



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: July 30, 2012

RE: Guardian Automotive / 113-31932-00024

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 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, 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-MOD.dot 12/3/07



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Mike Sorg, Environmental, Health and Safety
Guardian Automotive Products
860 West U.S. Route 6
Ligonier, IN 46767

July 30, 2012

Re: 113-31932-00024
First Minor Revision to
F113-27390-00024

Dear Mr. Sorg:

Guardian Automotive Products was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F113-27390-00024 on October 2, 2009 for a stationary automotive window panel with PVC trim manufacturing operation located at 860 West U.S. Route 6, Ligonier, IN 46767. On May 24, 2012, the Office of Air Quality (OAQ) received an application from the source requesting to add a laminated windshield line, a lamination powder application process, an adhesive operation, a laser coating deletion operation and six (6) parts washers. The attached Technical Support Document (TSD) provides additional explanation of the changes to the source/permit. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Minor Permit Revision (MPR) procedures of 326 IAC 2-8-11.1(e). Pursuant to the provisions of 326 IAC 2-8-11.1, a minor permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the minor permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Deborah Cole, of my staff, at 317-234-5377 or 1-800-451-6027, and ask for extension 4-5377.

Sincerely,



Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Technical Support Document
Revised Permit
Calculations

IC/dac

cc: File - Noble County
Noble County Health Department
U.S. EPA, Region V
Compliance and Enforcement Branch
Billing, Licensing and Training Section



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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: Original Signed by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: October 2, 2009 Expiration Date: October 2, 2019

First Administrative Amendment No.: 113-30504-00024, issued on June 30, 2011.

First Minor Permit Revision No.: 113-31932-00024	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: July 30, 2012 Expiration Date: October 2, 2019

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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.

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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
General Source Phone Number:	260-894-9337
SIC Code:	3231 (Glass Products, Made of Purchased Glass)
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) Laminated Windshield (LW) line identified as Cut 3, approved for construction in 2012, consisting of:
 - (a) one (1) glass cutting operation exhausting within the building with a maximum capacity of 80 parts of automotive LW panes per hour
 - (b) two (2) frit paint silkscreen operations using an automated application method, exhausting to vents C3-1, 2, 3, 4, with a maximum capacity of 80 parts of automotive LW panels per hour.
 - (4) One (1) Lamination Powder Application Process, identified as Cut 3 Lami Powder, approved for construction in 2012, using an automated application method, with an overall maximum capacity of 80 parts per hour of automotive LW panels, with a dust collector for particulate control that exhausts within the building.

- (5) One (1) Final Line Adhesive Application Process, identified as Final Line Adhesive, approved for construction in 2012, using either manual or automated application method, with an overall maximum capacity of 240 parts per hour of automotive LW panels and exhausts within the building.
- (6) One (1) Back Lite Adhesive Cell, identified as Back Lite Adhesive, constructed in 2012, using an automated application method, with an overall maximum capacity of 70 parts per hour of automotive tempered glass rear window panels and exhausting within the building.
- (7) One (1) IRR Deletion process identified as IRR Deletion, proposed for construction in 2012, consisting of laser deletion of the IRR coating off of portions of automotive LW panels, with an overall maximum capacity of 30 parts per hour exhausting to vent IRR-1.
- (8) Six (6) Parts Washers, identified as Parts Washers, approved for construction in 2012, consisting of:
 - (a) One (1) unit typical of parts washer, with a 30 gallon drum for solvent storage under the parts washer sink/cabinet, typically containing no more than 20 gallons of safety solvent.
 - (b) Five (5) units of the type that have no storage under the sink/cabinet, typically containing 8 to 10 gallons of safety solvent, primarily to be used for the soaking of vacuum heads for the zero clear edge frit silkscreen process.
- (9) 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;
- (10) 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) 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;
- (d) 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;

- (e) 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;
- (f) One (1) priming cell, identified as Priming Cell #2, constructed in 2005 and modification approved in 2011, exhausting through stack P-2, with the following maximum capacities:
 - (1) Adhesive Line with a maximum capacity of 46 automotive window panels per hour.
 - (2) PF-SL Line with a maximum capacity of 180 automotive window panels per hour.
 - (3) PF-BL Line with a maximum capacity of 35 automotive window panels per hour.
 - (4) One post PVC priming line with a maximum capacity of 35 automotive window panels per hour.
- (g) One (1) priming cell, identified as Priming Cell #3, constructed in 2005 with a maximum capacity of 244 parts per hour of automotive window panels and exhausting through stack P-2.
- (h) One (1) priming cell, identified as Priming Cell #4, approved for construction in 2011 with a maximum capacity of 180 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) natural gas-fired make-up heater with a heat input rate of 0.5 MMBtu/hr; and
 - (6) 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, 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 scrap particulates (interleave packaging from between the panes of raw glass) from one of the Laminated Windshield processes and one of the tempered glass lines and discharging inside the building.
- (h) Two (2) Amtech dust collectors, with a flow rate of 3000 cfm; one controlling scrap particulates (interleave packaging from between the panes of raw glass) from one of the Tempered Glass operations; and the other controlling scrap particulates from the Laminated Windshield processes and discharging inside the building.
- (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. 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) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

- (1) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

- (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.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

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

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.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 and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Compliance and Enforcement Branch)
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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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.

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 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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.16 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

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

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

Indiana Department of Environmental Management
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 does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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.18 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.19 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.20 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.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

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

Indiana Department of Environmental Management
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 does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within no later than (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.23 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.24 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) and greenhouse gases (GHGs), 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.
- (4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) 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 5-1-1 (Applicability) and 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 except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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) For performance testing required by this permit, 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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 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.12 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.13 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to 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 excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning 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 normal or usual manner of operation.
- (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 record the reasonable response steps taken.

C.14 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 submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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.15 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. Support information includes the following:
 - (AA) All calibration and maintenance records.

- (BB) All original strip chart recordings for continuous monitoring instrumentation.
 - (CC) Copies of all reports required by the FESOP>
- Records of required monitoring information include the following:
- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
 - (BB) The dates analyses were performed.
 - (CC) The company or entity that performed the analyses.
 - (DD) The analytical techniques or methods used.
 - (EE) The results of such analyses.
 - (FF) The operating conditions as existing at the time of sampling or measurement.

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, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.16 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. Proper notice submittal under Section B - Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that 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. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:

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) 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.17 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 applicable standards for recycling and emissions reduction.

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) Laminated Windshield (LW) line identified as Cut 3, approved for construction in 2012, consisting of:
 - (a) one (1) glass cutting operation exhausting within the building with a maximum capacity of 80 parts of automotive LW panes per hour.
 - (b) two (2) frit paint silkscreen operations using an automated application method, exhausting to vents C3-1, 2, 3, 4, with a maximum capacity of 80 parts of automotive LW panels per hour.
 - (4) One (1) Lamination Powder Application Process, identified as Cut 3 Lami Powder, approved for construction in 2012, using an automated application method, with an overall maximum capacity of 80 parts per hour of automotive LW panels, with a dust collector for particulate control that exhausts within the building.
 - (5) One (1) Final Line Adhesive Application Process, identified as Final Line Adhesive, approved for construction in 2012, using either manual or automated application method, with an overall maximum capacity of 240 parts per hour of automotive LW panels and exhausts within the building.
 - (6) One (1) Back Lite Adhesive Cell, identified as Back Lite Adhesive, constructed in 2012, using an automated application method, with an overall maximum capacity of 70 parts per hour of automotive tempered glass rear window panels and exhausting within the building.
 - (7) One (1) IRR Deletion process identified as IRR Deletion, proposed for construction in 2012, consisting of laser deletion of the IRR coating off of portions of automotive LW panels, with an overall maximum capacity of 30 parts per hour exhausting to vent IRR-1.
 - (8) Six (6) Parts Washers, identified as Parts Washers, approved for construction in 2012, consisting of:
 - (a) One (1) unit typical of parts washer, with a 30 gallon drum for solvent storage under the parts washer sink/cabinet, typically containing no more than 20 gallons of safety solvent.
 - (b) Five (5) units of the type that have no storage under the sink/cabinet,

typically containing 8 to 10 gallons of safety solvent, primarily to be used for the soaking of vacuum heads for the zero clear edge frit silkscreen process.

- (9) 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;
- (10) 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) 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;
- (d) 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;
- (e) 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;
- (f) One (1) priming cell, identified as Priming Cell #2, constructed in 2005 and modification approved in 2011, exhausting through stack P-2, with the following maximum capacities:
 - (1) Adhesive Line with a maximum capacity of 46 automotive window panels per hour.
 - (2) PF-SL Line with a maximum capacity of 180 automotive window panels per hour.
 - (3) PF-BL Line with a maximum capacity of 35 automotive window panels per hour.
 - (4) One post PVC priming line with a maximum capacity of 35 automotive window panels per hour.
- (g) One (1) priming cell, identified as Priming Cell #3, constructed in 2005 with a maximum capacity of 244 parts per hour of automotive window panels and exhausting through stack P-2.
- (h) One (1) priming cell, identified as Priming Cell #4, approved for construction in 2011 with a maximum capacity of 180 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, TG Black Silkscreen Operations, TG Silver Silkscreen Operations, Diatomaceous Earth Operations, Tempering Line #3, Priming Cells #1 - #4, Laminated Windshield (LW) Cut 3, Cut 3 Lami Powder, Final Line Adhesive, Back Lite Adhesive and Parts Washers shall be limited to less than 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) The input of any single HAP to the LW Black Silkscreen Operations, LW Silver Silkscreen Operations, TG Black Silkscreen Operations, TG Silver Silkscreen Operations, Diatomaceous Earth Operations, Tempering Line #3, Priming Cells #1 - #4, Laminated Windshield (LW) Cut 3, Cut 3 Lami Powder, Final Line Adhesive, Back Lite Adhesive and Parts Washers shall be limited to less than 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, TG Black Silkscreen Operations, TG Silver Silkscreen Operations, Diatomaceous Earth Operations, Tempering Line, #3 Priming Cells #1 - #4, Laminated Windshield (LW) Cut 3, Cut 3 Lami Powder, Final Line Adhesive, Back Lite Adhesive and Parts Washers shall be limited to less than 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 one (1) part washer 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 one (1) parts washer, 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 is required for the part washers and any control devices. Section B – Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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 the compliance status 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) Section C - General Record Keeping Requirements, of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.1.8 Reporting Requirements

A quarterly summary of the information to document the compliance status with each Conditions D.1.1 and D.1.2 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "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
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
FESOP Permit No.: F113-27390-00024

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, 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: _____

**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
FESOP Permit No.: F113-27390-00024
Facility: LW Black Silkscreen Operations, LW Silver Silkscreen Operations, TG Black Silkscreen Operations, TG Silver Silkscreen Operations, Diatomaceous Earth Operations, Tempering Line #3, Priming Cells #1 - #4, Laminated Windshield (LW) Cut 3, the Cut 3 Lami Powder, Final Line Adhesive, Back Lite Adhesive and the Parts Washers
Parameter: Volatile Organic Compounds (VOC)
Limit: Less than 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: _____

**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
FESOP Permit No.: F113-27390-00024
Facility: LW Black Silkscreen Operations, LW Silver Silkscreen Operations, TG Black Silkscreen Operations, TG Silver Silkscreen Operations, Diatomaceous Earth Operations, Tempering Line #3, Priming Cells #1 - #4, Laminated Windshield (LW) Cut 3, the Cut 3 Lami Powder, Final Line Adhesive, Back Lite Adhesive and Parts Washers
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: _____

**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
FESOP Permit No.: F113-27390-00024
Facility: LW Black Silkscreen Operations, LW Silver Silkscreen Operations, TG Black Silkscreen Operations, TG Silver Silkscreen Operations, Diatomaceous Earth Operations, Tempering Line #3, Priming Cells #1 - #4, Laminated Windshield (LW) Cut 3, the Cut 3 Lami Powder, Final Line Adhesive, Back Lite Adhesive and Parts Washers
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: _____

**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
FESOP Permit No.: F113-27390-00024

Months: _____ to _____ Year: _____

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B - Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C - General Reporting. Any deviation from the requirements of this permit, 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: _____

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

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

Source Description and Location

Source Name: Guardian Automotive Products, Inc.
Source Location: 860 West U.S. Route 6, Ligonier, IN 46767
County: Noble
SIC Code: 3231 (Glass Products, Made of Purchased Glass)
Operation Permit No.: F113-27390-00024
Operation Permit Issuance Date: October 2, 2009
Minor Permit Revision No.: 113-31932-00024
Permit Reviewer: Deborah Cole

On May 24, 2012, the Office of Air Quality (OAQ) received an application from Guardian Automotive Products, Inc. related to a modification to an existing stationary automotive window panel with PVC trim manufacturing operation.

Existing Approvals

The source was issued FESOP Renewal No. 113-27390-00024 on October 2, 2009. The source has since received Administrative Amendment No. 113-30504-00024, issued on June 30, 2011.

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.
¹ Unclassifiable 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 PM _{2.5} .	

- (a) Ozone Standards
 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) PM_{2.5}
 Noble County has been classified as attainment for PM_{2.5}. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM_{2.5} significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

- (c) Other Criteria Pollutants
 Noble County has been classified as attainment or unclassifiable in Indiana for other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Status of the Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed revision, after consideration of all enforceable limits established in the effective permits:

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)								Worst Single HAP
	PM	PM10 [*]	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	
LW Silk Screen	-	-	-	-	-	98.7 ⁽¹⁾	-	24.8 ⁽²⁾	9.81 ⁽²⁾
TG Silk Screen	-	-	-	-	-				
White Room	-	-	-	-	-				
Tempering Line #3	-	-	-	-	-				
Priming Cells #1-4	-	-	-	-	-				
Insignificant Activities	1.40	1.40	1.40	0.66	18.77	1.25	10.51	0.20	0.187
Total PTE of Entire Source	1.40	1.40	1.40	0.66	18.77	<100	10.51	<25	<10
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	NA	NA	NA	NA	NA	NA	NA

negl. = negligible

* 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, Diatomaceous Earth, Tempering Line #3, and Priming Cells #1-4 is 98.7 tons per year.

2. Even though the updated HAPs' 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, Diatomaceous Earth, Tempering Line #3, and Priming Cells #1-4 as 9.81 tons per year for a single HAP and 24.8 tons per year for combined HAPS.

These emissions are based upon the TSD to Administrative Amendment #113-30504-00024, issued on June 30, 2011.

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the Permittee has accepted limits on HAPs emissions to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Guardian Automotive Products, Inc. on May 24, 2012, relating to the construction of glass cutting and painting line consisting of two (2) silk screening/painting rooms and a lami powder applicator; the addition of up to six (6) parts washers and three (3) insignificant units identified as a backlite adhesive assembly cell, a final line adhesive station and an IRR deletion cell.

The following is a list of the new emission units and pollution control devices:

- (1) One (1) Laminated Windshield (LW) line, identified as LW Cut 3, approved for construction in 2012, consisting of:
 - (a) one (1) glass cutting operation exhausting within the building with a maximum capacity of 80 parts of automotive LW panes per hour
 - (b) two (2) frit paint silkscreen operations using an automated application method, exhausting to vents C3-1, 2, 3, 4, with a maximum capacity of 80 parts of automotive LW panels per hour.
- (2) One (1) Lamination Powder Application Process, identified as Cut 3 Lami Powder, approved for construction in 2012, using an automated application method, with an overall maximum capacity of 80 parts per hour of automotive LW panels, with a dust collector for particulate control that exhausts within the building.
- (3) One (1) Final Line Adhesive Application Process, identified as Final Line Adhesive, approved for construction in 2012, using either manual or automated application method, with an overall maximum capacity of 240 parts per hour of automotive LW panels and exhausts within the building.
- (4) One (1) Back Lite Adhesive Cell, identified as Back Lite Adhesive, constructed in 2012, using an automated application method, with an overall maximum capacity of 70 parts per hour of automotive tempered glass rear window panels and exhausting within the building.
- (5) One (1) IRR Deletion process, identified as IRR Deletion, approved for construction in 2012, consisting of laser deletion of the IRR coating off of portions of automotive LW panels, with an overall maximum capacity of 30 parts per hour exhausting to vent IRR-1.
- (6) Six (6) Parts Washers, identified as Parts Washers, approved for construction in 2012, consisting of:
 - (a) One (1) unit typical of parts washer, with a 30 gallon drum for solvent storage under the parts washer sink/cabinet, typically containing no more than 20 gallons of safety solvent.
 - (b) Five (5) units of the type that have no storage under the sink/cabinet, typically containing 8 to 10 gallons of safety solvent, primarily to be used for the soaking of vacuum heads for the zero clear edge frit silkscreen process.

Enforcement Issues

There are no pending enforcement actions related to this revision.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – FESOP Revision

The following table is used to determine the appropriate permit level under 326 IAC 2-8.11.1. This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	PTE of Proposed Revision (tons/year)									
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e	Total HAPs	Worst Single HAP
Laminated Windshield (LW) Cut 3	-	-	-	-	-	4.86	-	-	-	-
Cut 3 Lami Powder	9.01	9.01	9.01	-	-	9.03	-	-	-	-
Final Line Adhesive	-	-	-	-	-	0.07	-	-	-	-
Back Lite Adhesive	-	-	-	-	-	0.03	-	-	-	-
IRR Deletion	-	-	-	-	-	-	-	-	-	-
Parts Washers	-	-	-	-	-	4.66	-	-	-	-
Total PTE of Proposed Revision	9.01	9.01	9.01	-	-	13.99	-	-	-	-

This FESOP is being revised through a FESOP Minor Permit revision pursuant to 326 IAC 2-8-11.1(d) because the revision involves the construction of emission units which have VOC and PM and PM10 potential to emit greater than five (5) tons per year.

PTE of the Entire Source After Issuance of the FESOP Revision

The table below summarizes the potential to emit of the entire source with updated emissions shown as **bold** values and previous emissions shown as ~~strikethrough~~ values.

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)									
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	GHG	Total HAPs	Worst Single HAP
LW Silk Screen	-	-	-	-	-	<98.7 ⁽¹⁾	-	-	<24.8 ⁽²⁾	9.81 ⁽²⁾
TG Silk Screen	-	-	-	-	-		-	-		
White Room	-	-	-	-	-		-	-		
Tempering Line #3	-	-	-	-	-		-	-		
Priming Cells #1-4	-	-	-	-	-		-	-		
Laminated Windshield (LW) Cut 3	-	-	-	-	-		-	-		
Cut 3 Lami Powder	9.01	9.01	9.01	-	-		-	-		
Final Line Adhesive and Back Lite Adhesive	-	-	-	-	-	-	-	-	-	
Parts Washers	-	-	-	-	-	-	-	-	-	
IRR Deletion	-	-	-	-	-	-	-	-	-	
Insignificant Activities	1.40 0.79	1.40 1.38	1.40 1.38	0.66 0.61	18.77 18.76	1.25	10.51 10.53	12,858.13	0.20	0.19 (Hexane)
Total PTE of Entire Source	1.40 9.80	1.40 10.39	1.40 10.39	0.66 0.61	18.77 18.76	<100 99.95	10.51 10.53	12,858.13	<25 <25	<10 <10
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000 CO ₂ e	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000 CO ₂ e	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

negl. = negligible

* 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, Diatomaceous Earth, Tempering Line #3, and Priming Cells #1-4, **Laminated Windshield (LW) Cut 3, Cut 3 Lami Powder, Final Line Adhesive, Back Lite Adhesive and Parts Washers** is **less than 98.7 tons per year**.

2. ~~Even though the updated HAPS' PTE is less than 10 tons per year for a single HAP and 25 tons per year for combined HAPS; The total HAPS are still maintained for the LW Silk Screen, TG Silk Screen, Diatomaceous Earth, Tempering Line #3, and Priming Cells #1-4, Laminated Windshield (LW) Cut 3, the Cut 3 Lami Powder, Final Line Adhesive, Back Lite Adhesive and Parts Washers as are limited to less than 9.81 tons per year for a single HAP and less than 24.8 tons per year for combined HAPS.~~

The table below summarizes the potential to emit of the entire source after issuance of this revision, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this FESOP permit revision, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. (Note: The table below was generated from the above table, with bold text un-bolded and strikethrough text deleted.)

Process/ Emission Unit	Potential To Emit of the Entire After the Revision (tons/year)									
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	GHG	Total HAPs	Worst Single HAP
LW Silk Screen	-	-	-	-	-	<98.7 ⁽¹⁾	-	-	<24.8 ⁽²⁾	<9.81 ⁽²⁾
TG Silk Screen	-	-	-	-	-		-	-		
White Room	-	-	-	-	-		-	-		
Tempering Line #3	-	-	-	-	-		-	-		
Priming Cells #1-4	-	-	-	-	-		-	-		
Laminated Windshield (LW) Cut 3	-	-	-	-	-		-	-		
Cut 3 Lami Powder	9.01	9.01	9.01	-	-		-	-		
Final Line Adhesive and Back Lite Adhesive	-	-	-	-	-		-	-		
Parts Washers	-	-	-	-	-		-	-		
IRR Deletion	-	-	-	-	-	-	-	-	-	-
Insignificant Activities	0.79	1.38	1.38	0.61	18.76	1.25	10.53	12,858.13	0.20	0.19 (Hexane)
Total PTE of Entire Source	9.80	10.39	10.39	0.61	18.76	99.95	10.53	12,858.13	<25	<10
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000 CO ₂ e	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000 CO ₂ e	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

negl. = negligible
* 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, Diatomaceous Earth, Tempering Line #3, Priming Cells #1-4, Laminated Windshield (LW) Cut 3, Cut 3 Lami Powder, Final Line Adhesive, Back Lite Adhesive and Parts Washer is less than 98.7 tons per year.

2. The total HAPs for the LW Silk Screen, TG Silk Screen, Diatomaceous Earth, Tempering Line #3, Priming Cells #1-4, Laminated Windshield (LW) Cut 3, the Cut 3 Lami Powder, Final Line Adhesive, Back Lite Adhesive and Parts Washer are limited to less than 9.81 tons per year for a single HAP and less than 24.8 tons per year for combined HAPs.

- (a) FESOP Status
This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP).

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

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

National Emission Standards for Hazardous Air Pollutants (NESHAP)

There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included for this proposed revision.

Compliance Assurance Monitoring (CAM)

Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

The following state rules are applicable to the proposed revision:

- (a) 326 IAC 2-8-4 (FESOP)
This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP). See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (c) 326 IAC 2-3 (Emission Offset)
This modification to an existing Emission Offset minor stationary source will not change the Emission Offset minor status, because the potential to emit of all nonattainment regulated pollutants from the entire source will continue to be less than the Emission Offset major source threshold levels. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The unlimited potential to emit of HAPs from the new and modified units is greater than ten (10) tons per year for any single HAP and/or greater than twenty-five (25) tons per year of a combination of HAPs. However, the source shall limit the potential to emit of HAPs from the new and modified units to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, the proposed revision is not subject to the requirements of 326 IAC 2-4.1. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

- (e) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (f) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
 - (1) 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.
 - (2) 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.
- (g) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.

Laminated Windshield (LW) (Cut 3)

- (a) The proposed amendment is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from the Laminated Windshield (LW) Cut 3 is less than twenty-five (25) tons per year.
- (b) 326 IAC 8-2 (Surface Coating Emission Limitations) does not apply because Laminated Windshield (LW) Cut 3 does not surface coat any of the listed substances.

Cut 3 Lami Powder

- (a) The proposed amendment is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from the Cut 3 Lami Powder is less than twenty-five (25) tons per year.
- (b) The proposed amendment is not subject to the requirements of 326 IAC 8-2 (Surface Coating Emission Limitations) because it does not surface coat any of the listed substances.

Final Line Adhesive and Back Lite Adhesive

- (a) The proposed amendment is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from the Final Line Adhesive and the Back Lite Adhesive is less than twenty-five (25) tons per year.
- (a) The adhesive application is not a surface coating process. The requirements of 326 IAC 8-2-9 do not apply to this operation because the adhesive application operations are exempt from the rule because they are applying adhesive to glass rather than metal or plastic.

IRR Deletion

The IRR Deletion process is a laser cleaning process using no chemicals and having negligible emissions.

Parts Washers

The proposed amendment is subject to the requirements of 326 IAC 8-3-2 (Cold Cleaner Operation) and 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control). The work practice standards are already incorporated into the existing permit.

Compliance Determination, Monitoring and Testing Requirements

The existing compliance requirements will not change as a result of this revision. The source shall continue to comply with the applicable requirements and permit conditions as contained in (FESOP) (Renewal) No. F113-27390-00024 issued on October 2, 2009.

Proposed Changes

- (a) The following changes listed below are due to the proposed revision. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

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:

...

- (3) **One (1) Laminated Windshield (LW) line identified as Cut 3, approved for construction in 2012, consisting of:**
- (a) **one (1) glass cutting operation exhausting within the building with a maximum capacity of 80 parts of automotive LW panes per hour.**
 - (b) **two (2) frit paint silkscreen operations using an automated application method, exhausting to vents C3-1, 2, 3, 4, with a maximum capacity of 80 parts of automotive LW panels per hour.**
- (4) **One (1) Lamination Powder Application Process, identified as Cut 3 Lami Powder, approved for construction in 2012, using an automated application method, with an overall maximum capacity of 80 parts per hour of automotive LW panels, with a dust collector for particulate control that exhausts within the building.**
- (5) **One (1) Final Line Adhesive Application Process, identified as Final Line Adhesive, approved for construction in 2012, using either manual or automated application method with an overall maximum capacity of 240 parts per hour of automotive LW panels and exhausts within the building.**
- (6) **One (1) Back Lite Adhesive Cell identified as Back Lite Adhesive, constructed in 2012 using an automated application method with an overall maximum capacity of 70 parts per hour of automotive tempered glass rear window panels and exhausting within the building.**
- (7) **One (1) IRR Deletion process identified as IRR Deletion, proposed for construction in 2012, consisting of laser deletion of the IRR coating off of portions of automotive LW panels, with an overall maximum capacity of 30 parts per hour exhausting to vent IRR-1.**

- (8) **Six (6) Parts Washers, identified as Parts Washers, approved for construction in 2012, consisting of:**
- (a) **One (1) unit typical of parts washer, with a 30 gallon drum for solvent storage under the parts washer sink/cabinet, typically containing no more than 20 gallons of safety solvent.**
 - (b) **Five (5) units of the type that have no storage under the sink/cabinet, typically containing 8 to 10 gallons of safety solvent, primarily to be used for the soaking of vacuum heads for the zero clear edge frit silkscreen process.**

...

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

...

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

...

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) and **greenhouse gases (GHGs)**, from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
 - ...
 - (4) **The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO2 equivalent emissions (CO2e) per twelve (12) consecutive month period.**

...

C.15 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. **Support information includes the following:**
 - (AA) All calibration and maintenance records.
 - (BB) All original strip chart recordings for continuous monitoring instrumentation.
 - (CC) Copies of all reports required by the FESOP>**Records of required monitoring information include the following:**
 - (AA) The date, place, as defined in this permit, and time of sampling or measurements.
 - (BB) The dates analyses were performed.
 - (CC) The company or entity that performed the analyses.
 - (DD) The analytical techniques or methods used.
 - (EE) The results of such analyses.

(FF) The operating conditions as existing at the time of sampling or measurement.

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, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.16 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. **Proper notice submittal under Section B - Emergency Provisions satisfies the reporting requirements of this paragraph.** Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that 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. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

...

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) Laminated Windshield (LW) line identified as Cut 3, approved for construction in 2012, consisting of:**
 - (a) **one (1) glass cutting operation exhausting within the building with a maximum capacity of 80 parts of automotive LW panes per hour.**
 - (b) **two (2) frit paint silkscreen operations using an automated application method, exhausting to vents C3-1, 2, 3, 4, with a maximum capacity of 80 parts of automotive LW panels per hour.**
 - (4) **One (1) Lamination Powder Application Process, identified as Cut 3 Lami Powder, approved for construction in 2012, using an automated method, with an overall maximum capacity of 80 parts per hour of automotive LW panels, with a dust collector for particulate control that exhausts within the building.**
 - (5) **One (1) Final Line Adhesive Application Process, identified as Final Line Adhesive, approved for construction in 2012, using either manual or automated application method, with an overall maximum capacity of 240 parts per hour of automotive LW panels and exhausts within the building.**
 - (6) **One (1) Back Lite Adhesive Cell, identified as Back Lite Adhesive, constructed in 2012, using an automated application method, with an overall maximum capacity of 70 parts per hour of automotive tempered glass rear window panels and exhausting within the building.**
 - (7) **One (1) IRR Deletion process, identified as IRR Deletion, approved for construction in 2012, consisting of laser deletion of the IRR coating off of portions of automotive LW panels, with an overall maximum capacity of 30 parts per hour exhausting to vent IRR-1.**
 - (8) **Six (6) Parts Washers, identified as Parts Washers, approved for construction in 2012, consisting of:**
 - (a) **One (1) unit typical of parts washer, with a 30 gallon drum for solvent storage under the parts washer sink/cabinet, typically containing no more than 20 gallons of safety solvent.**
 - (b) **Five (5) units of the type that have no storage under the sink/cabinet, typically containing 8 to 10 gallons of safety solvent, primarily to be used**

for the soaking of vacuum heads for the zero clear edge frit silkscreen process.

- ~~(5)~~(9) 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;
- ~~(6)~~(10) 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

...

(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, TG Black Silkscreen Operations, TG Silver Silkscreen Operations, Diatomaceous Earth Operations, Tempering Line #3, Priming Cells #1 - #4, **Laminated Windshield (LW) Cut 3, Cut 3 Lami Powder, Final Line Adhesive, Back Lite Adhesive and Parts Washers** shall be limited to less than 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.

...

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

- (a) The input of any single HAP to the LW Black Silkscreen Operations, LW Silver Silkscreen Operations, TG Black Silkscreen Operations, TG Silver Silkscreen Operations, Diatomaceous Earth Operations, Tempering Line #3, Priming Cells #1 - #4, **Laminated Windshield (LW) Cut 3, the Cut 3 Lami Powder, Final Line Adhesive, Back Lite Adhesive and Parts Washers** shall be limited to **less than 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, TG Black Silkscreen Operations, TG Silver Silkscreen Operations, Diatomaceous Earth Operations, Tempering Line, #3 Priming Cells #1 - #4, **Laminated Windshield (LW) Cut 3, the Cut 3 Lami Powder, Final Line Adhesive, Back Lite Adhesive and Parts Washers** shall be limited to **less than 24.8 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month.**

...

**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
FESOP Permit No.: F113-27390-00024

Facility: LW Black Silkscreen Operations, LW Silver Silkscreen Operations, ultrasonic cleaning operation, TG Black Silkscreen Operations, TG Silver Silkscreen Operations, Diatomaceous Earth Operations, Tempering Line #3, Priming Cells #1 - #4, **Laminated Windshield (LW) Cut 3, the Cut 3 Lami Powder, Final Line Adhesive, Back Lite Adhesive and Parts Washers**

Parameter: Volatile Organic Compounds (VOC)

Limit: **Less than** 98.7 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

...

**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

FESOP Permit No.: F113-27390-00024

Facility: LW Black Silkscreen Operations, LW Silver Silkscreen Operations, TG Black Silkscreen Operations, TG Silver Silkscreen Operations, Diatomaceous Earth Operations, Tempering Line #3 and Priming Cells #1 - #4, **Laminated Windshield (LW) Cut 3, the Cut 3 Lami Powder, Final Line Adhesive, Back Lite Adhesive and Parts Washers**

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.

...

**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

FESOP Permit No.: F113-27390-00024

Facility: LW Black Silkscreen Operations, LW Silver Silkscreen Operations, TG Black Silkscreen Operations, TG Silver Silkscreen Operations, Diatomaceous Earth Operations, Tempering Line #3, Priming Cells #1 - #4, **Laminated Windshield (LW) Cut 3, the Cut 3 Lami Powder, Final Line Adhesive, Back Lite Adhesive, and Parts Washers**

Parameter: Combined HAPs

Limit: Less than 24.8 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

...

**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
FESOP Permit No.: F113-27390-00024

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. **Proper notice submittal under Section B - Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C - General Reporting.** Any deviation from the requirements of this permit, 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".

...

Pursuant to 326 IAC 2-7-1(39), starting July 1, 2011, greenhouse gases (GHGs) emissions are subject to regulation at a source with a potential to emit 100,000 tons per year or more of CO₂ equivalent emissions (CO₂e). Therefore, CO₂e emissions have been calculated for this source. Based on the calculations the unlimited potential to emit greenhouse gases from the entire source is less than 100,000 tons of CO₂e per year (see Appendix A for detailed calculations). This did not require any changes to the permit.

Conclusion and Recommendation

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 May 24, 2012.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Minor Revision No. 113-31932-00024. The staff recommends to the Commissioner that this FESOP Minor Revision be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Deborah Cole 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) 234-5377 or toll free at 1-800-451-6027 extension 4-5377.
- (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.in.gov/idem

**Appendix A: Emissions Calculations
Summary**

Company Name: Guardian Automotive Products
Address City IN Zip: 860 West U.S. 6, Ligonier, IN 46767
Permit Number: F113-27390-00024
MPR No.: 113-31932-00024
Permit Reviewer: Deborah Cole

Uncontrolled Potential Emissions (tons/year)														
Emissions Generating Activity														
Pollutant	LW Silkscreen	TG Silkscreen	Laminated Windshield (LW) Cut 3	Cut 3 Lami Powder Application	Ultra Sonic Cleaning	Diatomaceous Earth	White Room	Tempering Line #3	Priming Cells #1-4 ⁽¹⁾	Final Line Adhesive and Back Lite Adhesive	Parts Washers	IRR Deletion	Insignificant Activities ⁽²⁾	TOTAL
PM	0.00	0.00	0.00	9.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.000	0.79	9.80
PM10	0.00	0.00	0.00	9.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.000	1.38	10.39
PM2.5	0.00	0.00	0.00	9.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.000	1.38	10.39
SO2	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.000	0.61	0.61
NOx	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.000	18.76	18.76
VOC	19.42	5.50	4.86	9.03	1.43	49.06	17.84	6.05	39.04	0.10	4.66	0.000	1.25	158.26
CO	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.000	10.53	10.53
GHG	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.000	12,858.13	12,858.13
total HAPs	5.80	0.00	7.18	0.00	0.00	0.00	0.00	0.00	26.16	0.00	0.00	0.000	0.20	39.34
worst case single HAP	5.80		5.52						15.48				0.19	
	Chromium		Chromium						Toluene				Hexane	

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

Limited Potential Emissions (tons/year)														
Emissions Generating Activity														
Pollutant	LW Silkscreen	TG Silkscreen	Laminated Windshield (LW) Cut 3	Cut 3 Lami Powder Application	Ultra Sonic Cleaning	Diatomaceous Earth	White Room	Tempering Line #3	Priming Cells #1-4 ⁽¹⁾	Final Line Adhesive and Back Lite	Parts Washers	IRR Deletion	Insignificant Activities ⁽²⁾	TOTAL
PM	0.00	0.00	0.00	9.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.79	9.80
PM10	0.00	0.00	0.00	9.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.38	10.39
PM2.5	0.00	0.00	0.00	9.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.38	10.39
SO2	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.61	0.61
NOx	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	18.76	18.76
VOC	<98.7											0.00	1.25	99.50
CO	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	10.53	10.53
GHG	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	12,858.13	12,858.13
total HAPs	<24.8											0.00	0.20	<25
worst case single HAP	<9.81											0.00	0.19	<10
														Hexane

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

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

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

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

Company Name: Guardian Automotive Products
Address City IN Zip: 860 West U.S. 6, Ligonier, IN 46767
Permit Number: F113-27390-00024
MPR No.: 113-31932-00024
Permit Reviewer: Deborah Cole

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)	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	0.85	41.70%	0.0%	41.7%	0.00%		0.00230	275.000	0.85	0.85	0.54	12.92	2.36	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%
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%			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%
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%

State Potential Emissions Add worst case coating to all solvents **18.61 446.65 81.51 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
MPR No.: 113-31932-00024
Permit Reviewer: Deborah Cole

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	2.31	0.00	

Total State Potential Emissions

0.00 0.23 5.80 0.23 0.00 0.00 2.31 0.00 5.80

METHODOLOGY

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

**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
MPR No.: 113-31932-00024
Permit Reviewer: Deborah Cole

Cell/Line/Process	Material / MSDS Rev. Date	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
Cutting	KO 321 / 041012	7.1	41.70%	0.0%	41.7%	0.0%	0.00%	0.00031	80.000	2.98	2.98	0.07	1.76	0.32	0.00	#DIV/0!	100%
Surface 4 Room	Auto Black Lami Glass Enamel 2L52M400-IR784 / 122109	20.8	16.20%	0.4%	15.8%	0.2%	33.90%	0.00091	80.000	3.30	3.29	0.24	5.75	1.05	0.00	9.71	100%
Surface 2 Room	Auto Black Lami Glass Enamel 2L52M400-IR784 / 122109	20.8	16.20%	0.4%	15.8%	0.2%	33.90%	0.00303	80.000	3.30	3.29	0.80	19.15	3.49	0.00	9.71	100%

State Potential Emissions

Add worst case coating to all solvents

9.57 1.11 26.65 4.86 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

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
MPR No.: 113-31932-00024
Permit Reviewer: Deborah Cole

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Chromium	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Benzene	Weight % Hexane	Weight % Glycol Ethers	Weight % Methanol	Chromium Emissions (ton/yr)	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Methanol Emissions (ton/yr)
Auto Black Lami Glass Enamel 2L52M400-IR784/122109	20.8	0.000910	80.00	25.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.66	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Auto Black Lami Glass Enamel 2L52M400-IR784/122109	20.8	0.003030	80.00	25.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	5.52	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total State Potential Emissions												7.18	0.00	0.00	0.00	0.00	0.00	0.00	0.00

METHODOLOGY

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

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

Company Name: Guardian Automotive Products
Address City IN Zip: 860 West U.S. 6, Ligonier, IN 46767
Permit Number: F113-27390-00024
MPR No.: 113-31932-00024
Permit Reviewer: Deborah Cole

Emission Unit	Material	Lbs/Gal	VOC %	VOC (lb/Gal)	Material/Part (gram)	Max Part/Hour	Total material (gram/hour)	Total material (lbs/hr)	VOC Potential (lbs/hr)	VOC Potential (tons/yr)	Particulate Potential (ton/yr)	Transfer Efficiency
Priming Cell #1												
Final Finish	Betaseal 43518 Primer	6.97	99.54%	6.940	3.46	240	830.40	1.829	1.82	7.975	0.00	100%
	Betaseal 43520A Glass Primer	8.32	57.96%	4.820	4.78	240	1,147.20	2.527	1.46E+00	6.415	0.00	100%
	Priming Cell #1 Total:										14.389	0.00
Priming Cell #2												
272 Assembly	PC-3 Glass Primer / 100605	8.400	72.00%	6.048	5.71	35	199.85	0.440	0.32	1.388	0.00	100%
	Isopropyl Alcohol Pre-Primer / 011508	6.602	100.00%	6.602	2.30	35	80.50	0.177	0.18	0.777	0.00	100%
	58702SFHN / 011811	9.912	1.00%	0.099	4.54	35	158.90	0.350	0.00	0.015	0.00	100%
	Priming Cell #2 Total:										6.377	0.00
Adhesive	MR-4 Part A	8.06	80.40%	6.483	2.71	46	124.84	0.275	0.22	0.968	0.00	100%
	MR-4 Part B	9.49	34.50%	3.275	0.14	46	6.26	0.014	4.75E-03	0.021	0.00	100%
	A1100B	7.20	73.33%	5.280	0.97	46	44.62	0.098	0.07	0.316	0.00	100%
PF-SL	Betaseal 43518 Primer	6.97	99.54%	6.940	1.36	180	244.80	0.539	0.54	2.351	0.00	100%
	Betamate 73005	10.75	0.28%	0.030	6.00	180	1,080.00	2.379	6.64E-03	0.029	0.00	100%
	Betamate 73100	11.01	0.36%	0.040	6.00	180	1,080.00	2.379	8.64E-03	0.038	0.00	100%
PF-BL	MR-4 Part A	8.06	50.00%	4.032	2.71	35	94.99	0.209	0.10	0.458	0.00	100%
	MR-4 Part B	9.49	34.50%	3.275	0.14	35	4.76	0.010	3.62E-03	0.016	0.00	100%
	Priming Cell #2 Total:										6.377	0.00
Priming Cell #3												
	Betaseal 43518 Primer	6.97	99.54%	6.940	2.95	244	719.80	1.585	1.58E+00	6.912	0.00	100%
	Betaseal 43520A Glass Primer	8.32	57.96%	4.820	3.92	244	956.48	2.107	1.22E+00	5.348	0.00	100%
	Priming Cell #3 Total:										12.261	0.00
Priming Cell #4												
VW	Betaseal 43518 Primer	6.97	99.54%	6.940	3.34	90	300.60	0.662	0.66	2.887	0.00	100%
	EFTEC 6001	7.80	63.00%	4.914	3.72	90	334.80	0.737	0.46	2.035	0.00	100%
BMW F-25	Betaseal 16100A Primer	7.39	93.61%	6.920	1.31	90	117.90	0.260	0.24	1.065	0.00	100%
	Betaseal 16070N Urethane Adhesive	10.58	0.85%	0.090	3.63	90	326.70	0.720	0.01	0.027	0.00	100%
Priming Cell #4 Total:										6.013	0.00	
Total for Priming Cells:										39.041	0.00	

METHODOLOGY

Pounds of VOC per Gallon Coating = (Density (lb/gal) * VOC %)
Potential VOC Pounds per Hour = VOC% per lbs of coating * pound of Material (gram* (1lb/454 gram) * Maximum (units/hr)
Potential VOC Pounds per Day = VOC% per lbs of coating * pound of Material (gram* (1lb/454 gram) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = VOC% per lbs of coating * pound of Material (gram* (1lb/454 gram) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gram/unit) * (1lb/454gram) * (1- VOC%) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

**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
MPR No.: 113-31932-00024
Permit Reviewer: Deborah Cole

Emission Unit	Material	Lbs/Gal	VOC %	VOC (lb/Gal)	Material/Part (gram)	Max Part/Hour	Total material (gram/hour)	Total material (lbs/hr)	Weight % Xylene	Weight % Toluene	Weight % Methanol	Weight % Ethyl Benzene	Weight % Methy Methacrylate	Weight % MDI	Xylene Emissions	Toluene Emissions	Methanol Emissions	Ethyl Benzene Emissions	Methy Methacrylate Emissions	MDI Emissions
Priming Cell #1	Betaseal 43518 Primer	6.97	99.54%	6.940	3.46	240	830.40	1.829	0.00%	50.00%	50.00%	0.00%	0.00%	0.00%	0.00	4.01	4.01	0.00	0.00	0.00
	Betaseal 43520A Glass Primer	8.32	57.96%	4.820	4.78	240	1,147.20	2.527	1.00%	15.00%	0.00%	0.00%	0.00%		0.11	1.66	0.00	0.00	0.00	0.00
Priming Cell #2 272 Assembly	PC-3 Glass Primer	8.400	72.00%	6.048	5.71	35	199.95	0.440	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
	Isopropyl Alcohol Pre-Primer	6.602	100.00%	6.602	2.30	35	80.50	0.177	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
	58702SFHN	9.912		0.000	4.54	35	158.90	0.350	0.00%	0.00%	0.00%	0.00%	0.00%	1.00%	0.00	0.00	0.00	0.00	0.00	0.015
Adhesive	MR-4 Part A	8.06	80.40%	6.483	2.71	46	124.84	0.275	0.00%	50.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.60	0.00	0.00	0.00	0.00
	MR-4 Part B	9.49	34.50%	3.275	0.14	46	6.26	0.014	0.00%	90.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.05	0.00	0.00	0.00	0.00
	A1100B	7.20	73.33%	5.280	0.97	46	44.62	0.098	0.00%	22.00%	0.00%	0.00%	35.00%	0.00%	0.00	0.09	0.00	0.00	0.00	0.15
PF-SL	Betaseal 43518 Primer	6.97	99.54%	6.940	1.36	180	244.80	0.539	0.00%	50.00%	50.00%	0.00%	0.00%	0.00%	0.00	1.18	1.18	0.00	0.00	0.00
	Betamate 73005	10.75	0.28%	0.030	6.00	180	1,080.00	2.379	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
	Betamate 73100	11.01	0.36%	0.040	6.00	180	1,080.00	2.379	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
PF-BL	MR-4 Part A	8.06	50.00%	4.032	2.71	35	94.99	0.209	0.00%	50.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.46	0.00	0.00	0.00	0.00
	MR-4 Part B	9.49	34.50%	3.275	0.14	35	4.76	0.010	0.00%	90.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.04	0.00	0.00	0.00	0.00
Priming Cell #3	Betaseal 43518 Primer	6.97	99.54%	6.940	2.95	244	719.80	1.585	0.00%	50.00%	50.00%	0.00%	0.00%	0.00%	0.00	3.47	3.47	0.00	0.00	0.00
	Betaseal 43520A Glass Primer	8.32	57.96%	4.820	3.92	244	956.48	2.107	1.00%	15.00%	0.00%	0.00%	0.00%	0.00%	0.09	1.38	0.00	0.00	0.00	0.00
Priming Cell #4	Betaseal 43518 Primer	6.97	99.54%	6.940	3.34	90	300.60	0.662	0.00%	50.00%	50.00%	0.00%	0.00%	0.00%	0.00	1.45	1.45	0.00	0.00	0.00
	EFTEC 6001	7.80	63.00%	4.914	3.72	90	334.80	0.737	5.00%	0.00%	0.00%	1.00%	0.00%	0.00%	0.16	0.00	0.00	0.03	0.00	0.00
BMW F-25	Betaseal 16100A Primer	7.39	93.61%	6.920	1.31	90	117.90	0.260	0.00%	95.00%	0.00%	0.00%	0.00%	0.00%	0.00	1.08	0.00	0.00	0.00	0.00
	Betaseal 16070N Urethane Adhesive	10.58	0.85%	0.090	3.63	90	326.70	0.720	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Total Individual HAP:															0.364	15.484	10.109	0.032	0.151	0.015

METHODOLOGY

Pounds of VOC per Gallon Coating = (Density (lb/gal) * VOC %)
 total Material per hour = (gram material/part) * (1 lb/454 gram) * (part per hour)
 Potential HAP Pounds per Hour = HAP% per lbs of coating * total Material/ 1 hour)
 Potential HAP Tons per Year = HAP% per lbs of coating * total Material/ 1 hour) * (8760 hr/yr) * (1 ton/2000 lbs)

Total HAPs 26.156

**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
MPR No.: 113-31932-00024
Permit Reviewer: Deborah Cole

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr	Potential throughput for Humidification Boiler (mmscf/yr)
24.2	1000	207.8	1.8

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.20	0.79	0.79	0.06	10.39	0.57	8.73

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

PM2.5 emission factor is filterable and condensable PM2.5 combined.

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See page 2 for HAPs emissions calculations.

updated 7/11

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

HAPs Emissions

Company Name: Guardian Automotive Products
Address City IN Zip: 860 West U.S. 6, Ligonier, IN 46767
Permit Number: F113-27390-00024
MPR No.: 113-31932-00024
Permit Reviewer: Deborah Cole

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	0.0002	0.0001	0.0078	0.1871	0.0004

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	0.0001	0.0001	0.0001	0.0000	0.0002

Methodology is the same as page 1.

Total HAPS 0.20

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.
 See Page 3 for Greenhouse Gas calculations.

updated 7/11

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Greenhouse Gas Emissions

Company Name: Guardian Automotive Products
Address City IN Zip: 860 West U.S. 6, Ligonier, IN 46767
Permit Number: F113-27390-00024
MPR No.: 113-31932-00024
Permit Reviewer: Deborah Cole

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120,000	2.3	2.2
Potential Emission in tons/yr	12,470	0.2	0.2
Summed Potential Emissions in tons/yr	12,471		
CO2e Total in tons/yr	12,546		

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O

updated 7/11

**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
MPR No.: 113-31932-00024
Permit Reviewer: Deborah Cole

A. Emissions calculated based on heat input capacity (MMBtu/hr)

Heat Input Capacity (MMBtu/hr)	0.4
Maximum Hours Operated per Year	8760
Potential Throughput (MMBtu/yr)	3,154

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMBtu	0.31	0.31	0.31	0.29	4.41	0.36	0.95
Potential Emission in tons/yr	0.49	0.49	0.49	0.46	6.95	0.57	1.50

*PM and PM2.5 emission factors are assumed to be equivalent to PM10 emission factors. No information was given regarding which method was used to determine the factor or the fraction of PM10 which is condensable.

Hazardous Air Pollutants (HAPs)

	Pollutant							Total PAH HAPs***
	Benzene	Toluene	Xylene	1,3-Butadiene	Formaldehyde	Acetaldehyde	Acrolein	
Emission Factor in lb/MMBtu	9.33E-04	4.09E-04	2.85E-04	3.91E-05	1.18E-03	7.67E-04	9.25E-05	1.68E-04
Potential Emission in tons/yr	0.0015	0.0006	0.0004	0.0001	0.0019	0.0012	0.0001	0.0003

Potential Emission of Total HAPs (tons/yr)	0.01
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Green House Gas Emissions (GHG)

	Pollutant		
	CO2	CH4	N2O
Emission Factor in lb/MMBtu	1.64E+02	6.61E-03	1.32E-03
Potential Emission in tons/yr	2.59E+02	1.04E-02	2.09E-03

Summed Potential Emissions in tons/yr	258.61
CO2e Total in tons/yr	259.46

Methodology

Emission Factors are from AP42 (Supplement B 10/96), Tables 3.3-1 and 3.3-2
 CH4 and N2O Emission Factor from 40 CFR 98 Subpart C Table C-2.
 Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

Option A Methodology

Potential Throughput (MMBtu/yr) = [Heat Input Capacity (MMBtu/hr)] * [Maximum Hours Operated per Year]
 Potential Emission (tons/yr) = [Potential Throughput (MMBtu/yr)] * [Emission Factor (lb/MMBtu)] / [2,000 lb/ton]
 CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

**Appendix A: Emission 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
MPR No.: 113-31932-00024
Permit Reviewer: Deborah Cole

A. Emissions calculated based on heat input capacity (MMBtu/hr)

Heat Input Capacity (MMBtu/hr)	1.28
Maximum Hours Operated per Year	500
Potential Throughput (MMBtu/yr)	640

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMBtu	0.31	0.31	0.31	0.29	4.41	0.36	0.95
Potential Emission in tons/yr	0.10	0.10	0.10	0.09	1.41	0.12	0.30

*PM and PM2.5 emission factors are assumed to be equivalent to PM10 emission factors. No information was given regarding which method was used to determine the factor or the fraction of PM10 which is condensable.

Hazardous Air Pollutants (HAPs)

	Pollutant							Total PAH HAPs***
	Benzene	Toluene	Xylene	1,3-Butadiene	Formaldehyde	Acetaldehyde	Acrolein	
Emission Factor in lb/MMBtu	9.33E-04	4.09E-04	2.85E-04	3.91E-05	1.18E-03	7.67E-04	9.25E-05	1.68E-04
Potential Emission in tons/yr	0.0003	0.0001	0.0001	0.0000	0.0004	0.0002	0.0000	0.0001

Potential Emission of Total HAPs (tons/yr)							0.001
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Green House Gas Emissions (GHG)

	Pollutant		
	CO2	CH4	N2O
Emission Factor in lb/MMBtu	1.64E+02	6.61E-03	1.32E-03
Potential Emission in tons/yr	5.25E+01	2.12E-03	4.23E-04

Summed Potential Emissions in tons/yr		52.48
CO2e Total in tons/yr		52.66

Methodology

Emission Factors are from AP42 (Supplement B 10/96), Tables 3.3-1 and 3.3-2
 CH4 and N2O Emission Factor from 40 CFR 98 Subpart C Table C-2.
 Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

Option A Methodology

Potential Throughput (MMBtu/yr) = [Heat Input Capacity (MMBtu/hr)] * [Maximum Hours Operated per Year]
 Potential Emission (tons/yr) = [Potential Throughput (MMBtu/yr)] * [Emission Factor (lb/MMBtu)] / [2,000 lb/ton]
 CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

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 Perm
 Permit

Cell / Line	VOC Materials Input / MSDS Rev. Date	Max Material / Piece (grams)	Max Material / Piece (gallons) *
Parts Washers (6)	H939C / 020609	0.300	
Times 6 Units			

* Not able to ascertain how much material per piece per hour or how many pieces per hour. Parts are cleaned ()
 Methodology: lbs of material used per year/2000 * 6 washers

This is absolute worst case scenario. Source states that the solvent rarely needs to be changed in these washers

Appendix A: Emissions Calculations
VOC Emissions
Parts Washers

Company Name: Guardian Automotive Products
City IN Zip: 860 West U.S. 6, Ligonier, IN 46767
Permit Number: F113-27390-00024
MPR No.: 113-31932-00024
Reviewer: Deborah Cole

Max Piece / Hour	Lbs/Gal	Lbs VOC/Gal	Total VOC %	Total HAP %	Total gr / Hour	Lb / Hour
	6.539	5.914			0.900	0.177

only on an as needed basis.

ERS.

Lbs / Year of Material	VOC / YEAR	Total HAP / Year	
	(tons)	(Lbs)	(tons)
1,554.199	0.777	0.000	0.000
	4.66		0.00

Cell / Line	VOC Materials Input / MSDS Rev. Date	Max Material / Piece (grams)	Max Material / Piece (gallons)
IRR Deletion	IRR-NA (laser deletion of metallic coating off of IRR glass,)	0.040	NA

This process is a laser cleaning process using no chemicals and with negligible emissions.

**Appendix A: Emissions Calculations
IRR Deletion**

Company Name: Guardian Automotive Products
Address City IN Zip: 860 West U.S. 6, Ligonier, IN 46767
Permit Number: F113-27390-00024
MPR No.: 113-31932-00024
Permit Reviewer: Deborah Cole

Max Piece / Hour	Lbs/Gal	Lbs VOC/Gal	Total VOC %	Total HAP %	Total gr / Hour	Lb / Hour
30	NA	NA	NA	NA	1.191	0.003

Lbs / Year of Material	VOC / YEAR	Total HAP / Year	
	(tons)	(Lbs)	(tons)
22.981	NA	NA	NA



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: Mike Sorg
Guardian Automotive Products, Inc
860 W. US Rte 6
Ligonier, IN 46767

DATE: July 30, 2012

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

SUBJECT: Final Decision
Minor Permit Revision
113-31932-00024

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

Mail Code 61-53

IDEM Staff	MIDENNEY 7/30/2012 Guardian Automotive Products, Inc. 113-31932-00024 (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		Mike Sorg Guardian Automotive Products, Inc. 860 W US Rte 6 Ligonier IN 46767 (Source CAATS) via confirm 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												
9												
10												
11												
12												
13												
14												
15												

Total number of pieces Listed by Sender 6	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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