

Ms. Sonya Olbrantz
Premdor, Inc.
PO Box 1
Walkerton, IN 46574

Re: 141-10699
First Minor Permit Modification to
Part 70 No.: T 141-6277-00144

Dear Ms. Sonya Olbrantz:

Premdor, Inc. was issued a permit on November 11, 1998 for a stationary wood door manufacturing plant. A letter requesting changes to this permit was received on February 26, 1999. Pursuant to the provisions of 326 IAC 2-7-12 a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document.

Currently Premdor, Inc. is permitted for two (2) spray booths with one (1) spray gun per booth. This minor permit modification includes the addition of nine (9) spray guns to the previously permitted two (2) spray guns. With this addition only one (1) spray gun will be in use at any one time per booth. Thus, the maximum number of doors painted will increase from 300 to 315 total doors painted per hour, due to reduced time spent cleaning guns for color changes.

In addition, the Plant identification on the front page of the Title V permit, issued on November 11, 1998, was incorrectly written as 141-00104. It should have been 141-00144. The supporting documents and the rest of the Title V permits reflect the correct Plant identification.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of 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 Lynn Nieman, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Lynn Nieman or extension (3-2627), or dial (317) 233-2627.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

GLN

cc: File - St. Joseph County
U.S. EPA, Region V
St. Joseph County Health Department
Air Compliance Section Inspector - Paul Karkiewicz
Compliance Data Section - Jerri Curless
Administrative and Development - Janet Mobley
Technical Support and Modeling - Nancy Landau

Indiana Department of Environmental Management Office of Air Management

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

Source Background and Description

Source Name:	Premdor, Inc.
Source Location:	111 Muskin Drive, Walkerton, Indiana 46574
County:	St. Joseph
SIC Code:	2431
Operation Permit No.:	T 141-6277-00144
Operation Permit Issuance Date:	November 11, 1998
Permit Modification No.:	T 141-10699-00144
Permit Reviewer:	Lynn Nieman

The Office of Air Management (OAM) has reviewed a modification application from Premdor, Inc. relating to the operation of a stationary wood door manufacturing operation.

History

Premdor, Inc. was issued a Part 70 permit on November 11, 1998. On February 26, 1999, a letter requesting a Title V modification regarding the addition of nine (9) spray guns to the previously permitted two (2) spray booths with one (1) spray guns each, was received. This modification was requested in order to make color changes less difficult. Only one spray gun will be permitted to be in use at any one time per booth. This modification will result in the small increase in maximum production from 300 to 315 total doors painted per hour.

Existing Approvals

The source was issued a Part 70 Operating Permit T141-6277-00144 on November 11, 1998.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Minor Permit Modification be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on February 26, 1999.

Emission Calculations

Potential To Emit

There are no changes in the Potential to Emit from the original Title V permit.

Actual Emissions

There are no changes in the Actual Emissions from the original Title V permit.

County Attainment Status

There are no changes in County Attainment Status from the original Title V permit.

Federal Rule Applicability

There are no changes in Federal Rule Applicability from the original Title V permit.

State Rule Applicability - Entire Source

There are no changes in State Rule Applicability - Entire Source from the original Title V permit.

State Rule Applicability - Individual Facilities

326 IAC 6-1-2 (Nonattainment Area Particulate Limitations: Specified)

The source is located in St. Joseph County but is not specifically listed in 326 IAC 6-1-7, and has the potential to emit one hundred (100) tons or more of particulate matter per year. Therefore, particulate matter emissions shall be limited by 326 IAC 6-1-2, and 326 IAC 6-3-2 does not apply.

Pursuant to 326 IAC 6-1-2(a), particulate matter (PM) emissions from each of the spray booths (B1 and B2), from each of the woodworking shop dust collectors and cyclones (P1, P3, P4, P5, and P2 and P6) and from the 25 MMBtu/hr air make up unit shall be limited to 0.03 grain/dry standard cubic foot per facility.

The dry filters for PM control shall be in operation at all times when the paint booths (B1 and B2) are in operation.

In accordance with this Minor Permit Modification, only one (1) spray gun per booth shall be in use at any one time.

The baghouses and cyclones for PM control shall be in operation at all times when the woodworking shop is in operation.

There are no other additional changes in State Rule Applicability - Individual Sources from the original Title V permit.

Compliance Requirements

There are no other additional changes in Compliance Requirements from the original Title V

permit.

Premdor, Inc.
Walkerton, Indiana
Permit Reviewer: Lynn Nieman

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Air Toxic Emissions

There are no additional changes in Air Toxic Emissions from the original Title V permit.

Conclusion

The modification of this wood door manufacturing operation will be subject to the attached Minor Permit Modification 141-10699-00144.

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

**Premdor, Inc.
111 Muskin Drive
Walkerton, Indiana 46574**

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

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

Operation Permit No.: T141-6277-00144	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: November 11, 1998

Minor Permit Modification AT141-10699-00144	Pages Affected: 3, 5, 27, 28
Issued by: Paul Dubenetzky, Chief Permits Branch Office of Air Management	Issuance Date:

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air 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 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary wood door manufacturing operation.

Responsible Official: **Lance Singleton, Plant Manager**
Source Address: **111 Muskin Drive, Walkerton, IN 46574**
Mailing Address: **PO Box 1, Walkerton, IN 46574**
SIC Code: **2431**
County Location: **St. Joseph**
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules
Major Source, Part 70 Permit Program

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

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

- (a) Two (2) spray booths identified as B1 and B2, with a total of eleven (11) air assisted airless spray guns, with a combined maximum capacity of 315 units per hour. Only one (1) spray gun per booth shall be in use at any one time. Emissions shall be controlled by dry filters for overspray control and exhausted at stacks B1 and B2.
- (b) A woodworking shop including a scrap wood grinding process, with particulate controlled by 3 cyclones with built-in baghouses identified as P1, P5, and P6, and two portable dust collectors, identified as P3 and P4. The sawdust is transferred by a totally enclosed pneumatic system from P1 and P5 to a silo and from the silo for disposal. Cyclone P6 exhausts into the building. Wood chips from the grinder are transferred pneumatically and collected by a cyclone, identified as P2.

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

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21), that have applicable requirements.

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

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

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

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Two (2) spray booths identified as B1 and B2, with a total of eleven (11) air assisted airless spray guns, with a combined maximum capacity of 315 units per hour. Only one (1) spray gun per booth shall be in use at any one time. Emissions shall be controlled by dry filters for overspray control and exhausted at stacks B1 and B2.

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

D.1.1 Particulate Matter [326 IAC 6-1-2(a)]

- (a) Pursuant to 326 IAC 6-1-2(a), particulate matter (PM) emissions from each of the spray booths (B1 and B2) shall be limited to 0.03 grain/dry standard cubic foot per facility.
- (a) In accordance with Minor Permit Modification 141-10699-00144, only one (1) spray gun per booth shall be in use at any one time.

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

D.1.3 Surface Coating Emission Limitations: Wood Furniture and Cabinet Coating [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12(b), all coating materials, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) or more of the following application systems: Airless spray application system, air-assisted airless spray application system, electrostatic spray application system, electrostatic bell or disc application system, heated airless spray application system, roller coat, brush or wipe application system, or dip-and-drain application system.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-7-6(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 PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

D.1.5 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the paint booths (B1 and B2) are in operation.

D.1.6 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray from the surface coating booth stacks B1 and B2 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Weekly inspections shall be performed of the coating emissions from the stack and the

presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step.

Premdor, Inc.
Walkerton, Indiana
Permit Reviewer: Vickie Cordell

First Administrative Amendment 141-10699
Modified by: Lynn Nieman

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- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.7 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.6 and D.1.7, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Appendix A: Emission Calculations
HAP Emission Calculations (from Surface Coating)

Company Name: Premdor, Inc.
Address City IN Zip: 111 Muskin Drive, Walkerton, In 46574
Permit No./Plt ID: T141-6277-00144
Permit Reviewer: Lynn Nieman
Date: March 10, 1999

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Ethylene Glycol Butyl Ether	Xylene Emission (Tons/yr)	Ethylene Glycol Butyl Ether Emissions (Tons/yr)	Total State Potential Emissions from Individual Materials (Tons/yr)
W. B. Edge Coat	13.85	0.021880	300 315	0.00%	1.20%	0.00%	4.78 5.02	4.78 5.02

Total State Potential Emissions

4.78 5.02
Total Souce HAPs

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

* Units coated are wood doors.