

Mr. Trey Waldrip
Premdor Entry Systems
P.O. Box 667
Richmond, Indiana 47374

Re: 177-10405
First Administrative Amendment to
Part 70 177-7479-00068

Dear Mr. Trey Waldrip:

Premdor Entry Systems was issued a Title V permit (T177-7479-00068) on September 23, 1998 for operating a metal door manufacturing plant. A letter requesting changes in several conditions of the permit was received on November 23, 1998. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows:

The condition C.11 of the permit shall be modified to reflect the current model language(changes in bold):

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

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

in writing, ~~no more than~~ **prior to the end of the initial** ninety (90) ~~days after receipt of this permit~~ **day compliance schedule**, with full justification of the reasons for the inability to meet this date. ~~and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.~~

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).

A new section C.12-1 will be added to the Compliance Monitoring Requirements portion of the permit, which shall read:

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

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

- (a) The Permittee 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 after the date of issuance of this permit.
- (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]

The Quarterly Compliance Monitoring Report from page 32 of the Part 70 permit shall be replaced by the new Page 32 (see attachments Page 32).

The line "Emergency/Deviation Occurrence Reporting Form" can be deleted from the compliance data form (Page 29 of 32 of Part 70 permit) because the form with this deletion is the standard current model language for this certification form.

The last line " Attach a signed certification to complete this report" from the second page of the Emergency/Deviation Occurrence Report Form (Page 31 of 32 of the Part 70 permit) can be deleted from the permit because the form with this deletion is the standard current model language for this certification form.

The word "purported" from page 2 of the Technical Support Document(TSD) under the heading "Enforcement issue" part(b) will not be changed. A new copy of the Technical Support Document will not be created at this time. The language concerns of the company are noted and will be included in the files.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment with the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3.5. If you have any questions on this matter, please contact Shantanu Pahi, at (800) 451-6027, press 0 and ask for Shantanu Pahi or extension 3-0868, or dial (317) 233-0868.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Spahi

enclosed: Amended Title V pages (5 pages)

cc: File - Elkhart County
Elkhart County Health Department
Air Compliance Section Inspector - Doyle Houser
Compliance Data Section - Jerri Curless
Permit Tracking - Janet Mobley
Air Programs Section - Nancy Landau

**PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT**

**Premdor Entry Systems
305 Industrial Parkway
Richmond, Indiana 47374**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 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.: T177-7479-00068	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date: September 23, 1998
First Administrative Amendment AT 177-10405	Pages Affected: 19a, 29,30,31and 32
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION C

SOURCE OPERATION CONDITIONS

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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Indiana Department of Environmental Management
Compliance Branch, 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 the inability to meet this date.

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

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

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

(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]

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Premdor Entry Systems
Source Address: 305 Industrial Parkway, Richmond, Indiana 47374
Mailing Address: P.O. Box 667, Richmond, IN 47373
Part 70 Permit No.: T177-7479-00068

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**

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

Source Name: Premdor Entry Systems
Source Address: 305 Industrial Parkway, Richmond, Indiana 47374
Mailing Address: P.O. Box 667, Richmond, IN 47373
Part 70 Permit No.: T177-7479-00068

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2	
9	1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9	2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) C The Permittee must submit notice in writing within ten (10) calendar days

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

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

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

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , 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**

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

Source Name: Premdor Entry Systems
Source Address: 305 Industrial Parkway, Richmond, Indiana 47374
Mailing Address: P.O. Box 667, Richmond, IN 47373
Part 70 Permit No.: T177-7479-00068

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

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

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

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

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.