



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

July 7, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Miller Door & Trim, Inc / 039-16587-00155

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot 9/16/03



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

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Indianapolis, Indiana 46206-6015
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July 7, 2004

Ken Washburn
Miller Door and Trim, Inc.
1702 East Monroe
Goshen, Indiana 46528

Re: Part 70 Operating Permit Application
Part 70 No.: T 039-16587-00155
Notice of Administrative Completeness

Dear Mr. Washburn:

On September 18, 2002, the Office of Air Quality (OAQ) received your Part 70 permit application for a wood door and trim manufacturing source, located at 1702 East Monroe, Goshen, Indiana 46528. The OAQ has determined that the application is administratively complete under 326 IAC 2-7-8.

Even though this application has been deemed to be complete under 326 IAC 2-7-3, additional information needs may be discovered during the technical review of the application. The OAQ will inform you of any such need for additional information required to complete this review and to issue a permit under the state and federal requirements of 326 IAC 2-7.

If you have any questions regarding the administrative completeness of this Part 70 permit application, please call Frank P. Castelli at 631-691-3395, ext. 13. Please specify Part 70 No. T 039-16587-00155 for future inquiries or correspondence.

Sincerely,

Original Signed by
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

FPC/MES

cc: File - Elkhart County
Air Compliance - Paul Karkiewicz
Northern Regional Office



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**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
OFFICE OF AIR QUALITY**

**Miller Door and Trim, Inc.
1702 East Monroe
Goshen, Indiana 46528**

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; and denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 039-16587-00155	
Issued by: Original Signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: July 7, 2004 Expiration Date: July 7, 2009

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SECTION A

SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary wood door and trim manufacturing source.

Authorized individual:	President
Source Address:	1702 East Monroe, Goshen, Indiana 46528
Mailing Address:	1702 East Monroe, Goshen, Indiana 46528
General Source Phone:	574 - 533 - 8141
SIC Code:	2499
Source Location Status:	Elkhart
	Nonattainment for the 8-hour ozone standard
	Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP)
	Minor Source, under PSD Rules and Nonattainment New Source Review Only
	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)]

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

- (a) Two (2) surface coating booths, identified as B1 and B2, constructed in 1966, equipped with three (3) airless and air assisted airless spray guns and dry filters for overspray control, exhausting through Stacks S1, S2, S3, S4, and S5, capacity: 22.0 doors per hour total.
- (b) One (1) glue and putty application area, identified as GPA1, constructed in 1966, capacity: 22.0 doors per hour total.
- (c) One (1) automatic molding sprayer coating operation, identified as AMSC1, constructed in 2001, equipped with nine (9) HVLP spray applicators and three (3) dry filters for overspray control, exhausting through Stack F, capacity: 3,000 linear feet of wood door trim per hour.
- (d) One (1) woodworking operation, identified as WW1, constructed in 1966, exhausting to the central return air baghouse for particulate control, which exhausts to the interior of the building, capacity: 1,000 pounds of wood per hour.
- (e) One (1) Jet 24-inch, single head sanding machine, constructed in 2001, exhausting to the central return air baghouse for particulate control, which exhausts to the interior of the building, capacity: 6,000 linear feet of wood door trim per hour and 2,283 pounds of wood per hour.

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

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

- (a) Natural gas-fired non-boiler combustion units with heat input equal to or less than ten million (10,000,000) Btu per hour with a total rating of 12.0 million Btu per hour.
- (b) Paved and unpaved roads and parking lots with public access.
- (c) VOC and HAP storage containers with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

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

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

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [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, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 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 Provide Information [326 IAC 2-8-4(5)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1 when furnishing copies of requested records directly to U.S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, 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, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.11 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 initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications 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 Branch, Office of Air Quality
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, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 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 (PMPs) 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 the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The PMP extension notification does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.13 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, OAQ and the Northern Regional Office, 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 Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967
Northern Regional Office, Telephone 219-881-6712, Facsimile 219-881-6745

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.
- Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 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 Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a 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)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.16 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
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, OAQ on or before the date it is due.
 - (2) If IDEM, OAQ, 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, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as needed to process the application.

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at 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 2-8-11.1 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 Quality
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, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade 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).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.19 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-17-3-2] [IC13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10] [IC 13-17-3-2]

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

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

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, Billing, Licensing and Training Section (BLT)), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

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

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

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

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

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

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

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

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(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.6 Fugitive Dust Emissions [326 IAC 6-4]

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

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

Except as otherwise provided by statute, rule or in this permit, 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 is are in operation.

C.8 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

(C) Waste disposal site.

- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana 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 to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.10 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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 Quality
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 protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.11 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

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

C.12 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within *ninety (90) days*, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

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]

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 Quality
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 require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) If the ERP is disapproved by IDEM, OAQ, 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, OAQ 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]

If a regulated substance as defined in 40 CFR 68 is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the

Permittee shall amend its Compliance Response Plan to include such response steps taken.

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and 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.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (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, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 Branch, Office of Air Quality
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, OAQ on or before the date it is due.

- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years.

Stratospheric Ozone Protection

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

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Surface Coating Operations

- (a) Two (2) surface coating booths, identified as B1 and B2, constructed in 1966, equipped with three (3) airless and air assisted airless spray guns and dry filters for overspray control, exhausting through Stacks S1, S2, S3, S4, and S5, capacity: 22.0 doors per hour total.
- (b) One (1) glue and putty application area, identified as GPA1, constructed in 1966, capacity: 22.0 doors per hour total.
- (c) One (1) automatic molding sprayer coating operation, identified as AMSC1, constructed in 2001, equipped with nine (9) HVLP spray applicators and three (3) dry filters for overspray control, exhausting through Stack F, capacity: 3,000 linear feet of wood door trim per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

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

D.1.1 PSD Minor Limit [326 IAC 2-2] [326 IAC 2-7-10.5]

- (a) Pursuant to MSM 039-12945-00155, issued on December 29, 2000 and 326 IAC 2-7-10.5, the use of VOC, including coatings, dilution solvents, and cleaning solvents from the automatic molding sprayer coating operation shall be less twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) This usage limited the potential to emit VOC to less than the threshold level of twenty-five (25) tons per year for a significant source modification pursuant to 326 IAC 2-7-10.5. Compliance with this VOC limit also makes the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to the 2001 modification.

D.1.2 VOC Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, the total use of VOC, including coatings, dilution solvents, and cleaning solvents from the booths B1 and B2, the automatic molding sprayer coating operation AMSC1 and the glue and putty area GPA1 shall be less 99.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit combined with the 0.539 tons of VOC per year from the insignificant activities is required to limit the potential to emit VOC from the entire source to less than one hundred (100) tons per year.

Compliance with this limit makes 326 IAC 2-7 (Part 70 Permit Program) not applicable.

D.1.3 Hazardous Air Pollutant (HAP) Limits [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4:

- (a) The total use of the worst case single HAP including coatings, dilution solvents, and cleaning solvents from the booths B1 and B2, the automatic molding sprayer coating operation AMSC1 and the glue and putty area GPA1 shall be less 9.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit combined with the 0.35 tons of HAPs per year from the insignificant activities is required to limit the potential to emit of the worst case single HAP from the entire source to less than ten (10) tons per year.

- (b) The total use of the combination of HAPs including coatings, dilution solvents, and cleaning solvents from the booths B1 and B2, the automatic molding sprayer coating operation AMSC1 and the glue and putty area GPA1 shall be less 24.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit combined with the 0.35 tons of HAPs per year from the insignificant activities is required to limit the potential to emit of the combination of HAPs from the entire source to less than twenty-five (25) tons per year.
- (c) Compliance with these limits makes 326 IAC 2-7 (Part 70 Permit Program) not applicable.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coatings, applied to wood furniture and cabinets in booths B1 and B2, by the automatic molding sprayer coating operation AMSC1 and in the glue and putty area GPA1 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.1.5 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P the PM from the surface coating operations performed in booths B1 and B2 as well as those surface coating operations performed in the automatic molding sprayer coating operation AMSC1, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation 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.1.6 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating processes (B1, B2 and AMSC1) shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.7 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 these facilities and any control devices.

Compliance Determination Requirements

D.1.8 Volatile Organic Compounds (VOC) and HAPs [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC and HAPs usage limitations contained in Conditions D.1.1, D.1.2, and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth Stacks S1, S2, S3, S4, S5 and Stack F 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 Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from 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 Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from 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.1.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.
 - (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (3) The total VOC usage for each month; and
 - (4) The weight of VOCs emitted for each compliance period.

- (b) To document compliance with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAPs usage limits and/or the HAPs emission limits established in Condition D.1.3. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.
- (1) The HAP content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (3) The single HAP and combination of HAPs usage for each month; and
 - (4) The weight of the single HAP and the combination of HAPs emitted for each compliance period.
- (c) To document compliance with Conditions D.1.5 and D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1, D.1.2 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. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Woodworking Operations

- (d) One (1) woodworking operation, identified as WW1, constructed in 1966, exhausting to the central return air baghouse for particulate control, which exhausts to the interior of the building, capacity: 1,000 pounds of wood per hour.
- (e) One (1) Jet 24-inch, single head sanding machine, constructed in 2001, exhausting to the central return air baghouse for particulate control, which exhausts to the interior of the building, capacity: 6,000 linear feet of wood door trim per hour and 2,283 pounds of wood per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

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

D.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the central return air baghouse shall not exceed 5.71 pounds per hour when operating at a process weight rate of 3,283 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

D.2.2 PM₁₀ Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, the PM₁₀ emission rate from the central return air baghouse shall not exceed 5.71 pounds per hour.

Compliance with this limit makes 326 IAC 2-7 (Part 70 Permit Program) not applicable.

D.2.3 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 woodworking operation and sand machine and their control device.

Compliance Determination Requirements

D.2.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

Within 180 days after issuance of this FESOP, in order to demonstrate compliance with Conditions D.2.1 and D.2.2, the Permittee shall perform PM and PM₁₀ testing for central return air baghouse utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM₁₀ includes filterable and condensable PM₁₀. Testing shall be conducted in accordance with Section C-Performance Testing.

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

D.2.5 Particulate Control

In order to comply with Condition D.2.2, the baghouse for particulate control shall be in operation and control emissions from the woodworking operation and sanding machine at all times that these processes are in operation.

D.2.6 Visible Emissions Notations

- (a) Daily visible emission notations of the central return air baghouse stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.

D.2.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation and the sanding machine when venting to the atmosphere. A baghouse inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

D.2.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.9 Record Keeping Requirements

- (a) To document compliance with Condition D.2.6, the Permittee shall maintain records of daily visible emission notations of the central return air baghouse stack exhaust when exhausting to the atmosphere.
- (b) To document compliance with Condition D.2.7, the Permittee shall maintain records of the results of the inspections required under Condition D.2.7 and the dates the vents are redirected.
- (c) To document compliance with Condition D.2.2, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Miller Door and Trim, Inc.
Source Address: 1702 East Monroe, Goshen, Indiana 46528
Mailing Address: 1702 East Monroe, Goshen, Indiana 46528
FESOP No.: F 039-16587-00155

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

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify) _____
- Report (specify) _____
- Notification (specify) _____
- Affidavit (specify) _____
- Other (specify) _____

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
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 OCCURRENCE REPORT**

Source Name: Miller Door and Trim, Inc.
Source Address: 1702 East Monroe, Goshen, Indiana 46528
Mailing Address: 1702 East Monroe, Goshen, Indiana 46528
FESOP No.: F 039-16587-00155

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: Miller Door and Trim, Inc.
Source Address: 1702 East Monroe, Goshen, Indiana 46528
Mailing Address: 1702 East Monroe, Goshen, Indiana 46528
FESOP No.: F 039-16587-00155
Facilities: Automatic Molding Sprayer Coating Operation (AMSC1)
Parameter: VOC
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	VOC (tons)	VOC (tons)	VOC (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.
Deviation has been reported on _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Miller Door and Trim, Inc.
Source Address: 1702 East Monroe, Goshen, Indiana 46528
Mailing Address: 1702 East Monroe, Goshen, Indiana 46528
FESOP No.: F 039-16587-00155
Facilities: Surface Coating Booths (B1 and B2), Automatic Molding Sprayer Coating Operation (AMSC1) and Glue and Putty Area (GPA1)
Parameter: VOC
Limit: Total less than 99.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	VOC (tons)	VOC (tons)	VOC (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.
Deviation has been reported on _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Miller Door and Trim, Inc.
 Source Address: 1702 East Monroe, Goshen, Indiana 46528
 Mailing Address: 1702 East Monroe, Goshen, Indiana 46528
 FESOP No.: F 039-16587-00155
 Facilities: Surface Coating Booths (B1 and B2), Automatic Molding Sprayer Coating Operation (AMSC1) and Glue and Putty Area (GPA1)
 Parameter: Worst Case Single HAP
 Limit: Total less than 9.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	Single HAP (tons)	Single HAP (tons)	Single HAP (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.
 Deviation has been reported on _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Miller Door and Trim, Inc.
 Source Address: 1702 East Monroe, Goshen, Indiana 46528
 Mailing Address: 1702 East Monroe, Goshen, Indiana 46528
 FESOP No.: F 039-16587-00155
 Facilities: Surface Coating Booths (B1 and B2), Automatic Molding Sprayer Coating Operation (AMSC1) and Glue and Putty Area (GPA1)
 Parameter: Combination of HAPs
 Limit: Total less than 24.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	Combination of HAPs (tons)	Combination of HAPs (tons)	Combination of HAPs (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.
 Deviation has been reported on _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

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

Source Name: Miller Door and Trim, Inc.
 Source Address: 1702 East Monroe, Goshen, Indiana 46528
 Mailing Address: 1702 East Monroe, Goshen, Indiana 46528
 FESOP No.: F 039-16587-00155

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

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Federally Enforceable Operating Permit (FESOP)

Source Name: Miller Door and Trim, Inc.
Source Location: 1702 East Monroe, Goshen, Indiana 46528
County: Elkhart
SIC Code: 2499
FESOP: F 039-16587-00155
Permit Reviewer: Frank P. Castelli

On April 21, 2004, the Office of Air Quality (OAQ) had a notice published in the Goshen News, Goshen, Indiana, stating that Miller Door and Trim, Inc had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a wood door and trim manufacturing source. The notice also stated that OAQ proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP 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 should be issued as proposed.

Upon further review, the OAQ has decided to make the following changes to the FESOP. The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

Change 1:

Condition B.22 has been revised to correct the name of the section to contact regarding annual fee payments as shown below:

- B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]
- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
 - (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
 - (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, ~~IM & Billing Section~~ **Billing, Licensing and Training Section (BLT)**), to determine the appropriate permit fee.

Change 2:

Since 326 IAC 2-6 has been revised and this source is not located in Lake or Porter County with the potential to emit greater than twenty-five (25) tons per year of NO_x, does not emit five (5) tons per year or more of lead and does not require a Part 70 Operating Permit, the requirements of 326 IAC 2-6 do not apply. Therefore, Condition C.18 was deleted to reflect the revision to 326 IAC 2-6 and all subsequent conditions in Section C have been re-numbered.

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

- ~~(a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 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). The statement must be submitted to:~~

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

~~The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

- ~~(b) The 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, OAQ on or before the date it is due.~~

Change 3:

As of June 15, 2004 Elkhart County has been designated as nonattainment for the 8-hour ozone standard. Therefore Condition A.1 has been revised as follows:

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

The Permittee owns and operates a stationary wood door and trim manufacturing source.

Authorized individual: President
Source Address: 1702 East Monroe, Goshen, Indiana 46528
Mailing Address: 1702 East Monroe, Goshen, Indiana 46528
General Source Phone: 574 - 533 - 8141
SIC Code: 2499
Source Location Status: Elkhart
Attainment for all criteria pollutants
Nonattainment for the 8-hour ozone standard
Attainment for all other criteria pollutants
Source Status: Federally Enforceable State Operating Permit (FESOP)
Minor Source, under PSD Rules **and Nonattainment New Source Review only**
Minor Source, Section 112 of the Clean Air Act

Change 4:

The Quarterly Deviation and Compliance Monitoring Report has been made consistent with Condition B.14. The wording has been revised as follows:

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

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

Source Name: Miller Door and Trim, Inc.
Source Address: 1702 East Monroe, Goshen, Indiana 46528
Mailing Address: 1702 East Monroe, Goshen, Indiana 46528
FESOP No.: F 039-16587-00155

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. ~~A deviations that are~~ required to be reported by **pursuant to** an applicable requirement **that exists independent of the permit**, shall be reported according to the schedule stated in the applicable requirement and **does** not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

Source Background and Description

Source Name:	Miller Door and Trim, Inc.
Source Location:	1702 East Monroe, Goshen, Indiana 46528
County:	Elkhart
SIC Code:	2499
Operation Permit No.:	T 039-7365-00155
Operation Permit Issuance Date:	September 24, 1998
Permit No.:	F 039-16587-00155
Permit Reviewer:	Frank P. Castelli

The Office of Air Quality (OAQ) has reviewed a FESOP application from Miller Door and Trim, Inc. relating to the operation of a wood door and trim manufacturing source.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Two (2) surface coating booths, identified as B1 and B2, constructed in 1966, equipped with three (3) airless and air assisted airless spray guns and dry filters for overspray control, exhausting through Stacks S1, S2, S3, S4, and S5, capacity: 22.0 doors per hour total.
- (b) One (1) glue and putty application area, identified as GPA1, constructed in 1966, capacity: 22.0 doors per hour total.
- (c) One (1) automatic molding sprayer coating operation, identified as AMSC1, constructed in 2001, equipped with nine (9) HVLP spray applicators and three (3) dry filters for overspray control, exhausting through Stack F, capacity: 3,000 linear feet of wood door trim per hour.
- (d) One (1) woodworking operation, identified as WW1, constructed in 1966, exhausting to the central return air baghouse for particulate control, which exhausts to the interior of the building, capacity: 1,000 pounds of wood per hour.
- (e) One (1) Jet 24-inch, single head sanding machine, constructed in 2001, exhausting to the central return air baghouse for particulate control, which exhausts to the interior of the building, capacity: 6,000 linear feet of wood door trim per hour and 2,283 pounds of wood per hour.

Unpermitted Emission Units and Pollution Control Equipment

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

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

There are no new facilities proposed at this source during this review process.

Permitted Emission Units and Pollution Control Equipment But Never Constructed

One (1) forced air drying system, consisting of one (1) natural gas fired boiler and two (2) sixteen (16) inch production line cooling fans.

Insignificant Activities

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

- (a) Natural gas-fired non-boiler combustion units with heat input equal to or less than ten million (10,000,000) Btu per hour with a total rating of 12.0 million Btu per hour.
- (b) Paved and unpaved roads and parking lots with public access.
- (c) VOC and HAP storage containers with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

Existing Approvals

The source has been operating under a Part 70 Operating Permit T 039-7365-00155 issued on September 24, 1998, and the following amendments and modifications:

- (a) MPM 039-10393-00155 issued on March 4, 1999
- (b) MSM 039-12945-00155 issued on December 29, 2000
- (c) MPM 039-13595-00155 issued on February 6, 2001
- (d) AA 039-14831-00155 issued October 12, 2001
- (e) R 039-13261-00155 issued January 8, 2002

All conditions from previous approvals were incorporated into this FESOP except the following:

MPM 039-10393-00155 issued on March 4, 1999, MSM 039-12945-00155 issued on December 29, 2000, MPM 039-13595-00155 issued on February 6, 2001, AA 039-14831-00155 issued on October 12, 2001, and R 039-13261-00155 issued on January 8, 2002

Condition D.1.3: To avoid the applicability of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14 (40 CFR Part 63, Subpart JJ), the surface coating booths, identified as B1 and B2, and the automatic molding sprayer coating operation shall use no more than one hundred (100) gallons per month of finishing material or adhesives in the manufacture of wood furniture or wood furniture components. This limit is established in the definition of an incidental wood furniture manufacturer, pursuant to 40 CFR Part 63, Subpart JJ.

Reason not incorporated: Since the source has transitioned from a Part 70 Operating Permit to a FESOP, the source will no longer be a major source of HAPs. Therefore the requirements of 40 CFR Part 63, Subpart JJ are not applicable and the existing limit of one hundred (100) gallons per month of finishing material or adhesives in the manufacture of wood furniture or wood furniture components is no longer necessary.

Enforcement Issue

There are no enforcement actions pending.

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 Part 70 Operating Permit Renewal application was received on September 23, 2002 and a FESOP application for the purposes of this review was received on January 12, 2004. Additional information was received on June 17, 2003 and January 16, 2004.

A notice of completeness letter was mailed to the source on May 20, 2003 for the Part 70 Operating Permit Renewal and no notice of completeness letter was mailed to the source for the FESOP.

Emission Calculations

See pages 1 through 7 of Appendix A of this document for detailed emission calculations.

Potential to Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential to Emit (tons/yr)
PM	801
PM ₁₀	801
SO ₂	0.032
VOC	334
CO	4.42
NO _x	5.26

HAPs	Potential to Emit (tons/yr)
MEK	35.5
Toluene	43.6
Xylenes	17.5
Formaldehyde	0.814
MIBK	3.38
Methanol	3.34
Vinyl Acetate	0.001
Benzene	0.0001
Dichlorobenzene	0.00006
Hexane	0.095
Lead Compounds	0.00003
Cadmium Compounds	0.00006
Chromium Compounds	0.00007
Manganese Compounds	0.00002
Nickel Compounds	0.0001
Total	96.2

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM₁₀ and VOC are equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.
- (c) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.

Potential to Emit After Issuance

The source has opted to operate under the FESOP program. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control

equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the Part 70 Operating Permit and this FESOP.

Process/Emission Unit	Potential To Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Booths B1 and B2 & Glue and Putty Area GPA1	2.09	2.09	-	Less than 99.0	-	-	Less than 9.5 single and 24.5 total
Automatic Molding Sprayer Coating Operation AMSC1	0.111	0.111	-		-	-	
Woodworking Operation and Sand Machine Controlled by Central Return Air Baghouse	25.0	25.0	-	-	-	-	-
Insignificant Activities	5.29	5.59	0.032	0.539	4.42	5.26	0.35
Total Emissions	32.5	32.8	0.032	Less than 100	4.42	5.26	Less than 10/25

- (a) The woodworking and sanding machine operations both exhaust to the same baghouse and pursuant to 326 IAC 6-3-2 the particulate from the central return air baghouse shall not exceed 5.71 pounds per hour, equivalent to 25.0 tons per year. The PM and PM₁₀ emission limits have been set equal to this allowable particulate emission rate.
- (b) The VOC emissions from the automatic molding sprayer coating operation are limited to less than twenty-five (25) tons per year pursuant to 326 IAC 2-7-10.5 which is part of the overall surface coating limit of less than 99.0 tons per year

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM ₁₀	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Maintenance
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the

ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

- (b) Elkhart County has been classified as attainment or unclassifiable for the remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 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 applicability.

Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	32.5
PM ₁₀	32.8
SO ₂	0.032
VOC	Less than 100
CO	4.42
NO _x	5.26
Single HAP	Less than 10
Combination HAPs	Less than 25

This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20, 40 CFR 61 and 40 CFR Part 63) applicable to this source.
 - (1) This source is not subject to 40 CFR Part 63, Subpart JJ because the source is not a major source of HAPs. The source has elected to limit any individual HAP from the entire source to less than ten (10) tons per twelve (12) consecutive

month period with compliance determined at the end of each month and any combination of HAPs from the entire source to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Therefore, the source is not subject to the requirements of 40 CFR Part 63, Subpart JJ.

- (2) The source is not subject to the National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products, 40 CFR 63, Subpart QQQQ because the source is not a major source of HAPs. The source has elected to limit any individual HAP from the entire source to less than ten (10) tons per twelve (12) consecutive month period with compliance determined at the end of each month and any combination of HAPs from the entire source to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. The final Maximum Achievable Control Technology Standard (MACT), 40 CFR 63, Subpart QQQQ for Surface Coating of Wood Building Products, was published in the Federal Register on May 28, 2003.

State Rule Applicability – Entire Source

326 IAC 2-2 (PSD)

Pursuant to the Part 70 Operating Permit, T 039-7365-00155 issued on September 24, 1998, Miller Door and Trim, Inc. was a major PSD source since the potential to emit of VOC exceeded two hundred and fifty (250) tons per year and the source was not one of the 28 major source categories. The actual VOC emissions from this source were never equal to or greater than two hundred and fifty (250) tons per year.

Since this source has elected to obtain a FESOP and limit VOC emissions to less than one hundred (100) tons per year, this source will no longer be a major PSD source pursuant to this rule.

326 IAC 2-6 (Emission Reporting)

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

326 IAC 5-1 (Visible Emissions Limitations)

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 the permit:

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

State Rule Applicability – Individual Facilities

326 IAC 2-2 (PSD)

Pursuant to MSM 039-12945-00155, issued on December 29, 2000, the potential to emit VOC from the automatic molding sprayer coating operation was limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

Compliance with this VOC emission limit also made the requirements of 326 IAC 2-2 not applicable to this minor modification to an existing major PSD source. This modification to an existing major stationary source was not major because the emissions increase were less than the PSD significant levels.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of the one (1) automatic molding sprayer coating operation, identified as AMSC1, constructed in 2001, will emit less than ten (10) tons per year of a single HAP and (twenty-five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-7-10.5 (Part 70 permits; source modifications)

Pursuant to MSM 039-12945-00155, issued on December 29, 2000, the potential to emit VOC from the automatic molding sprayer coating operation was limited to less than twenty-five (25) tons per twelve (12) consecutive month period. This emission limit made the 2001 modification a minor modification to the source's Part 70 Operating Permit and also made the requirements of 326 IAC 2-2 not applicable to this modification.

326 IAC 2-8-4 (Permit Content (FESOP))

Pursuant to this rule, the amount of PM₁₀ and VOC will be limited to less than one hundred (100) tons per year. In addition, the amount of a single HAPs and combination of HAPs will be limited to less than ten (10) and twenty-five (25) tons per year, respectively. Therefore, the requirements of 326 IAC 2-7, do not apply. The specific limits required to limit the entire source to these levels are as follows:

(a) PM₁₀

The source-wide PM₁₀ emission limit will be assured by limiting the PM₁₀ emissions from the central return air baghouse to 5.71 pounds per hour equivalent to 25.0 tons per year. This limit represents the allowable PM limit pursuant 326 IAC 6-3-2 and assumes that for these ambient temperature emissions the PM₁₀ emissions cannot exceed the PM emissions. This limit will be verified by testing the emissions from the central return air baghouse.

(b) VOC

The total VOC delivered to the applicators for the surface coating operations will be limited to less than 99.0 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. This limit combined with VOC emissions of less than 0.539 tons per year from the insignificant activities assures that the VOC emissions from the entire source will be limited to less than one hundred (100) tons per year.

(c) Single HAP

The total worst case single HAP delivered to the applicators for the surface coating operations will be limited to less than 9.5 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. This limit combined with total HAPs of 0.350 tons per year from the insignificant activities assures that the worst case single HAP from the entire source will be limited to less than ten (10) tons per year.

(d) Combination of HAPs

The total combination of HAPs delivered to the applicators for the surface coating operations will be limited to less than 24.5 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. This limit combined with total HAPs of 0.350 tons per year from the insignificant activities assures that the combination of HAPs from the entire source will be limited to less than twenty five (25) tons per year

326 IAC 6-3-2 (Process Operations)

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirements from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain applicable requirements until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

Pursuant 40 CFR 52, Subpart P the particulate matter (PM) from the surface coating booths, identified as B1 and B2 as well as the automatic molding sprayer coating operation, identified as AMSC1, shall each 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:

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

Under the rule revision, particulate from the surface coating booths and sprayer coating operation shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations).

The particulate from the woodworking operation, exhausted to the central return air baghouse shall not exceed 2.58 pounds per hour when operating at the specified process weight rate of 0.500 tons per hour. The particulate from the sanding machine exhausted to the central return air baghouse shall not exceed 4.48 pounds per hour when operating at the specified process weight rate of 1.14 tons per hour.

Therefore, since the woodworking and sanding machine operation both exhaust to the same baghouse, the particulate from the central return air baghouse shall not exceed 5.71 pounds per hour when operating at the specified total process weight rate of 1.64 tons per hour.

This limitation is based upon the following:

Interpolation 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:

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

As shown on Page 4 of 7 of Appendix A, the potential to emit of these operations exhausted to the central return air baghouse is 1.70 pounds per hour and therefore, the baghouse complies with 326 IAC 6-3-2.

The baghouse shall be in operation at all times the woodworking and sanding machine are in operation, in order to comply with this limit.

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

Pursuant to 326 IAC 8-2-12, the surface coatings applied to wood furniture and cabinets in the two (2) surface coating booths, identified as B1 and B2, the automatic molding sprayer coating operation, identified as AMSC1, and the glue and putty area, identified as GPA1 shall each utilize 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.

The two (2) surface coating booths, identified as B1 and B2, the automatic molding sprayer coating operation, identified as AMSC1, use airless, air-assisted airless and/or HVLP spray applicators. The glue and putty area, identified as GPA1, utilize brush and/or wipe hand applications. Therefore, the surface coating operations B1, B2 and AMSC1 as well as the glue and putty area are in compliance with this rule.

Testing Requirements

The central return air baghouse that controls the PM and PM₁₀ emissions from the woodworking operations and the sanding machine is proposed to be tested to verify with the requirements of 326 IAC 6-3-2 for PM and the requirements of 326 IAC 2-8-4 for PM₁₀. These tests shall be performed within 180 days of permit issuance.

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, OAQ 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 in 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 surface coating booths, identified as B1 and B2, and the automatic molding sprayer coating operation, identified as AMSC1, have applicable compliance monitoring conditions as specified below:
 - (1) 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, S2, S3, S4, S5 and Stack F 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 Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
 - (2) 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 Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
 - (3) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8-4.

- (b) The woodworking operation and the sanding machine have applicable compliance monitoring conditions as specified below:

- (1) Daily visible emissions notations of the central return air baghouse exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (2) An inspection shall be performed within the last month of each calendar quarter of the central return air baghouse.
- (3) In the event that baghouse failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this proposed permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

These monitoring conditions are necessary because the central return air baghouse for the woodworking operation and sanding machine must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8-4.

Conclusion

The operation of this wood door and trim manufacturing source shall be subject to the conditions of the FESOP 039-16587-00155.

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

Company Name: Miller Door and Trim, Inc.
Address City IN Zip: 1702 East Monroe, Goshen, Indiana 46528
FESOP: F 039-16587
Plt ID: 039-00155
Reviewer: Frank P. Castelli
Application Date: January 12, 2004

Material	Density (lb/gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Gal of Mat (gal/unit)	Maximum (unit/hour)	Maximum (gal/hour)	Lb VOC / Lb Solids
Booths B1 and B2									
Top Coat	7.53	75.10%	0.00%	82.5%	0.00%	0.25	22	5.50	3.31
Sealer	7.46	79.83%	0.00%	79.8%	0.00%	0.25	22	5.50	3.96
Stain 14-8050	9.08	59.30%	0.00%	59.3%	0.00%	0.125	22	2.75	1.46
Laquer	9.32	53.97%	0.00%	54.0%	0.00%	0.25	22	5.50	1.17
Velvanguard	8.01	61.77%	0.00%	61.8%	0.00%	0.25	22	5.50	1.62
Stain Impervo	10.59	34.50%	0.00%	34.5%	0.00%	0.25	22	5.50	0.53
Minit Dry Enamel	9.10	72.00%	0.00%	72.0%	0.00%	0.25	22	5.50	2.57
Other Operations									
Putty	12.50	24.70%	0.00%	24.7%	0.00%	0.06	22	1.32	0.33
Glue	9.13	53.70%	0.00%	53.7%	0.00%	0.003	22	0.07	1.16

Material	Pounds VOC per gallon of coating	Pounds VOC per gallon of coating less water	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	Controlled Particulate Potential tons/yr	PM Control Efficiency	Transfer Efficiency
Booths B1 and B2									
Top Coat	6.21	6.21	34.17	820.13	149.67	11.29	0.56	95%	75%
Sealer	5.95	5.95	32.74	785.68	143.39	9.06	0.45	95%	75%
Stain 14-8050	5.38	5.38	14.81	355.37	64.86	11.13	0.56	95%	75%
Laquer	5.03	5.03	27.67	663.96	121.17	25.84	1.29	95%	75%
Velvanguard	4.95	4.95	27.21	653.11	119.19	18.44	0.92	95%	75%
Stain Impervo	3.65	3.65	20.09	482.27	88.01	41.77	2.09	95%	75%
Minit Dry Enamel	6.55	6.55	36.04	864.86	157.84	15.35	0.77	95%	75%
Other Operations									
Putty	3.09	3.09	4.08	97.81	17.85	0.00	0.00	95%	100%
Glue	4.90	4.90	0.32	7.77	1.42	0.00	0.00	95%	100%
Worst Case Coating in Booths B1 and B2 + Other Operations			TOTAL	177	41.8	2.09			

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 = Potential VOC Pounds per Hour * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hr) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
lb VOC/lb solids = Weight % organics/ (1-Weight % volatile)
Total Emissions = Sum of all numbers
Total = Sum of all Gallons of material (gal/unit)
Weighted Average - pounds VOC per gallon = sum of [gallons of material (gal / hr) * Pounds of VOC per gallon of coating less water]/total (gal/hr)

Company Name: Miller Door and Trim, Inc.
Address City IN Zip: 1702 East Monroe, Goshen, Indiana 46528
FESOP: F 039-16587
Plt ID: 039-00155
Reviewer: Frank P. Castelli
Application Date: January 12, 2004

Material	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum (unit/hr)	Weight % MEK	Weight % Toluene	Weight % Xylene	Weight % Formaldehyde	Weight % MIBK	Weight % Methanol	Weight % Vinyl Acetate
Booths B1 and B2										
Top Coat	7.53	0.25	22	0.00%	0.00%	3.00%	0.00%	0.00%	0.00%	0.00%
Sealer	7.46	0.25	22	14.06%	23.45%	4.06%	0.41%	1.88%	1.86%	0.00%
Stain 14-8050	9.08	0.125	22	0.00%	12.00%	14.00%	0.00%	0.00%	0.00%	0.00%
Laquer	9.32	0.25	22	5.00%	8.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Velvanguard	8.01	0.25	22	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Stain Impervo	10.59	0.25	22	0.00%	10.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Unit Dry Enamel	9.10	0.25	22	0.00%	10.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Other Ops										
Putty	12.50	0.06	22	8.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Glue	9.13	0.003	22	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.05%

Material	Density (lb/gal)	Gal of Mat (gal/hr)	MEK Emissions (tons/yr)	Toluene Emissions (tons/yr)	Xylene Emissions (tons/yr)	Formaldehyde Emissions (tons/yr)	MIBK Emissions (tons/yr)	Methanol Emissions (tons/yr)	Vinyl Acetate Emissions (tons/yr)	Total Emissions (tons/yr)
Booths B1 and B2										
Top Coat	7.53	5.5	0.00	0.00	5.44	0.00	0.00	0.00	0.00	5.44
Sealer	7.46	5.5	25.25	42.12	7.29	0.74	3.38	3.34	0.00	82.12
Stain 14-8050	9.08	2.75	0.00	13.12	15.31	0.00	0.00	0.00	0.00	28.44
Laquer	9.32	5.5	11.23	17.96	0.00	0.00	0.00	0.00	0.00	29.19
Velvanguard	8.01	5.5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Stain Impervo	10.59	5.5	0.00	25.51	0.00	0.00	0.00	0.00	0.00	25.51
Unit Dry Enamel	9.10	5.5	0.00	21.92	0.00	0.00	0.00	0.00	0.00	21.92
Other Ops										
Putty	12.50	1.32	5.78	0.00	0.00	0.00	0.00	0.00	0.000	5.78
Glue	9.13	0.066	0.00	0.00	0.00	0.00	0.00	0.00	0.0013	0.00

Worst Case Single HAP Emission **31.03** **42.12** **15.31** **0.74** **3.38** **3.34** **0.001**

Worst Case Combination HAPs **87.90**

METHODOLOGY

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

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

**Company Name: Miller Door and Trim, Inc.
Address City IN Zip: 1702 East Monroe, Goshen, Indiana 46528
FESOP: F 039-16587
Plt ID: 039-00155
Reviewer: Frank P. Castelli
Application Date: January 12, 2004**

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
Molding Sprayer Coating Operation													
Sherwood Custom Wiping Stain	6.36	95.40%	0.0%	95.4%	0.0%	2.30%	0.07810	ERR	ERR	ERR	ERR	264	75.0%
Clear Vinyl Sealer	7.24	79.20%	0.0%	79.2%	0.0%	14.20%	0.07810	ERR	ERR	ERR	ERR	40.4	75.0%
Precat Lacquer MRE Clear	7.47	70.80%	0.0%	70.8%	0.0%	18.50%	0.05050	ERR	ERR	ERR	ERR	28.6	75.0%
Cleaning Blend	6.81	100.00%	48.7%	51.3%	0.0%	0.00%	0.00034	ERR	ERR	ERR	ERR	N/A	100.0%

Cleaning Blend usage based on 0.25 gallons per month.

Potential to Emit	Add worst case coating to all solvents	ERR	ERR	ERR	ERR
		ERR	ERR	ERR	ERR

METHODOLOGY

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

Molding Sprayer Coating Operation HAP Emissions Calculations

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % MEK	Xylene	Toluene	Formaldehyde	MEK
								Emissions (tons/yr)	Emissions (tons/yr)	Emissions (tons/yr)	Emissions (tons/yr)
HVLP Spray Applicators											
Sherwood Custom Wiping Stain	6.38	0.07810	30.0	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.000	0.00
Clear Vinyl Sealer	7.24	0.07810	30.0	3.00%	2.00%	0.10%	6.00%	2.23	1.49	0.074	4.46
Clear Precat Lacquer MRE	7.47	0.05050	30.0	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.000	0.00
Cleaning Blend	6.81	0.00034	1.000	0.00%	21.30%	0.00%	0.00%	0.00	0.002	0.000	0.00

Methodology **2.23 1.49 0.074 4.46**

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

Cleaning Blend usage based on 0.25 gallons per month.

Overall Total 8 . 25

**Appendix A: Emission Calculations
Baghouse Operations**

Woodworking
Operation including
Sanding Machine

Company Name: Miller Door and Trim, Inc.
Address City IN Zip: 1702 East Monroe, Goshen, Indiana 46528
FESOP: F 039-16587
Pit ID: 039-00155
Reviewer: Frank P. Castelli
Application Date: January 12, 2004

Unit ID	Control Efficiency (%)	Dust Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	Emission Rate before Controls (lb/hr)	Emission Rate before Controls (tons/yr)	Emission Rate after Controls (lb/hr)	Emission Rate after Controls (tons/yr)
Central Return							
Air Baghouse	99.0%	0.0400	4968	170.33	746.1	1.7033	7.461

Methodology

Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (sq. ft.) ((cub. ft./min.)/sq. ft.) (60 min/hr) (lb/7000 grains)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Allowable Rate of Emissions

	Process Rate (lbs/hr)	Process Weight Rate (tons/hr)	Allowable Emissions (lbs/hr)
Woodworking Operation	1000	0.50	2.58
Sanding Machine	2283	1.14	4.48
Central Return Air Baghouse	3283	1.64	5.71

Methodology

Allowable Emissions = 4.10(Process Weight Rate)^0.67

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

**Company Name: Miller Door and Trim, Inc.
Address City IN Zip: 1702 East Monroe, Goshen, Indiana 46528
FESOP: F 039-16587
Plt ID: 039-00155
Reviewer: Frank P. Castelli
Application Date: January 12, 2004**

Insignificant non-boiler Natural Gas Combustion, all units less than 10 mmBtu/hr

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
12.000	105.12

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.90	7.60	0.600	100 **see below	5.50	84.0
Potential Emission in tons/yr	0.100	0.399	0.032	5.26	0.289	4.42

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

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

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 6 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
HAPs Emissions**

**Company Name: Miller Door and Trim, Inc.
Address City IN Zip: 1702 East Monroe, Goshen, Indiana 46528
FESOP: F 039-16587
Plt ID: 039-00155
Reviewer: Frank P. Castelli
Date: January 12, 2004**

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 0.002	Dichlorobenzene 0.001	Formaldehyde 0.075	Hexane 1.80	Toluene 0.003
Potential Emission in tons/yr	0.00011	0.000063	0.0039	0.095	0.00018

HAPs - Metals

Emission Factor in lb/MMcf	Lead 0.0005	Cadmium 0.001	Chromium 0.001	Manganese 0.0004	Nickel 0.002	Total HAPs
Potential Emission in tons/yr	0.000026	0.000058	0.000074	0.000020	0.00011	0.099

Methodology is the same as page 5.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations
Summary**

Company Name: Miller Door and Trim, Inc.
Address City IN Zip: 1702 East Monroe, Goshen, Indiana 46528
FESOP: F 039-16587
Plt ID: 039-00155
Reviewer: Frank P. Castelli
Application Date: January 12, 2004

Summary of Emissions

Emission Unit	Before	Before	Before	Before	Before	Before	After	After	After	After	After	After
	Controls	Controls	Controls	Controls	Controls	Controls	Controls	Controls	Controls	Controls	Controls	Controls
	PTE	PTE	PTE	PTE	PTE	PTE	PTE	PTE	PTE	PTE	PTE	PTE
	PM	PM-10	VOC	SO ₂	NO _x	CO	PM	PM-10	VOC	SO ₂	NO _x	CO
	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr
Booths B1 and B2 + Putty/Glue	41.8	41.8	177.1	0.000	0.000	0.000	2.09	2.09	177.1	0.000	0.000	0.000
Woodworking Operations	746.1	746.1	0.000	0.000	0.000	0.000	7.46	7.46	0.000	0.000	0.000	0.000
Molding Spayer Coating Op.	8.23	8.23	156.0	0.000	0.000	0.000	0.111	0.111	156.0	0.000	0.000	0.000
Subtotal	796	796	333	0.000	0.000	0.000	9.66	9.66	333	0.000	0.000	0.000
Insignificant Activities												
Natural Gas Combustion	0.100	0.399	0.289	0.032	5.26	4.42	0.100	0.399	0.289	0.032	5.26	4.42
Unpaved Roads	5.00	5.00	0.000	0.000	0.000	0.000	5.00	5.00	0.000	0.000	0.000	0.000
Storage Containers	0.000	0.000	0.250	0.000	0.000	0.000	0.000	0.000	0.250	0.000	0.000	0.000
Subtotal	5.10	5.40	0.539	0.032	5.26	4.42	5.10	5.40	0.539	0.032	5.26	4.42
Total	801	801	334	0.032	5.26	4.42	14.8	15.1	334	0.032	5.26	4.42