



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: May 29, 2007
RE: Guardian Automotive Products / 033-23265-00022
FROM: Nisha Sizemore
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 13-15-5-3, this permit 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 13-15-6-1(b) or IC 13-15-6-1(a) 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 of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

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

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

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



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Indianapolis, Indiana 46204-2251
(317) 232-8603
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www.IN.gov/idem

Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

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

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. 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 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T033-23265-00022	
Original signed by: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: May 29, 2007 Expiration Date: May 29, 2012

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SECTION A SOURCE SUMMARY

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

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

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

Source Address:	1900 South Center Street, Auburn, Indiana 46706
Mailing Address:	1900 South Center Street, Auburn, Indiana 46706
General Source Phone Number:	(260) 927-2638
SIC Code:	3231
County Location:	Dekalb
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) molding prime line, priming tempered or laminated glass parts using brush, identified as Manual Prime Line (Unit 2) constructed in 1988, with an overall maximum capacity of 513 parts per hour of automotive glass parts, and exhausting through stack L.
- (b) One (1) molding prime line, priming tempered or laminated glass parts using rollcoat with robotic applicators, identified as Auto Prime Line (Unit 3) constructed in 1992, with an overall maximum capacity of 47 parts per hour of automotive glass parts, and exhausting through stack G.
- (c) One (1) molding line, priming tempered glass parts using robotic applicators and placing PVC parts using adhesives, identified as GMT 800 Pop Out PVC Line Unit 4 constructed in 1998, with an overall maximum capacity of 163 parts per hour of automotive glass parts, and exhausting through stack K.
- (d) One (1) molding prime line, priming automotive glass parts using robotic rollcoat applicators, identified as Auto Prime Line (North) constructed in 2003, with an overall maximum capacity of 47 parts per hour of automotive glass parts, and exhausting through stack G.
- (e) Three (3) surface coating lines identified as diatomaceous earth lines (Lines 1, 2 and 3) constructed in 2001, with an overall maximum capacity of 217.5 parts per hour of automotive LW window panels using air atomization spray, utilizing dry filters as particulate control, exhausting to the interior of the building.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

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

- (a) Other categories with emissions below insignificant thresholds (VOC less than three (3) pounds per hour):
 - (1) One (1) molding operation, identified as Molding - Mezzanine B and consisting of the following units: [326 IAC 6-3-2]
 - (i) Five (5) application booths, each applying mold release using spray application method, identified as Booths 10, 11, 12, 13, and 14, each capable of processing maximum of 16 units per hour, each with a maximum coating throughput of 0.56 lb/hr, each equipped with a dry filter for particulate control, and each exhausting through one (1) stack, identified as stack I1, I2, I3, I4 and I5, respectively.
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2]

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

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

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

SECTION B GENERAL CONDITIONS

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

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

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

- (a) This permit, T033-23265-00022, 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 of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-7-7]

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

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

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

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

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(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 "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (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 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

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

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

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

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

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

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)][326 IAC 2-7-6(1) and (6)][326 IAC 1-6-3]

- (a) The Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) for the source as described in 326 IAC 1-6-3. At a minimum, the PMPs shall include:
- (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.
- (b) 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 PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) 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.11 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and 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 Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

Northern Regional Office phone: (574) 245-4870; fax: (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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
 - (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

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

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T033-23265-00022 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

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

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.

- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
MC 61-53 IGCN 1003
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) 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) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12][40 CFR 72]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

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

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

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

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) 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 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 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 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.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
MC 61-53 IGCN 1003
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

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

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][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) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

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

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

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

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

C.6 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
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

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

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, 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 2-7-6(1)]

C.7 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the 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.8 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 2-7-5(1)][326 IAC 2-7-6(1)]

C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on 4/15/2002.
- (b) 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.13 Risk Management Plan [326 IAC 2-7-5(12)] [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.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate 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 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 "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
 - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

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

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are 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.19 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

Emissions Unit Description:

- (a) One (1) molding prime line, priming tempered or laminated glass parts using brush, identified as Manual Prime Line (Unit 2) constructed in 1988, with an overall maximum capacity of 513 parts per hour of automotive glass parts, and exhausting through stack L.
- (b) One (1) molding prime line, priming tempered or laminated glass parts using rollcoat with robotic applicators, identified as Auto Prime Line (Unit 3) constructed in 1992, with an overall maximum capacity of 47 parts per hour of automotive glass parts, and exhausting through stack G.
- (c) One (1) molding line, priming tempered glass parts using robotic applicators and placing PVC parts using adhesives, identified as GMT 800 Pop Out PVC Line Unit 4 constructed in 1998, with an overall maximum capacity of 163 parts per hour of automotive glass parts, and exhausting through stack K.
- (d) One (1) molding prime line, priming automotive glass parts using robotic rollcoat applicators, identified as Auto Prime Line (North) constructed in 2003, with an overall maximum capacity of 47 parts per hour of automotive glass parts, and exhausting through stack G.
- (e) Three (3) surface coating lines identified as diatomaceous earth lines (Lines 1, 2 and 3) constructed in 2001, with an overall maximum capacity of 217.5 parts per hour of automotive LW window panels using air atomization spray, utilizing dry filters as particulate control, exhausting to the interior of the building.

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

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

D.1.1 Hazardous Air Pollutants (HAPs) Minor Limit [326 IAC 20] [40 CFR 63]

- (a) The amount of each individual HAP input to the surface coating operations identified as Manual Prime Line (Unit 2), Auto Prime Line (Unit 3), GMT Pop Out PVC Line (Unit 4), and Auto Prime Line (North) shall be limited to less than 8.28 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The amount of any combination of HAPs input to the surface coating operations identified as Manual Prime Line (Unit 2), Auto Prime Line (Unit 3), GMT Pop Out PVC Line (Unit 4), and Auto Prime Line (North) shall be limited to less than 21.70 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with above conditions shall limit the source-wide single HAP and total HAPs emissions to less than 10 and 25 tons per twelve (12) consecutive month period, respectively. Therefore, the source will be classified as a minor source for HAPs.

D.1.2 Particulate Emission Limitations, Work Practices, and Control Technologies [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating operations, identified as Diatomaceous Earth Coating Lines 1 through 3 shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

Compliance Determination Requirements

D.1.3 Hazardous Air Pollutants [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the HAPs content and usage limitations contained in Condition D.1.1 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 2-7-5(3)] [326 IAC 2-7-19]

D.1.4 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAPs usage limits and/or the HAPs emission limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The individual HAP and total HAPs content of each coating material and solvent used less water.
 - (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 individual HAP and total HAPs usage for each month; and
 - (4) The weight of each individual HAP and total HAPs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities

- (a) Other categories with emissions below insignificant thresholds (VOC less than three (3) pounds per hour:
 - (1) One (1) molding operation, identified as Molding - Mezzanine B and consisting of the following units: [326 IAC 6-3-2]
 - (i) Five (5) application booths, each applying mold release using spray application method, identified as Booths 10, 11, 12, 13, and 14, each capable of processing maximum of 16 units per hour, each with a maximum coating throughput of 0.56 lb/hr, each equipped with a dry filter for particulate control, and each exhausting through one (1) stack, identified as stack I1, I2, I3, I4 and I5, respectively.
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2]

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

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

D.2.1 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating operations, identified as Mezzanine B (Booths 10 through 14) shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), cold cleaner degreasing operation constructed after January 1, 1980, the Permittee 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.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Guardian Automotive Products, Inc.
Source Address: 1900 South Center Street, Auburn, Indiana 46706
Mailing Address: 1900 South Center Street, Auburn, Indiana 46706
Part 70 Permit No.: T033-23265-00022

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

Please check what document is being certified:

- 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:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Guardian Automotive Products, Inc.
Source Address: 1900 South Center Street, Auburn, Indiana 46706
Mailing Address: 1900 South Center Street, Auburn, Indiana 46706
Part 70 Permit No.: T033-23265-00022

This form consists of 2 pages

Page 1 of 2

- | |
|---|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), 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
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

Part 70 Quarterly Report

Source Name: Guardian Automotive Products, Inc.
 Source Address: 1900 South Center Street, Auburn, Indiana 46706
 Mailing Address: 1900 South Center Street, Auburn, Indiana 46706
 Part 70 Permit No.: T033-23265-00022
 Facility: Manual Prime Line (Unit 2), Auto Prime Line (Unit 3), GMT Pop Out PVC Line (Unit 4), and Auto Prime Line (North)
 Parameter: Single HAP and Combined HAPs
 Limit: (1) 8.28 tons per year of any single HAP
 (2) 21.70 tons year of total HAPs

QUARTER :

YEAR:

Month	Total Usage This Month (tons)		Total Usage Previous 11 Months (tons)		Total Usage 12 Months (tons)	
	Single HAP	Combined HAPs	Single HAP	Combined HAPs	Single HAP	Combined HAPs
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
 PART 70 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Guardian Automotive Products, Inc.
 Source Address: 1900 South Center Street, Auburn, Indiana 46706
 Mailing Address: 1900 South Center Street, Auburn, Indiana 46706
 Part 70 Permit No.: T033-23265-00022

Months: _____ **to** _____ **Year:** _____

<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>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Part 70 Operating Permit Renewal

Source Name:	Guardian Automotive Products, Inc.
Source Location:	1900 South Center Street, Auburn, IN 46706
County:	Dekalb
SIC Code:	3231
Operation Permit No.:	T033-12745-00022
Operation Permit Issuance Date:	March 22, 2002
Permit Renewal No.:	T033-23265-00022
Permit Reviewer:	Adeel Yousuf / EVP

On April 4, 2007, the Office of Air Quality (OAQ) had a notice published in Auburn Evening Star stating that Guardian Automotive Products, Inc. had applied for a Part 70 Operating Permit renewal relating to the operation of a stationary automotive window panel manufacturing operation. The notice also stated that OAQ proposed to issue a permit renewal for this operation and provided information on how the public could review the proposed Part 70 permit renewal and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit renewal should be issued as proposed.

No comment has been received from the source or other interest public persons during public notice or at the end of public notice. However, upon further review, OAQ has determined the following changes (bolded language has been added and the language with a line through it has been deleted) will be made to the permit:

- The following addresses throughout the permit have been revised to include the mailing codes for each respective department. Mailing code MC61-50 has been added for Technical Support and Modeling addresses. Mailing code MC61-52 has been added for Asbestos Section addresses. Mailing code MC61-53 has been added for Permits Branch, Compliance Branch, Compliance Data Section addresses and to the cover page of the permit.

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

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

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

Source Background and Description

Source Name:	Guardian Automotive Products, Inc.
Source Location:	1900 South Center Street, Auburn, IN 46706
County:	Dekalb
SIC Code:	3231
Operation Permit No.:	T033-12745-00022
Operation Permit Issuance Date:	March 22, 2002
Permit Renewal No.:	T033-23265-00022
Permit Reviewer:	Adeel Yousuf / EVP

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Renewal application from Guardian Automotive Products, Inc. relating to the operation of a stationary automotive window panel manufacturing operation.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) molding prime line, priming tempered or laminated glass parts using brush, identified as Manual Prime Line (Unit 2) constructed in 1988, with an overall maximum capacity of 513 parts per hour of automotive glass parts, and exhausting through stack L.
- (b) One (1) molding prime line, priming tempered or laminated glass parts using rollcoat with robotic applicators, identified as Auto Prime Line (Unit 3) constructed in 1992, with an overall maximum capacity of 47 parts per hour of automotive glass parts, and exhausting through stack G.
- (c) One (1) molding line, priming tempered glass parts using robotic applicators and placing PVC parts using adhesives, identified as GMT 800 Pop Out PVC Line Unit 4 constructed in 1998, with an overall maximum capacity of 163 parts per hour of automotive glass parts, and exhausting through stack K.
- (d) One (1) molding prime line, priming automotive glass parts using robotic rollcoat applicators, identified as Auto Prime Line (North) constructed in 2003, with an overall maximum capacity of 47 parts per hour of automotive glass parts, and exhausting through stack G.
- (e) Three (3) surface coating lines identified as diatomaceous earth lines (Lines 1, 2 and 3) constructed in 2001, with an overall maximum capacity of 217.5 parts per hour of automotive LW window panels using air atomization spray, utilizing dust collector as particulate control, exhausting to the interior of the building.

Unpermitted Emission Units and Pollution Control Equipment

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

Insignificant Activities

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

- (a) Other categories with emissions below insignificant thresholds (VOC less than three (3) pounds per hour):
- (1) One (1) molding operation, identified as Molding - Mezzanine B and consisting of the following units: [326 IAC 6-3-2]
 - (i) Five (5) application booths, each applying mold release using spray application method, identified as Booths 10, 11, 12, 13, and 14, each capable of processing maximum of 16 units per hour, each with a maximum coating throughput of 0.56 lb/hr, each equipped with a dry filter for particulate control, and each exhausting through one (1) stack, identified as stack I1, I2, I3, I4 and I5, respectively.
 - (2) One (1) glass laminating process using spray application method, identified as Laminating - Autoclave Exhaust, with an overall maximum laminating capacity of 181 units per hour and maximum coating throughput of 0.58 lb/hr, and exhausting through stack B.
 - (3) One (1) silkscreen process, identified as Laminating - Cutting Paint Room, with an overall maximum processing capacity of 131 units per hour and maximum coating throughput of 5.73 lb/hr, and exhausting through stack A.
 - (4) One (1) silkscreen cleaning booth using rollcoat application method, identified as Laminating and Tempering Silkscreen cleaning operation, with an overall maximum capacity of cleaning 768 parts per hour and maximum cleaner usage of 4.54 lb/hr, and exhausting through stack F.
 - (5) One (1) silkscreen process, identified as Tempering - F467 Black Frit Paint Room, with an overall maximum processing capacity of 434 units per hour and maximum paint throughput of 7.15 lb/hr, and exhausting through stack C.
 - (6) One (1) silkscreen process, identified as Tempering - F497 Black Frit Paint Room, with an overall maximum processing capacity of 125 units per hour and maximum paint throughput of 2.014 lb/hr, and exhausting to the interior of the building.
 - (7) One (1) silkscreen process, identified as Tempering - Silver Paint Room, with an overall maximum processing capacity of 125 units per hour and maximum paint throughput of 2.17 lb/hr, and exhausting through stack C.
 - (8) One (1) molding operation, priming tempered glass parts using rollcoat application method with robotic applicators, identified as Molding - GMT 800 LG Auto Prime Line, with a an overall maximum processing capacity of 42 units per hour and with maximum coating throughput of , and exhausting through stack G.
 - (9) One (1) automated bonding operation, identified as BONDING, consisting of two (2) stations bonding molded parts to glass, capable of processing of 164 parts per hour and exhausting through one (1) stack, identified as BONDING.
 - (10) One (1) molding line, identified as PVC line unit # 4, using robotic applicators for the application of adhesive to PVC parts, and with maximum capacity of 47.33 parts per hour.

- (11) One (1) molding line, identified as PVC line unit # 5, using robotic applicators for the application of adhesive to PVC parts, and with maximum capacity of 47.33 parts per hour.
- (12) Usage of following materials at the facility:
 - (i) Windex with maximum usage of 5870 lbs per year.
 - (ii) Mold cleaner # 201B with maximum usage of 1503 pounds per year.
 - (iii) Denatured Alcohol with maximum usage of 891 pound per year.
 - (iv) Lacquer thinner with maximum usage of 74 pounds per year.
 - (v) Sulfur-di-Oxide with maximum usage of 225 pounds per year.
- (b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour consisting of the following:
 - (1) One (1) flame breakout 55" line rated at 0.01 MMBtu/hr.
 - (2) One (1) flame breakout 80" line rated at 0.01 MMBtu/hr.
 - (3) One (1) shipping receiver space heater, identified as # 1, rated at 4.375 MMBtu/hr.
 - (4) One (1) shipping receiver space heater, identified as # 2, rated at 4.375 MMBtu/hr.
 - (5) One (1) west plant heating unit rated at 2.187 MMBtu/hr.
 - (6) One (1) tack oven # 2 rated at 0.83 MMBtu/hr.
 - (7) One (1) north plant heating unit rated at 2.187 MMBtu/hr.
 - (8) One (1) 497 furnace draft curtain rated at 0.05 MMBtu/hr.
 - (9) One (1) engineering office heater rated at 0.15 MMBtu/hr.
 - (10) One (1) water heater rated at 0.032 MMBtu/hr.
 - (11) One (1) northeast air make up unit rated at 5.185 MMBtu/hr.
 - (12) One (1) north office space heater rated at 0.131 MMBtu/hr.
 - (13) One (1) center office space heater rated at 0.26 MMBtu/hr.
 - (14) One (1) south office space heater rated at 0.131 MMBtu/hr.
- (c) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.
- (d) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2]
- (e) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (f) Natural draft cooling towers not regulated under a NESHAP.
- (g) Mold release agents using low volatile products (Vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).

Existing Approvals

The source has constructed or has been operating under the following previous approvals:

- (a) Part 70 operating permit No.: T033-12745-00022, issued on March 22, 2002.
- (b) First Minor Source Modification No.: 033-17460-00022, issued on September 24, 2003.
- (c) First Minor Permit Modification No.: 033-17859-00022, issued on November 10, 2003.
- (d) First Administrative Amendment No.: 033-20239-00022, issued on October 6, 2005.

- (e) Second Administrative Amendment No.: 033-21831-00022, issued on October 14, 2005.
- (f) Third Administrative Amendment No.: 033-21784-00022, issued on November 3, 2005.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

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

An administratively complete Part 70 permit renewal application for the purposes of this review was received on June 23, 2006.

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 20 of Appendix A).

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	Less than 100
PM-10	Less than 100
SO ₂	Less than 100
VOC	Greater than 100
CO	Less than 100
NO _x	Less than 100

HAPs	Unrestricted Potential Emissions (tons/yr)
Toluene	Greater than 10
Xylene	Less than 10
Methanol	Less than 10
Others	Less than 10
Total	Greater than 25

- (a) The unrestricted potential emissions of VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

- (b) The unrestricted potential emissions of any single HAP is equal to or greater than ten (10) tons per year and the unrestricted potential emissions of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Potential to Emit of the Source After Issuance

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

The source was issued a Part 70 Operating Permit on March 22, 2002. 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 the original Part 70 operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Unit 2: Manual Prime Line	-	-	-	19.93	-	-	21.70 (total) 8.28 (single)
Unit 3: Auto Prime Line	-	-	-	21.35	-	-	
Unit 4: GMT 800 POP Out PVC Line	0.01	0.01	-	14.90	-	-	
Auto Prime Line (North)	-	-	-	16.50	-	-	
Three (3) Diatomaceous Earth Coating Lines: Lines 1, 2 and 3	0.24	0.24	-	24.35	-	-	-
* Mezzanine B (Booths 10-14)	0.02	0.02	-	9.20	-	-	-
* Autoclave Exhaust	0.10	0.10	-	2.51	-	-	-
* Cutting Paint Room	-	-	-	4.22	-	-	0.43 (total) 0.43 (single)
* Laminating and Tempering Silkscreen Cleaning	-	-	-	12.37	-	-	-
* Tampering - Black Frit and Silver Paint Room	-	-	-	1.51	-	-	-
* Molding - GMT 800 LG Auto Prime Line	-	-	-	2.11	-	-	1.43 (total) 0.82 (single)
* Bonding	-	-	-	0.31	-	-	0.31 (total) 0.154 (single)
* PVC Line Units # 4 and 5	-	-	-	1.64	-	-	0.65 (total) 0.616 (single)
* Miscellaneous Insignificant Activities	-	-	-	1.33	-	0.11	0.25 (total) 0.026 (single)
* Natural combustion units	0.17	0.66	0.05	0.48	7.33	8.72	0.13 (total) 0.12 (single)
Total Emissions	0.54	1.03	0.05	132.71	7.33	8.83	24.90 (total) 9.90 (single)

* Insignificant Activities

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, fugitive emissions are not counted toward the determination of PSD applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2003 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM2.5	Not Reported
PM10	Not Reported
SO ₂	Not Reported
VOC	57.0
CO	1.0
NO _x	1.0
HAP (Lead)	0.0

County Attainment Status

The source is located in Dekalb County.

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

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Posey County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Dekalb County has been classified as attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM_{2.5} emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions.
- (c) Dekalb County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Part 70 Permit Conditions

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

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

Federal Rule Applicability

- (a) This source is not subject to the provisions of 40 CFR 64, Compliance Assurance Monitoring. In order for this rule to apply, a specific emissions unit must meet three criteria for a given pollutant:
 - (1) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant;
 - (2) The unit uses a control device to achieve compliance with any such emission limitation or standard, and
 - (3) The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal or greater than 100 percent of the amount required for a source to be classified as a major source.

For this source, no emission unit has potential pre-control emissions of any criteria air pollutant that are equal or greater than 100 tons per year. In addition, no emission unit has potential pre-control emissions of any single HAP and total HAPs that are equal or greater than 10 and 25 tons per year, respectively. Therefore, 40 CFR 64 is not applicable.

- (b) 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.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants: Parts washer Operation, (326 IAC 20, 40 CFR 63, Subpart T), are not included in this permit for the cold cleaning degreasing operation identified as an insignificant activity because the solvent used in the degreasing operation does not contain any of the following halogenated solvents in concentrations greater than five percent by weight: methylene chloride, 1,1,1-trichloroethane, trichloroethylene, perchloroethylene, carbon tetrachloride, or chloroform.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light Duty Trucks, (326 IAC 20, 40 CFR 63, Subpart IIII), are not included in this permit because the source only engages in priming automotive glass parts, and glass parts are not body parts according to the definition given in 40 CFR 63, Subpart IIII.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart M MMM 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.

State Rule Applicability – Entire Source

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

This source constructed in 2000, after the rule applicability date of August 7, 1977, is not considered a major source because it does not belong to one of the 28 listed source categories and the unrestricted potential emissions of each attainment criteria pollutant are less than two hundred-fifty (250) tons per year. There have been no major modifications at the source, therefore, this is a minor source pursuant to 326 IAC 2-2, PSD.

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2004 and every 3 years after. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

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.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This source is not subject to 326 IAC 6-5, for fugitive particulate matter emissions, because the fugitive particulate matter emissions from this source are negligible.

State Rule Applicability – Individual Facilities

326 IAC 2-4.1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1 (New Source Toxics Control), any new process or production unit constructed after July 27, 1997, 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 any combination of HAPs, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). None of the units constructed after July 27, 1997 at this source have PTE 10 tons per year of any HAP or 25 tons per year of any combination of HAPs, and furthermore the total source wide single HAP and combination of HAPs are also being limited to less than the rule applicability threshold, therefore, 326 IAC 2-4.1 does not apply.

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

326 IAC 8-1-6 (General Reduction Requirements) applies to new facilities (as of January 1, 1980) which have potential emissions of 25 tons or more per year of VOC. Each facility at this source has the potential to emit of VOC below the twenty-five (25) tons per year rule applicability threshold and, therefore, none is subject to the requirements of 326 IAC 8-1-6.

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

- (a) Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating operations, identified as Diatomaceous Earth Coating Lines 1 through 3, and Mezzanine B (Booths 10 through 14) shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

- (b) Pursuant to 326 IAC 6-3-2(d)(4), the Laminating - Autoclave Exhaust operation and GMT 800 POP Out PVC Line (Unit 4) is exempt from the requirements of 326 IAC 6-3-2(d) because the coating usage is less than 5 gallons per day.
- (c) Other operations including Manual Prime Line (Unit 2), Auto Prime Line (Unit 3), Auto Prime Line (North), Laminating and Tempering silkscreen cleaning, Laminating - Cutting Paint Room, Tempering - Black Frit and Silver Paint, Bonding, PVC Line Units # 4 and # 5, and GMT 800 Auto Prime Line, at this source utilize either brush or rollcoat method for application and do not emit PM emissions. Therefore, these operations are not subject to the requirements of rule 326 IAC 6-3-2.

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

This rule 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 8-2-9 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.

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

The source, which is located in DeKalb County and maintains Safety-Kleen type cold cleaning parts washer with capacities of less than 145 gallons (i.e., insignificant activities), is subject to the applicable rule requirements since the facilities are new after January 1, 1980. Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee 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.

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

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

326 IAC 8-6 (Organic Solvent Emission Limitations)

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

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

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

326 IAC 20 (National Emission Standards for Hazardous Air Pollutants)

- (a) The amount of each individual HAP input to the surface coating operations identified as Manual Prime Line (Unit 2), Auto Prime Line (Unit 3), GMT Pop Out PVC Line (Unit 4), and Auto Prime Line (North) shall be limited to less than 8.28 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The amount of any combination of HAPs input to the surface coating operations identified as Manual Prime Line (Unit 2), Auto Prime Line (Unit 3), GMT Pop Out PVC Line (Unit 4), and Auto Prime Line (North) shall be limited to less than 21.70 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with above conditions shall limit the source-wide single HAP and total HAPs emissions to less than 10 and 25 tons per twelve (12) consecutive month period, respectively. Therefore, the source will be classified as a minor source for HAPs.

Testing Requirements

VOC testing is not required for any facilities located at this source because no facilities utilize a control device and VOC emissions are assumed to be 100% of VOC input. Therefore, compliance is determined through records of VOC usage.

Compliance Requirements

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

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also 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 source.

Diatomaceous Earth Coating Lines 1 through 3 equipped with a dust collector for particulate control, and with before control potential PM emissions of 5.57 lb/hr, exhaust inside the building and do not have any stack exhaust. Therefore, compliance monitoring is not applicable to these units.

Molding operation identified as Mezzanine B (Booths 10 through 14) equipped with dry filters for particulate control, and with before control potential PM emissions of 0.513 lb/hr is not subject to any compliance monitoring requirements since the operation is classified as an insignificant activity.

Conclusion

The operation of this automotive glass fabrication facility shall be subject to the conditions of this Part 70 permit T033-23265-00022.

Appendix A: Emission Calculations

Company Name: Guardian Automotive Products, Inc.
Address City IN Zip: 1900 S. Center Street, Auburn, IN 46706
Part 70 No.: 033-23265-00022
Permit Reviewer: Adeel Yousuf/EVP
Date: February 1, 2007

Uncontrolled Potential Emissions (tons/year)

Pollutant	Natural Gas Combustion	Molding Manual Prime Line Unit 2	Molding Auto Prime Line Unit 3	Molding GMT 800 POP Out PVC Line Unit 4	Coating Diatomaceous Earth Coating Line Lines 1, 2 and 3	Priming Auto Prime Line North	Laminating and Tempering Silkscreen cleaning	Laminating Cutting Paint Room	Laminating Autoclave Exhaust	Tempering Black Frit and Silver Paint Rooms	Bonding Automated Bonding Process
PM	0.17	0.00	0.00	0.01	24.43	0.00	0.00	0.00	0.10	0.00	0.00
PM10	0.66	0.00	0.00	0.01	24.43	0.00	0.00	0.00	0.10	0.00	0.00
SO2	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
NOx	8.72	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
VOC	0.48	19.93	21.35	14.90	24.35	16.50	12.37	4.22	2.51	1.51	0.31
CO	7.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
total HAPs	0.16	9.49	0.87	4.03	0.00	11.53	0.00	0.43	0.00	0.00	0.31
worst case single HAP	0.157 (Hexane)	5.91 (Toluene)	0.45 (Toluene)	3.47 (Toluene)	0	6.46 (Toluene)	0	0.43 (Glycol Ether)	0	0	0.154 (Toluene)

Pollutant	Molding Mezzanine B (Booths 10-14)	PVC Line Unit # 4 and #5	Molding GMT 800 Auto Prime Line	Other Miscellaneous clean-up operations	Total
	Insignificant	Insignificant	Insignificant	Insignificant	
PM	2.25	0.00	0.00	0.00	26.96
PM10	2.25	0.00	0.00	0.00	27.45
SO2	0.00	0.00	0.00	0.00	0.05
NOx	0.00	0.00	0.00	0.11	8.83
VOC	9.20	1.64	2.11	1.33	132.71
CO	0.00	0.00	0.00	0.00	7.33
total HAPs	0.00	0.65	1.43	0.25	29.16
worst case single HAP	0	0.616 (Toluene)	0.82 (Toluene)	0.026 (Toluene)	17.906 (Toluene)

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

Appendix A: Emission Calculations

Company Name: Guardian Automotive Products, Inc.
Address City IN Zip: 1900 S. Center Street, Auburn, IN 46706
Part 70 No.: 033-23265-00022
Permit Reviewer: Adeel Yousuf/EVP
Date: February 1, 2007

Controlled/Limited Potential Emissions (tons/year)

Pollutant	Natural Gas Combustion	Molding Manual Prime Line Unit 2	Molding Auto Prime Line Unit 3	Molding GMT 800 POP Out PVC Line Unit 4	Coating Diatomaceous Earth Coaing Line Lines 1, 2 and 3	Priming Auto Prime Line North	Laminating and Tempering Silkscreen cleaning Insignificant	Laminating Cutting Paint Room Insignificant	Laminating Autoclave Exhaust Insignificant	Tempering Black Frit and Silver Paint Rooms Insignificant	Bonding Automated Bonding Process Insignificant
PM	0.17	0.00	0.00	0.01	0.24	0.00	0.00	0.00	0.10	0.00	0.00
PM10	0.66	0.00	0.00	0.01	0.24	0.00	0.00	0.00	0.10	0.00	0.00
SO2	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
NOx	8.72	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
VOC	0.48	19.93	21.35	14.90	24.35	16.50	12.37	4.22	2.51	1.51	0.31
CO	7.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
total HAPs	0.16	*	*	*	0.00	*	0.00	0.43	0.00	0.00	0.31
worst case single HAP	0.157 (Hexane)	*	*	*	0	*	0.43 (Glycol Ether)	0	0	0.154 (Toluene)	

Pollutant	Molding Mezzanine B (Booths 10-14) Insignificant	PVC Line Unit # 4 and #5 Insignificant	Molding GMT 800 Auto Prime Line Insignificant	Other Miscellaneous clean-up operations Insignificant	Total
PM	0.02	0.00	0.00	0.00	0.54
PM10	0.02	0.00	0.00	0.00	1.03
SO2	0.00	0.00	0.00	0.00	0.05
NOx	0.00	0.00	0.00	0.11	8.83
VOC	9.20	1.64	2.11	1.33	132.71
CO	0.00	0.00	0.00	0.00	7.33
total HAPs	0.00	0.65	1.43	0.25	24.90
worst case single HAP	0.616 (Toluene)		0.82 (Toluene)	0.026 (Toluene)	9.90 (Toluene)

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

* Single HAP and total HAPs emissions from the Manual Prime Line (Unit 2), Auto Prime Line (Unit 3), GMT 800 Pop Out PVC Line (Unit 4), and Auto Prime Line North are limited to less than 8.28 and 21.70 tons per year, respectively.

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

**Company Name: Guardian Automotive Products, Inc.
Address City IN Zip: 1900 S. Center Street, Auburn, IN 46706
Part 70 No.: 033-23265-00022
Permit Reviewer: Adeel Yousuf/EVP
Date: February 1, 2007**

Unit 3: Molding Auto Prime Line

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Essex 43518 Clear Primer	7.0	99.20%	0.0%	99.2%	0.0%	0.08%	0.00045	47.000	6.94	6.94	0.15	3.52	0.64	0.00	8680.00	100%
Essex 43520A Black Primer	8.4	57.80%	0.0%	57.8%	0.0%	42.20%	0.00117	47.000	4.83	4.83	0.27	6.38	1.16	0.00	11.44	100%
MEK line flush tip cleaning spray	6.8	100.00%	0.0%	100.0%	0.0%	0.00%	0.01390	47.000	6.83	6.83	4.46	107.09	19.54	0.00	#DIV/0!	100%

State Potential Emissions

Add worst case coating to all solvents

4.87 116.99 21.35 0.00

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

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

Appendix A: Emission Calculations

HAP Emission Calculations

Company Name: Guardian Automotive Products, Inc.
Address City IN Zip: 1900 S. Center Street, Auburn, IN 46706
Part 70 No.: T033-23265-00022
Permit Reviewer: Adeel Yousuf/EVP
Date: February 1, 2007

Unit ID 3: Molding Auto Prime Line

Uncontrolled HAP emissions

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Methanol	Weight % Toluene	Xylene Emissions (ton/yr)	Methanol Emissions (ton/yr)	Toluene Emissions (ton/yr)
Essex 43518 Clear Primer	7	0.000450	47.00	0.00%	47.50%	52.50%	0.00	0.31	0.34
Essex 43520A Black Primer	8.35	0.001170	47.00	1.00%	0.00%	10.00%	0.02	0.00	0.20

Total State Potential Emissions

0.02 0.31 0.54

METHODOLOGY

Total: 0.87

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

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

**Company Name: Guardian Automotive Products, Inc.
Address City IN Zip: 1900 S. Center Street, Auburn, IN 46706
Part 70 No.: 033-23265-00022
Permit Reviewer: Adeel Yousuf/EVP
Date: February 1, 2007**

Unit 2: Molding Manual Prime Line

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

State Potential Emissions

Add worst case coating to all solvents

4.55 109.18 19.93 0.00

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

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

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

**Company Name: Guardian Automotive Products, Inc.
Address City IN Zip: 1900 S. Center Street, Auburn, IN 46706
Part 70 No.: T033-23265-00022
Permit Reviewer: Adeel Yousuf/EVP
Date: February 1, 2007**

Unit 2: Molding Manual Prime Line

Uncontrolled HAP emissions

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

Total State Potential Emissions **5.91 3.36 0.22**

METHODOLOGY **Total: 9.49**

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

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

Company Name: Guardian Automotive Products, Inc.
Address City IN Zip: 1900 S. Center Street, Auburn, IN 46706
Part 70 No.: 033-23265-00022
Permit Reviewer: Adeel Yousuf/EVP
Date: February 1, 2007

Unit ID 4: Molding GMT 800 Pop Out PVC Line

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Essex 43518 Clear Primer	7.0	99.20%	0.0%	99.2%	0.0%	0.08%	1.71E-06	81.000	6.94	6.94	0.00	0.02	0.00	0.00	8680.00	50%
Essex 43520A Black Primer	8.4	57.80%	0.0%	57.8%	0.0%	42.20%	1.0E-05	81.000	4.83	4.83	0.00	0.09	0.02	0.01	11.44	50%
Essex Betamate 73005 button adhesive	10.8	0.30%	0.0%	0.3%	0.0%	0.00%	0.00018	81.000	0.03	0.03	0.00	0.01	0.00	0.00	#DIV/0!	100%
Essex Betamate 73100 button adhesive	11.1	0.40%	0.0%	0.4%	0.0%	0.00%	0.00020	81.000	0.04	0.04	0.00	0.02	0.00	0.00	#DIV/0!	100%
Sovereign A1167B PVC adhesive	7.3	88.20%	0.0%	88.2%	0.0%	0.00%	0.00029	81.000	6.41	6.41	0.15	3.61	0.66	0.00	#DIV/0!	100%
Sovereign A1669B PVC Adhesive	7.4	80.40%	0.0%	80.4%	0.0%	0.00%	0.00180	81.000	5.97	5.97	0.87	20.88	3.81	0.00	#DIV/0!	100%
MEK	6.8	100.00%	0.0%	100.0%	0.0%	0.00%	0.00120	81.000	6.83	6.83	0.66	15.93	2.91	0.00	#DIV/0!	50%

State Potential Emissions

Add worst case coating to all solvents

1.69 40.57 7.40 0.01

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1-Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Control Efficiency:		Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Controlled PM tons/yr
VOC	PM				
0.00%	0.00%	1.69	40.57	7.40	0.01

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

**Company Name: Guardian Automotive Products, Inc.
Address City IN Zip: 1900 S. Center Street, Auburn, IN 46706
Part 70 No.: T033-23265-00022
Permit Reviewer: Adeel Yousuf/EVP
Date: February 1, 2007**

Unit ID 4: Molding GMT 800 Pop Out PVC Line

Uncontrolled HAP emissions

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

Total State Potential Emissions **0.17 0.02 3.47 0.37 0.00**

METHODOLOGY

Total HAPs 4.03

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

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

**Company Name: Guardian Automotive Products, Inc.
Address City IN Zip: 1900 S. Center Street, Auburn, IN 46706
Part 70 No.: 033-23265-00022
Permit Reviewer: Adeel Yousuf/EVP
Date: February 1, 2007**

Three (3) Diatomaceous earth lines

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

State Potential Emissions

Add worst case coating to all solvents

5.56 133.42 24.35 24.43

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

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

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

**Company Name: Guardian Automotive Products, Inc.
Address City IN Zip: 1900 S. Center Street, Auburn, IN 46706
Part 70 No.: T033-23265-00022
Permit Reviewer: Adeel Yousuf/EVP
Date: February 1, 2007**

1. Laminating - Cutting Paint Room

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Lb. of Mat. (lb/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
8169/1537 Frit Paint	n/a	8.00%	0.0%	8.0%	0.0%	92.00%	0.01520	131.000	n/a	n/a	0.16	3.82	0.70	0.00	0.00	100%
Credec 1537 Medium	7.7	80.00%	0.0%	80.0%	0.0%	20.00%	0.00122	131.000	6.16	6.16	0.13	3.07	0.56	0.00	30.80	100%
Ferro A3565/C32 Frit Paint	n/a	16.00%	0.0%	16.0%	0.0%	84.00%	0.05000	68.000	n/a	n/a	0.54	13.06	2.38	0.00	0.00	100%
Ferro C32 Medium	n/a	78.00%	0.0%	78.0%	0.0%	22.00%	0.00250	68.000	n/b	n/b	0.13	3.18	0.58	0.00	0.00	100%

0.96 23.13 4.22 0.00

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

2. Laminating - Autoclave Exhaust

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Lb. of Mat. (lb/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Dowanol	8.0	99.00%	0.0%	99.0%	0.0%	1.00%	0.00320	181.000	7.92	7.92	0.57	13.76	2.51	0.10	792.00	50%

0.57 13.76 2.51 0.10

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

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

**Company Name: Guardian Automotive Products, Inc.
Address City IN Zip: 1900 S. Center Street, Auburn, IN 46706
Part 70 No.: T033-23265-00022
Permit Reviewer: Adeel Yousuf/EVP
Date: February 1, 2007**

3. Tempering - F467 Black Frit Paint Room

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Lb. of Mat. (lb/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Cookson Matheny 2T01M003/63/200 3 Frit Paint	n/a	0.00%	0.0%	0.0%	0.0%	100.00%	0.01635	434.000	n/a	n/a	0.00	0.00	0.00	0.00	0.00	100%
Cerdec 1518 Medium	n/a	74.00%	0.0%	74.0%	0.0%	26.00%	0.00012	434.000	n/a	n/a	0.04	0.89	0.16	0.00	0.00	100%

0.04 0.89 0.16 0.00

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

4. Tempering - F497 Black Frit Paint Room

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Lb. of Mat. (lb/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Cookson Matheny 2T01M003/63/200 3 Frit Paint	n/a	0.00%	0.0%	0.0%	0.0%	100.00%	0.01635	125.000	n/a	n/a	0.00	0.00	0.00	0.00	0.00	100%
Cerdec 1518 Medium	n/a	74.00%	0.0%	74.0%	0.0%	26.00%	0.00012	125.000	n/a	n/a	0.01	0.26	0.05	0.00	0.00	100%

0.01 0.26 0.05 0.00

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

5. Tempering - Silver Paint Room

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Lb. of Mat. (lb/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Englehard M571A high Amp	36.7	11.00%	0.0%	11.0%	0.0%	89.00%	0.01408	125.000	n/a	n/a	0.19	4.65	0.85	0.00	4.54	100%
Englehard M571A Low Amp	36.7	25.00%	0.0%	25.0%	0.0%	75.00%	0.00328	125.000	n/a	n/a	0.10	2.46	0.45	0.00	12.24	100%

0.30 7.11 1.30 0.00

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

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

**Company Name: Guardian Automotive Products, Inc.
Address City IN Zip: 1900 S. Center Street, Auburn, IN 46706
Part 70 No.: T033-23265-00022
Permit Reviewer: Adeel Yousuf/EVP
Date: February 1, 2007**

7. Molding - Mezzanine B

Unit ID	Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Lb. of Mat. (lb/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Booth 10	Chem Trend Mold Release PRC-7118	7.3	95.00%	20.0%	75.0%	25.0%	5.00%	0.03500	16.000	7.34	5.51	0.42	10.08	1.84	0.45	110.10	50%
Booth 11	Chem Trend Mold Release PRC-7118	7.3	95.00%	20.0%	75.0%	25.0%	5.00%	0.03500	16.000	7.34	5.51	0.42	10.08	1.84	0.45	110.10	50%
Booth 12	Chem Trend Mold Release PRC-7118	7.3	95.00%	20.0%	75.0%	25.0%	5.00%	0.03500	16.000	7.34	5.51	0.42	10.08	1.84	0.45	110.10	50%
Booth 13	Chem Trend Mold Release PRC-7118	7.3	95.00%	20.0%	75.0%	25.0%	5.00%	0.03500	16.000	7.34	5.51	0.42	10.08	1.84	0.45	110.10	50%
Booth 14	Chem Trend Mold Release PRC-7118	7.3	95.00%	20.0%	75.0%	25.0%	5.00%	0.03500	16.000	7.34	5.51	0.42	10.08	1.84	0.45	110.10	50%

2.10 50.40 9.20 2.25

Control Efficiency:		Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Controlled PM tons/yr
VOC	PM				
0.00%	99.00%	2.10	50.40	9.20	0.02

9. GMT 800 Auto Prime Line

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Lb. of Mat. (lb/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Essex 43518 Clear Primer	6.9	99.20%	0.0%	99.2%	0.0%	0.80%	0.00690	42.000	6.87	6.87	0.29	6.90	1.26	0.00	858.82	100%
Essex 43520A Black Primer	8.3	57.80%	0.0%	57.8%	0.0%	42.20%	0.00800	42.000	4.77	4.77	0.19	4.66	0.85	0.00	11.31	100%

0.48 11.56 2.11 0.00

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

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Appendix A: Emission Calculations
HAP Emission Calculations
Insignificant Activities

Company Name: Guardian Automotive Products, Inc.
Address City IN Zip: 1900 S. Center Street, Auburn, IN 46706
Part 70 No.: T033-23265-00022
Permit Reviewer: Adeel Yousuf/EVP
Date: February 1, 2007

1. Laminating - Cutting Paint Room

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

4. GMT 800 Auto Prime Line

Material	Density (Lb/Gal)	Pounds of Material (lb/unit)	Maximum (unit/hour)	Weight % Toluene	Weight % Methanol	Weight % Xylene	Weight % Glycol Ether	Toluene Emissions (ton/yr)	Methanol Emissions (ton/yr)	Xylene Emissions (ton/yr)	Glycol Ether Emissions (ton/yr)	
Essex 43518 Clear Primer	6.9	0.006900	42.00	53.00%	47.00%	0.00%	0.00%	0.67	0.60	0.00	0.00	
Essex 43520A Black Primer	8.3	0.008000	42.00	10.00%	0.00%	1.00%	0.00%	0.15	0.00	0.01	0.00	
Total												
Total State Potential Emissions								0.82	0.60	0.01	0.00	1.43

METHODOLOGY

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

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

**Company Name: Guardian Automotive Products, Inc.
Address City IN Zip: 1900 S. Center Street, Auburn, IN 46706
Part 70 No.: 033-23265-00022
Permit Reviewer: Adeel Yousuf/EVP
Date: February 1, 2007**

Insignificant Activity: Cleaning Operation

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

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

METHODOLOGY

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

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

**Appendix A: Emission Calculations
Insignificant Activities**

**Company Name: Guardian Automotive Products, Inc.
Address City IN Zip: 1900 S. Center Street, Auburn, IN 46706
Part 70 No.: T033-23265-00022
Permit Reviewer: Adeel Yousuf/EVP
Date: February 1, 2007**

Miscellaneous clean-up operations

VOC Emissions

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

NOx Emissions

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

HAPs Emissions

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

METHODOLOGY

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

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

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

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

Company Name: Guardian Automotive Products, Inc.
Address City IN Zip: 1900 S. Center Street, Auburn, IN 46706
Part 70 No.: 033-23265-00022
Permit Reviewer: Adeel Yousuf/EVP
Date: February 1, 2007

Heat Input Capacity
MMBtu/hr
19.9

Potential Throughput
MMCF/yr
174.4

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

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

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

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

HAPs Emissions

Company Name: Guardian Automotive Products, Inc.
Address City IN Zip: 1900 S. Center Street, Auburn, IN 46706
Part 70 No.: 033-23265-00022
Permit Reviewer: Adeel Yousuf/EVP
Date: February 1, 2007

HAPs - Organics

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

HAPs - Metals

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

Methodology is the same as previous page.

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

**Appendix A: Emission Calculations
VOC & HAPS from Surface Coating**

**Company Name: Guardian Automotive Products, Inc.
Address City IN Zip: 1900 S. Center Street, Auburn, IN 46706
Part 70 No.: T033-23265-00022
Permit Reviewer: Adeel Yousuf/EVP
Date: February 1, 2007**

Auto Prime Line (North) - Potential to Emit (PTE) for VOC -8760 hours of operation at 47 parts per hour

Coating	Parts per hour	Coating usage (lb/hr)	Coating usage (gram/ hr)	Grams per part	% VOC (Based on MSDS)	VOC (lb/hr)	VOC (ton/yr)
43518 Clear Primer	47	2.27	1029.655	21.907553	100	2.27	9.9426
43520A Black Primer	47	2.27	1029.655	21.907553	66	1.4982	6.562116
Total							16.50472

*Note: VOC emissions estimated at worst case scenario based on the maximum range values given in MSDS

Auto Prime Line (North) - Potential to Emit (PTE) for HAPS -8760 hours of operation at 47 parts per hour

Coating	Coating usage (lb/hr)	Wt.% of Toluene	Wt. % of Methanol	Wt.% of Xylene	Toluene emissions (ton/ yr)	Methanol emissions (ton/yr)	Xylene emissions (ton/yr)	HAPS
43518 Clear Primer	2.27	50	50	0	4.9713	4.9713	0	9.9426
43520A Black Primer	2.27	15	0	1	1.49139	0	0.099426	1.590816
Total					6.46269	4.9713	0.099426	11.53342

*Note: HAP emissions estimated at worst case scenario based on the maximum range values given in MSDS

**Appendix A: Emission Calculations
VOC & HAPs from Surface Coating**

Company Name: Guardian Automotive Products, Inc.
Address City IN Zip: 1900 S. Center Street, Auburn, IN 46706
Part 70 No.: T033-23265-00022
Permit Reviewer: Adeel Yousuf/EVP
Date: February 1, 2007

PVC Line Unit # 4 - Potential to Emit (PTE) for VOC at 8760 hours of operation at 47.33 parts per hour

Coating	Parts per hour	Grams per part	Total usage (Grams/hr)	Coating usage (lb/hr)	% VOC (Based on MSDS)	VOC (lb/hr)	VOC (ton/yr)
A1669 B	47.000	2.000	94.000	0.207	81.000	0.168	0.735
A 1167 B catalyst	47.000	0.200	9.400	0.021	92.000	0.019	0.084
Total							0.819

*Note: VOC emissions estimated at worst case scenario based on the maximum range values given in MSDS

PVC Line Unit # 4 - Potential to Emit (PTE) for HAPS at 8760 hours of operation at 47.33 parts per hour

Coating	Coating usage (lb/hr)	Wt.% of Toluene	Wt.% of Methyl Methacrylate	Wt.% of Propylene oxide	Toluene emissions (ton/ yr)	Methyl Methacrylate emissions (ton/yr)	Propylene oxide emissions (ton/yr)	HAPS
A1669 B	0.207	30.000	1.000	1.000	0.272	0.009	0.009	0.290
A 1167 B catalyst	0.021	40.000	0.000	0.000	0.036	0.000	0.000	0.036
Total					0.308	0.009	0.009	0.326

PVC Line Unit # 5 - Potential to Emit (PTE) for VOC at 8760 hours of operation at 47.33 parts per hour

Coating	Parts per hour	Grams per part	Total usage (Grams/hr)	Coating usage (lb/hr)	% VOC (Based on MSDS)	VOC (lb/hr)	VOC (ton/yr)
A1669 B	47.000	2.000	94.000	0.207	81.000	0.168	0.735
A 1167 B catalyst	47.000	0.200	9.400	0.021	92.000	0.019	0.084
Total							0.819

*Note: VOC emissions estimated at worst case scenario based on the maximum range values given in MSDS

PVC Line Unit # 5 - Potential to Emit (PTE) for HAPS at 8760 hours of operation at 47.33 parts per hour

Coating	Coating usage (lb/hr)	Wt.% of Toluene	Wt.% of Methyl Methacrylate	Wt.% of Propylene oxide	Toluene emissions (ton/ yr)	Methyl Methacrylate emissions (ton/yr)	Propylene oxide emissions (ton/yr)	HAPS
A1669 B	0.207	30.000	1.000	1.000	0.272	0.009	0.009	0.290
A 1167 B catalyst	0.021	40.000	0.000	0.000	0.036	0.000	0.000	0.036
Total					0.308	0.009	0.009	0.326

Appendix A: Emission Calculations
VOC
From Degreasing Operation

Company Name: Guardian Automotive Products, Inc.
Address City IN Zip: 1900 S. Center Street, Auburn, IN 46706
Part 70 No.: T033-23265-00022
Permit Reviewer: Adeel Yousuf/EVP
Date: February 1, 2007

Insignificant Activity: Degreaser

Potential Emissions:											
Material (as applied)	Process	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/day)	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year
Safety Clean	Degreaser	6.68	100.00%	0.00%	100.00%	0.00%	0.00%	0.175	0.05	1.17	0.21
Total Potential Emissions:									0.05	1.17	0.21

Methodology:

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

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

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

**Appendix A: Emission Calculations
Insignificant Activity**

**Company Name: Guardian Automotive Products, Inc.
Address City IN Zip: 1900 S. Center Street, Auburn, IN 46706
Part 70 No.: T033-23265-00022
Permit Reviewer: Adeel Yousuf/EVP
Date: February 1, 2007**

BONDING (Automated Bonding Process)

Material	Annual Production (Parts/yr)	Maximum Usage Per Part (lb/part)	Potential Emission Rate (TPY)	Potential Emission Rate (lb/hr)
Clear Primer	600,000	0.0013	0.40	0.091
Black Prime	600,000	0.0032	0.95	0.218
			Total VOC/HAPs*	0.309

* Each coating contains Methanol and Toluene, 50% by weight each, therefore, VOC and HAP are equal.