



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

April 30, 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: Specialized Wood Products / 039-17462-00296

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 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, 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 4-21.5-3-7 and IC 13-15-7-3 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 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-MOD.dot 9/16/03



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

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April 30, 2004

Leanna Miller, President
Specialized Wood Products, Inc.
4221 Middlebury Street
Elkhart, Indiana 46516

Re: **039-17462**
Minor Source Modification to:
Part 70 Operating Permit No.: **T 039-7236-00296**

Dear Ms. Miller:

Specialized Wood, Inc. was issued Part 70 Operating Permit **T 039-7236-00296** on December 28, 2003 for wood moulding manufacturing source. An application from Specialized Wood Products, Inc. to modify the source was received on June 25, 2003. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

- (c) One (1) surface coating booth, identified as EU6, equipped with flowcoating applicators and dry filters for PM control, exhausting to Stack EU6X, capacity: 933 pounds of wood moulding per hour.

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

This minor source modification authorizes construction of the new emission units. Operating conditions shall be incorporated into the Part 70 Operating Permit as a significant permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12. Operation is not approved until the significant permit modification has been issued.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter contact Mark L. Kramer, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395, ext. XX or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Original Signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments - MSM with TSD
MLK/MES

cc: File - Elkhart County
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector - Paul Karkiewicz
Compliance Branch - Karen Ampil
Administrative and Development
Technical Support and Modeling - Michele Boner



Joseph E. Kernan
 Governor

Lori F. Kaplan
 Commissioner

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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

Specialized Wood Products, Inc.
4221 Middlebury Street
Elkhart, Indiana 46516

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

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

Operation Permit No.: T 039-7236-00296	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: December 28, 1998 Expiration Date: December 28, 2003
First Minor Source Modification No.: 039-17462-00296	Conditions Affected: A.2 and C.17 Conditions Added: D.3.1- D.3.4 and D.4.1 - D.4.4 Sections Added: D.3 and D.4
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:

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

- D.2.5 Visible Emissions Notations
- D.2.6 Baghouse Inspections
- D.2.7 Broken or Failed Bag Detection

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

- D.2.8 Record Keeping Requirements

D.3 FACILITY OPERATION CONDITIONS - One (1) Surface Coating Booth (EU6)

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

- D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Compliance Determination Requirements

- D.3.2 Volatile Organic Compounds (VOC)

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

- D.3.3 Record Keeping Requirements
- D.3.4 Reporting Requirements

D.4 FACILITY OPERATION CONDITIONS - Entire Source

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

- D.4.1 Hazardous Air Pollutants (HAPs) [40 CFR 63, Subpart QQQQ]

Compliance Determination Requirements

- D.4.2 Hazardous Air Pollutants (HAPs)

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

- D.4.3 Record Keeping Requirements
- D.4.4 Reporting Requirements

Certification Form

Emergency/Deviation Occurrence Report

Quarterly Report Forms

Compliance Monitoring Report Form

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 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a wood moulding production operation

Responsible Official: President
Source Address: 4221 Middlebury Street, Elkhart, IN 46516
Mailing Address: 4221 Middlebury Street, Elkhart, IN 46516
SIC Code: 2499
County Location: Elkhart
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD
Major Source, Section 112 of the Clean Air Act

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

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

- (a) Five (5) surface coating booth identified as EU1-EU5, with dry filters to control particulate emissions. Each booth uses flowcoating as the method of application. Surface coating booth EU4 has two (2) additional spray guns, identified as SG1 and SG2 which use air atomization method of application.
- (b) Woodworking operations with particulate emissions controlled by a baghouse.
- (c) One (1) surface coating booth, identified as EU6, equipped with flowcoating applicators and dry filters for PM control, exhausting to Stack EU6X, capacity: 933 pounds of wood moulding per hour.

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

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

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

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

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

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

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

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

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

- (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
- (2) Indicate actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used on for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.

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

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

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

C.18 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

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

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Surface Coating Booth (EU6)

- (c) One (1) surface coating booth, identified as EU6, equipped with flowcoating applicators and dry filters for PM control, exhausting to Stack EU6X, capacity: 933 pounds of wood moulding 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 2-7-5(1)]

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The VOC usage, including coatings and clean-up solvents, from the one (1) surface coating booth, identified as EU6, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit shall render the requirements of 326 IAC 8-1-6 not applicable.

Compliance Determination Requirements

D.3.2 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitation contained in Conditions D.3.1 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 2-7-6 (1)] [326 IAC 2-7-5 (1)]

There are no specific Compliance Monitoring Requirements applicable to this facility.

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

D.3.3 Record Keeping Requirements

- (a) To document compliance with Condition D.3.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.3.1.

- (1) The VOC content of each coating material and solvent used.
- (2) The amount of coating material and solvent used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (3) The cleanup solvent usage for each month;
- (4) The total VOC usage for each month; and

- (5) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.4

ENTIRE SOURCE CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Entire Source

Wood moulding manufacturing source, consisting of:

- Five (5) Surface Coating Booths - EU1 - EU5 (SECTION D.1),
- Woodworking Operations (SECTION D.2),
- One (1) Surface Coating Booth - EU6 (SECTION D.3)
- Insignificant Activities

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

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

D.4.1 Hazardous Air Pollutants (HAPs) [40 CFR 63, Subpart QQQQ]

- (a) The usage of any individual HAP, including coatings and clean-up solvents, from the entire source, shall be limited to less than ten (10) tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The usage of any combination of HAPs, including coatings and clean-up solvents, from the entire source, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limitations shall render the requirements of 40 CFR 60, Subpart QQQQ (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products) not applicable.

Compliance Determination Requirements

D.4.2 Hazardous Air Pollutants (HAPs)

Compliance with the HAPs usage limitations contained in Conditions D.4.1(a) and (b) 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" HAPs 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 2-7-6 (1)] [326 IAC 2-7-5 (1)]

There are no specific Compliance Monitoring Requirements applicable to the entire source.

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

D.4.3 Record Keeping Requirements

- (a) To document compliance with Conditions D.4.1(a) and (b), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.4.1(a) and (b).
 - (1) The individual and total HAP content of each coating material and solvent used.

- (2) The amount of coating material and solvent used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The cleanup solvent usage for each month;
 - (4) The individual and total HAP usage for each month; and
 - (5) The weight of HAPs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

Part 70 Quarterly Report

Source Name: Specialized Wood Products, Inc.
Source Address: 4221 Middlebury Street, Elkhart, IN 46516
Mailing Address: 4221 Middlebury Street, Elkhart, IN 46516
Part 70 Permit No.: T 039-7236-00296
Facility: One (1) surface coating booth (EU6)
Parameter: VOC usage, including coatings and clean-up solvents
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 Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
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**

Part 70 Quarterly Report

Source Name: Specialized Wood Products, Inc.
Source Address: 4221 Middlebury Street, Elkhart, IN 46516
Mailing Address: 4221 Middlebury Street, Elkhart, IN 46516
Part 70 Permit No.: T 039-7236-00296
Facilities: Entire Source
Parameter: Individual HAP usage, including coatings and clean-up solvents
Limit: Less than ten (10) tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	Individual HAP Usage (tons)	Individual HAP Usage (tons)	Individual HAP Usage (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
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**

Part 70 Quarterly Report

Source Name: Specialized Wood Products, Inc.
Source Address: 4221 Middlebury Street, Elkhart, IN 46516
Mailing Address: 4221 Middlebury Street, Elkhart, IN 46516
Part 70 Permit No.: T 039-7236-00296
Facilities: Entire Source
Parameter: Combination of HAPs usage, including coatings and clean-up solvents
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

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

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Mail to: Permit Administration & Development Section
Office of Air Quality
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015

Specialized Wood Products, Inc.
4221 Middlebury Street
Elkhart, Indiana 46516

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

- 1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
- 2. I hold the position of _____ for _____.
(Title) (Company Name)
- 3. By virtue of my position with _____, I have personal knowledge of the
(Company Name)
representations contained in this affidavit and am authorized to make these representations on behalf of
_____.
(Company Name)
- 4. I hereby certify that Specialized Wood Products, Inc., 4221 Middlebury Street, Elkhart, Indiana 46516, completed construction of the one (1) surface coating booth, identified as EU6, on _____ in conformity with the requirements and intent of the Part 70 Source Modification application received by the Office of Air Quality on June 25, 2003 and as permitted pursuant to **Part 70 Minor Source Modification No. MSM 039-17462, Plant ID No. 039-00296** issued on _____.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature

Date

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of
Indiana on this _____ day of _____, 20 _____.

My Commission expires: _____.

Signature

Name (typed or printed)

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for Part 70 Minor Source and Significant Permit Modifications

Source Background and Description

Source Name:	Specialized Wood Products, Inc.
Source Location:	4221 Middlebury Street, Elkhart, Indiana 46516
County:	Elkhart
SIC Code:	2459 and 2499
Operation Permit No.:	T 039-7236-00296
Operation Permit Issuance Date:	December 28, 1998
Minor Source Modification No.:	039-17462-00296
Significant Permit Modification No.:	039-18182-00296
Permit Reviewer:	Mark L. Kramer

The Office of Air Quality (OAQ) has reviewed a modification application from Specialized Wood Products, Inc. relating to the construction and operation of the following emission units and pollution control devices:

- (c) One (1) surface coating booth, identified as EU6, equipped with flowcoating applicators and dry filters for PM control, exhausting to Stack EU6X, capacity: 933 pounds of wood moulding per hour.

History

On June 25, 2003, Specialized Wood Products, Inc. (formerly Specialized Wood, Inc.) submitted an application to the OAQ requesting to add an additional surface coating booth utilizing flowcoaters to their existing plant. The flowcoater will not operate in series with the existing surface coating booths. Specialized Wood Products, Inc., formerly known as Finishing Unlimited, was issued a Part 70 Operating Permit (T 039-7236-00296) on December 28, 1998, First Reopening 039-13232-00296, on May 16, 2002, and First Administrative Amendment 039-16210-00296 on October 31, 2002.

On May 26, 2003, 40 CFR 63 Subpart QQQQ (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products) was promulgated. Pursuant to 40 CFR 63.4680, the entire source (including the proposed surface coating booth) is subject to the requirements of 40 CFR 63, Subpart QQQQ, because the source coats wood mouldings, uses more than 4,170 liters (1,100 gallons) of coating per year, and is a major source of HAPs. As a result, the source has elected, as part of this modification, to limit the potential to emit of any single HAP from the entire source to less than ten (10) tons per year and any combination of HAPs from the entire source to less than twenty-five (25) tons per year to render the requirements of 40 CFR 60 Subpart QQQQ not applicable.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
EU6X	One (1) Surface Coating Booth (EU6)	22.0	1.17	2,600	68.0

Recommendation

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

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

An application for the purposes of this review was received on June 25, 2003. Additional information was received on October 14 as well as November 4 and 5, 2003.

Emission Calculations

See pages 2 of 2 of Appendix A of this document for detailed emissions calculations.

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source 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."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	-
PM ₁₀	-
SO ₂	-
VOC	38.6
CO	-
NO _x	-

HAPs	Potential To Emit (tons/year)
Ethylbenzene	0.098
Methanol	1.18
MIBK	1.18
Toluene	9.98
Xylenes	5.18
Glycol Ethers	0.817
Cumene	0.001
TOTAL	18.4

Justification for Modification

The Part 70 Operating Permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(8), since the source is requesting a change for which an emission limit is necessary to render the requirements of 326 IAC 8-1-6 not applicable. The proposed operating conditions shall be incorporated into the Part 70 Operating Permit as a Significant Permit Modification (SPM 039 -18182-00296) in accordance with 326 IAC 2-7-12(d)(1) since limits as well as additional record keeping and reporting requirements will be added to the existing Part 70 Operating Permit. The Significant Permit Modification will give the source approval to operate the proposed emission unit.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
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.
- (b) Elkhart County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	Less Than 100
PM ₁₀	Less Than 100
SO ₂	Less Than 100
VOC	Less Than 100
CO	Less Than 100
NO _x	Less Than 100

- (a) 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 more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon Page 2 of 7 of the TSD for T 039-7236-00296.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

Process/facility	Potential to Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
One (1) flowcoater (EU6)	-	-	-	Less Than 25	-	-	Single Less Than 10 Total Less Than 20
PSD Threshold Level	250	250	250	250	250	250	-

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

The VOC usage from the one (1) flowcoater, identified as EU6, will be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month, therefore, the BACT requirements of 326 IAC 8-1-6 do not apply.

Federal Rule Applicability

- (a) This significant permit modification does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 for VOC:
 - (1) with the potential to emit before controls equal to or greater than the major source threshold for VOC;
 - (2) that is subject to an emission limitation or standard for VOC; and
 - (3) uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this modification.

- (b) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (c) The entire source (including the proposed modification) is subject to the National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products, 40 CFR 63, Subpart QQQQ because the source participates in the surface coating of wood mouldings, uses more than 4,170 liters (1,100 gallons) of coating per year, and is a major source of HAPs. The final Maximum Achievable Control Technology Standard (MACT) at 40 CFR 63, Subpart QQQQ for Surface Coating of Wood Building Products was published in the Federal Register on May 28, 2003.

However, as part of this modification, 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. Compliance with these limits will render the requirements of 40 CFR 63, Subpart QQQQ not applicable.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1-1 (New Source Toxics Control)

Since the source has elected to limit the entire source to an area (a minor) source of HAPs as part of this modification to render the requirements of 40 CFR 63 Subpart QQQQ not applicable, that limit will also render the requirements of 326 IAC 2-4.1-1 not applicable to this modification.

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)

Pursuant to 326 IAC 6-3-1(b)(7), the proposed surface coating booth, identified as EU6, is exempt the requirements of 326 IAC 6-3-2 because the proposed surface coating booth will use flowcoaters to deliver coatings to the applicators.

326 IAC 8-1-6 (New facilities; General reduction requirements)

The potential to emit VOC from the proposed surface coating booth, identified as EU6 is greater than twenty-five (25) tons per year. As a result, the source has elected to limit the VOC usage, including coatings and clean-ups solvents, from the proposed surface coating booth, identified as EU6, to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit will render the requirements of 326 IAC 8-1-6 not applicable.

326 IAC 8-2-12 (Wood furniture and cabinet coating)

This source will not coat any products at the proposed surface coating booth (EU6) in the SIC codes listed in the definition of wood furniture. Thus, the wood mouldings coated at this source are structural and are not considered furniture. Therefore, the requirements of 326 IAC 8-2-12 are not applicable.

Compliance Requirements

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

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

There will be no specific Compliance Monitoring Requirements applicable to the proposed modification since the dry filters in surface coating booth EU6 are not required to demonstrate compliance with any applicable rule.

Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in **bold**):

Change 1:

The name of the source has been changed from Specialized Wood, Inc. to **Specialized Wood Products, Inc.** throughout the permit.

Change 2:

The new equipment was added to the Condition A.2 as follows:

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

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

- (c) **One (1) surface coating booth, identified as EU6, equipped with flowcoating applications and dry filters for PM control, exhausting to Stack EU6X, capacity: 933 pounds of wood moulding per hour.**

Change 3:

As a result of this modification, Sections D.3 and D.4 and subsequent quarterly report forms will be added to the Part 70 Operating Permit as follows:

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Surface Coating Booth (EU6)

- (c) **One (1) surface coating booth, identified as EU6, equipped with flowcoating applicators and dry filters for PM control, exhausting to Stack EU6X, capacity: 933 pounds of wood moulding 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 2-7-5(1)]

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The VOC usage, including coatings and clean-up solvents, from the one (1) surface coating booth, identified as EU6, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit shall render the requirements of 326 IAC 8-1-6 not applicable.

Compliance Determination Requirements

D.3.2 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitation contained in Conditions D.3.1 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 2-7-6 (1)] [326 IAC 2-7-5 (1)]

There are no specific Compliance Monitoring Requirements applicable to this facility.

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

D.3.3 Record Keeping Requirements

- (a) To document compliance with Condition D.3.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.3.1.

- (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.4

ENTIRE SOURCE CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Entire Source

Wood moulding manufacturing source, consisting of:

Five (5) Surface Coating Booths - EU1 - EU5 (SECTION D.1),

Woodworking Operations (SECTION D.2),

One (1) Surface Coating Booth - EU6 (SECTION D.3)

Insignificant Activities

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

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

D.4.1 Hazardous Air Pollutants (HAPs) [40 CFR 63, Subpart QQQQ]

- (a) The usage of any individual HAP, including coatings and clean-up solvents, from the entire source, shall be limited to less than ten (10) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

- (b) The usage of any combination of HAPs, including coatings and clean-up solvents, from the entire source, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limitations shall render the requirements of 40 CFR 60, Subpart QQQQ (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products) not applicable.

Compliance Determination Requirements

D.4.2 Hazardous Air Pollutants (HAPs)

Compliance with the HAPs usage limitations contained in Conditions D.4.1(a) and (b) 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" HAPs 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 2-7-6 (1)] [326 IAC 2-7-5 (1)]

There are no specific Compliance Monitoring Requirements applicable to the entire source.

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

D.4.3 Record Keeping Requirements

- (a) To document compliance with Conditions D.4.1(a) and (b), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.4.1(a) and (b).
- (1) The individual and total HAP content of each coating material and solvent used.
 - (2) The amount of coating material and solvent used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The cleanup solvent usage for each month;
 - (4) The individual and total HAP usage for each month; and
 - (5) The weight of HAPs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this

permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

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

Part 70 Quarterly Report

Source Name: Specialized Wood Products, Inc.
Source Address: 4221 Middlebury Street, Elkhart, IN 46516
Mailing Address: 4221 Middlebury Street, Elkhart, IN 46516
Part 70 Permit No.: T 039-7236-00296
Facility: One (1) surface coating booth (EU6)
Parameter: VOC usage, including coatings and clean-up solvents
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 Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Specialized Wood Products, Inc.
Source Address: 4221 Middlebury Street, Elkhart, IN 46516
Mailing Address: 4221 Middlebury Street, Elkhart, IN 46516
Part 70 Permit No.: T 039-7236-00296
Facilities: Entire Source
Parameter: Individual HAP usage, including coatings and clean-up solvents
Limit: Less than ten (10) tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	Individual HAP Usage (tons)	Individual HAP Usage (tons)	Individual HAP Usage (tons)
	This Month	Previous 11 Months	12 Month Total

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
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**

Part 70 Quarterly Report

Source Name: Specialized Wood Products, Inc.
Source Address: 4221 Middlebury Street, Elkhart, IN 46516
Mailing Address: 4221 Middlebury Street, Elkhart, IN 46516
Part 70 Permit No.: T 039-7236-00296
Facilities: Entire Source
Parameter: Combination of HAPs usage, including coatings and clean-up solvents
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

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

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Change 4:

As a result of this source becoming a minor source of HAPs in this modification, the source will no longer be operating as a Title V source for HAPs emissions. However, the VOC limits in Condition D.1.1 of the current permit in combination with the VOC limit of Condition D.3.1 will cause the source to operate as a Title V source for VOC emissions because VOC emission from the entire source are limited to greater than one hundred (100) tons per year. Therefore, Condition C.17 will be revised as follows:

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]
~~[326 IAC 2-7-19 (e)]~~

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements ~~and be used for the purpose of a Part 70 fee assessment:~~

- (1) Indicate actual emissions of criteria pollutants from the source, **in compliance with 326 IAC 2-6 (Emission Reporting)**;
- (2) Indicate actual emissions of ~~other~~ regulated pollutants **as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used on for purposes of Section 19 of this rule")** from the source, **for purposes of Part 70 fee assessment.**

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

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

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

Conclusion

The construction and operation of this proposed modification shall be subject to the conditions of the attached Part 70 Minor Source Modification No. 039-17462-00296 and proposed Part 70 Significant Permit Modification No. 039 -18182-00296.

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

**Company Name: Specialized Wood Products, Inc.
Address City IN Zip: 4221 Middlebury Street, Elkhart, IN 46516
Minor Source Modification: 039-17462
Significant Permit Modification: 039-18182
Plt ID: 039-00296
Reviewer: Mark L. Kramer
Application Date: June 25, 2003**

Surface Coating Booth (EU6)

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
16338 Easy Sanding Tinted White	8.58	51.23%	0.00%	51.23%	0.00%	21.98%	0.000234	933	4.40	4.40	0.96	23.0	4.20	0.00	20.0	100%
LP-514 Tan Lacquer*	7.90	59.89%	0.00%	59.9%	0.00%	18.58%	0.000020	933	4.73	4.73	0.088	2.12	0.387	0.00	25.5	100%
LP-535 Silver Lining Lacquer*	8.60	53.61%	0.00%	53.6%	0.00%	21.81%	0.000064	933	4.61	4.61	0.275	6.61	1.21	0.00	21.1	100%
Brenyl Facett LV 40*	7.72	70.77%	0.00%	70.77%	0.00%	22.29%	0.000381	933	5.46	5.46	1.94	46.6	8.51	0.00	24.5	100%
402-35C6V-1127 35 Sheen High Solids Lacquer*	7.77	64.67%	0.00%	64.67%	0.00%	19.76%	0.000087	933	5.02	5.02	0.408	9.79	1.79	0.00	25.43	100%
LP-520 Turkish Towel Lacquer Primer	8.67	52.93%	0.00%	52.93%	0.00%	22.18%	0.000085	933	4.59	4.59	0.364	8.7	1.59	0.00	20.7	100%
E60WJ539 Millwork Primer	13.41	35.76%	0.00%	35.8%	0.00%	42.8%	0.000159	933	4.80	4.80	0.711	17.1	3.12	0.00	11.2	100%
Laqva Prime	12.30	43.18%	34.02%	9.16%	13.46%	36.26%	0.000240	933	1.30	1.13	0.252	6.05	1.11	0.00	3.11	100%
6-WPL-13008 Black Frame Paint*	7.78	69.43%	0.00%	69.4%	0.00%	18.80%	0.000220	933	5.40	5.40	1.109	26.610	4.856	0.00	28.7	100%
BO-20271 Black Frame Paint	7.16	83.70%	0.00%	84%	0.00%	16.29%	0.000002	933	5.99	5.99	0.011	0.27	0.049	0.00	N/A	100%
S-114 Thinner (Cleanup)	7.08	100%	0.00%	100%	0.00%	0.00%	0.000408	933	7.08	7.08	2.70	64.7	11.8	0.00	N/A	100%
Potential to Emit									PM	Control Efficiency	95.0%					
Add worst case coating to all solvents									Uncontrolled		8.82	212	38.6	0.00		
									Controlled		8.82	212	38.6	0.00		

Coatings are mixed with defomer and S-114(where applicable) to represent coatings "as applied" to the applicators.

* Represents Coatings "as applied" to the applicators that have been mixed S-114 thinner

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 Case Coatings + Sum of all solvents used

**Appendix A: Emission Calculations
HAP Emission Calculations**

Company Name: Specialized Wood Products, Inc.
Address City IN Zip: 4221 Middlebury Street, Elkhart, IN 46516
Minor Source Modification: 039-17462
Significant Permit Modification: 039-18182
Plt ID: 039-00296
Reviewer: Mark L. Kramer
Application Date: June 25, 2003

Surface Coating Booth (EU6)

Material	Weight Per Gallon of Mixture (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Ethylbenzene	Weight % Methanol	Weight % MIBK	Weight % Toluene	Weight % Xylenes	Weight % Glycol Ethers	Weight % Cumene	Ethylbenzene Emissions	Methanol Emissions	MIBK Emissions	Toluene Emissions	Xylenes Emissions	Glycol Ethers Emissions	Cumene Emissions
As Applied Coatings and Solvents Only											(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
16338 Easy Sanding Tinted White	8.54	0.000233	933	0.50%	0.00%	0.00%	5.00%	3.00%	0.00%	0.00%	0.041	0.000	0.000	0.406	0.244	0.000	0.000
LP-514 Tan Lacquer	7.72	0.000020	933	0.00%	0.00%	0.00%	7.00%	0.0%	0.00%	0.00%	0.000	0.000	0.000	0.043	0.000	0.000	0.000
LP-535 Silver Lining Lacquer	8.42	0.000062	933	0.50%	0.00%	0.00%	2.00%	3.00%	0.00%	0.00%	0.011	0.000	0.000	0.043	0.064	0.000	0.000
Brenyl Facett LV 40	7.54	0.000371	933	0.00%	0.00%	0.00%	0.00%	30.0%	0.00%	0.00%	0.000	0.000	0.000	0.000	3.43	0.000	0.000
402-35C6V-1127 35 Sheen High Solids Lacquer	7.59	0.000085	933	1.20%	0.00%	0.00%	0.00%	5.00%	2.00%	0.00%	0.032	0.000	0.000	0.000	0.132	0.053	0.000
LP-520 Turkish Towel Lacquer Primer	8.64	0.000085	933	0.50%	0.00%	0.00%	2.00%	3.00%	0.00%	0.00%	0.015	0.000	0.000	0.060	0.090	0.000	0.000
E60WJ539 Millwork Primer	13.37	0.000158	933	0.00%	0.00%	0.00%	0.00%	0.00%	1.00%	0.00%	0.000	0.000	0.000	0.000	0.000	0.086	0.000
Laqva Prime	12.26	0.000239	933	0.00%	0.00%	0.00%	0.00%	0.00%	5.00%	0.00%	0.000	0.000	0.000	0.000	0.000	0.598	0.000
6-WPL-13008 Black Frame Paint	7.60	0.000215	933	0.00%	0.00%	0.00%	17.41%	0.48%	1.16%	0.00%	0.000	0.000	0.000	1.16	0.032	0.077	0.000
BO-20271 Black Frame Paint	7.12	0.000002	933	1.00%	0.00%	0.00%	0.00%	3.00%	2.00%	1.00%	0.001	0.000	0.000	0.000	0.002	0.001	0.001
S-114 Thinner (Cleanup)	7.08	0.000408	933	0.00%	10.00%	10.00%	70.00%	10.00%	0.00%	0.00%	0.000	1.18	1.18	8.26	1.18	0.000	0.000
Subtotal											0.098	1.18	1.18	9.98	5.18	0.816	0.001

Note that the "as applied" coating has been divided up in to parts in order to calculate the PTE of HAPs. The preceding represents the coating portion of each mixture, which consists 97.5% of each mixture that contains thinner and defoamer and 99.5% of each mixture that contains defoamer only.
 The S-114 Thinner used for cleanup is not mixed and is "as applied" to the applicators

Subtotal 18.43

Material	Weight Per Gallon of Mixture (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Methanol	Weight % MIBK	Weight % Toluene	Weight % Xylenes	Methanol Emissions	MIBK Emissions	Toluene Emissions	Xylenes Emissions
As Applied S-114 Thinner Only								(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
LP-514 Tan Lacquer	0.14	0.0000004	933	10.00%	10.00%	70.00%	10.00%	0.00002	0.00002	0.0002	0.00002
LP-535 Silver Lining Lacquer	0.14	0.000001	933	10.00%	10.00%	70.00%	10.00%	0.0001	0.0001	0.001	0.0001
Brenyl Facett LV 40	0.14	0.000008	933	10.00%	10.00%	70.00%	10.00%	0.0004	0.0004	0.003	0.0004
402-35C6V-1127 35 Sheen High Solids Lacquer	0.14	0.000002	933	10.00%	10.00%	70.00%	10.00%	0.0001	0.0001	0.001	0.0001
6-WPL-13008 Black Frame Paint	0.14	0.000004	933	10.00%	10.00%	70.00%	10.00%	0.0003	0.0003	0.002	0.0003
Subtotal								0.001	0.001	0.006	0.001

Note that the preceding represents the S-114 thinner portion of each mixture where the product is used, which consists of 2.00% of each mixture.

Subtotal 0.009

Material	Weight Per Gallon of Mixture (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Glycol Ethers	Glycol Ethers Emissions
As Applied Defoamer Only					(tons/yr)
16338 Easy Sanding Tinted White	0.04	0.000001	933	90.51%	0.000
LP-514 Tan Lacquer	0.04	0.0000001	933	90.51%	0.000
LP-535 Silver Lining Lacquer	0.04	0.0000003	933	90.51%	0.000
Brenyl Facett LV 40	0.04	0.000002	933	90.51%	0.000
402-35C6V-1127 35 Sheen High Solids Lacquer	0.04	0.0000004	933	90.51%	0.000
LP-520 Turkish Towel Lacquer Primer	0.04	0.0000004	933	90.51%	0.000
E60WJ539 Millwork Primer	0.04	0.000001	933	90.51%	0.000
Laqva Prime	0.04	0.000001	933	90.51%	0.000
6-WPL-13008 Black Frame Paint	0.04	0.000001	933	90.51%	0.000
BO-20271 Black Frame Paint	0.04	0.0000001	933	90.51%	0.0000
Subtotal					0.001

Note that the preceding represents the defoamer portion of each mixture, which consists of 0.5% of each mixture.

Subtotal 0.001

Total Emissions *As Applied*

Overall Total HAPs Emissions	Ethylbenzene Emissions	Methanol Emissions	MIBK Emissions	Toluene Emissions	Xylenes Emissions	Glycol Ethers Emissions	Cumene Emissions
(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
18.4	0.098	1.18	1.18	9.98	5.18	0.817	0.001

Methodology

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