



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant
DATE: February 07, 2006
RE: Adorn LLC / 039-17506-00324
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, 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 13-15-6-1(b) or IC 13-15-6-1(a) 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.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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.



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Adorn LLC
1808 West Hively Avenue,
57420 Nagy Drive, and
58038 County Road No. 3
Elkhart, Indiana 46517**

(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 provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. 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 2-7 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.: T039-17506-00324	
Issued by: Original signed by Paul Dubenetzky Assistant Commissioner Office of Air Quality	Issuance Date: February 07, 2006 Expiration Date: February 07, 2011

TABLE OF CONTENTS

SECTION A	SOURCE SUMMARY	5
A.1	General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]	
A.2	Part 70 Source Definition [326 IAC 2-7-1(22)]	
A.3	Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]	
A.4	Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]	
A.5	Part 70 Permit Applicability [326 IAC 2-7-2]	
SECTION B	GENERAL CONDITIONS	9
B.1	Definitions [326 IAC 2-7-1]	
B.2	Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]	
B.3	Term of Conditions [326 IAC 2-1.1-9.5]	
B.4	Enforceability [326 IAC 2-7-7]	
B.5	Severability [326 IAC 2-7-5(5)]	
B.6	Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]	
B.7	Duty to Provide Information [326 IAC 2-7-5(6)(E)]	
B.8	Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]	
B.9	Annual Compliance Certification [326 IAC 2-7-6(5)]	
B.10	Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]	
B.11	Emergency Provisions [326 IAC 2-7-16]	
B.12	Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]	
B.13	Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]	
B.14	Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]	
B.15	Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]	
B.16	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]	
B.17	Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]	
B.18	Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]	
B.19	Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]	
B.20	Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]	
B.21	Source Modification Requirement [326 IAC 2-7-10.5] [326 IAC 2-3-2]	
B.22	Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]	
B.23	Transfer of Ownership or Operational Control [326 IAC 2-7-11]	
B.24	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]	
B.25	Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]	
SECTION C	SOURCE OPERATION CONDITIONS	19
	Emission Limitations and Standards [326 IAC 2-7-5(1)]	
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2	Opacity [326 IAC 5-1]	
C.3	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.4	Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.5	Fugitive Dust Emissions [326 IAC 6-4]	
C.6	Stack Height [326 IAC 1-7]	
C.7	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
	Testing Requirements [326 IAC 2-7-6(1)]	
C.8	Performance Testing [326 IAC 3-6]	
	Compliance Requirements [326 IAC 2-1.1-11]	
C.9	Compliance Requirements [326 IAC 2-1.1-11]	

TABLE OF CONTENTS (Continued)

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

- C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.11 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]
- C.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]
- C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

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

- C.16 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]
- C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6][326 IAC 2-3]
- C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11][326 IAC 2-3]

Stratospheric Ozone Protection

- C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 FACILITY OPERATION CONDITIONS 27

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

- D.1.1 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]
- D.1.2 Particulate Emissions Limitations for Manufacturing Processes [326 IAC 6-3-2]
- D.1.3 Baghouse Limitations [326 IAC 2-7-1(21)(G)(xxx)]
- D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.1.5 Particulate Control [40 CFR 64]

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

- D.1.6 Visible Emissions Notations [40 CFR 64]
- D.1.7 Baghouse Inspections [40 CFR 64]
- D.1.8 Broken or Failed Bag Detection [40 CFR 64]
- D.1.9 Cyclone Inspections [40 CFR 64]
- D.1.10 Cyclone Failure Detection [40 CFR 64]
- D.1.11 Storage Silo Inspections [40 CFR 64]

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

- D.1.12 Record Keeping Requirements

SECTION D.2 FACILITY OPERATION CONDITIONS 32

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

- D.2.1 General Provisions Relating to HAPs [326 IAC 20-14] [40 CFR 63, Subpart A]
- D.2.2 Wood Furniture Manufacturing Operations NESHAP [40 CFR 63, Subpart JJ] [326 IAC 20-14-1]
- D.2.3 Work Practice Standards for Wood Furniture Manufacturing Operations [40 CFR 63, Subpart JJ]
- D.2.4 PSD Minor Limit [326 IAC 2-2]
- D.2.5 Hazardous Air Pollutants (HAP) [40 CFR 63, Subpart QQQQ] [40 CFR 63, Subpart JJJJ]
- D.2.6 Particulate [326 IAC 6-3-2(d)]
- D.2.7 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

TABLE OF CONTENTS (Continued)

D.2.8 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

D.2.9 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

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

D.2.10 Monitoring

D.2.11 Scrubber Inspections

D.2.12 Scrubber Malfunction

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

D.2.13 Record Keeping Requirements

D.2.14 Reporting Requirements

SECTION D.3 FACILITY OPERATION CONDITIONS 38

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

D.3.1 Particulate [326 IAC 6-2-4(a)]

Certification	39
Emergency Occurrence Report.....	40
Quarterly Report.....	42
Semi-Annual Report.....	43
Quarterly Deviation and Compliance Monitoring Report	44

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)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary wood counter top and cabinet manufacturing plant.

Responsible Official:	Vice President
Source Address:	1808 West Hively Avenue, Elkhart, Indiana 46517 57420 Nagy Drive, Elkhart, Indiana 46517 58038 County Road No. 3, Elkhart, Indiana 46517.
Mailing Address:	2421 Nappanee Street, Suite B, Elkhart, Indiana 46517
Source Phone Number:	(574) 295-5223
SIC Code:	2421, 2431, 2434, 2541, 2672
County Location:	Elkhart
Source Location Status:	Nonattainment for 8-hour ozone standard Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules Major Source, under Emission Offset; Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

This wood counter top and cabinet manufacturing company consists of three (3) plants:

- (a) Plant 1 is located at 1808 West Hively Avenue, Elkhart, Indiana 46517;
- (b) Plant 2 is located at 57420 Nagy Drive, Elkhart, Indiana 46517; and
- (c) Plant 3 is located at 58038 County Road No. 3, Elkhart, Indiana 46517.

Since the three (3) plants are located in contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source, effective from the date of issuance of Part 70 permit T039-7650-00324, issued on October 6, 1998.

A.3 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:

Plant 1 (1808 West Hively Avenue)

- (a) One (1) sawdust storage silo, identified as S-1, constructed in 1997, with a capacity of 690 cubic yards, collecting sawdust from the woodworking equipment through a cyclonic baghouse system, and exhausting to stack C1-1.
- (b) Woodworking equipment, identified as WW1a, constructed in 1995, with a maximum throughput of 25,000 pounds of wood per hour, using a cyclonic baghouse system to control particulate emissions, and exhausting to three (3) stacks, identified as C1-2, C1-3 and C1-4.
- (c) Woodworking equipment, identified as WW1b, constructed in 1995, with a maximum

throughput of 25,000 pounds of wood per hour, using a cyclonic baghouse system to control particulate emissions, and exhausting to two (2) stacks, identified as C1-5 and C1-6.

- (d) Woodworking equipment, identified as WW1c, constructed in 2003, having a maximum throughput capacity of 5,000 pounds of wood per hour, using a cyclonic baghouse system to control particulate emissions, and exhausting to stack C1-7.
- (e) Two (2) denibbers for D1, identified as DN1a and DN1b, constructed in 2000, each with maximum capacities of 3,900 board feet per hour, using a cyclonic baghouse system to control particulate emissions, and exhausting to stack C1-4.
- (f) One (1) denibber for D4, identified as DN4, constructed in 2000, with a maximum capacity of 3,900 board feet per hour, using a cyclonic baghouse system to control particulate emissions, and exhausting to stack C1-4.
- (g) One (1) adhesive spray booth and one (1) wood wrapping press, identified as SA1 and WWP1, respectively, constructed in 1995, with a maximum capacity of laminating 39.143 linear feet per hour, utilizing a high volume low pressure (HVLP) application system, with particulate emissions controlled by dry filters, and exhausting to stack E1-10.
- (h) One (1) dualtech automated back sealing machine, identified as D1, constructed in 2000, with a maximum capacity of 3,900 board feet per hour, equipped with eight (8) airless/air assist spray guns, with particulate emissions controlled by a water wall and water scrubber system, identified as D2, exhausting to stack E1-2, and a hot air drying tunnel exhausting to stack E1-3.
- (i) One (1) rototech automated front staining machine, identified as D3, constructed in 2000, with a maximum capacity of 3,900 board feet per hour, equipped with twenty (20) airless/air assist spray guns, with particulate emissions controlled by dry filters, exhausting to stack E1-4, and a forced air drying tunnel exhausting to stack E1-5.
- (j) One (1) dualtech automated sealing machine, identified as D4, constructed in 2000, with a maximum capacity of 3,900 board feet per hour, equipped with eight (8) airless/air assist spray guns, with particulate emissions controlled by a water wall and water scrubber system, identified as D5, exhausting to stack E1-6, and a hot air/infrared drying tunnel exhausting to stack E1-7.
- (k) One (1) dualtech automated topcoat machine, identified as D6, constructed in 2000, with a maximum capacity of 3,900 board feet per hour, equipped with eight (8) airless/air assist spray guns, with particulate emissions controlled by a water wall and water scrubber system, identified as D7, exhausting to stack E1-8, a hot air drying tunnel exhausting to stack E1-9, and a non-heated cooling hood exhausting inside the building.
- (l) One (1) manual touch up booth, identified as TU1, constructed in 2000, with a maximum capacity of one (1) gallon of stain, two (2) gallons of sealer, and two (2) gallons of topcoat per day, consisting of one (1) airless/air assist gun, with particulate emissions controlled by dry filters, exhausting to stack TU-1.
- (m) One (1) rototech automated back staining machine, identified as D8, constructed in 2002, with a maximum capacity of 3,900 board feet per hour, equipped with twenty (20) HVLP spray guns used for coating cabinet doors and an infrared drying oven, with particulate emissions controlled by dry filters, and exhausting to stack E1-1.
- (n) One (1) vacuum coater, identified as VC-1, constructed in 1995, with a maximum capacity of 5,000 linear feet of wood per hour, applying coatings containing no VOC or HAP to wood trim, utilizing an ultraviolet (UV) curing process, with particulate emissions controlled by dry filters, and exhausting to stack E1-11.

Plant 2 (57420 Nagy Drive)

- (o) Woodworking equipment, identified as WW2a, constructed in 1995, with a maximum throughput of 3,000 pounds of wood per hour, using a cyclonic baghouse system to control particulate emissions, and exhausting to stack C2-1.
- (p) Woodworking equipment, identified as WW2b, constructed in 1995, with a maximum throughput of 5,000 pounds of wood per hour, using a cyclonic baghouse system to control particulate emissions, and exhausting to stack C2-2.
- (q) Six (6) wood wrapping machines, identified as WR2a, WR2b, WR2c, WR2d, WR2e, and WR2f, constructed in 1995, each with a maximum capacity of 280 pounds of wood styles per hour, using water-based and hot melt adhesives, using a cyclonic baghouse system to control particulate emissions, exhausting to stack C2-1.
- (r) Three (3) wood panel laminating machines, identified as WPL2, constructed in 1995, each with a maximum capacity of 1,500 pounds of wood panels per hour, using a cyclonic baghouse system to control particulate emissions, and exhausting to stack C2-2.

Plant 3 (58038 County Rd. No.3)

- (s) Woodworking equipment, identified as WW3a, constructed in 2002, having a maximum throughput capacity of 25,000 pounds of wood per hour. Emissions of particulate matter are controlled using a cyclonic baghouse, exhausting to stack C3-1.
- (t) Woodworking equipment, identified as WW3b, constructed in 2004, consisting of sanders, saws and woodworking tools with a maximum throughput rate of 500 pounds of wood per hour and 25 pounds of plastic per hour, with particulate matter emissions controlled by a cyclonic baghouse and exhausting at stack C3-1.
- (u) One (1) MDF board laminating machine, identified as BL3, constructed in 1997, utilizing a rollcoat adhesive application system, with a maximum capacity of 1,000 pounds of wood panels per hour, with particulate matter emissions controlled by a cyclonic baghouse and exhausting to stack C3-1.
- (v) One (1) adhesive coating facility, identified as S3-1, constructed in 2004, equipped with an airless/air assisted spray gun and roll coater, with a maximum usage rate of 0.8 gallons of adhesives per day, with particulate matter emissions controlled by dry filter, and exhausting at stack S3-1.
- (w) One (1) Corian surface coating line, identified as Corian, constructed in 1998, utilizing a hand application method, with a maximum capacity of 1,000 pounds per hour, and exhausting to one (1) stack, identified as C5.

A.4 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 also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
 - (1) One (1) natural gas-fired boiler, identified as B1, constructed in 1995, rated at 0.4 MMBtu/hr, and exhausting to stack B1. [326 IAC 6-2-4]
 - (2) Four (4) natural gas-fired hot water boilers, identified as AB1, AB2, AB3, and AB4, constructed in 2000, with each rated at 1 MMBtu per hour, exhausting to stacks AB1, AB2, AB3, and AB4, respectively. [326 IAC 6-2-4]

- (b) Insignificant woodworking equipment, meeting the definition of "insignificant woodworking operation" as specified in 326 IAC 2-7-1(21)(G)(xxx), identified as WW1c, constructed in 2005, having a maximum process weight rate of 5,000 pounds of wood per hour, using a cyclonic baghouse system to control particulate emissions, with a maximum air flow rate of 35,000 standard cubic feet of air per minute (scfm) and a maximum outlet grain loading of less than 0.003 grains per dry standard cubic foot of exhaust air, and exhausting to stack C1-7. [326 IAC 2-7-1(21)(G)(xxx)] [326 IAC 6-3-2]

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

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

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

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

- (a) This permit, T039-17506-00324, 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 of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal 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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-7-7]

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 Severability [326 IAC 2-7-5(5)]

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.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(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 "responsible official" as defined by 326 IAC 2-7-1(34). 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.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (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 a responsible official 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. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (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. All 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
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (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 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) 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.
- (b) 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 PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) 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.11 Emergency Provisions [326 IAC 2-7-16]

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

IDEM Main Office

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

Northern Regional Office

Telephone Number: 1-800-753-5519

Telephone Number: 574-245-4870

Facsimile Number: 574-245-4877

- (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
Indianapolis, Indiana 46204-2251

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 2-7-5(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) 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 2-7 and any other applicable rules.
- (g) 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.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T039-17506-00324 and issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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 2-7-3 and 326 IAC 2-7-4(a).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), 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
Indianapolis, Indiana 46204-2251

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 not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit 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 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 2-7-9(a)(3)]
- (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 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(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 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

- (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 2-7-4. 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 "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) 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) 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 2-7 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 being needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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
Indianapolis, Indiana 46204-2251
- Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(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.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable

requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a 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 preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in 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
Indianapolis, Indiana 46204-2251

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, on a rolling five (5) year basis, which document all such changes and emissions trades that are subject to 326 IAC 2-7-20(b), (c), or (e). The Permittee shall and make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at 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 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(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 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-7-10.5] [326 IAC 2-3-2]

- (a) A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.
- (b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2-2 and 326 IAC 2-3-2.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

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 Part 70 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 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 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 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.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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
Indianapolis, Indiana 46204-2251

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

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][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) Except as provided in 326 IAC 2-7-19(e), 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 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour 326 IAC 6-3-2]

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 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. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

C.7 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
Indianapolis, Indiana 46204-2251

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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 2-7-6(1)]

C.8 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
Indianapolis, Indiana 46204-2251

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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (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.9 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 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of 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
Indianapolis, Indiana 46204-2251

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

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

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.11 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 2-7-5] [326 IAC 2-7-6]

C.12 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 prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on May 6, 1999.
- (b) 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.13 Risk Management Plan [326 IAC 2-7-5(12)] [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.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records;
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;

- (2) monitor performance data, if applicable; and
- (3) corrective actions taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (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 "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.16 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) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2007 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
 - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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.

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-3]

- (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) If there is a reasonable possibility that a “project” (as defined in 326 IAC 2-3-1 (II)) at an existing emissions unit, other than projects at a Clean Unit, which is not part of a “major modification” (as defined in 326 IAC 2-2-1(z)) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-3-1 (mm)), the Permittee shall comply with following:
 - (1) Prior to commencing the construction of the “project” (as defined in 326 IAC 2-3-1 (II)) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-3-1(mm)(2)(A)(3); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
 - (2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
 - (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-3]

- (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 “responsible official” as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue

Indianapolis, Indiana 46204-2251

- (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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-3-1 (II)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
 - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
 - (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-3-2(c)(3).
 - (4) Any other information that the Permittee deems fit to include in this report,

Reports required in this part shall be submitted to:

Indiana Department of Environmental Management
Air Compliance Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

- (h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

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 2-7-5(15)]:

Plant 1 (1808 West Hively Avenue)

- (a) One (1) sawdust storage silo, identified as S-1, constructed in 1997, with a capacity of 690 cubic yards, collecting sawdust from the woodworking equipment through a cyclonic baghouse system, and exhausting to stack C1-1.
- (b) Woodworking equipment, identified as WW1a, constructed in 1995, with a maximum throughput of 25,000 pounds of wood per hour, using a cyclonic baghouse system to control particulate emissions, and exhausting to three (3) stacks, identified as C1-2, C1-3 and C1-4.
- (c) Woodworking equipment, identified as WW1b, constructed in 1995, with a maximum throughput of 25,000 pounds of wood per hour, using a cyclonic baghouse system to control particulate emissions, and exhausting to two (2) stacks, identified as C1-5 and C1-6.
- (d) Woodworking equipment, identified as WW1c, constructed in 2003, having a maximum throughput capacity of 5,000 pounds of wood per hour, using a cyclonic baghouse system to control particulate emissions, and exhausting to stack C1-7.
- (e) Two (2) denibbers for D1, identified as DN1a and DN1b, constructed in 2000, each with maximum capacities of 3,900 board feet per hour, using a cyclonic baghouse system to control particulate emissions, and exhausting to stack C1-4.
- (f) One (1) denibber for D4, identified as DN4, constructed in 2000, with a maximum capacity of 3,900 board feet per hour, using a cyclonic baghouse system to control particulate emissions, and exhausting to stack C1-4.

Plant 2 (57420 Nagy Drive)

- (o) Woodworking equipment, identified as WW2a, constructed in 1995, with a maximum throughput of 3,000 pounds of wood per hour, using a cyclonic baghouse system to control particulate emissions, and exhausting to stack C2-1.
- (p) Woodworking equipment, identified as WW2b, constructed in 1995, with a maximum throughput of 5,000 pounds of wood per hour, using a cyclonic baghouse system to control particulate emissions, and exhausting to stack C2-2.
- (q) Six (6) wood wrapping machines, identified as WR2a, WR2b, WR2c, WR2d, WR2e, and WR2f, constructed in 1995, each with a maximum capacity of 280 pounds of wood styles per hour, using water-based and hot melt adhesives, using a cyclonic baghouse system to control particulate emissions, exhausting to stack C2-1.
- (r) Three (3) wood panel laminating machines, identified as WPL2, constructed in 1995, each with a maximum capacity of 1,500 pounds of wood panels per hour, using a cyclonic baghouse system to control particulate emissions, and exhausting to stack C2-2.

Plant 3 (58038 County Rd. No.3)

- (s) Woodworking equipment, identified as WW3a, constructed in 2002, having a maximum throughput capacity of 25,000 pounds of wood per hour. Emissions of particulate matter are controlled using a cyclonic baghouse, exhausting to stack C3-1.
- (t) Woodworking equipment, identified as WW3b, constructed in 2004, consisting of sanders, saws and woodworking tools with a maximum throughput rate of 500 pounds of wood per hour and 25 pounds of plastic per hour, with particulate matter emissions controlled by a cyclonic

baghouse and exhausting at stack C3-1.

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

- (u) One (1) MDF board laminating machine, identified as BL3, constructed in 1997, utilizing a rollcoat adhesive application system, with a maximum capacity of 1,000 pounds of wood panels per hour, with particulate matter emissions controlled by a cyclonic baghouse and exhausting to stack C3-1.

Insignificant Activities: Insignificant Woodworking Plant 1 (1808 West Hively Avenue)

- (b) Insignificant woodworking equipment, meeting the definition of "insignificant woodworking operation" as specified in 326 IAC 2-7-1(21)(G)(xxx), identified as WW1c, constructed in 2005, having a maximum process weight rate of 5,000 pounds of wood per hour, using a cyclonic baghouse system to control particulate emissions, with a maximum air flow rate of 35,000 standard cubic feet of air per minute (scfm) and a maximum outlet grain loading of less than 0.003 grains per dry standard cubic foot of exhaust air, and exhausting to stack C1-7. [326 IAC 2-7-1(21)(G)(xxx)] [326 IAC 6-3-2]

(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.1.1 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), the particulate emissions from the significant and insignificant woodworking operations, denibbers, wood wrapping operations, laminating operations and sawdust storage silo are subject to PM/PM10 emission limits as shown in the following table:

Stack ID	PM/PM10 limit (lb/hr)
C1-1	3.6
C1-2	4.2
C1-3	2.9
C1-4	9.3
C1-5	3.0
C1-6	5.3
C1-7	2.9
C2-1	4.2
C2-2	1.4
C3-1	2.6

These limits, combined with the total potential to emit PM/PM-10 from the other emission units at this source, will ensure that the potential to emit PM/PM-10 remains less than 250 tons per twelve (12) consecutive month period. Compliance with these limits will render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable and make this source minor for PM and PM10 under 326 IAC 2-2 (PSD).

D.1.2 Particulate Emissions Limitations for Manufacturing Processes [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 exhaust stacks of the baghouses and cyclones controlling the significant and insignificant woodworking operations, wood wrapping operations, wood laminating operations, denibbers and sawdust storage silo shall not exceed the pounds per hour limits as shown in the following table:

Particulate Emission Rate		
Exhaust Stack ID	Process Weight Rate (lbs)	Particulate Emission Rate (lb/hr)
C1-1	55,000	37.8
C1-2	11,000	12.8
C1-3	7,500	9.9
C1-4	6,500	9.0
C1-5	12,000	13.6
C1-6	13,000	14.4
C1-7	5,000	7.6
C2-1	4,680	7.2
C2-2	9,500	11.6
C3-1	26,525	23.2

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:

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

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.1.3 Baghouse Limitations [326 IAC 2-7-1(21)(G)(xxx)]

The insignificant woodworking operation (WW1c) controlled by a cyclonic baghouse shall be considered an insignificant activity for Title V permitting purposes provided that the baghouse operations meet the requirements of 326 IAC 2-7-1(21)(G)(xxx), including the following:

- (a) Each woodworking baghouse shall not exhaust to the atmosphere greater than forty thousand (40,000) cubic feet of air per minute and shall not emit particulate matter with a diameter less than ten (10) microns in excess of one hundredth (0.01) grain per dry standard cubic foot of outlet air.
- (b) The opacity from each baghouse shall not exceed ten percent (10%).
- (c) Visible emissions from the baghouse shall be observed daily using procedures in accordance with Method 22 and normal or abnormal emissions are recorded. In the event abnormal emissions are observed for greater than six (6) minutes in duration, the following shall occur:
 - (1) The baghouse shall be inspected.
 - (2) Corrective actions, such as replacing or reseating bags, are initiated, when necessary.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.5 Particulate Control [40 CFR 64]

- (a) Pursuant to CP 039-8835-00324, issued on December 29, 1997, SSM 039-18363-00324, issued on July 21, 2004, and 326 IAC 6-3-2, and in order to comply with Conditions D.1.1, D.1.2 and D.1.3, the baghouses and cyclones for particulate control shall be in operation and control emissions from the significant and insignificant woodworking operations, wood

wrapping operations, wood laminating operations, denibbers and sawdust storage silo at all times that the woodworking operations, wood wrapping operations, wood laminating operations, denibbers and sawdust storage silo are in operation.

- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (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.

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

D.1.6 Visible Emissions Notations [40 CFR 64]

- (a) Daily visible emission notations of the significant and insignificant woodworking operations, wood wrapping operations, wood laminating operations, denibbers and sawdust storage silo stack exhausts (C1-1, C1-2, C1-3, C1-4, C1-5, C1-6, C1-7, C2-1, C2-2, and C3-1) 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) If abnormal emissions are observed at the significant and insignificant woodworking operations, wood wrapping operations, wood laminating operations, denibbers and sawdust storage silo stack exhausts, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

D.1.7 Baghouse Inspections [40 CFR 64]

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operations, wood wrapping operations, wood laminating operations, denibbers and sawdust storage silo when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.1.8 Broken or Failed Bag Detection [40 CFR 64]

- (a) For a single compartment baghouse controlling emissions from a process operated continuously a failed unit and the associated process shall be shut down immediately until the failed unit has 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).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. 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).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

D.1.9 Cyclone Inspections [40 CFR 64]

An inspection shall be performed each calendar quarter of all cyclones controlling the woodworking operations, wood wrapping operations, wood laminating operations, denibbers, and sawdust storage silo when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

D.1.10 Cyclone Failure Detection [40 CFR 64]

In the event that cyclone 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 permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

D.1.11 Storage Silo Inspections [40 CFR 64]

An inspection of the sawdust outloading operation and storage silo shall be performed at least once every two weeks. The Compliance Response Plan for the woodworking operations shall contain troubleshooting contingency and response steps for the sawdust outloading operation when abnormal emissions are observed or there is evidence of sawdust in the area surrounding the storage silo.

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

D.1.12 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.3(c) and D.1.6, the Permittee shall maintain records of daily visible emission notations of the exhaust from stacks C1-1, C1-2, C1-3, C1-4, C1-5, C1-6, C1-7, C2-1, C2-2, and C3-1.
- (b) To document compliance with Conditions D.1.3(c), D.1.7, D.1.9, and D.1.11, the Permittee shall maintain records of the results of the inspections required under Conditions D.1.3(c), D.1.7, D.1.9, and D.1.11.
- (c) The Permittee shall maintain records of corrective actions to document compliance with Condition D.1.3 and 326 IAC 2-7-21(1)(G)(xxx)(GG)(dd).
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2

FACILITY OPERATION CONDITIONS

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

Plant 1 (1808 West Hively Avenue)

- (g) One (1) adhesive spray booth and one (1) wood wrapping press, identified as SA1 and WWP1, respectively, constructed in 1995, with a maximum capacity of laminating 39.143 linear feet per hour, utilizing a high volume low pressure (HVLP) application system, with particulate emissions controlled by dry filters, and exhausting to stack E1-10.
- (h) One (1) dualtech automated back sealing machine, identified as D1, constructed in 2000, with a maximum capacity of 3,900 board feet per hour, equipped with eight (8) airless/air assist spray guns, with particulate emissions controlled by a water wall and water scrubber system, identified as D2, exhausting to stack E1-2, and a hot air drying tunnel exhausting to stack E1-3.
- (i) One (1) rototech automated front staining machine, identified as D3, constructed in 2000, with a maximum capacity of 3,900 board feet per hour, equipped with twenty (20) airless/air assist spray guns, with particulate emissions controlled by dry filters, exhausting to stack E1-4, and a forced air drying tunnel exhausting to stack E1-5.
- (j) One (1) dualtech automated sealing machine, identified as D4, constructed in 2000, with a maximum capacity of 3,900 board feet per hour, equipped with eight (8) airless/air assist spray guns, with particulate emissions controlled by a water wall and water scrubber system, identified as D5, exhausting to stack E1-6, and a hot air/infrared drying tunnel exhausting to stack E1-7.
- (k) One (1) dualtech automated topcoat machine, identified as D6, constructed in 2000, with a maximum capacity of 3,900 board feet per hour, equipped with eight (8) airless/air assist spray guns, with particulate emissions controlled by a water wall and water scrubber system, identified as D7, exhausting to stack E1-8, a hot air drying tunnel exhausting to stack E1-9, and a non-heated cooling hood exhausting inside the building.
- (l) One (1) manual touch up booth, identified as TU1, constructed in 2000, with a maximum capacity of one (1) gallon of stain, two (2) gallons of sealer, and two (2) gallons of topcoat per day, consisting of one (1) airless/air assist gun, with particulate emissions controlled by dry filters, exhausting to stack TU-1.
- (m) One (1) rototech automated back staining machine, identified as D8, constructed in 2002, with a maximum capacity of 3,900 board feet per hour, equipped with twenty (20) HVLP spray guns used for coating cabinet doors and an infrared drying oven, with particulate emissions controlled by dry filters, and exhausting to stack E1-1.
- (n) One (1) vacuum coater, identified as VC-1, constructed in 1995, with a maximum capacity of 5,000 linear feet of wood per hour, applying coatings containing no VOC or HAP to wood trim, utilizing an ultraviolet (UV) curing process, with particulate emissions controlled by dry filters, and exhausting to stack E1-11.

Plant 3 (58038 County Rd. No.3)

- (v) One (1) adhesive coating facility, identified as S3-1, constructed in 2004, equipped with an airless/air assisted spray gun and roll coater, with a maximum usage rate of 0.8 gallons of adhesives per day, with particulate matter emissions controlled by dry filter, and exhausting at stack S3-1.

(The information describing the process contained in this facility description box is descriptive

information and does not constitute enforceable conditions.)

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

- (w) One (1) Corian surface coating line, identified as Corian, constructed in 1998, utilizing a hand application method, with a maximum capacity of 1,000 pounds per hour, and exhausting to one (1) stack, identified as C5.

(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.2.1 General Provisions Relating to HAPs [326 IAC 20-14] [40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-14, apply to the facilities described in this section except when otherwise specified in 40 CFR 63, Subpart JJ.

D.2.2 Wood Furniture Manufacturing Operations NESHAP [40 CFR 63, Subpart JJ] [326 IAC 20-14-1]

Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:

- (a) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
- (1) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids, as applied; or
 - (2) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or
 - (3) Use any combination of (1) and (2).
- (b) Limit VHAP emissions from contact adhesives as follows:
- (1) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pound VHAP per pound solids;
 - (2) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids;
- (c) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids, as applied.

D.2.3 Work Practice Standards for Wood Furniture Manufacturing Operations [40 CFR 63, Subpart JJ]

The Permittee shall maintain a written work practice implementation plan, as required by 40 CFR 63.803(a). The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

- (a) Operator training course.

- (b) Leak inspection and maintenance plan.
- (c) Cleaning and washoff solvent accounting system.
- (d) Chemical composition of cleaning and washoff solvents.
- (e) Spray booth cleaning.
- (f) Storage requirements.
- (g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
- (h) Line cleaning.
- (i) Gun cleaning.
- (j) Washoff operations.
- (k) Formulation assessment plan for finishing operations.

D.2.4 PSD Minor Limit [326 IAC 2-2]

- (a) The total VOC input to all the surface coating operations and laminating operations combined shall not exceed 249 tons per twelve (12) consecutive month period, with compliance determined on a monthly basis. This limit, in conjunction with the uncontrolled potential to emit of the boilers, heaters and laminating operations is equivalent to VOC emissions of less than 250 tons per year for the entire source. Compliance with the VOC usage limit makes the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to the modifications done under CP 039-8835-00324, MSM 039-11334-00324, AA 039-15653-00324, MSM 039-15677-00324 and SSM 039-18363-00324.
- (b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), the particulate emissions from the surface coating operations are subject to PM/PM10 emission limits as shown in the following table:

PSD Minor Limit for PM / PM10, By Stack ID	
Stack ID	PM/PM10 limit (lb/hr)
E1-1	0.1
E1-2	1.9
E1-3	0.1
E1-4	0.1
E1-5	0.1
E1-6	2.0
E1-7	0.1
E1-8	2.0
E1-9	0.1
E1-10	0.4
E1-11	0.1
TU1	0.1
C5	0.1

These limits, in combination with other PM/PM10 emissions from this source, will ensure that the source-wide potential to emit PM/PM-10 remains less than 250 tons per twelve (12) consecutive month period. Compliance with these limits also makes 326 IAC 2-2 (PSD) not applicable to the construction and modifications performed under CP 039-4472-00324, issued on August 8, 1995, CP 039-8835-00324, issued on December 29, 1997, T039-7650-00324, issued on October 6, 1998, AA 039-15653-00324, issued on April 26, 2002, and SSM 039-18363-00324, issued on July 21, 2004.

D.2.5 Hazardous Air Pollutants (HAP) [40 CFR 63, Subpart QQQQ] [40 CFR 63, Subpart JJJJ]

The source's potential to emit a single HAP is less than ten (10) tons per year and the source's potential to emit a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to 40 CFR 63, Subpart QQQQ and 40 CFR 63, Subpart JJJJ. Any change that would increase HAP emissions to greater than ten (10) tons per year of a single HAP or greater than twenty-five (25) tons per year of a combination of HAPs requires prior approval from IDEM, OAQ.

D.2.6 Particulate [326 IAC 6-3-2(d)]

Particulate emissions from the surface coating facilities shall be controlled by a dry particulate filter and/or water wall and water scrubber system, and the Permittee shall operate the control devices in accordance with manufacturer's specifications.

D.2.7 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the emission units identified as D1, D3, D4, D6, D8 and TU1 applying surface coatings to wood furniture and cabinets shall utilize one of the following application methods:

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

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

Any change that would increase actual VOC emissions from the corian surface coating line, or the adhesive coating facility (S3-1) to greater than fifteen (15) pounds per day requires prior approval from IDEM, OAQ.

D.2.8 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.2.9 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC content and usage limitations contained in Conditions D.2.2, D.2.4(a), and D.2.7 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)]

D.2.10 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating facilities stacks while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance

with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

- (b) Daily inspections shall be performed to verify that the water level of the water wall/baffles meets the manufacturer's recommended level. To monitor the performance of the water wall/baffles, the water level shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. In addition, weekly observations shall be made of the overspray from the surface coating booth stacks while one or more of the booths are in operation. If a noticeable change in overspray emission, or evidence of overspray emission is observed at any stack exhaust, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (c) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emission, or when evidence of overspray emissions is observed at any stack exhaust, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

D.2.11 Scrubber Inspections

An inspection of the scrubbers controlling emissions from the surface coating facilities shall be performed semi-annually. Inspections required by this condition shall not be performed in consecutive months. Repairs or replacement of defective components shall be performed in accordance with the Preventive Maintenance Plan.

D.2.12 Scrubber Malfunction

In the event that a scrubber malfunction has been observed:

- (a) The affected unit will be shut down immediately in accordance with safe operating procedures until the failed unit has been repaired or the appropriate components replaced".
- (b) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

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

D.2.13 Record Keeping Requirements

- (a) To document compliance with Condition D.2.2 and D.2.5, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Conditions D.2.2 and D.2.5. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
 - (2) The VHAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
 - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable spray booth coating used.

- (4) The VHAP content in weight percent of each thinner used.
 - (5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (b) To document compliance with Condition D.2.4(a), the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) 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.2.4(a). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The amount and VOC content of each coating material, dilution solvent and cleaning solvent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) The total VOC usage for each month; and
 - (3) The weight of VOCs emitted for each compliance period.
- (c) To document compliance with Condition D.2.3, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (d) To document compliance with Condition D.2.10, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.
- (e) To document compliance with Conditions D.2.11, the Permittee shall maintain records of the results of the inspections required under Condition D.2.11.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.14 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.2.4(a) 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.
- (b) A semi-annual Continuous Compliance Report to document compliance with Condition D.2.2 and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported. The six (6) month periods shall cover the following months:
 - (1) January 1 through June 30.
 - (2) July 1 through December 31.

This report shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

SECTION D.3

FACILITY OPERATION CONDITIONS

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

Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
- (1) One (1) natural gas-fired boiler, identified as B1, constructed in 1995, rated at 0.4 MMBtu/hr, and exhausting to stack B1. [326 IAC 6-2-4]
 - (2) Four (4) natural gas-fired hot water boilers, identified as AB1, AB2, AB3, and AB4, constructed in 2000, with each rated at 1 MMBtu per hour, exhausting to stacks AB1, AB2, AB3, and AB4, respectively. [326 IAC 6-2-4]

(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 Particulate [326 IAC 6-2-4(a)]

Pursuant to 326 IAC 6-2-4(a), the PM emission limit for boilers B1, AB1, AB2, AB3, and AB4 shall be 0.6 lb/MMBtu.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Adorn LLC
Source Address: 1808 West Hively Avenue, Elkhart, Indiana 46517; 57420 Nagy Drive, Elkhart, Indiana 46517 and 58038 County Road No. 3, Elkhart, Indiana 46517
Mailing Address: 2421 Nappanee St., Suite B, Elkhart, Indiana 46517
Part 70 Permit No.: T039-17506-00324

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:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Adorn LLC
Source Address: 1808 West Hively Avenue, Elkhart, Indiana 46517; 57420 Nagy Drive, Elkhart, Indiana 46517 and 58038 County Road No. 3, Elkhart, Indiana 46517
Mailing Address: 2421 Nappanee St., Suite B, Elkhart, Indiana 46517
Part 70 Permit No.: T039-17506-00324

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- C 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
 - C 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
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**

Part 70 Quarterly Report

Source Name: Adorn LLC
Source Address: 1808 West Hively Avenue, Elkhart, Indiana 46517; 57420 Nagy Drive, Elkhart, Indiana 46517 and 58038 County Road No. 3, Elkhart, Indiana 46517
Mailing Address: 2421 Nappanee St., Suite B, Elkhart, Indiana 46517
Part 70 Permit No.: T039-17506-00324
Facility: All Laminating/Surface Coating Facilities
Parameter: VOC
Limit: Less than 249 tons per twelve consecutive month period, with compliance determined at the end of each month.

YEAR:

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

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 MANAGEMENT
 COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
 Semi-Annual Report**

VOC and VHAP usage - Wood Furniture NESHAP

Source Name: Adorn LLC, Inc.
 Source Address: 1808 West Hively Avenue, 57420 Nagy Drive, and 58038 County Road No. 3, Elkhart, Indiana 46517
 Mailing Address: 2421 Nappanee St., Suite B, Elkhart, Indiana 46517
 Part 70 Permit No.: T039-17506-00324
 Facility: All Laminating/Surface Coating Facilities
 Parameter: VOC and VHAPs - NESHAP
 Limit: (1) Finishing operations - 1.0 lb VHAP/lb Solids
 (2) Thinners used for on-site formulation of washcoats, basecoats and enamels - 3% VHAP content by weight
 (3) All other thinner mixtures - 10% VHAP content by weight
 (4) Foam adhesives meeting the upholstered seating flammability requirements - 1.8 lb VHAP/lb Solids
 (5) All other contact adhesives - 1.0 lb VHAP/lb Solids
 (6) Strippable spray booth material - 0.8 pounds VOC per pound solids

YEAR: _____

Month	Finishing Operations (1lb VHAP/lb Solid)	Thinners (3% by weight)	All Other Thinner Mixtures (10% by weight)	Foam Adhesives (upholstered) (1.8lb VHAP/lb Solid)	Contact Adhesives (1.0 lb VHAP/lb Solid)	Strippable Spray Booth Material (0.8 lb VOC/ lb Solid)
1						
2						
3						
4						
5						
6						

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**

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

Source Name: Adorn LLC
 Source Address: 1808 West Hively Avenue, Elkhart, Indiana 46517; 57420 Nagy Drive, Elkhart, Indiana 46517; and 58038 County Road No. 3, Elkhart, Indiana 46517
 Mailing Address: 2421 Nappanee St., Suite B, Elkhart, Indiana 46517
 Part 70 Permit No.: T039-17506-00324

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

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".	
<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: _____

Attach a signed certification to complete this report.

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

**Addendum to the Technical Support Document
for a Title V (Part 70) Renewal**

Source Background and Description

Source Name: Adorn, LLC
Source Location: 1808 West Hively Avenue, Elkhart, Indiana 46517
57420 Nagy Drive, Elkhart, Indiana 46517
58038 County Road No. 3, Elkhart, Indiana 46517.
County: Elkhart
SIC Code: 2421, 2431, 2434, 2541, 2672
Operation Permit No.: T039-17506-00324
Permit Reviewer: ERG/ST

On March 6, 2005, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Adorn, LLC had applied for a Title V (Part 70) Renewal Permit to operate a stationary wood counter top and cabinet manufacturing plant with control. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit 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 permit should be issued as proposed.

On September 23, 2005, the source informed IDEM of its intent to add insignificant woodworking operations controlled by a cyclonic baghouse to their plant at 1808 W. Hively Avenue (Plant 1). The woodworking operation is deemed insignificant under 326 IAC 2-7-1(21)(G)(xxx). The draft of the permit on Public Notice mistakenly included a significant woodworking operation located at Plant 1, identified as WW1c and exhausting to stack C1-7. This facility was never located at Plant 1, but was added to Plant 3 under Administrative Amendment 039-16890-00324, issued on March 14, 2003. All references to the new insignificant woodworking operation (WW1c) are **bolded** to signify that this is a new emissions unit and a change that was made after Public Notice.

Therefore, the permit will be changed as follows:

A.4 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 also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

.....

(b) Insignificant woodworking equipment, meeting the definition of "insignificant woodworking operation" as specified in 326 IAC 2-7-1(21)(G)(xxx), identified as WW1c, constructed in 2005, having a maximum process weight rate of 5,000 pounds of wood per hour, using a cyclonic baghouse system to control particulate emissions, with a maximum air flow rate of 35,000 standard cubic feet of air per minute (scfm) and a maximum outlet grain loading of less than 0.003 grains per dry standard cubic foot of exhaust air, and exhausting to stack C1-7. [326 IAC 2-7-1(21)(G)(xxx)] [326 IAC 6-3-2]

SECTION D.1 FACILITY OPERATION CONDITIONS

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

.....

Insignificant Activities: Insignificant Woodworking: Plant 1 (1808 West Hively Avenue)

- (b) Insignificant woodworking equipment, meeting the definition of "insignificant woodworking operation" as specified in 326 IAC 2-7-1(21)(G)(xxx), identified as WW1c, constructed in 2005, having a maximum process weight rate of 5,000 pounds of wood per hour, using a cyclonic baghouse system to control particulate emissions, with a maximum air flow rate of 35,000 standard cubic feet of air per minute (scfm) and a maximum outlet grain loading of less than 0.003 grains per dry standard cubic foot of exhaust air, and exhausting to stack C1-7. [326 IAC 2-7-1(21)(G)(xxx)] [326 IAC 6-3-2]

(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.1.1 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), the particulate emissions from the **significant and insignificant** woodworking operations, denibbers, wood wrapping operations, laminating operations and sawdust storage silo are subject to PM/PM10 emission limits as shown in the following table:

Stack ID	PM/PM10 limit (lb/hr)
C1-1	3.6
C1-2	4.2
C1-3	2.9
C1-4	9.3
C1-5	3.0
C1-6	5.3
C1-7	2.9
C2-1	4.2
C2-2	1.4
C3-1	2.6

...

D.1.2 Particulate Emissions Limitations for Manufacturing Processes [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 exhaust stacks of the baghouses and cyclones controlling the **significant and insignificant** woodworking operations, wood wrapping operations, wood laminating operations, denibbers and sawdust storage silo shall not exceed the pounds per hour limits as shown in the following table:

Particulate Emission Rate		
Exhaust Stack ID	Process Weight Rate (lbs)	Particulate Emission Rate (lb/hr)
C1-1	55,000	37.8
C1-2	11,000	12.8
C1-3	7,500	9.9
C1-4	6,500	9.0
C1-5	12,000	13.6
C1-6	13,000	14.4
C1-7	5,000	7.6
C2-1	4,680	7.2
C2-2	9,500	11.6
C3-1	26,525	23.2

.....

D.1.3 Baghouse Limitations [326 IAC 2-7-1(21)(G)(xxx)]

The insignificant woodworking operation (WW1c) controlled by a cyclonic baghouse shall be considered an insignificant activity for Title V permitting purposes provided that the baghouse operations meet the requirements of 326 IAC 2-7-1(21)(G)(xxx), including the following:

- (a) Each woodworking baghouse shall not exhaust to the atmosphere greater than forty thousand (40,000) cubic feet of air per minute and shall not emit particulate matter with a diameter less than ten (10) microns in excess of one hundredth (0.01) grain per dry standard cubic foot of outlet air.
- (b) The opacity from each baghouse shall not exceed ten percent (10%).
- (c) Visible emissions from the baghouse shall be observed daily using procedures in accordance with Method 22 and normal or abnormal emissions are recorded. In the event abnormal emissions are observed for greater than six (6) minutes in duration, the following shall occur:
 - (1) The baghouse shall be inspected.
 - (2) Corrective actions, such as replacing or reseating bags, are initiated, when necessary.

Compliance Determination Requirements

D.1.45 Particulate Control [40 CFR 64]

- (a) Pursuant to CP 039-8835-00324, issued on December 29, 1997, SSM 039-18363-00324, issued on July 21, 2004, and 326 IAC 6-3-2, and in order to comply with Conditions D.1.1, ~~and~~ D.1.2 and D.1.3, the baghouses and cyclones for particulate control shall be in operation and control emissions from the **significant and insignificant** woodworking operations, wood wrapping operations, wood laminating operations, denibbers and sawdust storage silo at all times that the woodworking operations, wood wrapping operations, wood laminating operations, denibbers and sawdust storage silo are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (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.

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

D.1.56 Visible Emissions Notations [40 CFR 64]

- (a) Daily visible emission notations of the **significant and insignificant** woodworking operations, wood wrapping operations, wood laminating operations, denibbers and sawdust storage silo stack exhausts (C1-1, C1-2, C1-3, C1-4, C1-5, C1-6, **C1-7**, C2-1, C2-2, and C3-1) shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- ...
- (e) **If abnormal emissions are observed at the significant and insignificant woodworking operations, wood wrapping operations, wood laminating operations, denibbers and sawdust storage silo stack exhausts, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances.** ~~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~~ **Response to Excursions or Exceedances**, shall be considered a deviation from this permit.

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

D.1.12 Record Keeping Requirements

- (a) To document compliance with Conditions **D.1.3(c)** and D.1.56, the Permittee shall maintain records of daily visible emission notations of the exhaust from stacks C1-1, C1-2, C1-3, C1-4, C1-5, C1-6, **C1-7**, C2-1, C2-2, and C3-1.
- (b) To document compliance with Conditions **D.1.3(c)**, D.1.67, D.1.89, and D.1.4011, and ~~D.1.14~~, the Permittee shall maintain records of the results of the inspections required under Conditions **D.1.3(c)**, D.1.67, D.1.89, and D.1.4011. ~~and D.1.14.~~
- ~~(c) To document compliance with Condition D.1.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.~~
- (c) The Permittee shall maintain records of corrective actions to document compliance with Condition D.1.3 and 326 IAC 2-7-21(1)(G)(xxx)(GG)(dd).**
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

The Prevention of Significant Deterioration and State Rule Applicability – Individual Activities sections in the Technical Support Document should read as follows. No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

326 IAC 2-2 (Prevention of Significant Deterioration)

...

In 2005, under Title V Renewal 039-17506-00324, the source added insignificant woodworking equipment. This modification did not trigger PSD review because the increase in PM/PM10 emissions due to this modification was less than 250 tons per year. The source remained a minor source under PSD for PM and PM10 after this modification.

..... Therefore, the particulate emitting facilities are subject to the following limits shown in the following table:

PSD Minor Limit for PM / PM10, By Stack ID		
Stack ID	PM/PM10 limit (lb/hr)	PM/PM10 limit (ton/yr)
C1-1	3.6	15.6
C1-2	4.2	18.6
C1-3	2.9	12.8
C1-4	9.3	40.7
C1-5	3.0	13.1
C1-6	5.3	23.2
C1-7	2.9	12.8
C2-1	4.2	18.6
C2-2	1.4	6.0
C3-1	2.6	11.3
E1-1	0.1	0.5
E1-2	1.9	8.5
E1-3	0.1	0.5
E1-4	0.1	0.5
E1-5	0.1	0.5
E1-6	2.0	8.7
E1-7	0.1	0.5
E1-8	2.0	8.7
E1-9	0.1	0.5
E1-10	0.4	1.8
E1-11	0.1	0.5
TU1	0.1	0.5
C5	0.1	0.5
Total		206

...

State Rule Applicability – **Significant and Insignificant** Woodworking Equipment, Denibbers, Wood Wrapping Machines, Wood Laminating Machines and Sawdust Storage Silo

326 IAC 2-7-1(21)(G)(xxx) (Insignificant Activities)

Pursuant to 326 IAC 2-7-1(21)(G)(xxx), the insignificant woodworking operation located at 1808 W. Hively Avenue, identified as WW1c, and controlled by a cyclonic baghouse shall be considered an insignificant woodworking operations provided that: the baghouse does not exhaust to the atmosphere greater than forty thousand (40,000) cubic feet per minute, the baghouse does not emit particulate matter with a diameter less than ten (10) microns in excess of one hundredth (0.01) grain per dry standard cubic feet of outlet air, the opacity from the baghouse does not exceed ten percent (10%), and, the baghouse is in operation at all times that the woodworking equipment is in use.

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

Pursuant to CP 039-4472-00324, issued on August 8, 1995, CP 039-8835-0-324, issued on December 29, 1997, AA 039-15653-00324, issued on April 26, 2002, SSM 039-18363-00324, issued on July 21, 2004, and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emissions from the exhaust stacks of the baghouses and cyclones controlling the **significant and insignificant** woodworking operations, denibbers, wood wrapping machines, wood laminating machines, and sawdust storage silo shall not exceed the pounds per hour limits as shown in the following table:

Particulate Emission Rate		
Exhaust Stack ID	Process Weight Rate (lbs)	Particulate Emission Rate (lb/hr)
C1-1	55,000	37.8
C1-2	11,000	12.8
C1-3	7,500	9.9
C1-4	6,500	9.0
C1-5	12,000	13.6
C1-6	13,000	14.4
C1-7	5,000	7.6
C2-1	4,680	7.2
C2-2	9,500	11.6
C3-1	26,525	23.2

The TSD: Appendix A documents these changes.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table of Contents has been modified, if applicable, to reflect these changes. Conditions have been renumbered as necessary.

1. Indiana was required to incorporate credible evidence provisions into state rules consistent with the SIP call published by U.S. EPA in 1997 (62 FR 8314). Indiana has incorporated the credible evidence provisions in 326 IAC 1-1-6. This rule is effective March 16, 2005; therefore, the condition reflecting this rule will be incorporated into the permit as follows:

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]

~~Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.~~ **For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.**

2. IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request, records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. Therefore, IDEM has deleted paragraph (b) of Section B – Preventive Maintenance, and has amended the Section B – Emergency Provisions condition as follows. Some changes shown here reflect changes made for other reasons, and will be documented elsewhere in this addendum.

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) 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.
- ~~(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.
- ~~(e)~~**(b)** 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 PMPs does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- ~~(d)~~**(c)** 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.11 Emergency Provisions [326 IAC 2-7-16]

...

- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.**

...

D.1.12 Record Keeping Requirements

- (a) To document compliance with Conditions **D.1.3(c)** and D.1.56, the Permittee shall maintain records of daily visible emission notations of the exhaust from stacks C1-1, C1-2, C1-3, C1-4, C1-5, C1-6, C1-7, C2-1, C2-2, and C3-1.
- (b) To document compliance with Conditions **D.1.3(c)**, D.1.67, D.1.89, and D.1.4011, and ~~D.1.11~~, the Permittee shall maintain records of the results of the inspections required under Conditions **D.1.3(c)**, D.1.67, D.1.89, and D.1.4011. ~~and D.1.11.~~
- ~~(c)~~ To document compliance with Condition D.1.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) The Permittee shall maintain records of corrective actions to document compliance with Condition D.1.3 and 326 IAC 2-7-21(1)(G)(xxx)(GG)(dd).**
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

.....

D.2.413 Record Keeping Requirements

....

- (d) To document compliance with Conditions ~~D.2.410~~ and D.2.8, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections. ~~and those additional inspections prescribed by the Preventive Maintenance Plan.~~

....

3. The 326 IAC revisions that became effective on June 12, 2002 were approved into the State Implementation Plan (SIP) on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP, therefore, the requirements of the previous version of 326 IAC 6-3-2 are not longer applicable to this source.

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. ~~This condition is not federally enforceable.~~

.....

D.2.6 Particulate [40 CFR 52 Subpart P] [326 IAC 6-3-2(d)]

- (a) ~~Pursuant to 40 CFR 52 Subpart P, the particulate emissions from the surface coating facilities 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:~~

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

Particulate emissions from the surface coating facilities shall be controlled by a dry particulate filter and/or water wall and water scrubber system, and the Permittee shall operate the control devices in accordance with manufacturer's specifications.

D.2.10 Particulate Control

~~Pursuant to 326 IAC 6-3-2, and in order to comply with Conditions D.2.4 and D.2.6, the dry filters, water walls, water scrubbers for particulate control shall be in operation and control particulate emissions from the wood furniture coating facilities at all times that the wood furniture coating facilities are in operation.~~

4. Upon further review, IDEM has determined to remove Condition C.6 - Operation of Equipment because the requirements in this condition have been included in Section D.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

~~Except as otherwise provided by statute or 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 are in operation.~~

5. Operational Flexibility: For clarification purposes, Condition B.20 has been revised as follow:

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

...

- (3) The changes do not result in emissions which exceed the ~~emissions allowable under~~ **limitations provided in** this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

...

- (5) The Permittee maintains records on-site, **on a rolling five (5) year basis**, which document, ~~on a rolling five (5) year basis~~, all such changes and emissions ~~trading trades~~ that are subject to 326 IAC 2-7-20(b), (c), or (e). **The Permittee shall make** such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

...

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade **emissions** increases and decreases ~~in emissions in~~ at 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 2-7-20(c).

...

6. Upon further review, IDEM has determined that both baghouse inspections and parametric monitoring are not required for the baghouses controlling the wood wrapping and laminating facilities. The Parametric Monitoring Condition (Condition D.1.11) has been removed from the permit, along with related recordkeeping requirements. The Pressure Gauge Specifications condition has also been removed from the permit, as this condition is applicable only to the Parametric Monitoring requirement in Condition D.1.11.

~~C.13 Pressure Gauge Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]~~

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

.....

~~D.1.11 Parametric Monitoring [40 CFR 64]~~

~~The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the wood wrapping and laminating facilities, at least once per shift when these facilities are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan- Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. 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.~~

~~The instrument used for determining the pressure shall comply with Section C- Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.~~

.....

7. IDEM has reconsidered the requirement to develop and follow a Compliance Response Plan. The Permittee will still be required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. Replacing the requirement to develop and follow a Compliance Response Plan with a requirement to take reasonable response steps will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated. The Section D conditions that refer to this condition have been revised to reflect the new condition title, and the following changes have been made to the Section C condition. Condition numbers and references to Conditions have been renumbered as necessary.

C.1614 Compliance Response Plan – Preparation, Implementation, Records, and Reports Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

- (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 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 timeframe 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 (c) 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 a minor permit modification 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, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.~~
- ~~(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.~~
- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.**
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:**
 - (1) initial inspection and evaluation;**
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or**
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.**
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:**
 - (1) monitoring results;**
 - (2) review of operation and maintenance procedures and records;**

- (3) **inspection of the control device, associated capture system, and the process.**
- (d) **Failure to take reasonable response steps shall be considered a deviation from the permit.**
- (e) **The Permittee shall maintain the following records:**
 - (1) **monitoring data;**
 - (2) **monitor performance data, if applicable; and**
 - (3) **corrective actions taken.**

.....

D.1.56 Visible Emissions Notations [40 CFR 64]

...

- (e) **If abnormal emissions are observed at the woodworking operations, wood wrapping operations, wood laminating operations, denibbers and sawdust storage silo stack exhausts, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances.** ~~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~~ **Response to Excursions or Exceedances**, shall be considered a deviation from this permit.

...

D.1.910 Cyclone Failure Detection [40 CFR 64]

In the event that cyclone 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 permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - ~~Compliance Response Plan Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances**, shall be considered a deviation from this permit.

.....

D.2.4110 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating facilities stacks while one or more of the booths are in operation. ~~The Compliance Response Plan shall be followed whenever~~ **If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances.** Failure to take response steps in accordance with Section C - ~~Compliance Response Plan Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances**, shall be considered a deviation from this permit.
- (b) Daily inspections shall be performed to verify that the water level of the water wall/baffles meets the manufacturer's recommended level. To monitor the performance of the water wall/baffles, the water level shall be maintained weekly at a level where surface agitation

indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. In addition, weekly observations shall be made of the overspray from the surface coating booth stacks 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.~~ **If a noticeable change in overspray emission, or evidence of overspray emission is observed at any stack exhaust, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances.** Failure to take response steps in accordance with Section C - ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances**, shall be considered a deviation from this permit.

(c) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. ~~The Compliance Response Plan for these units 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.~~ **When there is a noticeable change in overspray emission, or when evidence of overspray emissions is observed at any stack exhaust, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances.** Failure to take response steps in accordance with Section C - ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances**, shall be considered a deviation from this permit.

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

8. Paragraph (a) of the Broken or Failed Baghouse condition has been deleted. For multi-compartment baghouses, the permit will not specify what actions the Permittee needs to take in response to a broken bag. However, a requirement has been added to Condition D.1.5 **[formerly D.1.4]** requiring the Permittee to notify IDEM if a broken bag is detected and the control device will not be repaired for more than ten (10) days. This notification allows IDEM to take any appropriate actions if the emission unit will continue to operate for a long period of time while the control device is not operating in optimum condition.

D.1.45 Particulate Control [40 CFR 64]

(a) Pursuant to CP 039-8835-00324, issued on December 29, 1997, SSM 039-18363-00324, issued on July 21, 2004, and 326 IAC 6-3-2, and in order to comply with Conditions D.1.1, ~~and D.1.2~~ **and D.1.3**, the baghouses and cyclones for particulate control shall be in operation and control emissions from the **significant and insignificant** woodworking operations, wood wrapping operations, wood laminating operations, denibbers and sawdust storage silo at all times that the woodworking operations, wood wrapping operations, wood laminating operations, denibbers and sawdust storage silo are in operation.

(b) **In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (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.**

D.1.78 Broken or Failed Bag Detection [40 CFR 64]

~~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 ten (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) (a) For a single compartment baghouses controlling emissions from a process operated continuously, 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 shall 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).**
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. 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).**

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

9. IDEM's mailing address has been corrected throughout the permit:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

10. The County Attainment Status section in the Technical Support Document should document a Notice published by U.S.EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 regarding PM2.5 attainment status for Indiana Counties. Elkhart County is determined to be "Attainment or Unclassifiable for PM2.5." U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the

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

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM10	Attainment
PM2.5	Attainment or Unclassifiable
SO ₂	Attainment
NO ₂	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Nonattainment
CO	Attainment
Lead	Attainment

- (a) **Elkhart County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability for the source section.**
- ~~(a)~~(b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset. **See the State Rule Applicability for the source section.**
- ~~(b)~~(c) Elkhart County has been classified as attainment or unclassifiable for all other 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.**

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name:	Adorn LLC
Source Location:	1808 West Hively Avenue, Elkhart, Indiana 46517 57420 Nagy Drive, Elkhart, Indiana 46517 58038 County Road No. 3, Elkhart, Indiana 46517.
County:	Elkhart
SIC Code:	2421, 2431, 2434, 2541, 2672
Operation Permit No.:	039-7650-00324
Operation Permit Issuance Date:	October 6, 1998
Permit Renewal No.:	039-17506-00324
Permit Reviewer:	ERG/ST

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Renewal application from Adorn LLC relating to the operation of a stationary wood counter top and cabinet manufacturing plant.

Source Definition

This Source Definition from the previous Part 70 Operating Permit was incorporated into this permit as follows:

This wood counter top and cabinet manufacturing company consists of three (3) plants:

- (a) Plant 1 is located at 1808 West Hively Avenue, Elkhart, Indiana 46517;
- (b) Plant 2 is located at 57420 Nagy Drive, Elkhart, Indiana 46517; and
- (c) Plant 3 is located at 58038 County Road No. 3, Elkhart, Indiana 46517.

Since the three (3) plants are located on contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source.

Permitted Emission Units and Pollution Control Equipment

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

Plant 1 (1808 West Hively Avenue)

- (a) One (1) sawdust storage silo, identified as S-1, constructed in 1997, with a capacity of 690 cubic yards, collecting sawdust from the woodworking equipment through a cyclonic baghouse system, and exhausting to stack C1-1.
- (b) Woodworking equipment, identified as WW1a, constructed in 1995, with a maximum throughput of 25,000 pounds of wood per hour, using a cyclonic baghouse system to

- control particulate emissions, and exhausting to three (3) stacks, identified as C1-2, C1-3 and C1-4.
- (c) Woodworking equipment, identified as WW1b, constructed in 1995, with a maximum throughput of 25,000 pounds of wood per hour, using a cyclonic baghouse system to control particulate emissions, and exhausting to two (2) stacks, identified as C1-5 and C1-6.
 - (d) Woodworking equipment, identified as WW1c, constructed in 2003, having a maximum throughput capacity of 5,000 pounds of wood per hour, using a cyclonic baghouse system to control particulate emissions, and exhausting to stack C1-7.
 - (e) Two (2) denibbers for D1, identified as DN1a and DN1b, constructed in 2000, each with maximum capacities of 3,900 board feet per hour, using a cyclonic baghouse system to control particulate emissions, and exhausting to stack C1-4.
 - (f) One (1) denibber for D4, identified as DN4, constructed in 2000, with a maximum capacity of 3,900 board feet per hour, using a cyclonic baghouse system to control particulate emissions, and exhausting to stack C1-4.
 - (g) One (1) adhesive spray booth and one (1) wood wrapping press, identified as SA1 and WWP1, respectively, constructed in 1995, with a maximum capacity of laminating 39.143 linear feet per hour, utilizing a high volume low pressure (HVLP) application system, with particulate emissions controlled by dry filters, and exhausting to stack E1-10.
 - (h) One (1) dualtech automated back sealing machine, identified as D1, constructed in 2000, with a maximum capacity of 3,900 board feet per hour, equipped with eight (8) airless/air assist spray guns, with particulate emissions controlled by a water wall and water scrubber system, identified as D2, exhausting to stack E1-2, and a hot air drying tunnel exhausting to stack E1-3.
 - (i) One (1) rototech automated front staining machine, identified as D3, constructed in 2000, with a maximum capacity of 3,900 board feet per hour, equipped with twenty (20) airless/air assist spray guns, with particulate emissions controlled by dry filters, exhausting to stack E1-4, and a forced air drying tunnel exhausting to stack E1-5.
 - (j) One (1) dualtech automated sealing machine, identified as D4, constructed in 2000, with a maximum capacity of 3,900 board feet per hour, equipped with eight (8) airless/air assist spray guns, with particulate emissions controlled by a water wall and water scrubber system, identified as D5, exhausting to stack E1-6, and a hot air/infrared drying tunnel exhausting to stack E1-7.
 - (k) One (1) dualtech automated topcoat machine, identified as D6, constructed in 2000, with a maximum capacity of 3,900 board feet per hour, equipped with eight (8) airless/air assist spray guns, with particulate emissions controlled by a water wall and water scrubber system, identified as D7, exhausting to stack E1-8, a hot air drying tunnel exhausting to stack E1-9, and a non-heated cooling hood exhausting inside the building.
 - (l) One (1) manual touch up booth, identified as TU1, constructed in 2000, with a maximum capacity of one (1) gallon of stain, two (2) gallons of sealer, and two (2) gallons of topcoat per day, consisting of one (1) airless/air assist gun, with particulate emissions controlled by dry filters, exhausting to stack TU-1.
 - (m) One (1) rototech automated back staining machine, identified as D8, constructed in 2002, with a maximum capacity of 3,900 board feet per hour, equipped with twenty (20) HVLP spray guns used for coating cabinet doors and an infrared drying oven, with particulate emissions controlled by dry filters, and exhausting to stack E1-1.
 - (n) One (1) vacuum coater, identified as VC-1, constructed in 1995, with a maximum capacity of 5,000 linear feet of wood per hour, applying coatings containing no VOC or

HAP to wood trim, utilizing an ultraviolet (UV) curing process, with particulate emissions controlled by dry filters, and exhausting to stack E1-11.

Plant 2 (57420 Nagy Drive)

- (o) Woodworking equipment, identified as WW2a, constructed in 1995, with a maximum throughput of 3,000 pounds of wood per hour, using a cyclonic baghouse system to control particulate emissions, and exhausting to stack C2-1.
- (p) Woodworking equipment, identified as WW2b, constructed in 1995, with a maximum throughput of 5,000 pounds of wood per hour, using a cyclonic baghouse system to control particulate emissions, and exhausting to stack C2-2.
- (q) Six (6) wood wrapping machines, identified as WR2a, WR2b, WR2c, WR2d, WR2e, and WR2f, constructed in 1995, each with a maximum capacity of 280 pounds of wood styles per hour, using water-based and hot melt adhesives, using a cyclonic baghouse system to control particulate emissions, exhausting to stack C2-1.
- (r) Three (3) wood panel laminating machines, identified as WPL2, constructed in 1995, each with a maximum capacity of 1,500 pounds of wood panels per hour, using a cyclonic baghouse system to control particulate emissions, and exhausting to stack C2-2.

Plant 3 (58038 County Rd. No.3)

- (s) Woodworking equipment, identified as WW3a, constructed in 2002, having a maximum throughput capacity of 25,000 pounds of wood per hour. Emissions of particulate matter are controlled using a cyclonic baghouse, exhausting to stack C3-1.
- (t) Woodworking equipment, identified as WW3b, constructed in 2004, consisting of sanders, saws and woodworking tools with a maximum throughput rate of 500 pounds of wood per hour and 25 pounds of plastic per hour, with particulate matter emissions controlled by a cyclonic baghouse and exhausting at stack C3-1.
- (u) One (1) MDF board laminating machine, identified as BL3, constructed in 1997, utilizing a rollcoat adhesive application system, with a maximum capacity of 1,000 pounds of wood panels per hour, with particulate matter emissions controlled by a cyclonic baghouse and exhausting to stack C3-1.
- (v) One (1) adhesive coating facility, identified as S3-1, constructed in 2004, equipped with an airless/air assisted spray gun and roll coater, with a maximum usage rate of 0.8 gallons of adhesives per day, with particulate matter emissions controlled by dry filter, and exhausting at stack S3-1.
- (w) One (1) Corian surface coating line, identified as Corian, constructed in 1998, utilizing a hand application method, with a maximum capacity of 1,000 pounds per hour, and exhausting to one (1) stack, identified as C5.

Unpermitted Emission Units and Pollution Control Equipment

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

Insignificant Activities

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
 - (1) One (1) natural gas-fired boiler, identified as B1, constructed in 1995, rated at 0.4 MMBtu/hr, and exhausting to stack B1. [326 IAC 6-2-4]

- (2) Four (4) natural gas-fired hot water boilers, identified as AB1, AB2, AB3, and AB4, constructed in 2000, with each rated at 1 MMBtu per hour, exhausting to stacks AB1, AB2, AB3, and AB4, respectively. [326 IAC 6-2-4]
- (3) Fifteen (15) natural gas-fired forced air and radiant heaters, identified as H1 through H15, constructed after September 21, 1983, with nine (9) units rated at 0.2 MMBtu/hr and six (6) units rated at 0.1 MMBtu/hr, and exhausting to stacks H1 – H15, respectively.
- (b) Closed loop heating and cooling systems.
- (c) Infrared cure equipment.
- (d) Exposure chambers (“towers, “columns”), for curing of ultraviolet inks and ultraviolet coatings where heat is the intended discharge.
- (e) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (f) Any operation using aqueous solutions containing less than 1% by weight VOCs excluding HAPs.
- (g) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (h) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (i) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

Existing Approvals

The source has been operating under T039-7650-00324, issued on October 6, 1998 and the following modifications:

- (a) First Minor Source Modification 039-11334-00324, issued on January 3, 2000;
- (b) First Significant Permit Modification 039-11565-00324, issued on February 7, 2000;
- (c) First Administrative Amendment 039-12127-00324, issued on April 14, 2000;
- (d) Second Administrative Amendment 039-13886-00324, issued on February 14, 2001;
- (e) Reopening 039-13209-00324, issued on December 18, 2001;
- (f) Third Administrative Amendment 039-15653-00324, issued on April 26, 2002;
- (g) Second Minor Source Modification 039-15677-00324, issued on May 10, 2002;
- (h) First Minor Permit Modification 039-15410-00324, issued on June 18, 2002;
- (i) Fourth Administrative Amendment 039-16786-00324, issued on February 20, 2003;
- (j) Fifth Administrative Amendment 039-16890-00324, issued on May 14, 2003;
- (k) First Significant Source Modification 039-18363-00324, issued on July 21, 2004; and
- (l) Second Significant Permit Modification 039-18666-00324, issued on August 6, 2004.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit renewal 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 permit renewal application for the purposes of this review was received on December 23, 2002. Additional information was received on February 16, 2005.

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 4).

Potential to Emit of the Source

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.”

The source was issued a Part 70 Operating Permit on October 6, 1998. 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 the original Part 70 operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Woodworking and Denibbers (WW1a, WW1b, WW1c, WW3a, WW3b, DN1a, DN1b, DN4)	Less than 200	Less than 200	0	0	0	0	0
Surface Coating (D1, D3, D4, D6, D8, TU1, SA1, WPL2, BL3, S3-1, WR2)	Less than 48	Less than 48	--	Less than 249	0	0	9.35
Boilers and Heaters (B1, AB1-4, H1-H15)	0.2	0.2	--	0.2	2.5	3.0	--
Total PTE	Less than 250	Less than 250	--	Less than 250	2.5	3.0	9.35

VOC emissions are limited by a PSD Minor limit in the permit.
 PM/PM10 emissions are limited by a PSD Minor limit in the permit.
 "--" Emissions are negligible (less than 0.1 tons per year).

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM10 and VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards

that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2001 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	Not reported
PM10	12
SO ₂	0
VOC	139
CO	1
NO _x	1
HAP	Not reported

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Nonattainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Emission Offset.
- (b) Elkhart County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) The woodworking equipment, denibbers and sawdust storage silo at this source are subject to the provisions of 40 CFR 64, Compliance Assurance Monitoring (CAM). In order for this rule to apply, a pollutant-specific-emissions-unit at a source that requires a

Part 70 or Part 71 permit must meet three criteria for a given pollutant: 1) the unit is subject to an applicable emission limitation or standard for the applicable regulated air pollutant, 2) the unit uses a control device to achieve compliance with any such emission limitation or standard, and 3) the unit has the potential to emit, of the applicable regulated air pollutant, equal or greater than 100 percent of the amount required for a source to be classified as a major source. The following facilities have the potential to emit greater than 100 tons of a specific pollutant, and use a control device to comply with an emission limitation for that specific pollutant: woodworking equipment, denibbers and sawdust storage silo exhausting to the following stacks: C1-1, C1-2, C1-3, C1-4, C1-5, C1-6, C1-7, C2-1, C2-2, and C3-1. The CAM plan for these emission units is as follows:

The Permittee shall use cyclones and/or baghouses to control particulate emissions from the woodworking, denibber and sawdust storage operations. The cyclones and baghouses shall be in operation at all times that the woodworking, denibber and sawdust storage operations are in operation. Visible emissions from the cyclones and baghouses shall be observed daily using procedures in accordance with Method 22 and normal and abnormal emissions shall be recorded. Baghouse and cyclone inspections shall be performed quarterly when venting to the atmosphere. In the event that bag/cyclone failure has been observed, the affected units and their associated processes shall be shut down immediately until the failed units have been repaired or replaced.

- (b) The requirements of the New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12, 40 CFR 60, Subpart Dc) are not applicable to the four (4) natural gas-fired boilers because these boilers each have a maximum design heat input capacity less than 10 MMBtu/hr.
- (c) The five (5) natural gas-fired boilers are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD. This source is not a major source of HAP.
- (d) The wood furniture coating operations and adhesive application operations at this source are subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 20-14, (40 CFR Part 63, Subpart JJ), because Adorn LLC, Inc. manufactures wood counter tops and cabinets (a wood furniture component) and was a major source of HAPs as of December 7, 1998 (the compliance date of the rule).

Pursuant to 40 CFR 63.800, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:

- (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
 - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids, as applied; or
 - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or
 - (C) Use any combination of (A) and (B).
- (2) Limit VHAP emissions from contact adhesives by using:

- (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pound VHAP per pound solids;
- (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids;
- (3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.
- (4) Pursuant to 40 CFR 63.803, the owner or operator of an affected source subject to this subpart shall maintain a written work practice implementation plan. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:
 - (A) Operator training course.
 - (B) Leak inspection and maintenance plan.
 - (C) Cleaning and washoff solvent accounting system.
 - (D) Chemical composition of cleaning and washoff solvents.
 - (E) Spray booth cleaning.
 - (F) Storage requirements.
 - (G) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
 - (H) Line cleaning.
 - (I) Gun cleaning.
 - (J) Washoff operations.
 - (K) Formulation assessment plan for finishing operations.

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart JJ.

- (e) The surface coating facilities are not subject to the requirements of 40 CFR Part 63, Subpart QQQQ (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products) and 326 IAC 20. The source was a major source of HAPs upon issuance of the initial Title V permit, T039-7650-00324, issued on October 6, 1998, but subsequently changed its VOC coatings and became a minor source of HAPs before the compliance date of May 29, 2006. While the source performs surface coating of wood building products, the source is a minor source of HAPs and is also subject to the requirements of 40 CFR Part 63, Subpart JJ; therefore it is not subject to the requirements of 40 CFR Part 63, Subpart QQQQ. Any change that would increase HAP emissions to greater than ten (10) tons per year of a single HAP or greater than twenty-five (25) tons per year of a combination of HAPs requires prior approval from IDEM, OAQ.
- (f) The gypsum laminating machine is not subject to the requirements of 40 CFR Part 63, Subpart JJJJ (National Emission Standards for Hazardous Air Pollutants: Paper and

Other Web Coating) and 326 IAC 20. The source was a major source of HAPs upon issuance of the initial Title V permit, T039-7650-00324, issued on October 6, 1998, but subsequently changed its VOC coatings and became a minor source of HAPs before the compliance date of May 29, 2006. While the gypsum laminating machine performs web coating operations, it is located at a minor source of HAPs and is therefore not subject to the requirements of 40 CFR Part 63, Subpart JJJJ. Any change that would increase HAP emissions to greater than ten (10) tons per year of a single HAP or greater than twenty-five (25) tons per year of a combination of HAPs requires prior approval from IDEM, OAQ.

State Rule Applicability – Entire Source

326 IAC 2-3 (Emission Offset)

This source is located in Elkhart County. Elkhart County was designated as a nonattainment area for the 8-hour ozone standard in June 2004. The potential to emit of VOC of this source, after limits, is greater than 100 tons per year. Therefore, this source is a major source under Emission Offset. Under SSM 039-18363-00324, issued on July 21, 2004, the source added an adhesive spray booth and a woodworking facility. This modification did not trigger Emission Offset review because the increase in PM, PM10 and VOC due to this modification was less than the Emission Offset significant levels. The source remained a major source under Emission Offset after this modification.

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not in 1 of the 28 source categories and there are no applicable New Source Performance Standards that were in effect on August 7, 1980; therefore, fugitive emissions are not counted towards applicability of PSD.

This source was constructed in 1995. The PTE for PM, PM10 and VOC for the source before limits and controls was greater than 250 tons per year. The initial construction permit (CP 039-4472-00324, issued on August 8, 1995, limited PM, PM10 and VOC emissions from the woodworking operations (WW1a, WW1b, WWP1, WR2a, WR2b, WR2c, WR2d, WPL2, and GSL2) and the spray adhesive booth (SA1) to less than 250 tons per year. The permit included enforceable limits on PM and PM10 emissions and required the operation of baghouses to control particulate emissions. The source was a PSD minor source upon construction.

In CP 039-4803-00324, issued on November 14, 1995, the source accepted enforceable limits to limit source-wide VOC emissions to less than 250 tons per year. The source remained a minor source under PSD after the issuance of this permit.

In CP 039-8835-00324, issued on December 29, 1997, the source added woodworking operations, a surface coating facility and two (2) radiant heaters. The source retained the source-wide VOC limits of less than 250 tons per year. The permit included enforceable limits on PM and PM10 emissions and required the operation of baghouses to control particulate emissions. The increase in emissions for PM, PM10 and VOC did not trigger PSD review because the increase was below PSD significant levels. Compliance with the VOC usage limit, PM and PM10 emission limits made the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to the modifications. The source remained a minor source under PSD after the issuance of this permit.

In T039-7650-00324, issued on October 6, 1998, the source retained its source-wide VOC limits of less than 250 tons per year. The permit included enforceable limits on PM and PM10 emissions and required the operation of baghouses to control particulate emissions. The source remained a minor source under PSD after the issuance of this permit.

In MSM 039-11334-00324, issued on January 3, 2000, the source added five (5) surface coating facilities and three (3) boilers and removed three (3) existing surface coating facilities. This modification did not trigger PSD review because the increase in emissions was below the PSD significant level. The new surface coating facilities were included in the source-wide VOC limit of less than 250 tons per year. The source remained a minor source under PSD after this modification.

In AA 039-15653-00324, issued on April 26, 2002, the source added a new plant, relocated existing woodworking and laminating equipment to the new plant and added a baghouse to control particulate emissions. This modification did not trigger PSD review because the increase in emissions was below the PSD significant level. The source remained a minor source under PSD after this modification.

In MSM 039-15677-00324, issued on May 10, 2002, the source added a surface coating facility. This modification did not trigger PSD review because the increase in emissions was below the PSD significant level. The new surface coating facility was included in the source-wide VOC limit of less than 250 tons per year. The source remained a minor source under PSD after this modification.

In June 2004, Elkhart County was designated as a nonattainment area for the 8-hour ozone standard. The potential to emit of VOC of this source, after limits, is greater than 100 tons per year.

In SSM 039-18363-00324, issued on July 21, 2004, the source added woodworking equipment and a surface coating facility. This modification did not trigger PSD review because the increase in PM/PM10 emissions was below the PSD significant level and the increase in VOC was below the Emission Offset significant level. The new surface coating facility was included in the source-wide VOC limit of less than 250 tons per year. The source remained a minor source under PSD for PM and PM10 after this modification.

Pursuant to T039-7650-00324, issued on October 6, 1998, AA 039-15653-00324, issued on April 26, 2002, and SSM 039-18363-00324, issued on July 21, 2004, the baghouses are required to operate and control particulate emission from all particulate emitting facilities at all times that the facilities are in operation. This ensures that PM and PM-10 emissions remain below the major PSD source threshold of 250 tons per year. Actual source-wide emissions of PM and PM10 have never exceeded the PSD threshold of 250 tons per year. However, the particulate emission limits imposed by the requirements of 326 IAC 6-3-2 are not adequate to keep source-wide emissions of PM and PM10 to less than 250 tons per year. Therefore, the particulate emitting facilities are subject to the following limits shown in the following table:

PSD Minor Limit for PM / PM10, By Stack ID		
Stack ID	PM/PM10 limit (lb/hr)	PM/PM10 limit (ton/yr)
C1-1	3.6	15.6
C1-2	4.2	18.6
C1-3	2.9	12.8
C1-4	9.3	40.7
C1-5	3.0	13.1
C1-6	5.3	23.2
C1-7	9.3	40.5
C2-1	4.2	18.6
C2-2	1.4	6.0
C3-1	2.6	11.3
E1-1	0.1	0.5
E1-2	1.9	8.5
E1-3	0.1	0.5
E1-4	0.1	0.5
E1-5	0.1	0.5
E1-6	2.0	8.7
E1-7	0.1	0.5
E1-8	2.0	8.7
E1-9	0.1	0.5
E1-10	0.4	1.8
E1-11	0.1	0.5
TU1	0.1	0.5
C5	0.1	0.5
Total		233

These limits, in combination with other PM/PM10 emissions from this source, will ensure that the source-wide potential to emit PM/PM-10 remains less than 250 tons per twelve (12) consecutive month period. Any change or modification which may increase the potential to emit PM/PM-10 to

250 tons per year or more shall require prior approval by the IDEM, OAQ before such changes may take place.

This permit also includes a condition limiting the usage of VOC at the entire source to less than 250 tons per year:

The total VOC input to all the surface coating operations and laminating operations combined shall not exceed 249 tons per twelve (12) consecutive month period, with compliance determined on a monthly basis. This limit, in conjunction with the uncontrolled potential to emit of boilers B1, AB1-AB4, and Heaters H1-H15, is equivalent to VOC emissions of less than 250 tons per year. Compliance with the VOC usage limit makes the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to the modifications done under CP 039-8835-00324, MSM 039-11334-00324, AA 039-15653-00324, MSM 039-15677-00324 and SSM 039-18363-00324.

326 IAC 2-4.1 (Hazardous Air Pollutants)

- (a) The emission units identified as SA1, WWP1, WR2a, WR2b, WR2c, WR2d, WR2e, WR2f, and WRL2 are not subject to the requirements of 326 IAC 2-4.1 because these emission units were constructed prior to July 27, 1997.
- (b) The emission units identified as D1, D3, D4, D6, D8, TU1, BL3, Corain and S3-1 were constructed after July 27, 1997. However, these emission units are not subject to the requirements of 326 IAC 2-4.1 because pursuant to 326 IAC 2-4.1(b)(2) facilities subject to the requirements of 40 CFR Part 63, Subpart JJ are exempt from the requirements of 326 IAC 2-4.1.

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2007 and every 3 years after. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)

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 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.

326 IAC 6-4 (Fugitive Dust Emissions)

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

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

The source does not contain any facilities which generate 25 tons per year of fugitive particulate emissions. Therefore, the source is not subject to the requirements of 326 IAC 6-5.

State Rule Applicability – Woodworking Equipment, Denibbers, Wood Wrapping Machines, Wood Laminating Machines and Sawdust Storage Silo

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

Pursuant to CP 039-4472-00324, issued on August 8, 1995, CP 039-8835-0-324, issued on December 29, 1997, AA 039-15653-00324, issued on April 26, 2002, SSM 039-18363-00324, issued on July 21, 2004, and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emissions from the exhaust stacks of the baghouses and cyclones controlling the woodworking operations, denibbers, wood wrapping machines, wood laminating machines, and sawdust storage silo shall not exceed the pounds per hour limits as shown in the following table:

Particulate Emission Rate		
Exhaust Stack ID	Process Weight Rate (lbs)	Particulate Emission Rate (lb/hr)
C1-1	55,000	37.8
C1-2	11,000	12.8
C1-3	7,500	9.9
C1-4	6,500	9.0
C1-5	12,000	13.6
C1-6	13,000	14.4
C1-7	5,000	7.6
C2-1	4,680	7.2
C2-2	9,500	11.6
C3-1	26,525	23.2

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:

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

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The baghouses and cyclones shall be in operation at all times the woodworking equipment, denibbers, wood wrapping machines, wood laminating machines and sawdust storage silo are in operation, in order to comply with this limit.

State Rule Applicability – Surface Coating Facilities

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). 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 to 40 CFR 52 Subpart P, the particulate emissions from the surface coating facilities shall be limited by 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:

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

Pursuant to 326 IAC 6-3-2(d), particulate emissions from the surface coating facilities shall be controlled by a dry particulate filter and/or water wall and water scrubber system, and the Permittee shall operate the control devices in accordance with manufacturer's specifications.

Under the revised rule, the adhesive coating facility, identified as S3-1, will be exempt from the requirements of 326 IAC 6-3-2 once EPA has approved the revisions into the SIP, because it uses less than five (5) gallons of adhesive per day.

326 IAC 8-1-6 (Volatile Organic Compounds Limitations - BACT)

The emission units identified as D1, D3, D4, D6, D8, and TU1 are not subject to the requirements of 326 IAC 8-1-6 (Volatile Organic Compounds Limitations - BACT) because they are each subject to the requirements of 326 IAC 8-2-12.

The emission units identified as SA1, WWP1, VC-1, WR2a through WR2f, WPL2 and BL3 are not subject to the requirements of 326 IAC 8-1-6 (Volatile Organic Compounds Limitations - BACT) because they do not have the potential to emit VOC. Any change or modification which may increase the potential to emit VOC from these facilities to greater than 25 tons per year or more shall require prior approval by the IDEM, OAQ before such changes may take place.

The adhesive coating facility (S3-1) and the Corian surface coating line are not subject to the requirements of 326 IAC 8-1-6 (Volatile Organic Compounds Limitations - BACT) because their PTE for VOC is less than 25 tons per year.

326 IAC 8-2-12 (Volatile Organic Compounds (VOC))

The emission units identified as SA1, WWP1, VC-1, WR2a through WR2f, WPL2 and BL3 are not subject to the requirements of 326 IAC 8-2-12 because they do not have the potential to emit VOC.

The corain surface coating line and the adhesive coating facility (S3-1) are not subject to the requirements of 326 IAC 8-2-12 because their actual VOC emissions are less than 15 pounds per day. Any change that would increase actual VOC emissions from these facilities to greater than fifteen (15) pounds per day requires prior approval from IDEM, OAQ.

The surface coating operations identified as D1, D3, D4, D6, D8 and TU1 are subject to the requirements of 326 IAC 8-2-12 because they have actual VOC emissions greater than 15 pounds per day.

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

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

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

State Rule Applicability – Natural Gas-Fired Boilers and Natural Gas-Fired Radiant Heaters

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The natural gas fired boilers and space heaters are not subject to the requirements of 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations) because they have the potential to emit less than twenty five (25) tons per year of SO₂.

326 IAC 6-2-4 (Particulate Matter- Sources of Indirect Heating)

The natural gas-fired radiant heaters at this source are not subject to the requirements of 326 IAC 6-2-4 (Particulate Matter- Sources of Indirect Heating) because they are not sources of indirect heating.

The 0.4 MMBtu natural gas boiler (B1) and the four (4) 1.0 MMBtu natural gas hot-water boilers (AB1-AB4) are subject to the requirements of 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) because each boiler was constructed after September 21, 1983. Pursuant to this rule, the particulate matter (PM) emissions from the boilers shall not exceed the pound per million Btu limit calculated using the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where Pt = pounds of particulate matter emitted per million Btu heat input (lb/MMBtu)
Q = total source maximum operating capacity rating (Q = 3.4 MMBtu/hr)

Pt for the boiler B1 is as follows: $Pt = 1.09 / 0.4^{0.26} = 1.38$ lb PM/MMBtu

Pt for the boilers AB1, AB2, AB3, and AB4 is as follows: $Pt = 1.09 / (1+1+1+1+0.4)^{0.26} = .74$ lb PM/MMBtu

However, pursuant to 326 IAC 6-2-4(a), for any facility with Q less than 10 MMBtu/hr, Pt shall not exceed 0.6 pounds per MMBtu heat input. Therefore, the PM emission limit for boilers B1, AB1, AB2, AB3, and AB4 shall be 0.6 lb/MMBtu.

Testing Requirements

(a) Woodworking Operations

The woodworking operations, laminating operations, wrapping operations, and denibbers at this source do not have a testing requirement. The woodworking operations, laminating operations, wrapping operations, and denibbers are required by Conditions in the Permit to use baghouses and cyclones to control PM and PM10 emissions. Visible emission notations, quarterly inspection, and bag failure and cyclone failure requirements have been added consistent with current compliance monitoring requirements for Title V woodworking sources. These monitoring requirements should be sufficient to ensure compliance with the particulate matter emission limitations specified in the Permit.

(b) Surface Coating Operations

The surface coating operations do not have a testing requirement for PM, PM10, VOC, or HAP. The surface coating operations and laminating operations at this source do not have a testing requirement for PM or PM10 because each of these emissions units accounts for a small portion of the total potential to emit for PM or PM10 from the source before controls. The Permittee is not required to perform compliance stack tests on the surface coating facilities and laminating operations for VOC and HAP emissions because there are no VOC/HAP control devices in operation and records must be kept of all VOCs and HAPs used at the source.

(c) IDEM may require testing at any time to determine if the facilities are in compliance with the emissions limitations contained in 326 IAC 5-1, 326 IAC 2-2 and, 326 IAC 6-3-2.

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 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:

1. The woodworking operations, wood wrapping machines, wood laminating machines, denibbers and sawdust storage silo have applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emission notations of the woodworking operations, sawdust storage silo, wood wrapping machines, wood panel laminating machines, and denibbers stack exhausts (C1-1, C1-2, C1-3, C1-4, C1-5, C1-6, C1-7, C2-1, C2-2 and C3-1) shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall 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.
 - (b) An inspection shall be performed each calendar quarter of all bags controlling the process when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.
 - (c) In the event that bag failure has been observed:
 - (i) 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 violation of 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.

- (ii) 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).
- (d) An inspection shall be performed each calendar quarter of all cyclones controlling these operations when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.
- (e) In the event that cyclone 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 permit (Section B - Emergency Provisions). 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.
- (f) An inspection of the sawdust outloading operation and storage silo shall be performed at least once every two weeks. The Compliance Response Plan for the woodworking operations shall contain troubleshooting contingency and response steps for the sawdust outloading operation when abnormal emissions are observed or there is evidence of sawdust in the area surrounding the storage silo.

These monitoring conditions are necessary because the baghouses and cyclones for the woodworking operations, denibbers, wood wrapping and laminating machines and sawdust storage silo must operate properly to ensure compliance with 326 IAC 2-2 (PSD), 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-7 (Part 70).

- 2. The surface coating facilities have applicable compliance monitoring conditions as specified below:
 - (a) Daily inspections shall be performed to verify that the water level of the water wall and water scrubber system meets the manufacturer's recommended level. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks while the respective booths are in operation. In addition, weekly observations shall be

made of the overspray from the surface coating booth and laminating facility stacks 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.

These monitoring conditions are necessary because the dry filters and water wall and water scrubber system for the surface coating operations must operate properly to ensure compliance with 326 IAC 2-2 (PSD), 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-7 (Part 70).

Conclusion

The operation of this stationary wood counter top and cabinet manufacturing plant shall be subject to the conditions of this Part 70 permit 039-17506-00324.

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

**Company Name: Adorn LLC
Address: 1808 West Hively Avenue, Elkhart, IN 46517
Title V: T039-17506-00324
Reviewer: ERG/ST
Date: 2/15/2005**

Facility	Stack ID	Material	Density (lb/gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Water	Weight % Organics	Weight % Solids	Max. Usage (gal/unit)	Maximum Throughput (unit/hour)	PTE of VOC (ton/yr)	Transfer Efficiency	PTE of PM/PM10 Uncontrolled (ton/yr)	Control Efficiency	PTE of PM/PM10 Controlled (ton/yr)
Plant 1														
D1	E1-2	Back Seal	7.32	81.8%	63.1%	18.7%	11.4%	0.0081	1424	69.4	80.0%	8.47	80.0%	1.69
D3, D8	E1-4, E1-1	Stain	6.66	98.7%	44.0%	54.7%	0.6%	0.0187	1424	425	80.0%	0.93	80.0%	0.19
D4	E1-6	Sealer	7.39	78.5%	40.1%	38.3%	13.6%	0.007	1424	123	80.0%	8.72	80.0%	1.74
D6	E1-8	Topcoat	7.39	78.5%	40.1%	38.3%	13.6%	0.007	1424	123	80.0%	8.72	80.0%	1.74
TU1	TU-1	Stain, Sealer and Topcoat												
SA1, WWP1	E1-10	Helmibond 859 adhesive	8.92	54.0%	54.0%	0.00%	45.0%	0.005	100	0.00	80.0%	1.76	80.0%	0.35
VC-1	E1-11	UV Coating	9.89	2.0%	2.0%	0.00%	98.0%	0.001	500	0.00	95.0%	0.53	80.0%	0.11
Plant 2														
WR2, WPL2	C2-1, C2-2	40-003A adhesive	8.80	43.0%	43.0%	0.00%	55.0%	0.050	1000	0.00	80.0%	212	99.0%	2.1
Plant 3														
BL3	C3-1	40-1105 adhesive	9.00	36.0%	36.0%	0.00%	62.0%	0.050	300	0.00	80.0%	73.3	99.0%	0.7
S3-1	S3-1	adhesive (roll coat)	8.67	45.0%	43.0%	2.00%	46.0%	0.050	16	0.61	100.0%	0.00	80.0%	0.00
S3-1	S3-1	adhesive (spray)	8.67	45.0%	43.0%	2.00%	46.0%	0.050	16	0.61	80.0%	2.79	80.0%	0.56

All stains and coatings are applied with airless/HVLP equipment and controlled by dry particulate filters.
Particulate emissions from adhesive application at WR2, WPL2 and BL3 are controlled by cyclonic baghouses with a control efficiency of 99%.

Methodology

PTE of VOC (tons/yr) = Density (lb/gal) x Weight % Organics x Max. Usage (gal/unit) x Max. Throughput (units/hr) x 8760 (hr/yr) x 1 ton/2000 lbs

PTE of PM/PM10 Uncontrolled (tons/yr) = Density (lb/gal) x Weight % Solids x Max. Usage (gal/unit) x Max. Throughput (units/hr) x (1- Transfer Eff. (%)) x 8760 (hr/yr) x 1 ton/2000 lbs

PTE of PM/PM10 Controlled (tons/yr) = Density (lb/gal) x Weight % Solids x Max. Usage (gal/unit) x Max. Throughput (units/hr) x (1- Transfer Eff. (%)) x (1-Control Eff. (%)) x 8760 (hr/yr) x 1 ton/2000 lbs

**Appendix A: Emissions Calculations
HAP Emissions from Surface Coating Operations**

Company Name: Adorn LLC
Address: 1808 West Hively Avenue, Elkhart, IN 46517
Title V: T039-17506-00324
Reviewer: ERG/ST
Date: 2/15/2005

	Material	Density (lb/gal)	Max. Usage (gal/unit)	Maximum Throughput (unit/hour)	Weight % Toluene	Toluene Emissions (ton/yr)
Plant 1						
D1	Back Seal	7.32	0.0081	1424	0.00%	0.00
D3, D8	Stain	6.66	0.0187	1424	0.00%	0.00
D4	Sealer	7.39	0.0070	1424	1.46%	4.68
D6	Topcoat	7.39	0.0070	1424	1.46%	4.68
SA1	Helmibond 859 adhesive	8.92	0.0050	100	0.00%	0.00
Plant 2						
WPL2, GSL2	40-003A adhesive	8.80	0.05	1000	0.00%	0.00
Plant 3						
BL3	40-1105 adhesive	9.00	0.05	300	0.00%	0.00
S3-1	adhesive	8.67	0.05	16	0.00%	0.00

The coatings used by the source contain toluene only.

TOTAL

9.35

METHODOLOGY

PTE HAPs (tons/yr) = Density (lb/gal) x Max. Usage (gal/unit) x Maximum Throughput (unit/hr) x Weight % HAP x 8760 hrs/yr x 1 ton/2000 lbs

**Appendix A: Emission Calculations
Particulate Emissions From Woodworking Operations**

Company Name: Adorn LLC
Address: 1808 West Hively Avenue, Elkhart, IN 46517
Title V: T039-17506-00324
Reviewer: ERG/ST
Date: 2/15/2005

Plant #	Emissions Unit/Baghouse ID	Stack ID	Air Flow Rate (acfm)	Outlet Grain Loading (grain/dscf)	Control Efficiency (%)	Uncontrolled PTE of PM/PM10 (ton/yr)	Controlled PTE of PM/PM10 (ton/yr)	Maximum Throughput Capacity (lbs/hr)	326 IAC 6-3-2 Allowable PM Emission Rate (lbs/hr)	Actual PM Emissions (lbs/hr)
Plant 1	232RF8 Storage Silo (S-1)	C1-1	23,090	0.003	99.0%	260	2.60	55,000	37.8	0.59
	276RF8 Mill Room	C1-2	27,470	0.003	99.0%	309	3.09	11,000	12.8	0.71
	72RF8 Mill Room	C1-3	19,000	0.003	99.0%	214	2.14	7,500	9.9	0.49
	484RF10 HWD	C1-4	60,190	0.003	99.0%	678	6.78	6,500	9.0	1.55
	156RF10 KC	C1-5	19,400	0.003	99.0%	218	2.18	12,000	13.6	0.50
	276RF10 Grinder	C1-6	34,330	0.003	99.0%	387	3.87	13,000	14.4	0.88
	Woodworking 1c	C1-7	60,000	0.003	99.0%	676	6.76	5,000	7.6	1.54
Plant 2	276RF8 Mill Room	C2-1	27,470	0.003	99.0%	309	3.09	3,000	7.2	0.71
	1,680									
	WR2a - WR2f WPL2 81PJD10 Laminators	C2-2	8,950	0.003	99.0%	101	1.01	4,500 5,000	11.6	0.23
Plant 3	MAC 144MCF12 Plant	C3-1	50,000	0.001	99.0%	188	1.88	525	23.2	0.43
	Woodworking 3b							25,000		
	BL3							1,000		
TOTAL						3,340	33.4			

Assume all PM is equal to PM10.

Methodology

PTE of PM/PM10 Controlled (tons/yr) = Flow Rate (acfm) x Outlet Grain Loading (gr/ascf) x 60 (min/hr) x 8760 (hr/yr) x 1/7000 (lb/gr) x 1 ton/2000 lbs

PTE of PM/PM10 Uncontrolled (tons/yr) = Flow Rate (acfm) x Outlet Grain Loading (gr/ascf) x 60 (min/hr) x 8760 (hr/yr) x 1/7000 (lb/gr) x 1 ton/2000 lbs x 1/(1-Control Eff. (%))

Allowable PM Emission Rate (lb/hr) = 4.1 x (Throughput (lbs/hr)/2000)^.67

Actual PM Emission Rate (lb/hr) = Flow Rate (acfm) x Outlet Grain Loading (gr/ascf) x 60 (min/hr) x 1/7000 (lb/gr)

**Appendix A: Emissions Calculations
Natural Gas Fired Heaters and Boilers**

Company Name: Adorn LLC
Address: 1808 West Hively Avenue, Elkhart, IN 46517
Title V: T039-17506-00324
Reviewer: ERG/ST
Date: 2/15/2005

# of Emission Units	Emission Unit ID	Total Heat Input Capacity (MMBtu/hr)	Total Maximum Potential Throughput (MMCF/yr)
1	B1	0.40	3.50
4	AB1 - AB4	4.00	35.0
15	H1 - H15	2.40	21.0

Emission Factors (lbs/MMCF)						
PM*	PM10*	SO ₂	NO _x **	CO	VOC	HAPs
7.6	7.6	0.6	100	84.0	5.5	1.89

Potential To Emit (tons/yr)							
Emission Unit ID	PM	PM10	SO ₂	NO _x	CO	VOC	HAPs
B1	0.01	0.01	0.00	0.18	0.15	0.01	3.3E-03
AB1 - AB4	0.13	0.13	0.01	1.75	1.47	0.10	3.3E-02
H1 - H15	0.08	0.08	0.01	1.05	0.88	0.06	2.0E-02
TOTALS	0.23	0.23	0.02	2.98	2.50	0.16	0.056

* PM and PM10 emission factor are for condensable and filterable PM and PM10 combined.

**Emission factors for NO_x: Uncontrolled = 100 lb/MMCF

Emission factors are from AP-42, Chapter 1.4 - Natural Gas Combustion, Tables 1.4-1, 1.4-2, 1.4-3 and 1.4-4. SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03. (AP-42 Supplement D 7/98)

1 MMBtu = 1,000,000 Btu

1 MMCF = 1,000,000 cubic feet of gas

All Emission factors are based on normal firing.

Methodology

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

PTE (tons/yr) = Max. Potential Throughput (MMCF/yr) x Emission Factor (lb/MMCF) x 1 ton/2,000 lbs