



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: October 2, 2009

RE: Guardian Automotive Products / 113-27390-00024

FROM: Matthew Stuckey, Branch 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 according to IC 13-15-6-3, 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 and IC 13-15-6-1 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, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot12/03/07



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Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**Guardian Automotive Products
860 W. US Route 6
Ligonier, Indiana 46767**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

Operation Permit No.: F113-27390-00024	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: October 2, 2009 Expiration Date: October 2, 2019

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SECTION A SOURCE SUMMARY

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

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

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

Source Address:	860 W. US Route 6, Ligonier, Indiana 46767
Mailing Address:	860 W. US Route 6, Ligonier, IN 46767
General Source Phone Number:	260 894-9337
SIC Code:	3231
County Location:	Noble
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State 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 2-8-3(c)(3)]

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

- (a) One (1) Laminated Windshield (LW) Silkscreen Operation, consisting of the following:
- (1) Two (2) Laminated Windshield (LW) black silkscreen operations, constructed in 1991 and 1999, using an automated application method each with an overall maximum capacity of 137.5 parts per hour of automotive LW window panels and one silkscreen operation exhausting to stacks identified as J-1, J-2, and J-3 and other silkscreen operation exhausting to stack identified as J-4;
 - (2) One (1) Laminated Windshield (LW) silver (Ag) silkscreen operation, constructed in 1991, using an automated application method with a maximum capacity of 51.7 parts per hour of automotive LW window panels and exhausting to the interior of the building;
 - (3) One (1) ultrasonic cleaning operation for the preparation of stainless steel buttons that are used to attach mirrors to windshields, constructed in 2001, with a maximum capacity of five (5) gallons of cleaner per week and exhausting to the interior of the building;
 - (4) One (1) LW Dowanol Roller Application operation, constructed in 1991, with an overall maximum capacity of 275 parts per hour of automotive LW window panels and exhausting to the interior of the building;
 - (5) Two (2) Diatomaceous Earth Applicators for the LW lines, constructed in 1999, using an automated application method with an overall maximum capacity of 275 parts per hour of automotive LW window panels, with dust collectors for particulate control;

- (b) One (1) Tempered Glass (TG) Silkscreen Operation, consisting of the following:
 - (1) Two (2) Tempered Glass (TG) black silkscreen lines, constructed in 1991 and 1999, using an automated application method with a maximum capacity of 130.2 parts per hour of automotive TG window panels and one silkscreen line exhausting to stacks identified as I-1, I-2, and I-3 and other silkscreen line exhausting to stack identified as I-4;
 - (2) Two (2) Tempered Glass (TG) silver (Ag) silkscreen lines, constructed in 1991 and 1999, using an automated application method with a maximum capacity of 130.2 parts per hour of automotive TG window panels and exhausting to the interior of the building;
- (c) One (1) Tempered Glass (TG) PVC Encapsulations Operation, consisting of the following:
 - (1) One (1) TG PVC encapsulation robotic wiping applicator, identified as Booth No. 2 and constructed in 1997, with a maximum capacity of 55 parts per hour (1,945 pounds per hour) of automotive window panels with PVC trim, and connected to a manifold which is exhausted through stack P-1;
 - (2) One (1) TG injection molding press, identified as Press No. 2 and constructed in 1997, with a maximum capacity of 55 parts per hour (1,945 pounds per hour) of automotive window panels with PVC trim ; and connected to a manifold which is exhausted through stack P-1;
- (d) One (1) Poly Vinyl Butyral Interlayer operation, identified as the White Room, constructed in 1991 with a maximum capacity of 200 parts per hour of automotive windshields and exhausting to the interior of the building;
- (e) One (1) tempering line, identified as Tempering Line #3, constructed in 2005 with a maximum capacity of 480 parts per hour (5,876 pounds per hour) of automotive window panels and exhausting through stack I-5;
- (f) One (1) priming cell, identified as Priming Cell #1, constructed in 2005 with a maximum capacity of 240 parts per hour of automotive window panels and exhausting through stack P-1;
- (g) One (1) priming cell, identified as Priming Cell #2, constructed in 2005 with a maximum capacity of 240 parts per hour of automotive window panels and exhausting through stack P-1;
- (h) One (1) priming cell, identified as Priming Cell #3, constructed in 2005 with a maximum capacity of 240 parts per hour of automotive window panels and exhausting through stack P-2.

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million (10,000,000) Btu per hour:

- (1) Four (4) natural gas-fired space heaters, each with heat input rate of 2.25 MMBtu/hr, respectively;
 - (2) Four (4) natural gas-fired make-up heaters, each with heat input rate of 3.35 MMBtu/hr, respectively;
 - (3) Seven (7) natural gas-fired space heaters, each with heat input rate of 0.097, 0.097, 0.097, 0.12, 0.071, 0.071, and 0.12 MMBtu/hr, respectively;
 - (4) One (1) natural gas-fired make-up heater with a heat input rate of 0.4 MMBtu/hr; and
 - (5) One (1) humidification boiler having a heat input rate of 0.21 MMBtu/hr;
- (b) The following VOC and HAP storage containers:
- (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons:
 - (A) Two (2) No. 2 diesel fuel storage tanks, each having a capacity of 260 and 250 gallons, respectively;
 - (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids:
 - (A) Totes, drums and steel buckets used to store isopropyl alcohol, H-939-C safe solvent cleaner, black frit paint, dowanol, adhesive, catalyst and clear and black primers;
- (c) Refractory storage not requiring air pollution control equipment;
- (d) Equipment used exclusively for the following:
- (1) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases;
- (e) Machining where an aqueous cutting coolant continuously floods the machining interface;
- (f) Cleaners and solvents characterized as follows:
- (1) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;
- (g) Two (2) Torits dust collectors with a flow rate of less than 1500 cfm, controlling glass and scrap particulates from the Laminated Windshield Silkscreen process and Diatomaceous Earth applicators.
- (h) Two (2) Amtech dust collectors, one controlling glass and scrap particulates from the Tempered Glass Silkscreen operations with a low rate of 3000 cfm; and the other controlling glass and scrap particulates from the Laminated Windshield Silkscreen process with a flow rate of 3000 cfm.
- (i) Closed loop heating and cooling systems;
- (j) Infrared cure equipment;

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

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

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

SECTION B GENERAL CONDITIONS

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

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

B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

-
- (a) This permit, F113-27390-00024, is issued for a fixed term of ten (10) 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, 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 2-8-6] [IC 13-17-12]

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 2-8-4(4)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

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

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

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

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

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. 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 and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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.12 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

- (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 and Enforcement 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 2-8-4(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) 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 2-8-3(c)(6) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
 - (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

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

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

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

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

- (a) All terms and conditions of permits established prior to F113-27390-00024 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency 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 and Enforcement Branch, 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State 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 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
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 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if,

subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 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
Permit Administration and Support Section, 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 2-8-15(b) through (d). 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 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(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 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

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

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

B.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][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 2-8-4(1)]

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

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

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

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

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

C.3 Opacity [326 IAC 5-1]

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

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

Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

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

C.7 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
Compliance and Enforcement Branch, 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed 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 Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

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

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

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance or ninety (90) days of initial start-up, whichever is later. 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 and Enforcement 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(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 2-8-4][326 IAC 2-8-5(a)(1)]

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

- (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 2-8-4][326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance or ninety (90) days of initial start-up, whichever is later.

C.17 General Reporting Requirements [326 IAC 2-8-4(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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) Laminated Windshield (LW) Silkscreen Operation, consisting of the following:
- (1) Two (2) Laminated Windshield (LW) black silkscreen operations, constructed in 1991 and 1999, using an automated application method each with an overall maximum capacity of 137.5 parts per hour of automotive LW window panels and one silkscreen operation exhausting to stacks identified as J-1, J-2, and J-3 and other silkscreen operation exhausting to stack identified as J-4;
 - (2) One (1) Laminated Windshield (LW) silver (Ag) silkscreen operation, constructed in 1991, using an automated application method with a maximum capacity of 51.7 parts per hour of automotive LW window panels and exhausting to the interior of the building;
 - (3) One (1) ultrasonic cleaning operation for the preparation of stainless steel buttons that are used to attach mirrors to windshields, constructed in 2001, with a maximum capacity of five (5) gallons of cleaner per week and exhausting to the interior of the building;
 - (4) One (1) LW Dowanol Roller Application operation, constructed in 1991, with an overall maximum capacity of 275 parts per hour of automotive LW window panels and exhausting to the interior of the building;
 - (5) Two (2) Diatomaceous Earth Applicators for the LW lines, constructed in 1999, using an automated application method with an overall maximum capacity of 275 parts per hour of automotive LW window panels, with dust collectors for particulate control;
- (b) One (1) Tempered Glass (TG) Silkscreen Operation, consisting of the following:
- (1) Two (2) Tempered Glass (TG) black silkscreen lines, constructed in 1991 and 1999, using an automated application method with a maximum capacity of 130.2 parts per hour of automotive TG window panels and one silkscreen line exhausting to stacks identified as I-1, I-2, and I-3 and other silkscreen line exhausting to stack identified as I-4;
 - (2) Two (2) Tempered Glass (TG) silver (Ag) silkscreen lines, constructed in 1991 and 1999, using an automated application method with a maximum capacity of 130.2 parts per hour of automotive TG window panels and exhausting to the interior of the building;
- (c) One (1) Tempered Glass (TG) PVC Encapsulations Operation, consisting of the following:
- (1) One (1) TG PVC encapsulation robotic wiping applicator, identified as Booth No. 2 and constructed in 1997, with a maximum capacity of 55 parts per hour (1,945 pounds per hour) of automotive window panels with PVC trim, and applicator connected to a manifold which is exhausted through stack P-1;
 - (2) One (1) TG injection molding press, identified as Press No. 2 and constructed in 1997, with a maximum capacity of 55 parts per hour (1,945 pounds per hour) of automotive window panels with PVC trim ; and connected to a manifold which is exhausted through stack P-1;

- (d) One (1) Poly Vinyl Butyral Interlayer operation, identified as the White Room, constructed in 1991 with a maximum capacity of 200 parts per hour of automotive windshields and exhausting to the interior of the building;
- (e) One (1) tempering line, identified as Tempering Line #3, to be constructed by 2005 with a maximum capacity of 480 parts per hour (5,876 pounds per hour) of automotive window panels and exhausting through stack I-5;
- (f) One (1) priming cell, identified as Priming Cell #1, to be constructed by 2005 with a maximum capacity of 240 parts per hour of automotive window panels and exhausting through stack P-1;
- (g) One (1) priming cell, identified as Priming Cell #2, to be constructed by 2005 with a maximum capacity of 240 parts per hour of automotive window panels and exhausting through stack P-1; and
- (h) One (1) priming cell, identified as Priming Cell #3, to be constructed by 2005 with a maximum capacity of 240 parts per hour of automotive window panels and exhausting through stack P-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 2-8-4(1)]

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

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

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

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

- (a) Pursuant to FESOP No.113-19112-00024, issued October 15, 2004, the input of any single HAP to the LW Black Silkscreen Operations, LW Silver Silkscreen Operations, LW Dowanol Application, TG Black Silkscreen Operations, TG Silver Silkscreen Operations, TG PVC Encapsulations Operations, Diatomaceous Earth Operations, Tempering Line #3 and Priming Cells #1 - #3 shall be limited to 9.81 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month.
- (b) Pursuant to FESOP No. 113-19112-00024, issued October 15, 2004, the input of all combined HAPs to the LW Black Silkscreen Operations, LW Silver Silkscreen Operations, LW Dowanol Application, TG Black Silkscreen Operations, TG Silver Silkscreen Operations, TG PVC Encapsulations Operations, Diatomaceous Earth Operations, Tempering Line #3 and Priming Cells #1 - #3 shall be limited to 24.8 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month.

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

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

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

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

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

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

- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC) (HAP) [326 IAC 8-1-2] [326 IAC 8-1-4]

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

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

D.1.7 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP and VOC usage limits and/or the HAP and VOC emission limits established in Conditions D.1.1 and D.1.2.
 - (1) The HAP and VOC content of each coating material and solvent used;
 - (2) The amount of coating material and solvent less water used on a 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 VOC and HAP content of the coatings used for month;
- (4) The cleanup solvent usage for each month;
- (5) The total VOC and HAP monthly usage;
- (6) The weight of HAP and VOC emitted for each compliance period;
- (7) The total waste VOC materials generated during each month;
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.8 Reporting Requirements

A quarterly summary of the information to document compliance with each Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the authorized individual as defined by 326 IAC 2-1.1-1(1).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
COMPLIANCE AND ENFORCEMENT BRANCH,
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Guardian Automotive Products
Source Address: 860 W. US Route 6, Ligonier, Indiana 46767
Mailing Address: 860 W. US Route 6, Ligonier, IN 46767
FESOP Permit No.: F113-27390-00024

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Guardian Automotive Products
Source Address: 860 W. US Route 6, Ligonier, Indiana 46767
Mailing Address: 860 W. US Route 6, Ligonier, IN 46767
FESOP Permit No.: F113-27390-00024

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
COMPLIANCE AND ENFORCEMENT BRANCH,
OFFICE OF AIR QUALITY**

FESOP Quarterly Report

Source Name: Guardian Automotive Products
Source Address: 860 W. US Route 6, Ligonier, Indiana 46767
Mailing Address: 860 W. US Route 6, Ligonier, IN 46767
FESOP Permit No.: F113-27390-00024
Facility: LW Black Silkscreen Operations, LW Silver Silkscreen Operations, ultrasonic cleaning operation, LW Dowanol Application, TG Black Silkscreen Operations, TG Silver Silkscreen Operations, TG PVC Encapsulations Operations, Diatomaceous Earth Operations, Tempering Line #3 and Priming Cells #1 - #3
Parameter: Volatile Organic Compounds (VOC)
Limit: 98.7 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
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
 COMPLIANCE AND ENFORCEMENT BRANCH,
 OFFICE OF AIR QUALITY**

FESOP Quarterly Report

Source Name: Guardian Automotive Products
 Source Address: 860 W. US Route 6, Ligonier, Indiana 46767
 Mailing Address: 860 W. US Route 6, Ligonier, IN 46767
 FESOP Permit No.: F113-27390-00024
 Facility: LW Black Silkscreen Operations, LW Silver Silkscreen Operations, LW Dowanol Application, TG Black Silkscreen Operations, TG Silver Silkscreen Operations, TG PVC Encapsulations Operations, Diatomaceous Earth Operations, Tempering Line #3 and Priming Cells #1 - #3
 Parameter: Worst-case single HAP
 Limit: Less than 9.81 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
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
 COMPLIANCE AND ENFORCEMENT BRANCH,
 OFFICE OF AIR QUALITY**

FESOP Quarterly Report

Source Name: Guardian Automotive Products
 Source Address: 860 W. US Route 6, Ligonier, Indiana 46767
 Mailing Address: 860 W. US Route 6, Ligonier, IN 46767
 FESOP Permit No.: F113-27390-00024
 Facility: LW Black Silkscreen Operations, LW Silver Silkscreen Operations, LW Dowanol Application, TG Black Silkscreen Operations, TG Silver Silkscreen Operations, TG PVC Encapsulations Operations, Diatomaceous Earth Operations, Tempering Line #3 and Priming Cells #1 - #3
 Parameter: Combined HAPs
 Limit: Less than 24.8 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
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
 COMPLIANCE AND ENFORCEMENT BRANCH,
 OFFICE OF AIR QUALITY**

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

Source Name: Guardian Automotive Products
 Source Address: 860 W. US Route 6, Ligonier, Indiana 46767
 Mailing Address: 860 W. US Route 6, Ligonier, IN 46767
 FESOP Permit No.: F113-27390-00024

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 (ATSD) for a
Federally Enforceable State Operating Permit Renewal

Source Background and Description

Source Name:	Guardian Automotive Products
Source Location:	860 W. US Route 6, Ligonier, IN 46767
County:	Noble
SIC Code:	3231
Operation Permit No.:	F 113-27390-00024
Permit Reviewer:	Bruce Farrar

On August 27, 2009, the Office of Air Quality (OAQ) had a notice published in Kendallville News-Sun, Kendallville, Indiana, stating that Guardian Automotive Products had applied for a Federally Enforceable State Operating Permit Renewal. The notice also stated that the OAQ proposed to issue a Federally Enforceable State Operating Permit Renewal for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments and Responses

On September 1, 2009, Guardian Automotive Products submitted comments to IDEM, OAQ on the draft Federally Enforceable State Operating Permit Renewal. The Technical Support Document (TSD) is used by IDEM, OAQ for historical purposes. IDEM, OAQ does not make any changes to the original TSD, but the Permit will have the updated changes. The comments and revised permit language are provided below with deleted language as ~~strikeouts~~ and new language **bolded**.

Comment 1:

Guardian Automotive requested that Condition D.1.7(a)(2) record keeping requirement be changed to reflect the changes to a monthly instead of daily requirement.

Response to Comment 1:

IDEM agrees with the recommended changes, since the required information is now maintained monthly instead of daily. The permit has been revised as follows:

D.1.7 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP and VOC usage limits and/or the HAP and VOC emission limits established in Conditions D.1.1 and D.1.2.

(1) ***

(2) The amount of coating material and solvent less water used on ~~daily~~ **a monthly** basis;

IDEM Contact

- (a) Questions regarding this proposed Federally Enforceable State Operating Permit Renewal can be directed to Bruce Farrar at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5401 or toll free at 1-800-451-6027 extension 4-5401.
- (b) A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

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

**Technical Support Document (TSD) for a Federally Enforceable State
Operating Permit Renewal**

Source Background and Description

Source Name:	Guardian Automotive Products
Source Location:	860 W. US Route 6, Ligonier, IN 46767
County:	Noble
SIC Code:	3231
Operation Permit No.:	F 113-27390-00024
Permit Reviewer:	Bruce Farrar

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

History

On January 20, 2009, Guardian Automotive Products submitted an application to the OAQ requesting to renew its operating permit. Guardian Automotive Products was issued a FESOP on October 15, 2004.

Permitted Emission Units and Pollution Control Equipment

- (a) One (1) Laminated Windshield (LW) Silkscreen Operation, consisting of the following:
- (1) Two (2) Laminated Windshield (LW) black silkscreen operations, constructed in 1991 and 1999, using an automated application method each with an overall maximum capacity of 137.5 parts per hour of automotive LW window panels and one silkscreen operation exhausting to stacks identified as J-1, J-2, and J-3 and other silkscreen operation exhausting to stack identified as J-4;
 - (2) One (1) Laminated Windshield (LW) silver (Ag) silkscreen operation, constructed in 1991, using an automated application method with a maximum capacity of 51.7 parts per hour of automotive LW window panels and exhausting to the interior of the building;
 - (3) One (1) ultrasonic cleaning operation for the preparation of stainless steel buttons that are used to attach mirrors to windshields, constructed in 2001, with a maximum capacity of five (5) gallons of cleaner per week and exhausting to the interior of the building;
 - (4) One (1) LW Dowanol Roller Application operation, constructed in 1991, with an overall maximum capacity of 275 parts per hour of automotive LW window panels and exhausting to the interior of the building;
 - (5) Two (2) Diatomaceous Earth Applicators for the LW lines, constructed in 1999, using an automated application method with an overall maximum capacity of 275 parts per hour of automotive LW window panels, with dust collectors controlling for particulate;

- (b) One (1) Tempered Glass (TG) Silkscreen Operation, consisting of the following:
 - (1) Two (2) Tempered Glass (TG) black silkscreen lines, constructed in 1991 and 1999, using an automated application method with a maximum capacity of 130.2 parts per hour of automotive TG window panels and one silkscreen line exhausting to stacks identified as I-1, I-2, and I-3 and other silkscreen line exhausting to stack identified as I-4;
 - (2) Two (2) Tempered Glass (TG) silver (Ag) silkscreen lines, constructed in 1991 and 1999, using an automated application method with a maximum capacity of 130.2 parts per hour of automotive TG window panels and exhausting to the interior of the building;
- (c) One (1) Tempered Glass (TG) PVC Encapsulations Operation, consisting of the following:
 - (1) One (1) TG PVC encapsulation robotic wiping applicators, identified as Booth No. 2 and constructed in 1997, with a maximum capacity of 55 parts per hour (1,945 pounds per hour) of automotive window panels with PVC trim, and connected to a manifold which is exhausted through stack P-1;
 - (2) One (1) TG injection molding presses, identified as Presses No. 2 and constructed in 1997, with a maximum capacity of 55 parts per hour (1,945 pounds per hour) of automotive window panels with PVC trim; and connected to a manifold which is exhausted through stack P-1;
- (d) One (1) Poly Vinyl Butyral Interlayer operation, identified as the White Room, constructed in 1991 with a maximum capacity of 200 parts per hour of automotive windshields and exhausting to the interior of the building;
- (e) One (1) Tempering Line, identified as tempering line #3, constructed in 2005 with a maximum capacity of 480 parts per hour (5,876 pounds per hour) of automotive window panels and exhausting through stack I-5;
- (f) One (1) Priming Cell, identified as priming cell #1, constructed in 2005 with a maximum capacity of 240 parts per hour of automotive window panels and exhausting through stack P-1;
- (g) One (1) Priming Cell, identified as priming cell #2, constructed in 2005 with a maximum capacity of 240 parts per hour of automotive window panels and exhausting through stack P-1; and
- (h) One (1) Priming Cell, identified as priming cell #3, constructed in 2005 with a maximum capacity of 240 parts per hour of automotive window panels and exhausting through stack P-2.

Emission Units and Pollution Control Equipment Removed From the Source

- (a) Four (4) TG PVC encapsulation robotic wiping applicators, identified as Booth No. 3 through 6 and constructed in 1997 through 2000, each with a maximum capacity of 55 parts per hour (1,945 pounds per hour) of automotive window panels with PVC trim (overall maximum 275 parts per hour), and each applicator connected to a manifold which is exhausted through stack P-1;
- (b) Four (4) TG injection molding presses, identified as Presses No. 3 through 6 and constructed in 1997 through 2000, each with a maximum capacity of 55 parts per hour

(1,945 pounds per hour) of automotive window panels with PVC trim (overall maximum 275 parts per hour); and each connected to a manifold which is exhausted through stack P-1.

Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million (10,000,000) Btu per hour:
 - (1) Four (4) natural gas-fired space heaters, each with heat input rate of 2.25 MMBtu/hr, respectively;
 - (2) Four (4) natural gas-fired make-up heaters, each with heat input rate of 3.35 MMBtu/hr, respectively;
 - (3) Seven (7) natural gas-fired space heaters, each with heat input rate of 0.097, 0.097, 0.097, 0.12, 0.071, 0.071, and 0.12 MMBtu/hr, respectively;
 - (4) One (1) natural gas-fired make-up heater with a heat input rate of 0.4 MMBtu/hr; and
 - (5) One (1) humidification boiler having a heat input rate of 0.21 MMBtu/hr;
- (b) The following VOC and HAP storage containers:
 - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons:
 - (A) Two (2) No. 2 diesel fuel storage tanks, each having a capacity of 260 and 250 gallons, respectively;
 - (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids:
 - (A) Totes, drums and steel buckets used to store isopropyl alcohol, H-939-C safe solvent cleaner, black frit paint, dowanol, adhesive, catalyst and clear and black primers;
- (c) Refractory storage not requiring air pollution control equipment;
- (d) Equipment used exclusively for the following:
 - (1) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases;
- (e) Machining where an aqueous cutting coolant continuously floods the machining interface;
- (f) Cleaners and solvents characterized as follows:
 - (1) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;
- (g) Two (2) Torits dust collectors with a flow rate of less than 1500 cfm, controlling glass and scrap particulates from the Laminated Windshield Silkscreen process and Diatomaceous Earth applicators.

- (h) Two (2) Amtech dust collectors, one controlling glass and scrap particulates from the Tempered Glass Silkscreen operations with a low rate of 3000 cfm; and the other controlling glass and scrap particulates from the Laminated Windshield Silkscreen process with a flow rate of 3000 cfm.
- (i) Closed loop heating and cooling systems;
- (j) Infrared cure equipment;
- (k) Noncontact cooling tower systems with either of the following:
 - (1) Two (2) forced and induced draft cooling tower systems not regulated under a NESHAP.
- (l) Quenching operations used with heat treating processes;
- (m) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
- (n) Heat exchanger cleaning and repair;
- (o) Paved and unpaved roads and parking lots with public access;
- (p) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;
- (q) Emergency generators as follows:
 - (1) Diesel generators not exceeding 1600 horsepower:
 - (A) One (1) standby generator, constructed in 1991 with a maximum heat input rate of 142 HP; and
- (r) Other emergency equipment as follows:
 - (1) Stationary fire pumps:
 - (A) One (1) fire pump, constructed in 1991 with a maximum fuel consumption capacity of 9.2 gallons/hr

Existing Approvals

Since the issuance of the FESOP 113-19112-00024 on October 15, 2004, the source has constructed or has been operating under the following approvals as well:

- (a) Administrative Amendment No. 113-23433-00024 issued on August 9, 2006;
- (b) Significant Permit Revision No. 113-22437-00024 issued on May 1, 2006; and
- (c) Minor Permit Revision No. 113-21320-00024 issued on October 11, 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.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document.

County Attainment Status

The source is located in Noble County

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.

¹Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.
Unclassifiable or attainment effective April 5, 2005, for PM2.5.

(a) Ozone Standards

- (1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, and St. Joseph as attainment for the 8-hour ozone standard.
- (3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.
- (4) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Noble County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM2.5

Noble County has been classified as attainment for PM2.5. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 emissions, and the effective date of these rules was July 15th, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM10 emissions as a surrogate for PM2.5 emissions until 326 IAC 2-2 is revised.

- (c) **Other Criteria Pollutants**
 Noble County has been classified as attainment or unclassifiable in Indiana for all pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) **Fugitive Emissions**
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	1.4
PM ₁₀	1.4
PM _{2.5}	1.4
SO ₂	0.66
VOC	150.63
CO	9.10
NO _x	18.77

HAPs	tons/year
Toluene	9.03
Menthanol	8.55
Chromium	5.80
Xylene	0.57
Hexane	0.18
Hexamethylene 1,6- diisocyanate	0.16
Butyl-Methacrylate	0.01
Total	24.3

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is equal to or greater than 100 tons per year. The source is subject to the provisions of 326 IAC 2-7. However, the source has agreed to limit their VOC emissions to less than Title V levels, therefore the source will be issued a FESOP.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. However, the source has agreed to limit their single HAP emissions and total HAP emissions below Title V limits. Therefore, the source will be issued a FESOP

Actual Emissions

No previous emission data has been received from the source.

Potential to Emit After Issuance

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

Process/ Emission Unit	Potential To Emit (tons/year)							Single HAP	Combined HAPs
	PM	PM ₁₀ *	SO ₂	VOC	CO	NO _x			
LW Silk Screen	-	-	-	98.7 ¹	-	-	9.81 ²	24.8 ²	
TG Silk Screen	-	-	-		-	-			
TG PVC Encapsulations Ops	-	-	-		-	-			
White Room	-	-	-		-	-			
Tempering Line #3	-	-	-		-	-			
Priming Cells #1-3	-	-	-		-	-			
Insignificant Activities	1.40	1.40	0.66	1.25	10.51	18.77			
Total Emissions	1.40	1.40	0.66	<100	10.51	18.77	<10	<25	
PSD	250	250	250	250	250	250	-	-	
Part 70 Operating Permit	-	100	100	100	100	100	10	25	

* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

1. The total VOC limit for the LW Silk Screen, TG Silk Screen, TG PVC Encapsulations, Diatomaceous Earth, Tempering Line #3, and Priming Cells #1-3 is 98.7 tons per year. As previously permitted in FESOP 113-19112-00024, dated October 15, 2004.
2. Even though the updated HAPSs' PTE is less than 10 tons per year for a single HAP and 25 tons per year for combined HAPS; the total HAP limits are still maintained for the LW Silk Screen, TG Silk Screen, TG PVC Encapsulations, Diatomaceous Earth, Tempering Line #3, and Priming Cells #1-3 as 9.81 tons per year for a single HAP and 24.8 tons per year for combined HAPS. As previously permitted in FESOP 113-19112-00024, dated October 15, 2004.

Federal Rule Applicability

NSPS

- (a) The requirements of the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60.390, Subpart MM are not included in the permit because the source is not an automobile or light duty truck assembly plant.
- (a) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels for which Construction, Reconstruction or Modification Commenced after July 23, 1984, (40 CFR Part 60.110b, Subpart Kb, are not included in the permit for the two (2) diesel and fuel oil storage tanks, with capacities of 260 and 250 gallons, listed as insignificant activities, since each of them has a storage capacity of less than 75 cubic meters.
- (c) The requirements of the New Source Performance Standard for Stationary Compression Ignition Internal Combustion Engines, 40 CFR 60.4200, Subpart IIII, are not included in

the permit for the Emergency generator and Stationary fire pump. Construction of these units commenced prior to July, 2005.

NESHAP

- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) Surface Coating of Automobiles and Light-Duty Trucks, Subpart IIII are not included in the permit since the source is not an automobile or light-duty truck assembly plant, and it is not a major source of HAPs after federally enforceable limits.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) Surface Coating of Miscellaneous Metal Parts and Products, 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, and it is not a major source of HAPs after federally enforceable limits.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source is subject to 326 IAC 1-6-3.

326 IAC 2-6 (Emission Reporting)

This source is located in Noble County and the potential to emit of each criteria pollutant is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 2-8-4 (FESOP)

- (a) Pursuant to this rule, source wide emissions of VOC shall be limited to less than one hundred (100) tons per year such that it does not fall within any of the categories listed in 326 IAC 2-7-2(a) and that assure compliance with all applicable requirements at the time of FESOP issuance.
- (b) Pursuant to this rule, source wide emissions of HAPs shall be limited to less than ten (10) tons per year of any single HAP or twenty-five (25) tons per year of any combination of HAPs such that it does not fall within any of the categories listed in 326 IAC 2-7-2(a) and that assures compliance with all applicable requirements at the time of FESOP issuance. Therefore, the source will not fall within any of the categories listed in 326 IAC 2-7-2(a) and will comply with all applicable requirements at the time of the FESOP issuance.

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 Exemptions), opacity shall meet the following, unless otherwise stated in the permit:

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

State Rule Applicability – Individual Facilities

326 IAC 2-8-4 (Volatile Organic Compounds (VOC))

The source has uncontrolled PTE of VOC over 100 tons per year. Pursuant to 326 IAC 2-8-4, the source has agreed to limit the the LW Silk Screen, TG Silk Screen, TG PVC Encapsulations,

Diatomaceous Earth operations, Tempering Line #3, and Priming Cells #1-3 PTE of total combined VOC to 98.7 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month to satisfy the requirements of 326 IAC 2-8 (FESOP). This is based on the VOC input of the black frit paint, solvent cleaner, silver coating, adhesives clear and black primers, and VOC solvents input to the units excluding the waste VOC materials.

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

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

The source has uncontrolled PTE of a single HAP and combined HAPs of less than 10 and 25 tons per year, respectively. However, pursuant to FESOP No. 113-19112-00024, issued October 15, 2004, the source agreed to limit the source-wide PTE of any single HAP and combined HAPs to less than 10 and 25 tons per year, respectively to satisfy the requirements of 326 IAC 2-8 (FESOP). Therefore, the source shall not have the potential to emit at 10 and 25 tons per year for a single HAP and combined HAPs, respectively, and the requirements of 326 IAC 2-4.1-1 shall not apply. The source shall limit HAP emissions by:

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

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

Laminated Windshield (LW) Silkscreen Operation

- (a) Two (2) Laminated Windshield (LW) Black Silkscreen Operation
 - (1) 326 IAC 8-1-6 (New facilities; general reduction requirements) does not apply because each facility in the LW Black Silkscreen operation has PTE for VOC less than 25 tons per year.
 - (2) 326 IAC 8-2 (Surface Coating Emission Limitations) does not apply because the facility does not surface coat any of the listed substances.
- (b) One (1) Laminated Windshield (LW) Silver Silkscreen Operation
 - (1) 326 IAC 8-1-6 (New facilities; general reduction requirements) does not apply because the facility's PTE for VOC is less than 25 tons per year.

- (2) 326 IAC 8-2 (Surface Coating Emission Limitations) does not apply because the facility does not surface coat any of the listed substances.
- (c) Two (2) Diatomaceous Earth Applicators
 - (1) In Significant Permit Revision (SPR) 113-12574-00024, issued on February 7, 2001, 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) was erroneously applied to the Diatomaceous Earth Applicators. The total uncontrolled PTE for VOC was 48.14 tons per year (the applicability standard for BACT is PTE greater than 25 tons per year and constructed after January 1, 1980). The source has demonstrated, through historical data, annual VOC emissions of less than 25 tons. Therefore, the requirements for 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) have been removed.
 - (2) 326 IAC 8-2 (Surface Coating Emission Limitations) does not apply because the facility does not surface coat any of the listed substances.
- (d) Dowanol Roller Application
 - (1) 326 IAC 8-1-6 (New facilities; general reduction requirements) does not apply because each facility in the Dowanol Roller Application has PTE for VOC less than 25 tons per year.
 - (2) 326 IAC 8-2 (Surface Coating Emission Limitations) does not apply because the facility does not surface coat any of the listed substances.

Tempered Glass (TG) Silkscreen Operation

- (a) Two (2) Tempered Glass (TG) Black Silkscreen Operation:
 - (1) 326 IAC 8-1-6 (New facilities; general reduction requirements) does not apply because each facility in the TG Black Silkscreen Operation has PTE for VOC less than 25 tons per year.
 - (2) 326 IAC 8-2 (Surface Coating Emission Limitations) does not apply because the facility does not surface coat any of the listed substances.
- (b) Two (2) Tempered Glass (TG) Silver Silkscreen Operation:
 - (1) 326 IAC 8-1-6 (New facilities; general reduction requirements) does not apply because the facility in the TG Silver Silkscreen Operation has PTE for VOC less than 25 tons per year.
 - (2) 326 IAC 8-2 (Surface Coating Emission Limitations) does not apply because the facility does not surface coat any of the listed substances.

TG PVC Encapsulations Operations

- (a) 326 IAC 8-1-6 (New facilities; general reduction requirements) does not apply because the facility's PTE for VOC is less than 25 tons per year.
- (b) 326 IAC 8-2 (Surface Coating Emission Limitations) does not apply because the facility does not surface coat any of the listed substances.

Tempering Line #3

- (a) 326 IAC 8-1-6 (New facilities; general reduction requirements) does not apply because the facility's PTE for VOC is less than 25 tons per year.
- (b) 326 IAC 8-2 (Surface Coating Emission Limitations) does not apply because the facility does not surface coat any of the listed substances.

Priming Cells #1

- (a) 326 IAC 8-1-6 (New facilities; general reduction requirements) does not apply because the facility's PTE for VOC is less than 25 tons per year.
- (b) 326 IAC 8-2 (Surface Coating Emission Limitations) does not apply because the facility does not surface coat any of the listed substances.

Priming Cells #2

- (a) 326 IAC 8-1-6 (New facilities; general reduction requirements) does not apply because the facility's PTE for VOC is less than 25 tons per year.
- (b) 326 IAC 8-2 (Surface Coating Emission Limitations) does not apply because the facility does not surface coat any of the listed substances.

Priming Cells #3

- (a) 326 IAC 8-1-6 (New facilities; general reduction requirements) does not apply because the facility's PTE for VOC is less than 25 tons per year.
- (b) 326 IAC 8-2 (Surface Coating Emission Limitations) does not apply because the facility does not surface coat any of the listed substances.

White Room

- (a) 326 IAC 8-1-6 (New facilities; general reduction requirements) does not apply because the facility's PTE for VOC is less than 25 tons per year.
- (b) 326 IAC 8-2 (Surface Coating Emission Limitations) does not apply because the facility does not surface coat any of the listed substances

Ultrasonic Cleaning Operation and Parts Washers

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

Pursuant to 326 IAC 8-3-2, the owner or operator of the ultrasonic cleaning operation and the three (3) part washers shall ensure that the following operating requirements are met:

- (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)

Pursuant to 326 IAC 8-3-5(a), the owner or operator of the ultrasonic cleaning operation and the three (3) part washers shall ensure that the following operating requirements are met:

- (a) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (1) the solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (2) the solvent is agitated; or
 - (3) the solvent is heated.
- (b) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (c) Provide a permanent, conspicuous label which lists the operating requirements outlined in 326 IAC 8-3-5 (b).
- (d) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (e) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (1) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (2) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (3) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

Compliance Determination and Monitoring Requirements

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

Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements 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 applicable testing requirements for this source.

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal 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 application for the purposes of this review was received on January 20, 2009.

Conclusion

The operation of this stationary automotive window panel with PVC trim manufacturing shall be subject to the conditions of the attached FESOP Renewal No. F113 27390 00024.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Bruce Farrar at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5401 or toll free at 1-800-451-6027 extension 4-5401.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Appendix A: Emissions Calculations

Company Name: Guardian Automotive Products
Address City IN Zip: 860 West U.S. 6, Ligonier, IN 46767
Permit Number: F113-27390-00024
Plt ID: 113-00024
Permit Reviewer: Bruce Farrar
Date: January 20, 2009

Uncontrolled Potential Emissions (tons/year)										
Emissions Generating Activity										
Pollutant	LW Silkscreen	TG Silkscreen	Ultra Sonic Cleaning	TG PVC Encapsulations	Diatomaceous Earth	White Room	Tempering Line #3	Priming Cells #1-3 ⁽¹⁾	Insignificant Activities ⁽²⁾	TOTAL
PM	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.40	1.40
PM10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.40	1.40
PM2.5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.40	1.40
SO2	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.66	0.66
NOx	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	18.77	18.77
VOC	47.01	8.28	1.43	1.79	24.53	17.84	7.44	41.63	0.68	150.63
CO	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	9.10	9.10
total HAPs	5.80	0.00	0.00	0.00	0.00	0.00	0.00	17.09	0.20	23.09
worst case single HAP	Toluene 9.26								Hexane 0.187	9.03

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

Controlled Potential Emissions (tons/year)										
Emissions Generating Activity										
Pollutant	LW Silkscreen	TG Silkscreen	Ultra Sonic Cleaning	TG PVC Encapsulations	Diatomaceous Earth	White Room	Tempering Line #3	Priming Cells #1-#3 ⁽¹⁾	Insignificant Activities ⁽²⁾	TOTAL
PM	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.40	1.40
PM10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.40	1.40
PM2.5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.40	1.40
SO2	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.66	0.66
NOx	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	18.77	18.77
VOC	<98.7								0.2	<100
CO	0.00	0.00	0.00	0.00	0.00		0.00	0.00	10.51	10.51
total HAPs	5.80	0.00	0.00	0.00	0.00	0.00	0.00	17.09	0.20	<25
worst case single HAP	Toluene 9.03								Hexane 0.187	<10

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

(1) Emissions are combined for three facilities (Priming Cells #1 - #3)

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

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

Company Name: Guardian Automotive Products
Address City IN Zip: 860 West U.S. 6, Ligonier, IN 46767
Permit Number: F113-27390-00024
Plt ID: 113-00024
Permit Reviewer: Bruce Farrar
Date: January 20, 2009

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
LW Black Silkscreen (2 lines)																
Black Frit Paint	8.34	79.70%	0.0%	79.7%	0.00%		0.00230	275.000	6.65	6.65	4.20	100.90	18.41	0.00	-	100%
KO-321	8.67	100.00%	0.0%	100.0%	0.00%		0.00230	275.000	8.67	8.67	5.48	131.61	24.02	0.00	-	100%
H-939-C	6.54		0.0%	97.9%			0.00018	275.000	6.40	6.40	0.32	7.60	1.39	0.00	-	100%
LW Silver Silkscreen (1 line)																
Silver Coating	25.05		0.0%	30.0%	0.00%	0.00%	0.00059	51.700	7.52	7.52	0.23	5.53	1.01	0.00	-	100%
H-939-C	6.54		0.0%	97.9%			0.00018	51.700	6.40	6.40	0.06	1.43	0.26	0.00	-	100%
LW Dowanol Application																
Dowanol (R) TPM	8.04		0.0%	99.0%	0.00%	0.00%	0.00020	275.000	8.03	8.03	0.44	10.49	1.92	0.00	-	100%
TG Black Silkscreen (2 lines)																
Black Frit Paint	8.34		0.0%	20.0%	0.00%		0.00120	260.400	1.67	1.67	0.52	12.52	2.29	0.00	-	100%
H-939-C	6.54		0.0%	97.9%			0.00018	275.000	6.40	6.40	0.32	7.60	1.39	0.00	-	100%
TG Silver Silkscreen (2 lines)																
Silver Coating	20.86	30.00%	0.0%	30.0%		15.00%	0.00045	260.400	6.26	6.26	0.73	17.60	3.21	0.00	-	100%
H-939-C	6.54		0.0%	97.9%			0.00018	275.000	6.40	6.40	0.32	7.60	1.39	0.00	-	100%
TG PVC Encapsulations (1 line)																
Adhesive A-1100-B	7.20			73.3%	0.0%	15.00%	0.00063	55.00	5.28	5.28	0.18	4.39	0.80	0.00	35.18	100%
Catalyst A1167-B	7.20		0.0%	97.9%		8.00%	0.00063	55.00	6.55	6.55	0.23	5.45	0.99	0.00	-	100%
Diatomaceous Earth (2 lines)																
Isopropyl Alcohol/Water	6.57	100.00%	0.0%	100.0%	0.0%	0.00%	0.00310	275.00	6.57	6.57	5.60	134.42	24.53	0.00	-	100%
White Room																
Isopropyl Alcohol/Water	6.57	100.00%	0.0%	100.0%	0.0%	0.00%	0.00310	200.00	6.57	6.57	4.07	97.76	17.84	0.00	-	100%
Tempering Line #3																
Black Frit Paint	8.34	0.00%	0.0%	20.0%	0.00%	0.00%	0.00173	480.00	1.67	1.67	1.381	33.15	6.05	0.00	-	100%
Silver Paint	20.86	0.00%	0.0%	30.0%	0.00%	57.20%	0.00034	480.00	6.26	6.26	1.02	24.51	4.47	0.00	-	100%
H939C Cleanup	6.54	0.00%	0.0%	97.9%	0.00%	0.00%	0.00018	275.00	6.40	6.40	0.32	7.61	1.39	0.00	-	100%
Priming Cell #1																
Betaseal 43520A	8.26	0.00%	0.0%	58.4%	0.00%	0.00%	0.00220	240.00	4.82	4.82	2.54	61.08	11.15	0.00	-	100%
Betaseal 43518 Clear Primer	6.94	100.00%	0.0%	100.0%	0.00%	0.00%	0.00071	240.00	6.94	6.94	1.18	28.38	5.18	0.00	-	100%
PC-3 Glass Primer	8.34	72.00%	0.0%	72.0%	0.00%		0.00220	240.00	6.00	6.00	3.17	76.03	13.88	0.00	-	100%
Priming Cell #2																
Betaseal 43520A	8.26	0.00%	0.0%	58.4%	0.00%	0.00%	0.00220	240.00	4.82	4.82	2.54	61.08	11.15	0.00	-	100%
Betaseal 43518 Clear Primer	6.94	100.00%	0.0%	100.0%	0.00%	0.00%	0.00071	240.00	6.94	6.94	1.18	28.38	5.18	0.00	-	100%
PC-3 Glass Primer	8.34	72.00%	0.0%	72.0%	0.00%		0.00220	240.00	6.00	6.00	3.17	76.03	13.88	0.00	-	100%
Priming Cell #3																
Betaseal 43520A	8.26	0.00%	0.0%	58.4%	0.00%	0.00%	0.00220	240.00	4.82	4.82	2.54	61.08	11.15	0.00	-	100%
Betaseal 43518 Clear Primer	6.94	100.00%	0.0%	100.0%	0.00%	0.00%	0.00071	240.00	6.94	6.94	1.18	28.38	5.18	0.00	-	100%
PC-3 Glass Primer	8.34	72.00%	0.0%	72.0%	0.00%		0.00220	240.00	6.00	6.00	3.17	76.03	13.88	0.00	-	100%

State Potential Emissions

Add worst case coating to all solvents

33.91

813.77

148.51

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)

Total = Worst Coating + Sum of all solvents used

* **Bolded** material represents worst case emissions

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

Company Name: Guardian Automotive Products
Address City IN Zip: 860 West U.S. 6, Ligonier, IN 46767
Permit Number: F113-27390-00024
Plt ID: 113-00024
Permit Reviewer: Bruce Farrar
Date: January 20, 2009

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Chromium	Weight % Butyl Methacrylate	Weight % Methanol	Weight % Hexamethylene 1,6- diisocyanate	Weight % Styrene	Methyl Ethyl Ketone	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Chromium Emissions (ton/yr)	Butyl Methacrylate Emissions (ton/yr)	Methanol Emissions (ton/yr)	Hexamethylene 1,6- diisocyanate (ton/yr)	Styrene (ton/yr)	Methyl Ethyl Ketone (ton/yr)	Worst Case Total HAPS
LW Black Silkscreen (2 lines)																				
Black Frit Paint	8.37	0.002300	275.00	0.00%	0.00%	25.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	5.80	0.00	0.00	0.00	0.00	0.00	5.80
Medium 784-63	8.34	0.002300	275.00	0.00%	1.00%	0.00%	1.00%	0.00%	0.00%	10.00%	0.00%	0.00	0.23	0.00	0.23	0.00	0.00	0.00	2.31	0.00
LW Dowanol Application																				
Dowanol (R) TPM	8.03	0.000200	275.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
TG PVC Encapsulations																				
Adhesive A-1100-B	7.2	0.000630	55.00	0.00%	25.00%	0.00%	1.00%	0.00%	0.00%	0.00%	55.00%	0.00	0.27	0.00	0.01	0.00	0.00	0.00	0.60	0.89
Catalyst A1167-B	7.2	0.000630	55.00	0.00%	40.00%	0.00%	0.00%	0.00%	0.00%	0.00%	35.00%	0.00	0.44	0.00	0.00	0.00	0.00	0.00	0.38	
Priming Cell #1																				
Betaseal 43520A	8.26	0.002200	240.00	1.00%	15.00%	0.00%	0.00%	0.00%	1.00%	0.00%	0.00%	0.19	2.87	0.00	0.00	0.00	0.19	0.00	0.00	
Betaseal 43518 Clear Primer	6.94	0.000710	240.00	0.00%	55.00%	0.00%	0.00%	55.00%	0.00%	0.00%	0.00%	0.00	2.85	0.00	0.00	2.85	0.00	0.00	0.00	5.70
Priming Cell #2																				
Betaseal 43520A	8.26	0.002200	240.00	1.00%	15.00%	0.00%	0.00%	0.00%	1.00%	0.00%	0.00%	0.19	2.87	0.00	0.00	0.00	0.19	0.00	0.00	
Betaseal 43518 Clear Primer	6.94	0.000710	240.00	0.00%	55.00%	0.00%	0.00%	55.00%	0.00%	0.00%	0.00%	0.00	2.85	0.00	0.00	2.85	0.00	0.00	0.00	5.70
Priming Cells #3																				
Betaseal 43520A	8.26	0.002200	240.00	1.00%	15.00%	0.00%	0.00%	0.00%	1.00%	0.00%	0.00%	0.19	2.87	0.00	0.00	0.00	0.19	0.00	0.00	
Betaseal 43518 Clear Primer	6.94	0.000710	240.00	0.00%	55.00%	0.00%	0.00%	55.00%	0.00%	0.00%	0.00%	0.00	2.85	0.00	0.00	2.85	0.00	0.00	0.00	5.70
Total State Potential Emissions												0.57	9.26	5.80	0.24	8.55	0.57	2.31	23.78	

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lb:
 * **Bolded** material represents worst case emissions

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Plant Heating Units and Humidification Boiler

Company Name: Guardian Automotive Products
Address City IN Zip: 860 West U.S. 6, Ligonier, IN 46767
Permit Number: F113-27390-00024
Plt ID: 113-00024
Permit Reviewer: Bruce Farrar
Date: January 20, 2009

POTENTIAL EMISSIONS

Heat Input Capacity* mmBTU/hr	Potential Throughput mmscf/yr	Potential throughput for Humidification Boiler (mmscf/yr)
23.7	207.5	1.8

Emission Factor in lb/mmcf	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
	7.6	7.6	0.6	100.0	5.5	84.0
Potential Emission in tons/yr	0.8	0.8	0.1	10.4	0.6	8.7

Methodology

All emission factors are based on normal firing.

mmBTU = 1,000,000 BTU

mmcf = 1,000,000 Cubic Feet of Gas

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

PM emission factors are condensable and filterable.

Potential Throughput (mmscf) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 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)

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

* Total source heat input capacity for external combustion devices = 4 plant heaters (2.25 MMBtu/hr each) + 4 make-up heaters (3.35 MMBtu/hr each) + 1 locker room heater (0.4 MMBtu/hr) + 7 space heaters (0.097, 0.097, .12, .071, .071, .12 and .097 MMBtu/hr each) + 1 humidification boiler (0.21 MMBtu/hr)

Compliance with 326 IAC 6-2-4 (Particulate Emissions for Sources of Indirect Heating)

One (1) Humidification Boiler (B1)

The following calculation demonstrates compliance with the allowable PM emission limit of 1.64 lb/MMBtu for B1 pursuant to 326 IAC 6-2-4:

Maximum heat input capacity (for B1)	0.21	MM Btu per hour	(for B1 only (0.21 MMBtu/hr))
--	------	--------------------	-------------------------------

B1 PM emissions .0076 pound per mm BTU which will comply with the allowable PM emission limit of 0.6 lb/mmBTU

Methodology

PM emissions (lb/mmBTU) = [(PM emission from humidification boiler, tpy) * 2000 lb/ton] / [8760 hours * maximum heat input capacity, mmBTU/hr]

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Plant Heating Units and Humidification Boiler
HAPs Emissions

Company Name: Guardian Automotive Products
Address City IN Zip: 860 West U.S. 6, Igonier, IN 46767
FESOP: 113-19112-00024
Reviewer: GS/EVP
Date: 10/2/2009

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	0.0002	0.0001	0.0078	0.1867	0.0004

HAPs - Metals

	Lead	Barium	Chromium	Vanadium	Nickel
Emission Factor in lb/MMcf	5.0E-04	4.4E-03	1.4E-03	2.3E-04	2.1E-03
Potential Emission in tons/yr	0.0001	0.0005	0.0001	0.0000	0.0002

Methodology is the same as Page 4.

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
Internal Combustion Engines - Diesel Fuel
One (1) Stanby Generator (<250 HP)**

Company Name: Guardian Automotive Products
Address City IN Zip: 860 West U.S. 6, Ligonier, IN 46767
Permit Number: F113-27390-00024
Plt ID: 113-00024
Permit Reviewer: Bruce Farrar
Date: January 20, 2009

Potential Emissions calculated based on 8760 hours per year.

Heat Input Capacity*
mmBTU/hr

0.36

Emission Factor in lb/MMBtu	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
	0.31	0.31	0.29	4.41	0.4	0.95
Potential Emission in tons/yr	0.49	0.49	0.46	6.95	0.57	1.50

Potential Emissions calculated based on 500 hours per year for standby generator

Heat Input Capacity
MM Btu/hr

0.36

Emission Factor in lb/MMBtu	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
	0.31	0.31	0.29	4.41	0.4	0.95
Potential Emission in tons/yr	0.03	0.03	0.03	0.40	0.03	0.09

Methodology

Emission Factors are from AP42 (Fifth edition, January 1995), Table 3.3-2

Potential Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 8760 hr/yr / (2,000 lb/ton)

Actual Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 500 hr/yr / (2,000 lb/ton)

* Heat input capacity for the diesel fired emergency generator is 142 HP.

**Appendix A: Emissions Calculations
Diesel-Fired Emergency Fire Pump (Engine)**

Company Name: Guardian Automotive Products
Address City IN Zip: 860 West U.S. 6, Ligonier, IN 46767
Permit Number: F113-27390-00024
Plt ID: 113-00024
Permit Reviewer: Bruce Farrar
Date: January 20, 2009

Heat Input Capacity* MMBtu/hr	Potential Throughput kgals/year	S = Weight % Sulfur 0.05
1.288	4.6 (potential throughput reflects 500 hours per year of fuel use for an emergency unit)	

Emission Factor in lb/MMBtu	Pollutant					CO
	PM	PM ₁₀	SO ₂	NO _x	VOC	
	0.3	0.3	0.29	4.4	0.36	1.0
Potential to Emit in tons/yr	0.100	0.1	0.093	1.420	0.116	0.306

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 500 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Table 3.3-1 (SCC 2-02-001-02, 2-02-003-01) 10/96

PM Emission Factor is equivalent to the PM-10 emission factor listed in AP-42.

Potential to Emit (tons/yr) = Heat input (MMBtu/hr) x Emission Factor (lb/MMBtu) * 500 hr/yr /2,000 lb/ton

* Fuel consumption capacity of the fire pump is 9.2 gal/hr

Emission Factor in lb/mmBtu	HAPs				
	Benzene	Toluene	Xylene	Propylene	Formaldehyde
	9.3E-04	4.1E-04	2.9E-04	2.6E-03	1.2E-03
Potential to Emit in tons/yr	3.004E-04	1.317E-04	9.177E-05	8.308E-04	3.800E-04

Emission Factor in lb/mmBtu	HAPs (continued)				
	Acetaldehyde	Acrolein	1,3 Butadiene	Total PAH	Total HAPs
	7.7E-04	9.3E-05	3.9E-05	1.7E-04	
Potential to Emit in tons/yr	2.470E-04	2.979E-05	1.259E-05	5.410E-05	2.078E-03

Methodology

Emission Factors are from AP 42, Table 3.3-2, 10/96.

Potential to Emit (tons/year) = Throughput (mmBtu/hr)*Emission Factor (lb/mmBtu)*500 hrs/yr / 2,000 lb/ton



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Randy Retherford
Guardian Automotive Products, Inc
860 W US Rte 6
Ligonier, IN 46767

DATE: October 2, 2009

FROM: Matt Stuckey, Branch Chief
Permits Branch
Office of Air Quality

SUBJECT: Final Decision
FESOP - Renewal
113-27390-00024

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
Jim Recob (Plant Manager)
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 11/30/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

October 2, 2009

TO: Ligonier Public Library

From: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Subject: **Important Information for Display Regarding a Final Determination**

Applicant Name: Guardian Automotive Products, Inc
Permit Number: 113-27390-00024

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

IDEM Staff	MIDENNEY 10/2/2009 Guardian Automotive Products, Inc. 113-27390-00024 (final)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING	
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Randy Retherford Guardian Automotive Products, Inc. 860 W US Rte 6 Ligonier IN 46767 (Source CAATS) via confirmed delivery										
2		Jim Recob Plant Mgr Guardian Automotive Products, Inc. 860 W US Rte 6 Ligonier IN 46767 (RO CAATS)										
3		Noble County Board of Commissioners 101 North Orange Street Albion IN 46701 (Local Official)										
4		Noble County Health Department 2090 N. State Rd 9, Suite C Albion IN 46701-9566 (Health Department)										
5		Mr. Steve Christman NISWMD 2320 W 800 S, P.O. Box 370 Ashley IN 46705 (Affected Party)										
6		Frederick & Iva Moore 6019 W 650 N Ligonier IN 46767 (Affected Party)										
7		Ligonier City Council and Mayors Office 103 West Third Street Ligonier IN 46767 (Local Official)										
8		Ligonier Public Library 300 S Main St Ligonier IN 46767-1812 (Library)										
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