

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

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T163-6502-00017	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

## SECTION A

## SOURCE SUMMARY

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

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

---

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

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

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

---

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

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

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

- (17) Two (2) air atomization spray coating booths, coating plastic parts, now located in storage, constructed before 1980, formerly identified as 20C-6B and 20C-7B, using a water back booth for Particulate Matter (PM) control;
- (18) One (1) Department 15 air atomization spray coating booth, coating plastic parts, constructed before 1980, identified as U15-1, using a fabric filter for Particulate Matter (PM) control, exhausting to one (1) stack (15-1B);
- (19) One (1) decorative chrome electroplating line, constructed in January 1991 and modified in March 1993, identified as U19-1, using wet scrubbers and fume suppressant for Particulate Matter (PM) and Hazardous Air Pollutant (HAP) control, exhausting to five (5) stacks (19-1S, 19-2S, 19-3S, 19-4S and 19-5);
- (20) One (1) Department 20 High Volume, Low Pressure (HVLP) paint spray booth, coating plastic parts, constructed in 1997, identified as 20-12B, using a water wash booth for Particulate Matter (PM) control, exhausting to one (1) stack (20-12B); and
- (21) Two (2) Department 25 air atomization spray coating booths, coating plastic parts, constructed before 1980, identified as 25S-1B and 25S-4B, each using fabric filters for Particulate Matter (PM) control, each exhausting to one (1) stack (25S-1B and 25S-4B).

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

---

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

- (1) Two (2) natural gas fired boilers, identified as Boiler #1 and Boiler #2, each with maximum heat input capacity of 7.0 million British thermal units per hour (mmBtu/hr).
- (2) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations.

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

---

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

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

## SECTION B

## GENERAL CONDITIONS

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

---

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.

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

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

---

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

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

---

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

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

---

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

**B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]**

---

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

**B.6 Severability [326 IAC 2-7-5(5)]**

---

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

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

---

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

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

---

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and  
City of Evansville EPA  
Room 250  
101 N.W. Martin Luther King, Jr. Blvd  
Evansville, Indiana 47708

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

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

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

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

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

and

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

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and City of Evansville EPA on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was based on continuous or intermittent data;
  - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
  - (5) Any insignificant activity that has been added without a permit revision;
  - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, and City of Evansville EPA may require to determine the compliance status of the source.

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

**B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]**

- 
- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units and associated emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

and

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

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

**B.13 Emergency Provisions [326 IAC 2-7-16]**

---

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, and City of Evansville EPA within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management,  
Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967

City of Evansville EPA Telephone Number: 812-426-5597  
City of Evansville EPA Facsimile Number: 812-426-7344

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

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

and

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

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
  - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
  - (e) IDEM, OAM, and City of Evansville EPA may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.

- (f) Failure to notify IDEM, OAM, and City of Evansville EPA by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

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

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

---

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
  - (1) The applicable requirements are included and specifically identified in this permit; or
  - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, and City of Evansville EPA shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.

- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, and City of Evansville EPA has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, and City of Evansville EPA has issued the modification. [326 IAC 2-7-12(b)(8)]

**B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]**

---

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

**B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

---

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

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

and

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

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

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
- (2) An emergency as defined in 326 IAC 2-7-1(12); or
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

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

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

**B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination**  
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

---

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, and City of Evansville EPA determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, and City of Evansville EPA to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, and City of Evansville EPA at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, and City of Evansville EPA may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.18 Permit Renewal [326 IAC 2-7-4]**

---

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and City of Evansville EPA and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and City of Evansville EPA on or before the date it is due. [326 IAC 2-5-3]

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

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, and City of Evansville EPA takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, and City of Evansville EPA any additional information identified as being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAM, and City of Evansville EPA fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

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

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

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

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

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

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1 and MCE 3.30.18 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

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

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

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

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

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
- (1) A brief description of the change within the source;
  - (2) The date on which the change will occur;
  - (3) Any change in emissions; and
  - (4) Any permit term or condition that is no longer applicable as a result of the change.

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

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

**B.23 Construction Permit Requirement [326 IAC 2]**

---

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

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

---

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, and City of Evansville EPA U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]
  - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, and City of Evansville EPA or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, and City of Evansville EPA nor an authorized representative, may disclose the information unless and until IDEM, OAM, and City of Evansville EPA makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
  - (2) The Permittee, IDEM, OAM, and City of Evansville EPA acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

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

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch and City of Evansville EPA within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM, and City of Evansville EPA shall reserve the right to issue a new permit.

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

- (a) The Permittee shall pay annual fees to IDEM, OAM, and City of Evansville EPA within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

**C.2 Opacity [326 IAC 5-1]**

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

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six minute averaging period, as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6 and MCE 3.30.18.214. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

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

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

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions) or MCE 3.30.18.212. 326 IAC 6-4-2(4) is not federally enforceable.

**C.6 Operation of Equipment [326 IAC 2-7-6(6)]**

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

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

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

All required notifications shall be submitted to:

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

and

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

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

### **Testing Requirements [326 IAC 2-7-6(1)]**

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

---

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

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

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

and

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

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

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

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

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

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

---

The Permittee:

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

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

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

---

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

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

and

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

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

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

**C.11 Monitoring Methods [326 IAC 3]**

---

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

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

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

---

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on July 14, 1997.
- (b) If the ERP is disapproved by IDEM, OAM, and City of Evansville EPA the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

- (e) Upon direct notification by IDEM, OAM, and City of Evansville EPA that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.  
[326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

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

- (a) Submit:
  - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
  - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
  - (3) A verification to IDEM, OAM, and City of Evansville EPA that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, and City of Evansville EPA that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

- (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
  - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

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

---

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, and City of Evansville EPA within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM and City of Evansville EPA within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM and City of Evansville EPA reserves the authority to use enforcement activities to resolve noncompliant stack tests.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

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

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

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

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

- (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
- (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

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

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

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

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

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

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

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

- (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
and  
  
City of Evansville EPA  
Room 250  
101 N.W. Martin Luther King Jr. Blvd  
Evansville, Indiana 47708
- (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, OAM, and City of Evansville EPA on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

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

### **Stratospheric Ozone Protection**

#### **C.20 Compliance with 40 CFR 82 and 326 IAC 22-1**

---

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

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

## SECTION D.1 FACILITY OPERATION CONDITIONS

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

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

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

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

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

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

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

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

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

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

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

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

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

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

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

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

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

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

## Compliance Determination Requirements

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

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

### D.1.6 Volatile Organic Compounds (VOC)

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

### D.1.7 VOC Emissions

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

### D.1.8 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2(c):

- (a) The water back booths shall be in operation at all times the one (1) Department 23 high gloss robotic spray coating line (U23-1), the one (1) Department 23 low gloss robotic spray coating line (U23-2), the one (1) spray booth (13-7B) in the one (1) Department 13 hand spray coating line (U13-1), the one (1) Department 13 air atomization hand spray coating booth (U13-2), the one (1) Department 22 robotic spray coating line (U22R-1), the one (1) Department 22 robotic spray coating line (U22R-2), the one (1) Department 20 paint line (U20-1), the one (1) Department 20 paint line (U20-2), the one (1) air atomization spray booth (20-8B) in the one (1) Department 20 paint line (U20-3), the one (1) Department 20 air atomization spray booth (U20-4), the one (1) Department 22 robotic spray coating line (U22R-3), the two (2) air atomization spray coating booths (formerly identified as 20C-6B and 20C-7B), and the one (1) Department 20 High Volume, Low Pressure paint spray booth (20-12B) are in operation.
- (b) The fabric filters shall be in operation at all times the one (1) Department 13 (formerly Department 14) air atomization hand spray coating booth (formerly 14-1B), the three (3) Department 13 automatic paint machines (13-7, 13-8, and 13-9), the two (2) air atomization spray booths (13-8B and 13-9B) in the one (1) Department 13 hand spray coating line (U13-1), the one (1) Department 13 air atomization hand spray coating booth (U13-3), the one (1) Department 13 air atomization hand spray coating booth (U13-4), the one (1) Department 13 air atomization hand spray coating booth (U13-5), the one (1) Department 13 air atomization hand spray coating booth (U13-6), the one (1) air atomization spray booth (20-7B) in the one (1) Department 20 paint line (U20-3), the one (1) Department 15 air atomization spray coating booth (U15-1), and the two (2) Department 25 air atomization spray coating booths (25S-1B and 25S-4B) are in operation.

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

### **D.1.9 Monitoring**

---

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

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

### **D.1.10 Record Keeping Requirements**

---

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1 and D.1.2.
  - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC usage for each month; and
  - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.11 Reporting Requirements

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

### SECTION D.2 FACILITY OPERATION CONDITIONS

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

(19) One (1) decorative chrome electroplating line, constructed in January 1991 and modified in March 1993, identified as U19-1, using wet scrubbers and fume suppressant for Particulate Matter (PM) and Hazardous Air Pollutant (HAP) control, exhausting to five (5) stacks (19-1S, 19-2S, 19-3S, 19-4S and 19-5);

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

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

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

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

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

- (a) During tank operation, the Permittee shall control chromium emissions discharged to the atmosphere from the electroplating line by not allowing the surface tension of the electroplating bath contained within each tank to exceed forty-five (45) dynes per centimeter (dynes/cm) ( $3.1 \times 10^{-3}$  pound-force per foot [lbf/ft]) at any time during operation of the tanks.

Pursuant to 40 CFR 63.343(c)(5)(i), the Permittee has accepted 45 dynes/cm as the maximum surface tension value that corresponds to compliance with the applicable emission limitation, 0.01 mg/dscm ( $4.4 \times 10^{-6}$  gr/dscf) in lieu of establishing the maximum surface tension during an initial performance test.

- (b) The following work practice standards for the tanks are also applicable:
- (1) At all times, including periods of startup, shutdown and malfunction, the Permittee shall operate and maintain the tanks, fume suppressant, and monitoring equipment in a manner consistent with good air pollution control practices, consistent with the Operation and Maintenance Plan (OMP) required by Condition D.2.4.
  - (2) Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the OMP required by Condition D.2.4.
  - (3) Determination of whether acceptable operation and maintenance procedures are being used will be based on the information available to IDEM, OAM, which may include, but is not limited to, monitoring results; review of the OMP, procedures and records; and inspection of the source.

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

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

---

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

**D.2.4 Operation and Maintenance Plan [40 CFR 63.342(f)(3)]**

---

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

**Compliance Determination Requirements**

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

---

The Permittee is not required to test this facility by this permit. However, IDEM, OAM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the emission limit of 0.01 milligrams per dry standard cubic meter shall be determined by a performance test conducted in accordance with the provisions of 40 CFR 63.344.

**D.2.6 Monitoring to Demonstrate Continuous Compliance [40 CFR 63.343 (c)(5) & (7)]**

---

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

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

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

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

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

**D.2.7 Record Keeping Requirements [40 CFR 63.346]**

---

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

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

D.2.8 Reporting Requirements [40 CFR 63.345 & 63.347]

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

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

### **SECTION D.3 FACILITY OPERATION CONDITIONS**

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

- (1) Two (2) natural gas fired boilers, identified as Boiler #1 and Boiler #2, each with maximum heat input capacity of 7.0 million British thermal units per hour (mmBtu/hr).

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

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

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

#### **Compliance Determination Requirements**

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

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

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

##### D.3.3 Monitoring

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

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

**PART 70 OPERATING PERMIT  
CERTIFICATION**

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

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

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

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

Signature:

Printed Name:

Title/Position:

Date:

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

**AND CITY OF EVANSVILLE EPA**

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

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

**This form consists of 2 pages**

**Page 1 of 2**

Check either No. 1 or No.2

**9** 1. This is an emergency as defined in 326 IAC 2-7-1(12)  
C The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and  
C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

**9** 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c)  
C The Permittee must submit notice in writing within ten (10) calendar days

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

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

**Page 2 of 2**

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

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

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

**AND CITY OF EVANSVILLE EPA**

**Part 70 Quarterly Report**

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

YEAR: \_\_\_\_\_

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

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

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

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

**Part 70 Quarterly Report**

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

YEAR: \_\_\_\_\_

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

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

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

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

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

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

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

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

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

**This form consists of 2 pages**

**Page 1 of 2**

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

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

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

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

## CHROMIUM ELECTROPLATING NESHAP ONGOING COMPLIANCE STATUS REPORT

ATTACH A SEPARATE PAGE IF NEEDED

Page 2 of 2

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

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

ADDITIONAL COMMENTS:

**ALL SOURCES: CHECK ONE**

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

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

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

**AND CITY OF EVANSVILLE EPA**

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

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

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

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

**9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD**

**9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.**

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

Form Completed By: \_\_\_\_\_  
 Title/Position: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management  
Office of Air Management  
and  
City of Evansville EPA**

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

Source Background and Description

**Source Name:** Guardian Automotive Trim, Inc.  
**Source Location:** 601 North Congress Avenue, Evansville, Indiana 47715  
**County:** Vanderburgh  
**SIC Code:** 3089  
**Operation Permit No.:** T163-6502-00017  
**Permit Reviewer:** Catherine Moore

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Guardian Automotive Trim, Inc. relating to the operation of an automotive decorative trim coating operation.

**Permitted Emission Units and Pollution Control Equipment**

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

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

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

- (18) One (1) Department 15 air atomization spray coating booth, coating plastic parts, constructed before 1980, identified as U15-1, using a fabric filter for Particulate Matter (PM) control, exhausting to one (1) stack (15-1B);
- (19) One (1) decorative chrome electroplating line, constructed in January 1991 and modified in March 1993, identified as U19-1, using wet scrubbers and fume suppressant for Particulate Matter (PM) and Hazardous Air Pollutant (HAP) control, exhausting to five (5) stacks (19-1S, 19-2S, 19-3S, 19-4S and 19-5);
- (20) One (1) Department 20 High Volume, Low Pressure (HVLP) paint spray booth, coating plastic parts, constructed in 1997, identified as 20-12B, using a water wash booth for Particulate Matter (PM) control, exhausting to one (1) stack (20-12B); and
- (21) Two (2) Department 25 air atomization spray coating booths, coating plastic parts, constructed before 1980, identified as 25S-1B and 25S-4B, each using fabric filters for Particulate Matter (PM) control, each exhausting to one (1) stack (25S-1B and 25S-4B).

### **Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR**

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

### **New Emission Units and Pollution Control Equipment Requiring ENSR**

There are no new facilities to be reviewed under the ENSR process.

### **Insignificant Activities**

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

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (2) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons and dispensing less than or equal to 230,000 gallons per month.
- (3) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.
- (4) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (5) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (6) Cleaners and solvents characterized as follows:
  - a) having a vapor pressure equal to or less than 2 kPa; 15 mmHg; or 0.3 psi measured at 38 degrees C (100°F) or;
  - b) having a vapor pressure equal to or less than 0.7 kPa; 5 mmHg; 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.
- (7) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

- (8) Infrared cure equipment.
- (9) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (10) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (11) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (12) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (13) Paved and unpaved roads and parking lots with public access.
- (14) Enclosed systems for conveying plastic raw materials and plastic finished goods.
- (15) Flue gas conditioning systems and associated chemicals such as the following: sodium sulfate, ammonia, and sulfur trioxide.
- (16) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment.
- (17) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.
- (18) Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower.
- (19) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations.
- (20) Purge double block and bleed valves.
- (21) Filter or coalescer media changeout.
- (22) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).
- (23) A laboratory as defined in 326 IAC 2-7-1(20)(C).
- (24) Thirty-six (36) Department 11 injection molding machines.
- (25) Nine (9) Department 11 general room heat exhausts.
- (26) One (1) Department 11 molding/maintenance reclamation exhaust.
- (27) Two (2) Department 14 electric normalizing ovens.
- (28) One (1) Department 15 electric normalizing oven.
- (29) Three (3) Department 19 lab fume exhaust hoods.

- (30) One (1) Department 19 passive vent sodium bisulfite chrome reduction tank.
- (31) Two (2) Department 20 therica wax coaters.
- (32) Four (4) Department 22 and 23 solventless mask washers.
- (33) Two (2) Department 22 and 23 therica wax coaters.
- (34) Two (2) Department 25 fume exhaust hoods.
- (35) One (1) Department 25 sample making lab - electric normalizing oven.
- (36) One (1) Department 25 physical testing lab - paint mixing.
- (37) One (1) Department 25 mixing room exhaust blower.
- (38) One (1) Department 28 process shop welding exhaust hood.
- (39) One (1) Department 28 process shop gun cleaning station.
- (40) Eight (8) silk screening stations.
- (41) One (1) acetone still bottom stripping booth.
- (42) One (1) process wastewater treatment plant.
- (43) Two (2) natural gas fired boilers, identified as Boiler #1 and Boiler #2, each with maximum heat input capacity of 7.0 million British thermal units per hour (mmBtu/hr).

### Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (1) Construction Permit CP 163-2106-00017, issued April 3, 1992.
- (2) Construction Permit CP 163-8311-00017, issued June 19, 1997, amended (A163-9900) on August 7, 1998).

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

- (1) Construction Permit CP 163-2106, issued on April 3, 1992.

Operation Condition 6: That the four solventless mask washers installed in 1988 and 1991 continue to be used. The bulk acetone usage for the plant shall be limited to 18 tons per month (216 tons per year). This limitation will result in a credit of 197 tons of VOC emissions.

AND

Operation Condition 8: That the amount of solvent, including thinners and cleanup solvents, delivered to the applicators shall be limited to 20.5 tons per month (246 tons per year). Therefore, this condition and Operation Condition Nos. 6 and 7 will make Emission Offset rules, 326 IAC 2-3, not applicable.

Reason not incorporated: Acetone is no longer considered a VOC, therefore the limit for bulk acetone has been lifted. This will increase the credit of VOC from 197 tons per year to 413 tons per year. Also, Vanderburgh County is now attainment for Ozone. Therefore, this modification to the source is no longer potentially subject to the requirements of 326 IAC 2-3 (Emission Offset). Therefore, the limit has been changed to limit the modification to the source under 326 IAC 2-2 (Prevention of Significant Deterioration). The conditions should be changed to be as follows. These new conditions have been incorporated into this Part 70 Operating Permit:

Operation Condition 6: That the four solventless mask washers installed in 1988 and 1991 continue to be used. To the extent possible, a non-VOC solvent shall be used for cleanup.

AND

Operation Condition 8: That the amount of non-acetone solvent, including thinners and cleanup solvents, delivered to the applicators shall be limited to 20.5 tons per month (246 tons per year). Therefore, this condition and Operation Conditions Nos. 6 and 7 will make Prevention of Significant Deterioration, 326 IAC 2-2, not applicable.

### Enforcement Issue

There are no enforcement actions pending.

### Recommendation

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

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

An administratively complete Part 70 permit application for the purposes of this review was received on September 3, 1996. Additional information was received on September 19, 1996, September 24, 1996, January 13, 1998 and August 18, 1998.

A notice of completeness letter was mailed to the source on October 29, 1996.

### Emission Calculations

See Appendix A of this document for detailed emissions calculations (twenty (20) pages).

### Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Potential Emissions (tons/year)
PM	greater than 100, less than 250
PM-10	greater than 100, less than 250
SO <sub>2</sub>	less than 100
VOC	greater than 250
CO	less than 100
NO <sub>x</sub>	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
Single Worst HAP	greater than 10
TOTAL HAP's	greater than 25

- (a) The potential emissions (as defined in 326 IAC 1-2-55) of PM10 and Volatile Organic Compound (VOC) are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential emissions (as defined in 326 IAC 1-2-55) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in 326 IAC 1-2-55) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions  
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

**Actual Emissions**

The following table shows the actual emissions from the source. This information reflects the 1996 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.760
PM-10	0.385
SO <sub>2</sub>	0.031
VOC	127.236
CO	1.040
NO <sub>x</sub>	5.840
HAP	not available

**Limited Potential to Emit**

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

Process/facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Dept 23 high gloss coating line (U23-1) and Dept 23 low gloss coating line (U23-2) [CP 163-2106]	-	-	-	246 (326 IAC 2-2)	-	-	-
Dept 20 HVLP paint spray booth (20-12B) [CP 163-8311]	-	-	-	24 (326 IAC 8-1-6)	-	-	-
Total Emissions	-	-	-	-	-	-	-

These limits were established in Construction Permit CP163-2106-00017, issued April 3, 1992 and Construction Permit CP163-8311-00017, issued June 19, 1997, amended (A163-9900) on August 7, 1998.

### County Attainment Status

The source is located in Vanderburgh County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Vanderburgh County has been designated as attainment or unclassifiable for ozone.

### Federal Rule Applicability

- (a) The two (2) 7.0 million British thermal units per hour (mmBtu/hr) natural gas fired boilers are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40, 40a, 40b, or 40c, Subparts D, Da, Db and Dc), because the heat input capacity is less than ten (10) million British thermal units per hour (mmBtu/hr).
- (b) There are no New Source Performance Standards (326 IAC 12) applicable to this source.
- (c) The one (1) electroplating operation is subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, (40 CFR 63.340, Subpart N). Pursuant to 40 CFR 63, Subpart N, and 326 IAC 20-1-1, the chromium electroplating operations are subject to the following conditions:
- (1) The surface tension of the chromium electroplating bath contained with the tank shall not exceed forty-five (45) dynes per centimeter at any time during the operation of the tank if a chemical fume suppressant containing a wetting agent is used to demonstrate compliance.
  - (2) Each time that surface tension monitoring exceeds forty-five (45) dynes per centimeter, the frequency of monitoring must revert back to every four (4) hours of tank operation. After forty (40) hours of monitoring tank operation every four (4) hours with no exceedances, surface tension measurement may be conducted once every eight (8) hours of tank operation. Once there have been no exceedances during forty (40) hours of tank operation, surface tension measurement may be conducted once every forty (40) hours of tank operation on an ongoing basis, until an exceedance occurs.
  - (3) An alternative emission limit of 0.01 milligram per day standard cubic meter (mg/dscm) will be applicable if the chromium electroplating bath does not meet the limit above.
  - (4) A summary report shall be prepared and submitted to IDEM semi-annually to document the ongoing compliance status of the chromium electroplating operation. If there are significant exceedance of chromium air emission limits (as defined in 40 CFR Part 63.347(h)(2)), then semiannual reports shall be submitted to:

Indiana Department of Environmental Management  
Air Compliance Branch, Office of Air Management  
Chromium Electroplating  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206

- (5) The chromium electroplating operations shall be subject to the record keeping and reporting requirement as indicated in the chromium electroplating NESHAP.

### **State Rule Applicability - Entire Source**

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

The source has submitted a Preventive Maintenance Plan (PMP) on September 3, 1996. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

#### 326 IAC 1-5-2 (Emergency Reduction Plans)

The source has submitted an Emergency Reduction Plan (ERP) on July 14, 1997. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

#### 326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of Volatile Organic Compound (VOC). Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

#### 326 IAC 2-2 (Prevention of Significant Deterioration)

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), this source is a major source because the potential Volatile Organic Compound (VOC) emissions are greater than two hundred fifty (250) tons per year.

#### 326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of thirty percent (30%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

### **State Rule Applicability - Individual Facilities**

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

- (a) The one (1) Department 23 high gloss robotic spray coating line (U23-1) and the one (1) Department 23 low gloss robotic spray coating line (U23-2) are subject to the requirements of 326 IAC 8-1-6 (General Reduction Requirements) because they were constructed in March 1994, which is after the January 1, 1980 applicability date and because their potential Volatile Organic Compound (VOC) emissions are greater than twenty-five (25) tons per year.

Pursuant to 326 IAC 8-1-6 (General Reduction Requirements) and Construction Permit CP 163-2106-00017, issued April 3, 1992, the Best Available Control Technology (BACT) shall consist of the following:

- (1) The use of high volume, low pressure (HVLP) applicators;
  - (2) The use of the solventless mask washers;
  - (3) The use of solventless boothcoat; and
  - (4) An annual report must be submitted to the Evansville Environmental Protection Agency on the feasibility of the use of water-based coatings or any other method of reducing VOC emissions.
  - (5) The one (1) Department 23 high gloss robotic spray coating line (U23-1) and the one (1) Department 23 low gloss robotic spray coating line (U23-2) shall have a limited potential to emit Volatile Organic Compound (VOC) of 95.0 tons per 12 month period.
- (b) The one (1) Department 13 (formerly Department 14) air atomization hand spray coating booth (formerly U14-1B), the three (3) Department 13 automatic paint machines (13-7, 13-8, and 13-9), the one (1) Department 13 hand spray coating line (U13-1), the one (1) Department 13 air atomization hand spray coating booth (U13-2), the one (1) Department 13 air atomization hand spray coating booth (U13-3), the one (1) Department 13 air atomization hand spray coating booth (U13-4), the one (1) Department 13 air atomization hand spray coating booth (U13-5), the one (1) Department 13 air atomization hand spray coating booth (U13-6), the one (1) Department 22 robotic spray coating line (U22R-1), the one (1) Department 22 robotic spray coating line (U22R-2), the one (1) Department 20 paint line (U20-1), the one (1) Department 20 paint line (U20-2), the one (1) Department 20 paint line (U20-3), the one (1) Department 20 paint line (U20-4), the one (1) Department 22 robotic spray coating line (U22R-3), the two (2) air atomization spray coating booths (formerly identified 20C-6B and 20C-7b), the one (1) Department 15 air atomization spray coating booth, and the two (2) Department 25 air atomization spray coating booths (25S-1B and 25S-4B) are not subject to the requirements of 326 IAC 8-1-6 (General Reduction Requirements) because they were constructed before the January 1, 1980 applicability date.
- (c) The one (1) Department 20 High Volume, Low Pressure (HVLP) paint spray booth (U20-12B) is subject to the requirements of 326 IAC 8-1-6 (General Reduction Requirements) because it was constructed in 1997, which is after the January 1, 1980 applicability date and because the potential Volatile Organic Compound (VOC) emissions are greater than twenty-five (25) tons per year. However, pursuant to 326 IAC 8-1-6 (General Reduction Requirements) and Construction Permit CP163-8311-00017, issued July 19, 1997 and amended (A163-9900) on August 7, 1998, the potential to emit Volatile Organic Compound (VOC) is limited to twenty-four (24) tons per 12 month period. Therefore, the one (1) Department 20 High Volume, Low Pressure (HVLP) paint spray booth is not subject to the requirements of 326 IAC 8-1-6 (General Reduction Requirements).

#### 326 IAC 8-6 (Organic Solvent Emission Limitations)

This source is not subject to the requirements of 326 IAC 8-6 (Organic Solvent Emission Limitations) because it did not commence operation between October 7, 1974 and January 1, 1980, which is the applicability dates for this rule.

#### 326 IAC 2-2 (Prevention of Significant Deterioration)

Pursuant to Construction Permit CP163-2106-00017 issued April 3, 1992 and 326 IAC 2-2 (Prevention of Significant Deterioration), the one (1) Department 23 high gloss robotic spray coating line and the one (1) Department 23 low gloss robotic spray coating line have the following requirements:

- (a) The use of the solventless mask washers;
- (b) The use of solventless boothcoat; and
- (c) The amount of non-acetone solvent, including thinners and cleanup solvents, delivered to the applicators shall be limited to 20.5 tons per month (246 tons per year).

This modification to the one (1) Department 23 high gloss robotic spray coating line and the one (1) Department 23 low gloss robotic spray coating line will result in a net increase of Volatile Organic Compound (VOC) emissions of less than forty (40) tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) will not apply to these facilities.

#### 326 IAC 2-1-3.4 (New Source Toxics Control)

None of the facilities listed in this permit are subject to the requirements of 326 IAC 2-1-3.4 (New Source Toxics Control) because they were all constructed prior to the July 27, 1997 applicability date. Any change or modification to these facilities as described in 326 IAC 2-1 (Construction and Operating Permit Requirements) may trigger applicability to 326 IAC 2-1-3.4 (New Source Toxics Control) and must be approved by the Office of Air Management (OAM) before such change may occur.

#### 326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 (Process Operations) the particulate matter (PM) from the one (1) Department 23 high gloss robotic spray coating line (U23-1), the one (1) Department 23 low gloss robotic spray coating line (U23-2), the one (1) Department 13 (formerly Department 14) air atomization hand spray coating booth (formerly U14-1B), the three (3) Department 13 automatic paint machines (13-7, 13-8, and 13-9), the one (1) Department 13 hand spray coating line (U13-1), one (1) Department 13 air atomization hand spray coating line (U13-2), the one (1) Department 13 air atomization hand spray coating booth (U13-3), the one (1) Department 13 air atomization hand spray coating booth (U13-4), the one (1) Department 13 air atomization hand spray coating booth (U13-5), the one (1) Department 13 air atomization hand spray coating booth (U13-6), the one (1) Department 22 robotic spray coating line (U22R-1), the one (1) Department 22 robotic spray coating line (U22R-2), the one (1) Department 20 paint line (U20-1), the one (1) Department 20 paint line (U20-2), the one (1) Department 20 paint line (U20-3), the one (1) Department 20 air atomization spray booth (U20-4), the one (1) Department 22 robotic spray coating line (U22R-3), the two (2) air atomization spray coating booths (formerly 20C-6B and 20C-7B), the one (1) Department 15 air atomization spray coating booth (U15-1), the one (1) decorative chrome electroplating line (U19-1), the one (1) Department 20 High Volume, Low Pressure paint spray booth (U20-12B) and the two (2) Department 25 air atomization spray coating booths (25S-1B and 25S-4B) shall be limited by the following:

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

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

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

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

- (a) The water back booths shall be in operation at all times the one (1) Department 23 high gloss robotic spray coating line (U23-1), the one (1) Department 23 low gloss robotic spray coating line (U23-2), the one (1) spray booth (13-7B) in the one (1) Department 13 hand spray coating line (U13-1), the one (1) Department 13 air atomization hand spray coating booth (U13-2), the one (1) Department 22 robotic spray coating line (U22R-1), the one (1) Department 22 robotic spray coating line (U22R-2), the one (1) Department 20 paint line (U20-1), the one (1) Department 20 paint line (U20-2), the one (1) air atomization spray booth (20-8B) in the one (1) Department 20 paint line (U20-3), the one (1) Department 20 air atomization spray booth (U20-4), the one (1) Department 22 robotic spray coating line (U22R-3), the two (2) air atomization spray coating booths (formerly identified as 20C-6B and 20C-7B), and the one (1) Department 20 High Volume, Low Pressure paint spray booth (20-12B) are in operation, in order to comply with this limit.
- (b) The fabric filters shall be in operation at all times the one (1) Department 13 (formerly Department 14) air atomization hand spray coating booth (formerly 14-1B), the three (3) Department 13 automatic paint machines (13-7, 13-8, and 13-9), the two (2) air atomization spray booths (13-8B and 13-9B) in the one (1) Department 13 hand spray coating line (U13-1), the one (1) Department 13 air atomization hand spray coating booth (U13-3), the one (1) Department 13 air atomization hand spray coating booth (U13-4), the one (1) Department 13 air atomization hand spray coating booth (U13-5), the one (1) Department 13 air atomization hand spray coating booth (U13-6), the one (1) air atomization spray booth (20-7B) in the one (1) Department 20 paint line (U20-3), the one (1) Department 15 air atomization spray coating booth (U15-1), and the two (2) Department 25 air atomization spray coating booths (25S-1B and 25S-4B) are in operation, in order to comply with this limit.
- (c) The wet scrubber and the fume suppressant shall be in operation at all times the one (1) decorative chrome electroplating line (U19-1) is in operation, in order to comply with this limit.

326 IAC 6-2-3 (Particulate Emission Limitations for Facilities Specified in 326 IAC 6-2-1(c))

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

The calculated limitation is based on the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

Where:

- C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter for a period not to exceed a sixty (60) minute time period.
- Pt = Pounds of particulate matter emitted per million Btu heat input (lb/mmBtu).
- Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case the capacity specified in the operation permit shall be used.

- N = Number of stacks in fuel burning operation.
- a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 mmBtu/hr heat input. The value 0.8 shall be used for Q greater than 1,000 mmBtu/hr heat input.
- h = Stack height in feet. If a number of stacks of different heights exist, the average stack height to represent "N" stacks shall be calculated by weighing each stack height with its particulate matter emission rate as follows:

$$h = \frac{\sum_{i=1}^N H_i \times p_{a_i} \times Q}{\sum_{i=1}^N p_{a_i} \times Q}$$

Where:

pa = the actual controlled emission rate in lb/mmBtu using the emission factor from AP-42 or stack test data. Stacks constructed after January 1, 1971, shall be credited with GEP stack height only. GEP stack height shall be calculated as specified in 326 IAC 1-7.

(a) For the Boiler #1:

$$\begin{aligned} C &= 50 \\ Q &= 7.0 \\ N &= 1 \\ a &= 0.67 \\ h &= 25 \end{aligned}$$

Pt = 2.54 > 0.6 Therefore, Boiler #1 is limited to 0.6 lb/mmBtu.

The boiler is in compliance when using natural gas by the following equation:

$$12.0 \text{ lb PM/MMCF} \times \text{MMCF} / 1,000 \text{ mmBtu} = 0.012 \text{ lb/mmBtu} < 0.6 \text{ mmBtu}$$

(b) For the Boiler #2:

$$\begin{aligned} C &= 50 \\ Q &= 7.0 + 7.0 = 14.0 \\ N &= 2 \\ a &= 0.67 \\ h &= 25 \end{aligned}$$

Pt = 1.27 > 0.6 Therefore, Boiler #2 is limited to 0.6 lb/mmBtu.

The boiler is in compliance when using natural gas by the following equation:

$$12.0 \text{ lb PM/MMCF} \times \text{MMCF} / 1,000 \text{ mmBtu} = 0.012 \text{ lb/mmBtu} < 0.6 \text{ mmBtu}$$

## Compliance Requirements

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

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The one (1) Department 23 high gloss robotic spray coating line (U23-1), the one (1) Department 23 low gloss robotic spray coating line (U23-2), the one (1) spray booth (13-7B) in the one (1) Department 13 hand spray coating line (U13-1), the one (1) Department 13 air atomization hand spray coating booth (U13-2), the one (1) Department 22 robotic spray coating line (U22R-1), the one (1) Department 22 robotic spray coating line (U22R-2), the one (1) Department 20 paint line (U20-1), the one (1) Department 20 paint line (U20-2), the one (1) air atomization spray booth (20-8B) in the one (1) Department 20 paint line (U20-3), the one (1) Department 20 air atomization spray booth (U20-4), the one (1) Department 22 robotic spray coating line (U22R-3), the two (2) air atomization spray coating booths (formerly identified as 20C-6B and 20C-7B), and the one (1) Department 20 High Volume, Low Pressure paint spray booth (20-12B) have applicable compliance monitoring conditions as specified below:
  - (a) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

These monitoring conditions are necessary because the water back booths for the one (1) Department 23 high gloss robotic spray coating line (U23-1), the one (1) Department 23 low gloss robotic spray coating line (U23-2), the one (1) spray booth (13-7B) in the one (1) Department 13 hand spray coating line (U13-1), the one (1) Department 13 air atomization hand spray coating booth (U13-2), the one (1) Department 22 robotic spray coating line (U22R-1), the one (1) Department 22 robotic spray coating line (U22R-2), the one (1) Department 20 paint line (U20-1), the one (1) Department 20 paint line (U20-2), the one (1) air atomization spray booth (20-8B) in the one (1) Department 20 paint line (U20-3), the one (1) Department 20 air atomization spray booth (U20-4), the one (1) Department 22 robotic spray coating line (U22R-3), the two (2) air atomization spray coating booths (formerly identified as 20C-6B and 20C-7B), and the one (1) Department 20 High Volume, Low Pressure paint spray booth (20-12B) must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

2. The one (1) Department 13 (formerly Department 14) air atomization hand spray coating booth (formerly 14-1B), the three (3) Department 13 automatic paint machines (13-7, 13-8, and 13-9), the two (2) air atomization spray booths (13-8B and 13-9B) in the one (1) Department 13 hand spray coating line (U13-1), the one (1) Department 13 air atomization hand spray coating booth (U13-3), the one (1) Department 13 air atomization hand spray coating booth (U13-4), the one (1) Department 13 air atomization hand spray coating booth (U13-5), the one (1) Department 13 air atomization hand spray coating booth (U13-6), the one (1) air atomization spray booth (20-7B) in the one (1) Department 20 paint line (U20-3), the one (1) Department 15 air atomization spray coating booth (U15-1), and the two (2) Department 25 air atomization spray coating booths (25S-1B and 25S-4B) have applicable compliance monitoring conditions as specified below:
  - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray from the surface coating booth stacks (formerly 14-1B, 13-1A, 13-2A, 13-3A, 13-8B, 13-9B, 13-5B, 13-3B, 13-2B, 13-1B, 20-7B, 15-1B, 25S-1B and 25S-4B) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
  - (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

These monitoring conditions are necessary because the fiber filters for the one (1) Department 13 (formerly Department 14) air atomization hand spray coating booth (formerly 14-1B), the three (3) Department 13 automatic paint machines (13-7, 13-8, and 13-9), the two (2) air atomization spray booths (13-8B and 13-9B) in the one (1) Department 13 hand spray coating line (U13-1), the one (1) Department 13 air atomization hand spray coating booth (U13-3), the one (1) Department 13 air atomization hand spray coating booth (U13-4), the one (1) Department 13 air atomization hand spray coating booth (U13-5), the one (1) Department 13 air atomization hand spray coating booth (U13-6), the one (1) air atomization spray booth (20-7B) in the one (1) Department 20 paint line (U20-3), the one (1) Department 15 air atomization spray coating booth (U15-1), and the two (2) Department 25 air atomization spray coating booths (25S-1B and 25S-4B) must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

3. The one (1) decorative chrome electroplating line (U19-1) has applicable compliance monitoring requirements as specified below:
  - (a) The surface tension shall be measured once every 4 hours during operation of the tank with a stalagmometer or a tensiometer as specified in 40 CFR 63, Method 306B, appendix A.
  - (b) The time between monitoring can be increased if there have been no exceedances. The surface tension shall be measured once every 4 hours of tank operation for the first 40 hours of tank operation after the compliance date.

Once there are no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every 8 hours of tank operation. Once there are no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every 40 hours of tank operation on an ongoing basis, until an exceedance occurs. The minimum frequency of monitoring allowed by this subpart is once every 40 hours of tank operation.

- (c) Once an exceedance occurs as indicated through surface tension monitoring, the original monitoring schedule of once every 4 hours must be resumed. A subsequent decrease in frequency shall follow the schedule laid out in paragraph (c)(5)(ii)(B) of 40 CFR 63.343. For example, if an owner or operator had been monitoring an affected source once every 40 hours and an exceedance occurs, subsequent monitoring would take place once every 4 hours of tank operation. Once an exceedance does not occur for 40 hours of tank operation, monitoring can occur once every 8 hours of tank operation. Once an exceedance does not occur for 40 hours of tank operation on this schedule, monitoring can occur once every 40 hours of tank operation.
- (d) Once a bath solution is drained from the affected tank and a new solution added, the original monitoring schedule of once every 4 hours must be resumed, with a decrease in monitoring frequency allowed following the procedures of paragraphs (c)(5)(ii) (B) and (C) of 40 CFR 63.343.
- (e) All monitoring equipment shall be installed such that representative measurements of emissions or process parameters from the affected source are obtained. For monitoring equipment purchased from a vendor, verification of the operational status of the monitoring equipment shall include execution of the manufacturer's written specifications or recommendations for installation, operation, and calibration of the system.

These monitoring conditions are necessary because the fume suppressant for the one (1) decorative chrome electroplating operation must operate properly to ensure compliance with 40 CFR 63.340, Subpart N, 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

## **Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.

## **Conclusion**

The operation of this automotive decorative trim coating operation shall be subject to the conditions of the attached proposed **Part 70 Permit No. T163-6502-00017**.

