00	0.00	0.00	0.00	1.40	1.40
SO2	0.00	0.00	0.00	0.00	0.00	0.00	0.66	0.66
NOx	0.00	0.00	0.00	0.00	0.00	0.00	18.77	18.77
VOC	12.45	8.47	9.06	24.53	16.67	67.72	1.29	140.19
CO	0.00	0.00	0.00	0.00	0.00	0.00	10.51	10.51
total HAPs	0.00	0.00	4.55	0.00	0.00	71.88	neglegible	76.42
worst case single HAF	0.00	0.00	(MEK) 3.00	0.00	0.00	(MEK) 9.55		(MEK) 9.55
Total emissions based on rated capacity at 8,760 hours/year, after control.								

(1) Emissions are combined for four facilities (Priming Cells #1 - #4)

(2) Insignificant activities include plant heating units, humidification boiler, standby generator and emergency fire pump

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

Company Name: Guardian Automotive Products, Inc.
Address City IN Zip: 860 West U.S. 6, Ligonier, IN 46767
Plant ID: 113-21320
Permit Number: 113-00024
Reviewer: Jenny Acker
Date: 10/11/2005

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
LW Black Silkscreen Ops																
Black Frit Paint	24.31	12.50%	0.0%	12.5%	0.00%	53.67%	0.00230	275.000	3.04	3.04	1.92	46.12	8.42	0.00	5.66	100%
H-939-C	6.50	100.00%	0.0%	100.0%	0.00%	0.00%	0.00018	275.000	6.54	6.54	0.32	7.77	1.42	0.00	-	100%
LW Silver Silkscreen Ops																
Silver Coating	36.70	9.00%	0.0%	9.0%	0.00%	0.00%	0.00059	51.700	3.30	3.30	0.10	2.43	0.44	0.00	-	100%
H-939-C	6.50	100.00%	0.0%	100.0%	0.00%	0.00%	0.00018	51.700	6.54	6.54	0.06	1.46	0.27	0.00	-	100%
LW Dowanol Application																
Dowanol (R) TPM	8.05	99.00%	0.0%	99.0%	0.00%	0.00%	0.00020	275.000	7.97	7.97	0.43	10.41	1.90	0.00	-	100%
TG Black Silkscreen Ops																
Black Frit Paint	24.31	12.50%	0.0%	12.5%	0.00%	53.67%	0.00120	260.400	3.04	3.04	0.95	22.79	4.16	0.00	5.66	100%
H-939-C	6.50	100.00%	0.0%	100.0%	0.00%	0.00%	0.00017	260.400	6.54	6.54	0.29	6.95	1.27	0.00	-	100%
TG Silver Silkscreen Ops																
Silver Coating	36.70	9.00%	0.0%	9.0%	0.00%	0.00%	0.00045	260.400	3.30	3.30	0.39	9.29	1.70	0.00	-	100%
H-939-C	6.50	100.00%	0.0%	100.0%	0.00%	0.00%	0.00018	260.400	6.54	6.54	0.31	7.36	1.34	0.00	-	100%
TG PVC Encapsulations Ops (Booths 2-6)																
Adhesive A-1100-B/Catalyst A1167-B	7.19	85.30%	0.0%	85.3%	0.0%	10.25%	0.00063	275.000	6.13	6.13	1.07	25.66	4.68	0.00	59.83	100%
Methy Isobutyl Ketone	6.66	100.00%	0.0%	100.0%	0.0%	0.00%	0.00100	150.000	6.66	6.66	1.00	23.99	4.38	0.00	-	100%
Diatomaceous Earth Ops (1-2)																
Isopropyl Alcohol/Water	6.57	100.00%	0.0%	100.0%	0.0%	0.00%	0.00310	275.000	6.57	6.57	5.60	134.42	24.53	0.00	-	100%
Tempering Line #3																
Black Frit Paint*	19.52	17.70%	0.0%	17.7%	0.00%	55.25%	0.00173	480.000	3.45	3.45	2.86	68.65	12.53	0.00	6.25	100%
Silver Paint*	36.70	9.00%	0.0%	9.0%	0.00%	57.20%	0.00034	480.000	3.30	3.30	0.54	12.94	2.36	0.00	5.77	100%
H939C Cleanup	6.50	100.00%	0.0%	100.0%	0.00%	0.00%	0.00013	480.000	6.50	6.50	0.41	9.73	1.78	0.00	-	100%
Priming Cell #1																
43518 Clear Primer	6.94	100.00%	0.0%	100.0%	0.00%	0.00%	0.00071	240.000	6.94	6.94	1.18	28.38	5.18	0.00	-	100%
43520A Black Primer	8.26	58.40%	0.0%	58.4%	0.00%	0.00%	0.00220	240.000	4.82	4.82	2.55	61.13	11.16	0.00	-	100%
Priming Cell #2																
43518 Clear Primer	6.94	100.00%	0.0%	100.0%	0.00%	0.00%	0.00071	240.000	6.94	6.94	1.18	28.38	5.18	0.00	-	100%
43520A Black Primer	8.26	58.40%	0.0%	58.4%	0.00%	0.00%	0.00220	240.000	4.82	4.82	2.55	61.13	11.16	0.00	-	100%
Priming Cell #3																
43518 Clear Primer	6.94	100.00%	0.0%	100.0%	0.00%	0.00%	0.00071	275.000	6.94	6.94	1.36	32.52	5.94	0.00	-	100%
43520A Black Primer	8.26	58.40%	0.0%	58.4%	0.00%	0.00%	0.00220	275.000	4.82	4.82	2.92	70.04	12.78	0.00	-	100%
Priming Cell #4																
43518 Clear Primer	6.94	100.00%	0.0%	100.0%	0.00%	0.00%	0.00071	240.000	6.94	6.94	1.18	28.38	5.18	0.00	-	100%
43520A Black Primer	8.26	58.40%	0.0%	58.4%	0.00%	0.00%	0.00220	240.000	4.82	4.82	2.55	61.13	11.16	0.00	-	100%

State Potential Emissions											31.71	761.07	138.89	0.00		
Potential Total Emissions (F113-19112-00024)											28.91	693.91	126.62	0.00		
¹⁾ Increased Potential Total Emissions											2.80	67.16	12.27	0.00		

METHODOLOGY

¹⁾ Increased emissions result from increased maximum units per hour LW Dowanol Application, Diatomaceous Earth Ops, and Priming Cell #3

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

* Emission factors depend on source specific test data

Appendix A: Emissions Calculations
HAP Emission Calculations

Company Name: Guardian Automotive Products, Inc.
Address City IN Zip: 860 West U.S. 6, Ligonier, IN 46767
Permit Number: 113-21320
Plant ID: 113-00024
Reviewer: Jenny Acker
Date: 10/11/2005

Material	(Lb/Gal)	(gal/unit)	(unit/hour)	Toluene	MEK	MIBK	Methyl Methacrylate	Glycol Ethers	Napthalene	Methanol	Xylene	Polycyclic Organic Matter
TG PVC Encapsulations Ops (Booths 1-6)												
Adhesive A-1100-B/Catalyst A1167-B	7.19	0.00063	275.000	25.71%	55.00%		0.95%	1.67%				
Priming Cell #1												
43518 Clear Primer	6.94	0.00071	240.000	45.00%						50.00%		
43520A Black Primer	8.26	0.00220	240.000	15.00%	50.00%							
Priming Cell #2												
43518 Clear Primer	6.94	0.00071	240.000	45.00%						50.00%		
43520A Black Primer	8.26	0.00220	240.000	15.00%	50.00%							
Priming Cell #3												
43518 Clear Primer	6.94	0.00071	275.000	45.00%						50.00%		
43520A Black Primer	8.26	0.00220	275.000	15.00%	50.00%							
Priming Cell #4												
43518 Clear Primer	6.94	0.00071	240.000	45.00%						50.00%		
43520A Black Primer	8.26	0.00220	240.000	15.00%	50.00%							

Material	Toluene Emissions (ton/yr)	MEK Emissions (ton/yr)	MIBK Emissions (ton/yr)	Methyl Methacrylate Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Napthalene Emissions (ton/yr)	Methanol Emissions (ton/yr)	Xylene Emissions (ton/yr)	Polycyclic Organic Matter Emissions (ton/yr)
TG PVC Encapsulations Ops (Booths 2-6)									
Adhesive A-1100-B/Catalyst A1167-B	1.40	3.00	0.00	0.05	0.09	0.00	0.00	0.00	0.00
Priming Cell #1									
43518 Clear Primer	2.33	0.00	0.00	0.00	0.00	0.00	2.59	0.00	0.00
43520A Black Primer	2.87	9.55	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Priming Cell #2									
43518 Clear Primer	2.33	0.00	0.00	0.00	0.00	0.00	2.59	0.00	0.00
43520A Black Primer	2.87	9.55	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Priming Cell #3									
43518 Clear Primer	2.67	0.00	0.00	0.00	0.00	0.00	2.97	0.00	0.00
43520A Black Primer	3.28	10.94	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Priming Cell #4									
43518 Clear Primer	2.33	0.00	0.00	0.00	0.00	0.00	2.59	0.00	0.00
43520A Black Primer	2.87	9.55	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Potential Total Emissions (113-21320-00024) **22.95** **42.60** **0.05** **0.09** **10.74**

Potential Total Emissions (F113-19112-00024) **22.19** **41.21** **0.05** **0.09** **10.36**

¹⁾ **Increased Potential Total Emissions** **0.76** **1.39** **0.00** **0.00** **0.38**

METHODOLOGY

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

¹⁾ Increased emissions result from maximum units per hour Priming Cell #3 increased from 240 to 275.