

**FEDERALLY ENFORCEABLE STATE  
OPERATING PERMIT (FESOP)  
and ENHANCED NEW SOURCE REVIEW  
OFFICE OF AIR MANAGEMENT**

**SACO Industries, Inc.  
17151 Morse Street  
Lowell, Indiana 46356**

(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 2-8 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.: F/ENSR089-10041-00443	
Issued by: Paul Dubenetzky, Branch Chief 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). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

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The Permittee owns and operates a stationary wood and particle board bathroom and kitchen cabinet manufacturing operation.

Responsible Official: Ron Bergstrom  
Source Address: 17151 Morse Street, Lowell, Indiana 46356  
Mailing Address: P.O. Box 342, Lowell, Indiana 46356  
SIC Code: 2434  
County Location: Lake  
Nonattainment for ozone  
Attainment area for all other criteria pollutants  
Source Status: Federally Enforceable State Operating Permit (FESOP)  
Minor Source, under PSD or Emission Offset Rules;  
Minor Source, Section 112 of the Clean Air Act

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

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

- (a) Four (4) spray booths (ID EU-01A through EU-01D) each with a maximum capacity of 43.75 wood pieces per hour, utilizing an HVLP application system and dry filters for overspray control, and exhausting through stacks S1 thru S4, respectively.

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour,
  - (1) Fifteen (15) space heaters each with a maximum heat input of 0.05 mmBtu/hr
- (b) Application of oils, greases, lubricants or other nonvolatile material applied as temporary protective coatings,
- (c) Water based adhesives that are less than or equal to 5% by volume of VOC's excluding HAPs,
- (d) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment,
- (e) Paved and unpaved roads and parking lots with public access,
- (f) 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 areas,

- (g) Other activities or categories not previously identified with emissions equal to or less than insignificant thresholds:
  - (1) one (1) welding department equipped with one (1) baghouse for particulate control, using E7018 welding material, constructing 43.75 units per hour
  - (2) one (1) lamination booth adhesive applicator, with a maximum capacity of 43.75 units per hour,
  - (3) one (1) end panel adhesive applicator, with a maximum capacity of 3.38 pounds per hour of adhesive,
- (h) Woodworking area equipped with the following miscellaneous woodworking equipment:
  - (1) one (1) rough milling unit, one (1) ripper unit, one (1) molder unit, one (1) door shaper unit, one (1) lamination booth, one (1) dado machine, and two (2) panel saws and one (1) sanding unit, each with a maximum capacity of 43.75 units per hour, utilizing two (2) baghouses for particulate control, and exhausting fugitively within the plant.

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

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

#### A.5 Prior Permit Conditions

- (a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, 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.

## **SECTION B GENERAL CONDITIONS**

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

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

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

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, 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 2-8-4(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 2-8-6]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.

- (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.

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

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

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

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

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(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

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, 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, 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, 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, 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 Order Issuance [326 IAC 2-8-5(b)]

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

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(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; and
  - (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.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(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.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The 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
- (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, 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 the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts as specified in Sections D of this permit, IDEM, OAM, may require to determine the compliance status of the source.

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

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (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 control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond 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

- (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, upon request and shall be subject to review and approval by IDEM, OAM.

B.14 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;

- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,  
Telephone No.: 317-233-5674 (ask for Compliance Section)  
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAM, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (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

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

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require the certification by the "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, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, 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 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

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

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

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

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include the information specified in 326 IAC 2-8-3.

Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

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, IN 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

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

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]

(2) If IDEM, OAM upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAM 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, any additional information identified as needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-8-10] [326 IAC 2-8-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11 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

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

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)(2)]

Notwithstanding 326 IAC 2-8-11(b)(1)(D)(i) and 326 IAC 2-8-11(c)(1), minor permit modification procedures may be used for modifications of this permit involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches to the extent that such minor permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated by U.S. EPA.

B.20 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(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 2-8-15(a) and the following additional condition:

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.21 Operational Flexibility [326 IAC 2-8-15]

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

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

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

and

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

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

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

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

- (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 2-8-15(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, 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.22 Construction Permit Requirement [326 IAC 2]**

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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.23 Inspection and Entry [326 IAC 2-8-5(a)(2)]**

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

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) 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 2-8-5(a)(4)]
  - (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, 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, nor an authorized representative, may disclose the information unless and until IDEM, OAM 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, and IDEM, OAM, 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.24 Transfer of Ownership or Operation [326 IAC 2-1-6][326 IAC 2-8-10]

Pursuant to 326 IAC 2-1-6 and 2-8-10:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, 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 current 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 2-8-10. 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 shall reserve the right to issue a new permit.

**B.25 Annual Fee Payment [326 IAC 2-8-4(6)][326 IAC 2-8-16]**

- (a) The Permittee shall pay annual fees to IDEM, OAM, 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.

**B.26 Enhanced New Source Review [326 IAC 2]**

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and such facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

**SECTION C SOURCE OPERATION CONDITIONS**

Entire Source

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

**C.1 Overall Source Limit [326 IAC 2-8]**

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

- (a) Pursuant to 326 IAC 2-8:
- (1) The potential to emit volatile organic compounds (VOCs) from the entire source shall be limited to less than twenty-five (25) tons per three hundred sixty-five (365) consecutive day period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
  - (2) The potential to emit any regulated pollutant from the entire source, except volatile organic compounds (VOCs), shall be limited to less than one-hundred (100) tons per three hundred sixty-five (365) consecutive day period;
  - (3) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per three hundred sixty-five (365) consecutive day period; and
  - (4) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per three hundred sixty-five (365) consecutive day period.

- (b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), emissions of particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per three hundred sixty-five (365) consecutive day period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.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 twenty percent (20%) in any one (1) six (6) minute averaging period, as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

C.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). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Fugitive Dust Emissions [326 IAC 6-1-11.1]

The Permittee shall be in violation of 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), if the opacity of fugitive particulate emissions exceeds ten percent (10%). Compliance with this opacity limit shall be achieved by controlling fugitive particulate matter emissions according to the plan submitted on November 12, 1998. The plan consists of:

- (a) All work performed by Saco is within the interior of the building. The baghouses shall be vented within the interior of the building and used at all times the facilities controlled by the baghouses are in operation,
- (b) The baghouses will be subject to EPA reference Method 22 for visible emissions on a daily basis,

- (c) Inspection and maintenance procedures recommended by the manufacturer of these baghouses will be followed and modified if needed,
- (d) The one parking lot on the premises is fully asphalt paved,
- (e) No dirt roads exist at the facility, and
- (f) No raw materials or finished products shall be stored outdoors.

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

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.8 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

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 2-8-4(3)]**

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

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- (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 the 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

no later than thirty-five (35) days prior to the intended test date. 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 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, 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 2-8-4] [326 IAC 2-8-5(a)(1)]**

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

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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 notify:

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

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

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

**C.11 Maintenance of Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]**

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- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

**C.12 Monitoring Methods [326 IAC 3]**

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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.

**C.13 Pressure Gauge Specifications**

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Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.

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

**C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

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

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

The ERP does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAM, 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.15 Risk Management Plan [326 IAC 2-8-4] [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, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, 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.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4][326 IAC 2-8-5] [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 upon request and shall be subject to review and approval by IDEM, OAM. 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.17 **Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]**  
**[326 IAC 2-8-5]**

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- (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, 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 within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM 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 2-8-4(3)]**

C.18 **Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]**

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- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that meets the requirements of 326 IAC 2-6 (Emission Reporting). This annual statement must be received by April 15 of each year and must comply with the minimum requirements 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). The annual 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
- (b) 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, on or before the date it is due.

C.19 **Monitoring Data Availability**

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- (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 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 in (a) above.

C.20 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]

- (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, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner 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.21 General Reporting Requirements [326 IAC 2-8-4(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
- (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, 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.22 Compliance with 40 CFR 82 and 326 IAC 22-1

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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 2-8-4(10)]

- (a) Four (4) spray booths (ID EU-01A through EU-01D) each with a maximum capacity of 43.75 wood pieces per hour, utilizing an HVLP application system and dry filters for overspray control, and exhausting through stacks S1 thru S4, respectively.

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

#### D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 2-3] [326 IAC 2-8] [326 IAC 8-1-6]

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The usage of VOC delivered to the applicators, including clean up solvents, in the four (4) spray booths (ID EU-01A through EU-01D) shall be limited to 2.0 tons per month. This usage limit is required to limit the source wide potential to emit of VOC to less than 25 tons per year, therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

Compliance with this VOC limit shall render:

- (a) the source in compliance with 326 IAC 2-8 (FESOP); and
- (b) 326 IAC 2-3 (Emission Offset) not applicable.

#### D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

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Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.3 New Source Toxics Control [326 IAC 2-1-3.4] [326 IAC 2-8]

The input of any single HAP and total HAPs to the four (4) spray booths (ID EU-01A through EU-01D) shall be limited to less than 10 tons and 25 tons per year, respectively. This usage limit is required to limit the potential to emit of any single HAP and total HAPs to less than 10 and 25 tons per year, respectively.

Compliance with this VOC limit shall render 326 IAC 2-1-3.4 (New Source Toxics Control) not applicable.

D.1.4 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the four (4) spray booths (ID EU-01A through EU-01D) shall not exceed the pound per hour emission rate established as E in the following formula:

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:

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

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

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the four (4) spray booths (ID EU-01A through EU-01D) and their control devices.

**Compliance Determination Requirements**

D.1.6 Testing Requirements [326 IAC 2-8-5(1)]

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 VOC and HAP limits specified in Condition D.1.1 and D.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 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 reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.8 VOC Emissions

Compliance with Condition D.1.1 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.1.9 Particulate Matter (PM)**

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The dry filters for PM control shall be in operation at all times when the four (4) spray booths (ID EU-01A through EU-01D) are in operation.

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

**D.1.10 Monitoring**

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- (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 (S1 thru S4) 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 2-8-4(3)] [326 IAC 2-8-16]**

**D.1.11 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.1.1 and D.1.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC, single HAP and total HAP usage limits established in Conditions D.1.1 and D.1.3.
  - (1) The amount and VOC and HAP 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, single HAP and total HAP usage for each month; and
  - (5) The weight of VOCs and HAPs emitted for each compliance period.

- (b) To document compliance with Condition D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventative Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.12 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

### SECTION D.2 FACILITY OPERATION CONDITIONS

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

The following insignificant activities

- (a) 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 areas,
- (b) Other activities or categories not previously identified with emissions equal to or less than insignificant thresholds:
  - (1) one (1) welding department equipped with one (1) baghouse for particulate control, using E7018 welding material, constructing 43.75 units per hour
  - (2) one (1) lamination booth adhesive applicator, with a maximum capacity of 43.75 units per hour,
  - (3) one (1) end panel adhesive applicator, with a maximum capacity of 3.38 pounds per hour of adhesive,
- (c) Woodworking area equipped with the following miscellaneous woodworking equipment:
  - (1) one (1) rough milling unit, one (1) ripper unit, one (1) molder unit, one (1) door shaper unit, one (1) lamination booth, one (1) dado machine, and two (2) panel saws and one (1) sanding unit, each with a maximum capacity of 43.75 units per hour, utilizing two (2) baghouses for particulate control, and exhausting fugitively within the plant.

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

##### D.2.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from insignificant activities shall not exceed allowable PM emission rate based on the following equation:

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

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

### **Compliance Determination Requirement**

#### **D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)]**

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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 PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### **D.2.3 Particulate Matter (PM)**

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The PM control equipment shall be in operation at all times when the insignificant activities are in operation.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION  
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: SACO Industries, Incorporated  
Source Address: 17151 Morse Street, Lowell, Indiana 46356  
Mailing Address: 17151 Morse Street, Lowell, Indiana 46356  
FESOP No.: F/ENSR089-10041-00443

**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**

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

Source Name: SACO Industries, Incorporated  
Source Address: 17151 Morse Street, Lowell, Indiana 46356  
Mailing Address: 17151 Morse Street, P.O. Box 342, Lowell, Indiana 46356  
FESOP No.: F/ENSR089-10041-00443

**This form consists of 2 pages**

**Page 1 of 2**

Check either No. 1 or No.2
<b>9</b> 1. This is an emergency as defined in 326 IAC 2-7-1(12) CThe 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 CThe 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
<b>9</b> 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) CThe 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**

**FESOP Quarterly Report**

Source Name: SACO Industries, Incorporated  
 Source Address: 17151 Morse Street, Lowell, Indiana 46356  
 Mailing Address: 17151 Morse Street, P.O. Box 342, Lowell, Indiana 46356  
 FESOP No.: F/ENSR089-10041-00443  
 Facility: Four (4) spray booths (ID EU-01A through EU-01D)  
 Parameter: VOC usage  
 Limit: The usage of VOC delivered to the applicators, including clean up solvents, in each of the four (4) spray booths (ID EU-01A through EU-01D) shall be limited to 2.0 tons per month.

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

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

- 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**

**FESOP Quarterly Report**

Source Name: SACO Industries, Incorporated  
 Source Address: 17151 Morse Street, Lowell, Indiana 46356  
 Mailing Address: 17151 Morse Street, P.O. Box 342, Lowell, Indiana 46356  
 FESOP No.: F/ENSR089-10041-00443  
 Facility: Four (4) spray booths (ID EU-01A through EU-01D)  
 Parameter: Any single HAP usage  
 Limit: The input of any single HAP and total HAPs to the four (4) spray booths (ID EU-01A through EU-01D) shall be limited to less than 10 tons and 25 tons per year, respectively.

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

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

- 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**

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

Source Name: SACO Industries, Incorporated  
 Source Address: 17151 Morse Street, Lowell, Indiana 46356  
 Mailing Address: 17151 Morse Street, P.O. Box 342, Lowell, Indiana 46356  
 FESOP No.: F/ENSR089-10041-00443

**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 (eg. Permit Condition D.2.3)	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**

### **Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) and Enhanced New Source Review (ENSR)**

#### **Source Background and Description**

Source Name: SACO Industries, Incorporated  
Source Location: 17151 Morse Street, Lowell, Indiana 46356  
County: Lake  
SIC Code: 2434  
Operation Permit No.: F/ENSR089-10041-00443  
Permit Reviewer: Phillip Ritz/EVP

The Office of Air Management (OAM) has reviewed a Federally Enforceable State Operating Permit (FESOP) application from SACO Industries, Incorporated, relating to the operation of a stationary wood and particle board surface coating and manufacturing operation for bathroom and kitchen cabinets.

#### **Permitted Emission Units and Pollution Control Equipment**

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

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

The source consists of the following unpermitted facilities/units:

- (a) Four (4) spray booths (ID EU-01A through EU-01D) each with a maximum capacity of 43.75 wood pieces per hour, utilizing an HVLP application system and dry filters for overspray control, and exhausting through stacks S1 thru S4, respectively.

#### **New Emission Units and Pollution Control Equipment Not Requiring ENSR**

The application includes information relating to the construction and operation of the following equipment with emissions less than levels requiring ENSR:

- (a) Other activities or categories not previously identified with emissions equal to or less than insignificant thresholds:
  - (1) one (1) rough milling unit, controlled by a baghouse (ID S6), emitting 2.25 tons of particulate matter per year without control.

## Insignificant Activities

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour,
  - (1) Fifteen (15) space heaters each with a maximum heat input of 0.05 mmBtu/hr
- (b) Application of oils, greases, lubricants or other nonvolatile material applied as temporary protective coatings,
- (c) Water based adhesives that are less than or equal to 5% by volume of VOC's excluding HAPs,
- (d) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment,
- (e) Paved and unpaved roads and parking lots with public access,
- (f) 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 areas,
- (g) Other activities or categories not previously identified with emissions equal to or less than insignificant thresholds:
  - (1) one (1) welding department equipped with one (1) baghouse for particulate control, using E7018 welding material, constructing 43.75 units per hour
  - (2) one (1) lamination booth adhesive applicator, with a maximum capacity of 43.75 units per hour,
  - (3) one (1) end panel adhesive applicator, with a maximum capacity of 3.38 pounds per hour of adhesive,
- (h) Woodworking area equipped with the following miscellaneous woodworking equipment:
  - (1) one (1) rough milling unit, one (1) ripper unit, one (1) molder unit, one (1) door shaper unit, one (1) lamination booth, one (1) dado machine, and two (2) panel saws and one (1) sanding unit, each with a maximum capacity of 43.75 units per hour, utilizing two (2) baghouses for particulate control, and exhausting fugitively within the plant.

## Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

## Recommendation

The staff recommends to the Commissioner that the FESOP 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 FESOP application for the purposes of this review was received on August 12, 1998. Additional information was received on October 28, 1998.

## Emission Calculations

See Appendix A of this document for detailed emissions calculations (6 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	7.21
PM-10	7.21
SO <sub>2</sub>	0.00
VOC	108.05
CO	0.13
NO <sub>x</sub>	0.31

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)
Xylene	10.72
Ethyl Benzene	2.34
Formaldehyde	0.03
Glycol Ethers	4.26
Hexane	0.04
Vinyl Acetate	0.00
TOTAL	17.39

See attached spreadsheets for detailed calculations (6 pages).

- (a) The potential emissions (as defined in 326 IAC 1-2-55) of VOC is equal to or greater than 25 tons per year in Lake county. 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) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.
- (d) 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.

**Limited Potential to Emit**

- (a) The source has accepted a federally enforceable limit on potential to emit VOC of less than 25 tons per year, consisting of:
  - (1) 23.97 tons per year for the significant activities; and
  - (2) 0.02 tons per year for the insignificant activities.
- (b) The source has accepted a limit on potential to emit of less than 10 tons per year for any single HAP and less than 25 tons per year for any combination of HAPs.
- (c) The table below summarizes the total limited potential to emit of the significant and insignificant emission units.

Process/facility	Limited Potential to Emit (tons/year)							
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	Any Single HAP	Total HAPs
spray booth (ID EU-01A - EU01D)	0.05	0.05	0.00	23.97	0.00	0.00	2.40 (xylene)	3.34
*natural gas combustion	0.02	0.02	0.00	0.02	0.13	0.31	0.00	0.00
*insignificant activities	insig.	insig.	insig.	insig.	insig.	insig.	insig.	insig.
<b>Total Emissions</b>	<b>0.07</b>	<b>0.07</b>	<b>0.00</b>	<b>23.99</b>	<b>0.13</b>	<b>0.31</b>	<b>2.40</b>	<b>3.34</b>

\* These activities also qualify as insignificant activities (see Insignificant Activities).

**County Attainment Status**

The source is located in Lake County.

Pollutant	Status
PM-10	unclassifiable/attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	unclassifiable/attainment
Ozone	severe nonattainment
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. Lake County has been designated as severe nonattainment for ozone.

**Federal Rule Applicability**

- (a) There are no New Source Performance Standards (326 IAC 12), 40 CFR Part 60, applicable to this source.

- (b) This woodworking area is not subject to 40 CFR Part 63, Subpart JJ (National Emission Standards for Wood Furniture Manufacturing Operations), because this source is not a major source of HAP as defined in 40 CFR Part 63.2

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

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

The source is not applicable to 326 IAC 2-1-3.4 (New Source Toxics Control) because 326 IAC 2-1-3.4 does not apply to sources with HAP emissions below major levels.

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

This source is not a major source under 326 IAC 2-2 (PSD) because the potential to emit for any regulated pollutant is less than 250 tons per year, and it is not one of the twenty-eight (28) listed sources.

#### 326 IAC 2-3 (Emission Offset)

326 IAC 2-3 (Emission Offset) does not apply because the source will limit VOC emissions from the four (4) spray booths (ID's EU-01A through EU-01D) and the adhesive application units to less than 25.0 tons per 12-month period. Therefore, pursuant to 326 IAC 2-2, 326 IAC 2-3, and 40 CFR 52.21, the PSD and Emissions Offset requirements do not apply.

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

This facility is subject to 326 IAC 2-6 (Emission Reporting), because the source emits more than 10 tons/yr of VOC and is located in Lake County. Pursuant to this rule, the owner/operator of this facility must annually submit an emission statement of the facility. The annual statement must be received by April 15 of each year and must contain the minimum requirements 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 2-8-4 (FESOP)

This source is subject to 326 IAC 2-8-4 (FESOP). Pursuant to this rule, the source will limit the usage of VOC delivered to the applicators, including clean up solvents in the four (4) spray booths (ID's EU-01A through EU-01D) to 23.97 tons per year. This VOC usage limit will limit source wide VOC emissions to less than 25 tons per year. The source will also limit single HAP, and any combination of HAPs delivered to the applicators, including clean up solvents, in the four (4) spray booths (ID's EU-01A through EU-01D) and the adhesive application units to 9.4 tons per year and 24.0 tons per year, respectively. These limitations will render 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-3 (Emission Offset) not applicable.

#### 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 twenty percent (20%) 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.

326 IAC 6-4 (Fugitive Dust Emissions)

This source is subject to 326 IAC 6-4 for fugitive dust emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), fugitive dust shall not be visible crossing the boundary or property line of a source. Observances of visible emissions crossing property lines may be refuted by factual data expressed in 326 IAC 6-4-2(1), (2) or (3).

**State Rule Applicability - Individual Facilities**

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the four (4) spray booths (ID's EU-01A through EU-01D) 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:

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

The dry filters shall be in operation at all times the four (4) spray booths (ID's EU-01A through EU-01D) are in operation, in order to comply with this limit.

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

The four (4) spray booths (ID's EU-01A through EU-01D) are not subject to the provisions of 326 IAC 8-1-6. This rule requires all facilities constructed after January 1, 1980, which have potential VOC emission rates of 25 or more tons per year, and which are not otherwise regulated by other provisions of 326 IAC 8, to reduce VOC emissions using Best Available Control Technology (BACT). This source is subject to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), and has accepted federally enforceable operation conditions which limit emissions of volatile organic compounds from the four (4) spray booths (ID's EU-01A through EU-01D) and the adhesive application units to less than 25 tons per year, therefore, the requirements of 326 IAC 8-1-6 do not apply.

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

The source is not subject to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), because there are no metal coating operations at this source.

326 IAC 8-2-10 (Flat Wood Panels; Manufacturing Operations)

This source is not subject to 326 IAC 8-2-10 (Flat Wood Panels; Manufacturing Operations), because it does not apply to coating lines used solely in the manufacture of exterior siding or particle board used as a furniture component.

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

(a) Surface coating of wood furnishings in Spray Booths EU-01A through EU-01D are subject to the requirements of 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating). Pursuant to this rule, the source shall at all times utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

All of Spray Booths EU-01A through EU-01D use an air-assisted airless application method, which is one of the rule approved application methods for surface coating.

- (b) Application of adhesive on wood furnishings in the additives and drawer department spray booth are not subject to 326 IAC 8-2-12, because potential VOC emissions for this operation are less than 15 pounds per day. Pursuant to 326 IAC 8-2-1, the requirements of 326 IAC 8-2-12 do not apply for the additives and drawer department spray booth. Any change or modification which increases the potential to emit VOC from the additives and drawer department spray booth to greater than or equal to 15 pounds per day shall comply with the requirements of 326 IAC 8-2-12 and shall require prior approval from the OAM.

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

This source is not subject to 326 IAC 8-6 (Organic Solvent Emission Limitations), because the source is limited by other rules in 326 IAC 8.

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

This source is not subject to 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties) because the source has limited its potential to emit of VOC to less than 25 tons per year.

**326 IAC 8-11 (Wood Furniture Coatings)**

This source is not subject to 326 IAC 8-11 (Wood Furniture Coatings) because the source has limited its potential to emit of VOC to less than 25 tons per year.

No other 326 IAC 8 rules apply.

## **Compliance Requirements**

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

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

- (A) The four (4) spray booths (ID EU-01A through EU-01D) have applicable compliance monitoring conditions as specified below:
- (1) The dry filters for PM control shall be in operation at all times when the four (4) spray booths (ID EU-01A through EU-01D) are in operation.

- (2) (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 (S1 thru S4) 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.
- (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.

These monitoring conditions are necessary because the dry filters for the four (4) spray booths (ID EU-01A through EU-01D) must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 2-8 (FESOP).

### **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) FESOP Application Form GSD-08.

- (a) This source has accepted federally enforceable air toxic emission limits of 9.4 tons per year for any single HAP and 24 tons per year for any combination of HAPs.
- (b) See attached calculations for detailed air toxic calculations. (App. A, page 3 of 6)

### **Conclusion**

The operation of this stationary wood and particle board bathroom and kitchen cabinet manufacturing operation, shall be subject to the conditions of the attached proposed **FESOP No. F/ENSR089-10041-00443**.

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

Addendum to the  
Technical Support Document for Federally Enforceable State Operating  
Permit (FESOP)  
and Enhanced New Source Review (ENSR)

**Source Name:** SACO Industries, Inc.  
**Source Location:** 17151 Morse Street, Lowell, Indiana 46356  
**SIC Code:** 2434  
**County:** Lake  
**Operation Permit No.:** F/ENSR089-10041-00443  
**Permit Reviewer:** Phillip Ritz / EVP

On January 8, 1999, the Office of Air Management (OAM) had a notice published in the Gary Post Tribune & the Times, Gary, Indiana, stating that SACO Industries, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) and Enhanced New Source Review (ENSR) to construct and operate a stationary wood and particle board bathroom and kitchen cabinet manufacturing operation. The notice also stated that OAM proposed to issue a FESOP and ENSR for this operation and provided information on how the public could review the proposed FESOP, ENSR and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP and ENSR should be issued as proposed.

Upon further review, the OAM has decided to incorporate the following revisions into FESOP F/ENSR089-10041-00443. (**bolded** language has been added, the language with a ~~line~~ through it has been deleted). The Table Of Contents has been modified to reflect these changes:

- (a) The following changes have been made to Condition C.2, on page 17 of 36, (changes indicated in bold face or strikeout):

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

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

- (a) ~~Visible emissions~~ **Opacity** shall not exceed an average of twenty percent (20%) ~~opacity~~ in ~~twenty four (24) consecutive readings~~ **any one (1) six (6) minute averaging period** as determined by 326 IAC 5-1-4,
- (b) ~~Visible emissions~~ **Opacity** shall not exceed sixty percent (60%) ~~opacity~~ 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.

- (b) The following changes have been made to Condition D.1.1, on page 27 of 36, (changes indicated in bold face or strikeout):

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 2-3] [326 IAC 2-8] [326 IAC 8-1-6]

The usage of VOC delivered to the applicators, including clean up solvents, in ~~each of the four (4)~~ spray booths (ID EU-01A through EU-01D) shall be limited to ~~23.97~~**2.0** tons per ~~year~~ **month**. This usage limit is required to limit the source wide potential to emit of VOC to less than 25 tons per year, therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

Compliance with this VOC limit shall render:

- a. the source in compliance with 326 IAC 2-8 (FESOP); and
  - b. 326 IAC 2-3 (Emission Offset) not applicable.
- (c) The following changes have been made to Condition D.1.11, on page 29 of 36, (changes indicated in bold face or strikeout):

D.1.11 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC, single HAP and total HAP usage limits established in Conditions D.1.1 and D.1.3.
- (1) The amount and VOC and HAP 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 ~~day~~ **month**;
  - (4) The total VOC, single HAP and total HAP usage for each ~~day~~ **month**; and
  - (5) The weight of VOCs and HAPs emitted for each compliance period.
- (d) The following changes have been made to FESOP Quarterly Report for VOC usage on page 34 of 36, (changes indicated in bold face or strikeout):
- Limit: The usage of VOC delivered to the applicators, including clean up solvents, in each of the four (4) spray booths (ID EU-01A through EU-01D) shall be limited to ~~23.97~~**2.0** tons per ~~year~~ **month**.

- (h) On pages 5 of 8 of the Technical Support Document under 326 IAC 5-1 (Visible Emissions Limitations), the language has been changed as follows (changes indicated in bold face or strikeout):

The OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

326 IAC 5-1 (~~Visible Emissions~~ **Opacity** Limitations)

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

- (a) ~~Visible emissions~~ **Opacity** shall not exceed an average of twenty percent (20%) ~~opacity~~ in ~~twenty four (24) consecutive readings~~ **any one (1) six (6) minute averaging period** as determined by 326 IAC 5-1-4,
- (b) ~~Visible emissions~~ **Opacity** shall not exceed sixty percent (60%) ~~opacity~~ 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.

**Appendix A: Emission Calculations**

**Company Name:** Saco Industries, Inc.  
**Address City IN Zip:** 17151 Morse Street, Lowell, IN 46356  
**FESOP:** F-089-10041  
**Plt ID:** 089-00443  
**Reviewer:** PR/EVP  
**Date:** August 12, 1998

**Potential Emissions (tons/year)**

Emissions Generating Activity					
Pollutant	Surface Coating	Combustion	Adhesive Operations	Wood Working	Total
PM	7.19	0.02	0.07	0.00	7.28
PM-10	7.19	0.02	0.07	0.00	7.28
SO <sub>2</sub>	0.00	0.00	0.00	0.00	0.00
NO <sub>x</sub>	0.00	0.31	0.00	0.00	0.31
VOC	108.03	0.02	0.11	0.00	108.16
CO	0.00	0.13	0.00	0.00	0.13

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

**Controlled Emissions (tons/year)**

Emissions Generating Activity					
Pollutant	Surface Coating	Combustion	Adhesive Operations	Wood Working	Total
PM	0.05	0.02	0.03	0.00	0.10
PM-10	0.05	0.02	0.03	0.00	0.10
SO <sub>2</sub>	0.00	0.00	0.00	0.00	0.00
NO <sub>x</sub>	0.00	0.31	0.00	0.00	0.31
VOC	23.97	0.02	0.00	0.00	23.99
CO	0.00	0.13	0.00	0.00	0.13

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

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

**Company Name:** Saco Industries, Inc.  
**Address City IN Zip:** 17151 Morse Street, Lowell, IN 46356  
**FESOP:** F-089-10041  
**Pit ID:** 089-00443  
**Reviewer:** PR/EVP  
**Date:** August 12, 1998

**State Potential Emissions (uncontrolled):**

Material (as applied)	Process	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
Thinner Solvent Blend S-0105	Staining Process	6.59	100.00%	0.00%	100.00%	0.00%	0.00%	0.0070	43.75	6.6	6.59	2.02	48.44	8.84	0.00	ERR	75.00%
White Precat Compliant Lacquer- 34-1288	Staining Process	8.43	63.53%	0.00%	63.53%	0.00%	22.03%	0.0030	43.75	5.4	5.36	0.70	16.87	3.08	0.44	32.41	75.00%
White Precat Compliant Lacquer Primer- 33-148	Staining Process	8.87	59.31%	0.00%	59.31%	0.00%	23.77%	0.0020	43.75	5.3	5.26	0.46	11.05	2.02	0.35	29.51	75.00%
Precatalyzed Compliant Lacquer- 35-0456x-1	Staining Process	7.57	72.86%	0.00%	72.86%	0.00%	19.31%	0.0570	43.75	5.5	5.52	13.75	330.10	60.24	5.61	38.08	75.00%
Honey Oak Spray and Wipe Stain	Staining Process	6.72	97.66%	0.00%	97.66%	0.00%	1.82%	0.0140	43.75	6.6	6.56	4.02	96.47	17.61	0.11	480.79	75.00%
Frosted Oak 91-9799	Staining Process	7.55	82.00%	0.15%	81.85%	0.13%	7.40%	0.0080	43.75	6.2	6.18	2.16	51.91	9.47	0.52	111.35	75.00%
Hazelnut 825-2240	Staining Process	7.80	82.91%	0.00%	82.91%	0.00%	7.00%	0.0020	43.75	6.5	6.47	0.57	13.58	2.48	0.13	123.18	75.00%
Walnut 21-9800	Staining Process	6.87	92.58%	0.16%	92.42%	0.13%	4.91%	0.0002	43.75	6.4	6.35	0.06	1.33	0.24	0.00	172.42	75.00%
Fruitwood 21-8424	Staining Process	6.75	96.90%	0.00%	96.90%	0.00%	2.09%	0.0030	43.75	6.5	6.54	0.86	20.60	3.76	0.03	417.27	75.00%
Clean-up Solvent-Butyl Cellosolve	Additives	7.52	100.00%	0.00%	100.00%	0.00%	0.00%	0.0002	43.75	7.5	7.52	0.07	1.58	0.29	0.00	ERR	75.00%
Quick Stick Panel & Construction Adhesive	Drawer Department-Adhesives	10.25	27.90%	0.00%	27.90%	0.00%	45.00%	0.0002	43.75	2.9	2.86	0.03	0.60	0.11	0.07	8.47	75.00%
Titebond Extend Wood Glue	Drawer Department-Adhesives	9.66	57.70%	57.68%	0.02%	66.91%	32.93%	0.0090	43.75	0.0	0.00	0.00	0.02	0.00	0.00	0.01	100.00%
Titebond Extend White Glue	Drawer Department-Adhesives	9.08	54.50%	54.45%	0.05%	59.35%	40.60%	0.0010	43.75	0.0	0.00	0.00	0.00	0.00	0.00	0.01	100.00%

**Total State Potential Emissions:**

<b>24.66</b>	<b>591.94</b>	<b>108.03</b>	<b>7.19</b>
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**Federal Potential Emissions (controlled):**

**Total Federal Potential Emissions:**

Limit Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr
VOC	PM				
77.81%	97.10%	<b>5.47</b>	<b>131.34</b>	<b>23.97</b>	<b>0.05</b>

**Methodology:**

- Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)
- Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)
- Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)
- Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)
- Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)
- Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)
- Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids) \* Transfer Efficiency
- Total = Worst Coating + Sum of all solvents used
- Controlled emission rate = uncontrolled emission rate \* (1 - control efficiency)

HAP Emission Calculations

Company Name: Saco Industries, Inc.  
 Address City IN Zip: 17151 Morse Street, Lowell, IN 46356  
 FESOP: F-089-10041  
 Pit ID: 089-00443  
 Reviewer: PR/EVP  
 Date: August 12, 1998

Material	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Ethyl Benzene	Weight % Formaldehyde	Weight % Glycol Ethers	Weight % Hexane	Weight % Vinyl Acetate	Cumene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Hexane Emissions (ton/yr)	Vinyl Acetate Emissions (ton/yr)	Cumene Emissions (ton/yr)
Thinner Solvent Blend S-0105	6.59	0.0070	43.75	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
White Precat Compliant Lacquer- 34-1288	8.43	0.0030	43.75	10.80%	2.49%	0.03%	0.00%	0.00%	0.00%	0.00	0.52	0.12	0.00	0.00	0.00	0.00	0.00
White Precat Compliant Lacquer Primer- 33-148	8.87	0.0020	43.75	10.60%	2.28%	0.02%	0.00%	0.00%	0.00%	0.00	0.36	0.08	0.00	0.00	0.00	0.00	0.00
Precatalyzed Compliant Lacquer- 35-0456x-1	7.57	0.0570	43.75	11.90%	2.59%	0.03%	0.97%	0.00%	0.00%	0.00	9.84	2.14	0.02	0.80	0.00	0.00	0.00
Honey Oak Spray and Wipe Stain	6.72	0.0140	43.75	0.00%	0.00%	0.00%	2.75%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.50	0.00	0.00	0.00
Frosted Oak 91-9799	7.55	0.0080	43.75	0.23%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.03	0.00	0.00	0.00	0.00	0.00	0.00
Hazelnut 825-2240	7.80	0.0020	43.75	1.00%	1.20%	0.00%	0.00%	0.00%	0.00%	7.00%	0.03	0.04	0.00	0.00	0.00	0.00	0.21
Walnut 21-9800	6.87	0.0002	43.75	2.61%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00
Fruitwood 21-8424	6.75	0.0030	43.75	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Clean-up Solvent-Butyl Cellosolve	7.52	0.0002	43.75	0.00%	0.00%	0.00%	100.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.29	0.00	0.00	0.00
Quick Stick Panel & Construction Adhesive	10.25	0.0002	43.75	0.00%	0.00%	0.00%	0.00%	10.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.04	0.00	0.00
Titebond Extend Wood Glue	9.66	0.0090	43.75	0.00%	0.00%	0.00%	0.00%	0.00%	0.02%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Titebond Extend White Glue	9.08	0.0010	43.75	0.00%	0.00%	0.00%	0.00%	0.00%	0.05%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Total State Potential Emissions 10.79      2.38      0.03      1.59      0.04      0.00      0.21

METHODOLOGY

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

Total HAPs 15.03

Limit Efficiency: VOC	Xylene Emissions Limited Emissions	Ethyl Benzene Limited Emissions	Formaldehyde Limited Emissions	Glycol Ethers Limited Emissions	Hexane Limited Emissions	Vinyl Acetate Limited Emissions	Vinyl Acetate Limited Emissions
77.86%	2.39	0.53	0.01	0.35	0.01	0.00	0.05

Total Limited HAPs 3.33

**Appendix A: Emission Calculations**  
**Insignificant Activity Emissions of Pollutants Limited Below Major Thresholds (HAPs)**

**Company Name:** Saco Industries, Inc.  
**Address City IN Zip:** 17151 Morse Street, Lowell, IN 46356  
**FESOP:** F-089-10041  
**Plt ID:** 089-00443  
**Reviewer:** PR/EVP  
**Date:** August 12, 1998

Type of Welding	Maximum Electrode Consumption (lb/hr)	Particulate Matter lb/1,000 lb	Particulate Matter tons/yr
Stick Welding	0.005	0.0211	4.56E-07
	0.004	0.0107	1.87E-07

Type of Welding	Maximum Electrode Consumption (lb/hr)	Manganese lb/1,000 lb	Manganese tons/yr
Electric Arc Welding	0.005	0.0009	1.97E-08
	0.004	0.0009	1.58E-08

**Appendix A: Emission Calculations**  
**Natural Gas Combustion**  
**MM Btu/hr < 0.3**

**Company Name:** Saco Industries, Inc.  
**Address City IN Zip:** 17151 Morse Street, Lowell, IN 46356  
**FESOP:** F-089-10041  
**Plt ID:** 089-00443  
**Reviewer:** PR/EVP  
**Date:** August 12, 1998

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

0.8

6.6

Heat Input Capacity includes:

15 Space Heaters, each with a heat input of 0.5 mmBtu/hr

Emission Factor in lb/MMCF	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
7.60	7.60	7.60	0.6	94.0	5.5	40.0
Potential Emission in tons/yr	0.02	0.02	0.00	0.31	0.02	0.13

Methodology:

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

All PM is assumed to be less than 1.0 micrometer in diameter. Therefore, the PM emission factors may be used to estimate PM10, PM2.5, and PM1 emissions.

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1 and 1.4-2, Residential Furnaces (no SCC)

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

**Appendix A: Process Particulate Emissions**

**Company Name:** Saco Industries, Inc.  
**Address City IN Zip:** 17151 Morse Street, Lowell, IN 46356  
**FESOP:** F-089-10041  
**Plt ID:** 089-00443  
**Reviewer:** PR/EVP  
**Date:** August 12, 1998

<b>State Potential Emissions (tons/year)</b>					
<b>A. Uncontrolled</b>					
Process	No. of Units	Pounds of Wood Processed/hour	Emission Factor	Control Efficiency	Total (tons/yr)
CE-01 (S5)	1	<b>60.00</b>	1.00	0.999	2.25
CE-01 (S6)	1	<b>60.00</b>	1.00	0.999	2.25
Total Emissions Based on Rated Capacity at 8,760 Hours/Year					<b>4.51</b>
<b>Federal Potential Emissions (tons/year)</b>					
<b>A. Controlled</b>					
Process	No. of Units	Pounds of Wood Processed/hour	Emission Factor	Control Efficiency	Total (tons/yr)
CE-01 (S5)	1	<b>60.00</b>	1.00	0.999	0.0023
CE-01 (S6)	1	<b>60.00</b>	1.00	0.999	0.0023
Total Emissions Based on Rated Capacity at 8,760 Hours/Year and source controls					<b>0.0045</b>

**Methodology:**(uncontrolled):

Emissions=# of units\* pounds of wood processed/hour \* emissions factor \* 8760 hours year/ 2000lbs/ton

(controlled):

Emissions=# of units\* pounds of wood processed/hour \* emissions factor \* control efficiency \* 8760 hours year/ 2000lbs/ton