



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: April 12, 2007
RE: Masonite International / 141-17524-00144
FROM: Nisha Sizemore
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

**Masonite International
111 Muskin Drive
Walkerton, Indiana 46574**

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

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.: T141-17524-00144	
Original Signed By: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: April 12, 2007 Expiration Date: April 12, 2012

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	Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]	
A.3	Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]	
A.4	Part 70 Permit Applicability [326 IAC 2-7-2]	
SECTION B	GENERAL CONDITIONS	7
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]	
B.22	Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC13-17-3-2]	
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	17
	Emission Limitations and Standards [326 IAC 2-7-5(1)]	
C.1	Opacity [326 IAC 5-1]	
C.2	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.3	Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.4	Fugitive Dust Emissions [326 IAC 6-4]	
C.5	Stack Height [326 IAC 1-7]	
C.6	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
	Testing Requirements [326 IAC 2-7-6(1)]	
C.7	Performance Testing [326 IAC 3-6]	
	Compliance Requirements [326 IAC 2-1.1-11]	
C.8	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.9 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]
- C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

Stratospheric Ozone Protection

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

SECTION D.1 FACILITY OPERATION CONDITIONS 24

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

- D.1.1 Particulate [326 IAC 6.5-1-2]
- D.1.2 Volatile Organic Compounds [326 IAC 8-2-12]
- D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.1.4 Particulate Control
- D.1.5 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.1.6 Monitoring

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

- D.1.7 Record Keeping Requirements

SECTION D.2 FACILITY OPERATION CONDITIONS 26

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

- D.2.1 Particulate Matter (PM) [326 IAC 6.5-1-2]
- D.2.2 PSD Minor Limit [326 IAC 2-2]
- D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.2.4 Particulate Control

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

- D.2.5 Visible Emissions Notations
- D.2.6 Parametric Monitoring
- D.2.7 Broken or Failed Bag Detection
- D.2.8 Cyclone Inspections
- D.2.9 Cyclone Failure Detection

TABLE OF CONTENTS (Continued)

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]
D.2.10 Record Keeping Requirements

SECTION D.3 FACILITY OPERATION CONDITIONS 29

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.3.1 Particulate Matter (PM) [326 IAC 6.5-1-2]

Certification 30
Emergency Occurrence Report 31
Quarterly Deviation and Compliance Monitoring Report 33

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 door manufacturing plant.

Source Address:	111 Muskin Drive, Walkerton, Indiana 46574
Mailing Address:	111 Muskin Drive, Walkerton, Indiana 46574
General Source Phone Number:	(574) 586-3192
SIC Code:	2431
County Location:	St. Joseph
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 and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) Two (2) spray booths applying coatings to the cut edges of wood doors, identified as B1 and B2, constructed in 1997, using airless and air-assisted airless spray equipment. Spray Booth B1 has seven (7) spray guns and Spray Booth B2 has four (4) spray guns. Only one spray gun per booth is in operation at any one time. The combined maximum capacity is 2,000 wood doors per hour. Overspray emissions are controlled by dry filters and exhaust to stacks B1 and B2.
- (b) One (1) woodworking shop, including a scrap wood grinding process, constructed in 1991, with a maximum capacity of 49,920 wood doors per day, with particulate controlled by 3 cyclones with built-in baghouses (identified as P1, P5, and P6) and two portable dust collectors (identified as P3 and P4). The sawdust is transferred by an enclosed pneumatic system from P1 and P5 to a silo for disposal. P6 collects dust from the Gang Saw Rip Area. Wood chips from the grinder are transferred pneumatically and collected by a cyclone, identified as P2.
- (c) One (1) natural gas fired air make-up unit, constructed in 1991, with a maximum heat input capacity of 25 MMBtu/hr, with emissions exhausting to stack H1.

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

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

Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

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

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

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

SECTION 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, T141-17524-00144, 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.
- (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 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 the this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) within ninety days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (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: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

Northern Regional Office:
Telephone Number: 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 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 T141-17524-00144, 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)]

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 emission 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).

- (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]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC13-17-3-2]

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, 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 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.2 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.3 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.

C.4 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.5 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.6 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 14-10-4-1, 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.7 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.8 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.9 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.10 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.

C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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 submitted written emergency reduction plans (ERPs) consistent with safe operating procedures in November, 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 2004 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]

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

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

Stratospheric Ozone Protection

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

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

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

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) Two (2) spray booths applying coatings to the cut edges of wood doors, identified as B1 and B2, constructed in 1997, using airless and air-assisted airless spray equipment. Spray Booth B1 has seven (7) spray guns and Spray Booth B2 has four (4) spray guns. Only one spray gun per booth is in operation at any one time. The combined maximum capacity is 2,000 wood doors per hour. Overspray emissions are controlled by dry filters and exhaust to stacks B1 and B2.

(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 Particulate [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(a), the particulate matter emissions from spray booths B1 and B2 shall not exceed 0.03 grains per dry standard cubic foot each.

D.1.2 Volatile Organic Compounds [326 IAC 8-2-12]

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.

D.1.3 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.1.4 Particulate Control

In order to comply with Condition D.1.1, the dry filters for particulate control shall be in operation and control emissions from spray booths B1 and B2 at all times that the spray booths are in operation.

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

D.1.5 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (B1, B2) 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) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, 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.

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

D.1.6 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, D.1.4, and D.1.5, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.
- (b) 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)]: Woodworking Shop

- (b) One (1) woodworking shop, including a scrap wood grinding process, constructed in 1991, with a maximum capacity of 49,920 wood doors per day, with particulate controlled by 3 cyclones with built-in baghouses (identified as P1, P5, and P6) and two portable dust collectors (identified as P3 and P4). The sawdust is transferred by an enclosed pneumatic system from P1 and P5 to a silo for disposal. P6 collects dust from the Gang Saw Rip Area. Wood chips from the grinder are transferred pneumatically and collected by a cyclone, identified as P2.

(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 Particulate Matter (PM) [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the woodworking shop (P1, P2, P3, P4, P5 and P6) shall not exceed 0.03 grains per dry standard cubic foot.

D.2.2 PSD Minor Limit [326 IAC 2-2]

The PM and PM10 emissions from the woodworking operations shall be limited as follows:

Emissions Unit ID	PM and PM10 Emissions Limit (lbs/hour)
P1 cyclone/baghouse	2.50
P2 cyclone	13.0
P3 portable dust collector	5.00
P4 portable dust collector	5.00
P5 cyclone/baghouse	4.00
P6 cyclone/baghouse	17.5

Compliance with these limits makes the requirements of 326 IAC 2-2 (PSD) not applicable to the modifications done in 1998 under T141-6277-00144.

D.2.3 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.2.4 Particulate Control

In order to comply with Conditions D.2.1 and D.2.2, the baghouses and cyclones for particulate control shall be in operation and control emissions from the woodworking shop (P1, P2, P3, P4, P5 and P6) at all times that the woodworking shop is in operation.

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

D.2.5 Visible Emissions Notations

- (a) Daily visible emission notations of the woodworking operations stack exhausts (P1, P2, P3, P4, P5, and P6) 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, 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.2.6 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouse used in conjunction with the woodworking process, at least once per day when the woodworking process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 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 – Response to Excursions and Exceedances. 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 - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.2.7 Broken or Failed Bag Detection

- (a) For a single compartment baghouses 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 have 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.2.8 Cyclone Inspections

An inspection shall be performed each calendar quarter of Cyclone P2 controlling the woodworking operation 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.2.9 Cyclone Failure Detection

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. 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).

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

D.2.10 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the woodworking shop stack exhausts.
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain the following:
 - (1) Daily records of the pressure drop during normal operation when venting to the atmosphere.
 - (2) Documentation of the dates vents are redirected.
- (c) To document compliance with Condition D.2.8, the Permittee shall maintain records of the results of the inspections required under Condition D.2.8.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS

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

- (c) One (1) natural gas fired air make-up unit, constructed in 1991, with a maximum heat input capacity of 25 MMBtu/hr, with emissions exhausting to stack H1.

(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 Matter (PM) [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(a), the particulate matter emissions from the 25 MMBtu/hr natural gas fired air make-up unit shall not exceed 0.03 grains per dry standard cubic foot.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Masonite International
Source Address: 111 Muskin Drive, Walkerton, Indiana 46574
Mailing Address: 111 Muskin Drive, Walkerton, Indiana 46574
Part 70 Permit No.: T141-17524-00144

**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: 317-233-0178
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Masonite International
Source Address: 111 Muskin Drive, Walkerton, Indiana 46574
Mailing Address: 111 Muskin Drive, Walkerton, Indiana 46574
Part 70 Permit No.: T141-17524-00144

This form consists of 2 pages

Page 1 of 2

<p>9 This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

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

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

Page 2 of 2

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 Compliance Data Section**

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

Source Name: Masonite International
 Source Address: 111 Muskin Drive, Walkerton, Indiana 46574
 Mailing Address: 111 Muskin Drive, Walkerton, Indiana 46574
 Part 70 Permit No.: T141-17524-00144

Months: _____ to _____ Year: _____

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<p><input checked="" type="radio"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input checked="" type="radio"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p>Permit Requirement (specify permit condition #)</p>	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
<p>Permit Requirement (specify permit condition #)</p>	
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 Part 70 Operating Permit Renewal

Source Background and Description

Source Name: Masonite International
Source Location: 111 Muskin Drive, Walkerton, Indiana 46574
County: St. Joseph
SIC Code: 2431
Operation Permit No.: T141-17524-00144
Permit Reviewer: ERG/ST

On December 30, 2006, the Office of Air Quality (OAQ) had a notice published in the South Bend Tribune, South Bend, Indiana, stating that Masonite International had applied for a Part 70 Operating Permit Renewal to operate a stationary wood door 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 January 12, 2007, Masonite International submitted comments on the proposed Part 70 Permit Renewal. The summary of the comments is as follows. Language that has been added is shown in bold while the language that has been deleted is shown in ~~strikeout~~. The Table of Contents has been modified, if applicable, to reflect these changes.

Comment 1: The Responsible Official should be changed to "General Manager" and the General Source Phone Number should be changed to (574) 586-3192.

IDEM Response to Comment 1: IDEM has determined that the "Responsible Official" information in Section A.1 is not necessary. Section A.1 of the permit has been changed as follows:

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 door manufacturing plant.

~~Responsible Official: Corporate Director~~
Source Address: 111 Muskin Drive, Walkerton, Indiana 46574
Mailing Address: 111 Muskin Drive, Walkerton, Indiana 46574
General Source Phone Number: ~~(256) 447-1304~~ **(574) 586-3192**
SIC Code: 2431
County Location: St. Joseph
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 and Emission Offset Rules
Minor Source, Section 112 of the Clean Air Act
Not 1 of 28 Source Categories

Comment 2: Masonite claims that the spray booths identified B1 and B2 are subject to the requirements of 326 IAC 8-2-12. Masonite currently meets the requirements of 326 IAC 8-2-12 by using airless and air-assisted airless spray equipment in the spray booths B1 and B2. Masonite requests that IDEM remove the emission limitations in Condition D.1.2, the compliance determination requirement in Condition D.1.5, and the record keeping requirements in Condition D.1.7(b).

IDEM Response to Comment 2: The requirements for surface coating booths subject to 326 IAC 8-2-12 have been added to the permit as follows:

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

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

- (a) Two (2) spray booths applying coatings to the cut edges of wood doors, identified as B1 and B2, constructed in 1997, **using airless and air-assisted airless spray equipment**. Spray Booth B1 has seven (7) spray guns and Spray Booth B2 has four (4) spray guns. Only one spray gun per booth is in operation at any one time. The combined maximum capacity is 2,000 wood doors per hour. Overspray emissions are controlled by dry filters and exhaust to stacks B1 and B2.

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) Two (2) spray booths applying coatings to the cut edges of wood doors, identified as B1 and B2, constructed in 1997, **using airless and air-assisted airless spray equipment**. Spray Booth B1 has seven (7) spray guns and Spray Booth B2 has four (4) spray guns. Only one spray gun per booth is in operation at any one time. The combined maximum capacity is 2,000 wood doors per hour. Overspray emissions are controlled by dry filters and exhaust to stacks B1 and B2.

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

D.1.2 Volatile Organic Compounds [326 IAC 8-2-12]

1. ~~In order to render the requirements of 326 IAC 8-2-12 not applicable, the usage of VOC in spray booths B1 and B2, including coatings, dilution solvents, and cleaning solvents shall each be limited to less than fifteen (15) pounds per day each. Compliance with this usage limit makes the requirements of 326 IAC 8-2-12 (Surface Coating Emissions Limitations: Wood Furniture) not applicable to the spray booths. 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:~~
- 2.
3. **Airless Spray Application**
4. **Air Assisted Airless Spray Application**
5. **Electrostatic Spray Application**
6. **Electrostatic Bell or Disc Application**
7. **Heated Airless Spray Application**
8. **Roller Coating**
9. **Brush or Wipe Application**
10. **Dip-and-Drain Application**
- 11.
12. **High Volume Low Pressure (HVLV) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLV spray is the technology used to apply coating to substrate by means of coating application equipment which operates**

between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

~~D.1.5~~ ~~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 Condition D.1.2 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~~

~~D.1.7~~ **D.1.6** Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, D.1.4, and ~~D.1.6~~ **D.1.5**, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.
- ~~(b)~~ To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (3) below for each booth. Records maintained for (1) through (3) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.1.2 for the spray booths B1 and B2. 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 daily 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 day; and
- (3) The weight of VOCs emitted for each compliance period.
- ~~(c)~~ **(b)** All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 3: Remove the sentence in Section A.2(b) and Section D.2 - Facility Description "Cyclone P6 exhausts inside the building." Add the sentence "P6 collects dust from the Gang Saw Rip Area." Change the description of P6 in the permit and calculations (Appendix A to TSD) from "P6 cyclone" to P6 cyclone/baghouse".

IDEM Response to Comment 3: The following changes to the permit have been made as a result of this comment:

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

...

- (b) One (1) woodworking shop, including a scrap wood grinding process, constructed in 1991, with a maximum capacity of 49,920 wood doors per day, with particulate controlled by 3 cyclones with built-in baghouses (identified as P1, P5, and P6) and two portable dust collectors (identified as P3 and P4). The sawdust is transferred by an enclosed pneumatic system from P1 and P5 to a silo for disposal. ~~Cyclone P6 exhausts into the building.~~ **P6 collects dust from the Gang Saw Rip Area.** Wood chips from the grinder are transferred pneumatically and collected by a cyclone, identified as P2.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(b) One (1) woodworking shop, including a scrap wood grinding process, constructed in 1991, with a maximum capacity of 49,920 wood doors per day, with particulate controlled by 3 cyclones with built-in baghouses (identified as P1, P5, and P6) and two portable dust collectors (identified as P3 and P4). The sawdust is transferred by an enclosed pneumatic system from P1 and P5 to a silo for disposal. ~~Cyclone P6 exhausts into the building.~~ **P6 collects dust from the Gang Saw Rip Area.** Wood chips from the grinder are transferred pneumatically and collected by a cyclone, identified as P2.

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

D.2.2 PSD Minor Limit [326 IAC 2-2]

The PM and PM10 emissions from the woodworking operations shall be limited as follows:

Emissions Unit ID	PM and PM10 Emissions Limit (lbs/hour)
P1 cyclone/baghouse	2.50
P2 cyclone	13.0
P3 portable dust collector	5.00
P4 portable dust collector	5.00
P5 cyclone/baghouse	4.00
P6 cyclone/ baghouse	17.5

Compliance with these limits makes the requirements of 326 IAC 2-2 (PSD) not applicable to the modifications done in 1998 under T141-6277-00144.

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 permit or 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.

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.

- 326 IAC 9-1-2 was incorporated into the Indiana SIP effective January 31, 2005 and is therefore federally enforceable. Condition C.3 has been changed as follows:

C.3 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.~~

Appendix A: Emission Calculations
 Particulate Emissions from Woodworking Shop

Company Name: Masonite International
 Address: 111 Muskin Drive, Walkerton, IN 46574
 Permit Number: T141-17524-00144
 Reviewer: ERG/ST
 Date: **1/31/2007**

Baghouse	Air Flow Rate (acfm)	Outlet Grain Loading (gr/ascf)	Control Efficiency (%)	Uncontrolled PTE of PM/PM10 (ton/yr)	Controlled PTE of PM/PM10 (ton/yr)	Equivalent 326 IAC 6.5-1-2 Allowable PM Emissions (ton/yr)
P1 cyclone/baghouse	44,500	0.00026	99%	43.4	0.434	50.1
P2 cyclone	2,100	0.03	60%	5.91	2.37	2.37
P3 portable dust collector	1,200	0.02	99%	90.1	0.901	1.35
P4 portable dust collector	1,200	0.02	99%	90.1	0.901	1.35
P5 cyclone/baghouse	36,500	0.00054	99%	74.0	0.740	41.1
P6 cyclone/ baghouse	2,831	0.03	60%	7.97	3.19	3.19
TOTALS				312	8.53	99.5

METHODOLOGY

Uncontrolled PTE of PM/PM10 (ton/yr) = Air Flow Rate (acfm) * Grain Loading (gr/ascf) / 7000 (gr/lb) * 60 (min/hr) * 8760 (hr/yr) / 2000 (lb/ton) / (1- Control Efficiency (%))

Controlled PTE of PM/PM10 (ton/yr) = Air Flow Rate (acfm) * Grain Loading (gr/ascf) / 7000 (gr/lb) * 60 (min/hr) * 8760 (hr/yr) / 2000 (lb/ton)

Allowable PM Emissions (tons/yr) = Air Flow Rate (acfm) * Outlet Grain Loading (0.03 gr/dscf) / 7000 (gr/lb) * 60 (min/hr) * 8760 (hrs/yr) * 1 ton/2000 lbs

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:	Masonite International
Source Location:	111 Muskin Drive, Walkerton, IN 46574
County:	St. Joseph
SIC Code:	2431
Operation Permit No.:	141-6277-00144
Operation Permit Issuance Date:	November 11, 1998
Permit Renewal Date:	141-17524-00144
Permit Reviewer:	ERG/ST

The Office of Air Quality (OAQ) has reviewed a Part 70 permit renewal application from Masonite International relating to the operation of a stationary wood door manufacturing source.

History

This source was previously identified as Premdor Inc. The source changed its name in January 2003 from Premdor Inc. to Masonite International and is currently operating under the name Masonite International.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Two (2) spray booths applying coatings to the cut edges of wood doors, identified as B1 and B2, constructed in 1997. Spray Booth B1 has seven (7) spray guns and Spray Booth B2 has four (4) spray guns. Only one spray gun per booth is in operation at any one time. The combined maximum capacity is 2,000 wood doors per hour. Overspray emissions are controlled by dry filters and exhaust to stacks B1 and B2.
- (b) One (1) woodworking shop, including a scrap wood grinding process, constructed in 1991, with a maximum capacity of 49,920 wood doors per day, with particulate controlled by 3 cyclones with built-in baghouses (identified as P1, P5, and P6) and two portable dust collectors (identified as P3 and P4). The sawdust is transferred by an enclosed pneumatic system from P1 and P5 to a silo for disposal. Cyclone P6 exhausts into the building. Wood chips from the grinder are transferred pneumatically and collected by a cyclone, identified as P2.
- (c) One (1) natural gas fired air make-up unit, constructed in 1991, with a maximum heat input capacity of 25 MMBtu/hr, with emissions exhausting to stack H1.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities 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) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (b) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (c) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

Existing Approvals

The source has been operating under Operating Permit T141-6277-00144, issued on November 11, 1998, and the following previous approvals:

- (a) Minor Source Modification 141-10699-00144, issued on April 22, 1998; and
- (b) Reopening 141-13474-00144, issued on January 14, 2002.

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. All previous permits are superseded 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 application for the purposes of this review was received on January 30, 2003.

Emission Calculations

See Appendix A of this document for detailed emissions 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 November 11, 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
Spray Booth B1	20.3	20.3	0	2.77	0	0	0
Spray Booth B2	20.3	20.3	0	2.77	0	0	0
P1 Cyclone	10.95	10.95	0	0	0	0	0
P2 Cyclone/Baghouse	2.37	2.37	0	0	0	0	0
P3 Cyclone/Baghouse	1.35	1.35	0	0	0	0	0
P4 Cyclone/Baghouse	1.35	1.35	0	0	0	0	0
P5 Cyclone/Baghouse	41.1	41.1	0	0	0	0	0
P6 Cyclone	3.19	3.19	0	0	0	0	0
Air Make-up Unit	0.83	0.83	0.07	0.6	9.2	11.0	0.21
Total PTE	134	134	0.07	6.13	9.2	11.0	0.21

PM/PM10 values for emission unit P1 represents allowable emissions under a PSD limit in the permit.
 PM/PM10 values for emission units P2 – P6 represents allowable emissions under 326 IAC 6.5-1-2.
 PM/PM10 values for emission units B1 and B2 represents allowable emissions under 326 IAC 6.5-1-2.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM10 is 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 2003 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM10	2
PM2.5	1
SO ₂	0
VOC	2
CO	1
NO _x	1
HAP	Not Reported

County Attainment Status

The source is located in Saint Joseph County.

Pollutant	Status
PM10	Attainment
PM 2.5	Attainment
SO ₂	Attainment
NO ₂	Attainment
8-hour Ozone	Nonattainment
CO	Attainment
Lead	Attainment

- (a) Saint Joseph 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 – Entire Source section.
- (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. Saint Joseph 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 (326 IAC 2-3). See the State Rule Applicability – Entire Source section.
- (c) Saint Joseph 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. See the State Rule Applicability – Entire Source section.

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 requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not included in this permit. This source does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 for PM, PM10, VOC, CO, NOx, or SO₂ with the potential to emit before controls equal to or greater than the major source threshold for PM, PM10, VOC, CO, NOx, or SO₂, that is subject to an emission limitation or standard for PM, PM10, VOC, CO, NOx, or SO₂, and uses a control device as defined in 40 CFR Part 64.1 to comply with that emission limitation or standard.
- (b) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) included in this permit.

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Wood Furniture (326 IAC 20-14 and 40 CFR 63, Subpart JJ) are not included in the permit for this source. The wood doors produced at this source are not defined as wood furniture or wood furniture components under this rule. Also, the potential to emit of HAPs from the entire source is less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs.

State Rule Applicability – Entire Source

326 IAC 1-5-2 (Emergency Reduction Plan)

The source submitted an Emergency Reduction Plan (ERP) in November 1999.

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 of VOC and PM are not counted towards applicability of PSD.

The woodworking operations at this source were constructed in 1991. The source originally consisted of woodworking operations P1 through P6 and an Air Make-up Unit. The potential to emit of PM and PM10 from the entire source before controls was greater than 250 tons per year. However, the permit required the use of cyclones and baghouses to control particulate emissions. Also, the woodworking operations were subject to the requirements of 326 IAC 6-1-2 [now 326 IAC 6.5-1-2]. This rule limited total particulate emissions from the woodworking operations to less than 100 tons per year and was a practically enforceable limit. Therefore, actual emissions of PM and PM10 never exceeded 250 tons per year and PSD review was not triggered. At the time the woodworking operations began operation, the potential to emit of PM and PM10 from the entire source was less than 250 tons per year and the source was a minor source under PSD.

On November 11, 1998, the source was issued T141-6277-00144 for booths B1 and B2, the woodworking operation, and the 25.0 MMBtu/hr natural gas-fired air make up unit. The source added spray booths B1 and B2 at this time. The increase in potential to emit of PM and PM10 from these spray booths (67.4 tons per year before controls and 13.5 tons per year after controls) was less than 250 tons per year. The increase in potential to emit of VOC from these spray booths (5.53 tons per year) was less than 250 tons per year. After this modification, the potential to emit of PM, PM10, and VOC from the entire source was less than 250 tons per year and the source was a minor source under PSD.

On April 22, 1999, the source was issued MSM 141-10699-00144 to modify existing spray booths B1 and B2 by adding additional spray guns to reduce wasted paint and facilitate color change in the booths. This modification increased the combined maximum capacity of the booths from 300 units (doors) per hour to 315 units per hour. The increase in potential to emit of PM and PM10 from these spray booths (3.37 tons per year before controls and 0.67 tons per year after controls) due to this modification was less than 250 tons per year. The increase in potential to emit of VOC from these spray booths (0.28 tons per year) due to this modification was less than 250 tons per year. After this modification, the potential to emit of PM, PM10, and VOC from the entire source was less than 250 tons per year and the source was a minor source under PSD.

During the Title V renewal process, the source informed IDEM of a change in operations in its surface coating operations. The combined capacity of the spray booths will increase from 315 units per hour to 2,000 units per hour. This increase in throughput will not result in a net increase in potential to emit for PM, PM10 or VOC because the source will be purchasing pre-coated doors/panels and the spray booths will now be coating only the cut edges of the doors/panels. After this modification, the potential to emit of PM, PM10, and VOC from the entire source is less than 250 tons per year and the source is a minor source under PSD.

The following PSD limits have been included in this permit to provide a practically enforceable PSD limit on the woodworking operations.

Emissions Unit ID	PM and PM10 Emissions Limit (lbs/hour)
P1 Cyclone/Baghouse	2.50
P2 Cyclone	13.0
P3 Portable Dust Collector	5.00
P4 Portable Dust Collector	5.00
P5 Cyclone/Baghouse	4.00
P6 Cyclone	17.5

The combined total emissions of PM and PM10 from the woodworking operations (P1 through P6) shall be limited to less than 206 tons per year. Combined with the particulate emissions from the other emissions units at this source, this will limit the PM and PM10 emissions from the entire source to less than 250 tons per year. Compliance with these limits makes the requirements of 326 IAC 2-2 (PSD) not applicable to the modifications done in 1998 under T141-6277-00144.

326 IAC 2-3 (Emission Offset)

This source is located in Saint Joseph County. Saint Joseph County was designated as a nonattainment area for the 8-hour ozone standard on June 15, 2004. The potential to emit of VOC and NOx of this source, after limits, is less than 100 tons per year. Therefore, this source is a minor source under Emission Offset. Any future modifications that increase VOC or NOx emissions must be reviewed in accordance with 326 IAC 2-3.

326 IAC 2-4.1 (Hazardous Air Pollutants)

This source is a minor source under Section 112 of the Clean Air Act and this source has not installed any new major sources of HAPs after July 27, 1997. Therefore the requirements of 326 IAC 2-4.1 do not apply.

326 IAC 2-6 (Emission Reporting)

Since the 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 2004 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)

This source is located in St. Joseph County. However, it is located in the area south of Kern Road and west of Pine Road. 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%) 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)

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 is not subject to the requirements of 326 IAC 6-5 because it is not located in an area listed in 326 IAC 6-5-1(a), and does not contain any facilities with the potential to emit fugitive PM greater than 25 tons per year which received a preconstruction approval after December 13, 1985.

326 IAC 8-6 (Organic Solvent Emission Limitations)

The source is not subject to 326 IAC 8-6 (Organic Solvent Emission Limitations) because it was constructed after January 1, 1980, and has the potential to emit less than 100 tons per year of VOC.

State Rule Applicability – Spray Booths

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

Spray Booths B1 and B2 are not subject to the requirements of 326 IAC 6-3-2 (Particulate Emissions Limitations for Manufacturing Processes) because they are subject to the requirements of 326 IAC 6.5-1-2 (Non-Attainment Area Particulate Limitations) (formerly 326 IAC 6-1-2).

326 IAC 6.5-1-2 (Particulate Emission Limitations)

Spray Booths B1 and B2 are subject to the requirements of 326 IAC 6.5-1-2 (Particulate Emission Limitations) (formerly 326 IAC 6-1-2) because the source is located in St. Joseph county, has the potential to emit greater than 100 tons per year of particulate matter, and the source is not listed in 326 IAC 6.5-3.

Pursuant to 326 IAC 6.5-1-2 (Particulate Emission Limitations) (formerly 326 IAC 6-1-2), particulate matter emissions from spray booths B1 and B2 shall each not exceed 0.03 grain per dry standard cubic foot.

The dry filters for PM control shall be in operation at all times that the spray booths B1 and B2 are in operation, in order to comply with this limit.

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

Spray Booths B1 and B2 are not subject to the requirements of 326 IAC 8-1-6 (Volatile Organic Compounds Limitations - BACT) even though they were constructed after January 1, 1980 because they each have potential VOC emissions less than 25 tons per year.

Any change or modification which may increase the potential to emit VOC of facilities B1 and B2 to 25 tons per year or more, per booth, shall require prior approval by the IDEM, OAQ before such changes may take place.

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

Spray Booths B1 and B2 were constructed after July 1, 1990, and each has actual VOC emissions of less than 15 pounds per day. Therefore, these spray booths are not subject to the requirements of 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating). However, since the potential to emit of VOC from each of these booths exceeds 15 pounds of VOC per day, the following VOC limit and recordkeeping will be included in the permit.

The usage of VOC in each of the spray booths (B1 and B2) shall not exceed 15 pounds per day. Compliance with this limit makes the requirements of 326 IAC 8-2-12 applicable. The Permittee shall keep records sufficient to demonstrate compliance with this limit.

State Rule Applicability – Woodworking Shop

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

Since particulate emissions from the woodworking shop are subject to the requirements of 326 IAC 6.5-1 (formerly 326 IAC 6-1) and 326 IAC 6-1 remains in effect under 40 CFR 52, Subpart P, the woodworking shop is exempt from the requirements of 326 IAC 6-3-2 pursuant to 326 IAC 6-3-1(c)(3)

326 IAC 6.5-1-2 (Particulate Emissions Limitations)

The woodworking shop (consisting of control devices P1, P2, P3, P4, P5 and P6) is subject to the requirements of 326 IAC 6.5-1-2 (Particulate Emission Limitations) (formerly 326 IAC 6-1-2) because the source is located in St. Joseph County and has the potential to emit greater than 100 tons per year of particulate matter.

Pursuant to 326 IAC 6.5-1-2 (Particulate Emissions Limitations) (formerly 326 IAC 6-1-2), particulate matter emissions from the woodworking shop (consisting of control devices P1, P2, P3, P4, P5 and P6) shall each not exceed 0.03 grain/dry standard cubic foot.

The baghouses and cyclones for particulate matter control shall be in operation at all times that the woodworking shop is in operation, in order to comply with this limit.

State Rule Applicability – 25 MMBtu/hr Air Make-Up Unit

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

The natural gas fired 25 MMBtu/hr air make-up unit are not subject to the requirements of 326 IAC 6-3-2 (Particulate Emissions Limitations for Manufacturing Processes) because they are subject to the requirements of 326 IAC 6.5-1-2 (Particulate Emissions Limitations) (formerly 326 IAC 6-1-2). 326 IAC 6-3-1(c)(3) exempts facilities from the requirements of 326 IAC 6-3-2 if they are subject to the requirements of 326 IAC 6-1. 326 IAC 6-1 remains in effect under 40 CFR 52, Subpart P.

326 IAC 6.5-1 (Particulate Matter Limitations Except Lake County)

The natural gas fired 25 MMBtu/hr air make-up unit is located in St. Joseph County, is located at a source that has the potential to emit greater than 100 tons per year of particulate matter, and is located at a source that is not specifically listed in 326 IAC 6.5-7. Pursuant to 326 IAC 6.5-1-2 (Particulate Emissions Limitations) (formerly 326 IAC 6-1-2), particulate matter emissions from the natural gas fired 25 MMBtu/hr air make-up unit shall each not exceed 0.03 grain/dry standard cubic foot.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The natural gas fired 25MMBtu/hr air make-up unit is not subject to the requirements of 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations) because it has the potential to emit less than 25 tons per year of SO₂.

Testing Requirements

(a) Woodworking Operations

The woodworking operations at this source do not have testing requirements because the woodworking operations are required by conditions in the permit to use baghouses to control PM and PM10 emissions and 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. Visible emission notations, quarterly inspection, and bag 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. Compliance with the requirements of 326 IAC 6.5-1-2 and 326 IAC 2-2 is expected with the use of baghouses and cyclones as shown in the emission calculations.

(b) Surface Coating Operations

The surface coating operations do not have testing requirements for PM, PM10 or VOC, because: (1) each paint booth accounts for a small portion of the total potential to emit for PM or PM10 from the source before controls; and (2) there are no VOC control devices in operation and records must be kept of all VOCs used at the source to ensure compliance with Condition D.1.2.

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 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 spray booths have applicable compliance monitoring conditions as specified below:
 - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (B1, B2) 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) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, 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.

These monitoring conditions are necessary because dry filters must operate properly to ensure compliance with 326 IAC 6.5-1-2.

2. The woodworking shop has applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emission notations of the woodworking operations stack exhausts (P1, P2, P3, P4, P5, and P6) 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, 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.

- (f) The Permittee shall record the pressure drop across the baghouse used in conjunction with the woodworking process, at least once per day when the woodworking process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 6.0 inches of water, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions and Exceedances. 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 - Response to Excursions or Exceedances, shall be considered a deviation from this permit. The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.
- (g) For a single compartment baghouses 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).
- (h) 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 have 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).
- (i) 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.
- (j) An inspection shall be performed each calendar quarter of all cyclones controlling the woodworking operation 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.
- (k) 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. 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).

These monitoring conditions are necessary because the baghouses and cyclones controlling the woodworking operations must operate properly to ensure compliance with 326 IAC 6.5-1-2.

Conclusion

The operation of this wood door manufacturing plant shall be subject to the conditions of the attached proposed Part 70 Permit No. T141-17524-00144.

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

Company Name: Masonite International
Address: 111 Muskin Drive, Walkerton, IN 46574
Permit Number: T141-17524-00144
Reviewer: ERG/ST
Date: 8/15/2006

Booth Material	Density (lbs/gal)	Weight % Volatile (H₂O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Weight % Solids	Maximum Usage (gal/unit)	Maximum Throughput (unit/hour)	PTE of VOC (lbs/day)	Actual Emissions of VOC (lbs/day)	PTE of VOC (tons/year)	Uncontrolled PTE of PM/PM10 (tons/year)	Transfer Efficiency	Control Efficiency of Dry Filters	Controlled PTE of PM/PM10 (tons/year)	326 IAC 6.5-1-2 Allowable PM/PM10 Emissions
B1																
650-W29-112	13.9	36.6%	35.3%	1.30%	53.8%	63.4%	0.00350	1000	15.2	12.6	2.77	33.7	75%	80%	6.74	20.3
B2																
650-W29-112	13.9	36.6%	35.3%	1.30%	53.8%	63.4%	0.00350	1000	15.2	12.6	2.77	33.7	75%	80%	6.74	20.3
Totals											5.53	67.4			13.5	40.5

Assume all PM emissions are equivalent to PM10.
 The spray booths operate 20 hours per day, five days per week.
 The spray booth's exhaust rate is 18,000 scfm.
 The edge coat material used in booths B1 and B2 contains no HAPs.

METHODOLOGY

PTE of VOC (lbs/day) = Pounds of VOC per Gallon Coating (lb/gal) * Maximum Usage (gal/unit) * Maximum Throughput (units/hr) * (24 hr/day)
 Actual Emissions of VOC (lbs/day) = Pounds of VOC per Gallon Coating (lb/gal) * Maximum Usage (gal/unit) * Maximum Throughput (units/hr) * 20 (hr/day)
 Potential to Emit VOC (tons/yr) = Pounds of VOC per Gallon Coating (lb/gal) * Maximum Usage (gal/unit) * Maximum Throughput (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
 Potential to Emit PM/PM10 Uncontrolled (tons/yr) = Max. Throughput (units/hour) * Max. Usage (gal/unit) * Density (lbs/gal) * Weight % Solids * (1-Transfer Efficiency %) * 8760 (hrs/yr) * 1 ton/2000 lbs
 Potential to Emit PM/PM10 Controlled (tons/yr) = Max. Throughput (units/hour) * Max. Usage (gals/unit) * Density (lbs/gal) * Weight % Solids * (1-Transfer Efficiency %) * 8760 (hrs/yr) * 1 ton/2000 lbs
 326 IAC 6.5-1-2 Allowable PM Emissions = Air Flow Rate (18,000 scfm) * Outlet Grain Loading (0.03 gr/scf) * 60 (min/hr) * 8760 (hr/yr) * 1 ton/2000 lbs * 1 lb/7000 gr

**Appendix A: Emission Calculations
Particulate Emissions from Woodworking Shop**

Company Name: Masonite International
Address: 111 Muskin Drive, Walkerton, IN 46574
Permit Number: T141-17524-00144
Reviewer: ERG/ST
Date: 8/15/2006

Baghouse	Air Flow Rate (acfm)	Outlet Grain Loading (gr/ascf)	Control Efficiency (%)	Uncontrolled PTE of PM/PM10 (ton/yr)	Controlled PTE of PM/PM10 (ton/yr)	Equivalent 326 IAC 6.5-1-2 Allowable PM Emissions (ton/yr)
P1 cyclone/baghouse	44,500	0.00026	99%	43.4	0.434	50.1
P2 cyclone	2,100	0.03	60%	5.91	2.37	2.37
P3 portable dust collector	1,200	0.02	99%	90.1	0.901	1.35
P4 portable dust collector	1,200	0.02	99%	90.1	0.901	1.35
P5 cyclone/baghouse	36,500	0.00054	99%	74.0	0.740	41.1
P6 cyclone	2,831	0.03	60%	7.97	3.19	3.19
TOTALS				312	8.53	99.5

METHODOLOGY

Uncontrolled PTE of PM/PM10 (ton/yr) = Air Flow Rate (acfm) * Grain Loading (gr/ascf) / 7000 (gr/lb) * 60 (min/hr) * 8760 (hr/yr) / 2000 (lb/ton) / (1- Control Efficiency (%))

Controlled PTE of PM/PM10 (ton/yr) = Air Flow Rate (acfm) * Grain Loading (gr/ascf) / 7000 (gr/lb) * 60 (min/hr) * 8760 (hr/yr) / 2000 (lb/ton)

Allowable PM Emissions (tons/yr) = Air Flow Rate (acfm) * Outlet Grain Loading (0.03 gr/dscf) / 7000 (gr/lb) * 60 (min/hr) * 8760 (hrs/yr) * 1 ton/2000 lbs

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only: MM BTU/HR <100
 25 MMBtu/hr Air Make-up Heater**

Company Name: Masonite International
Address: 111 Muskin Drive, Walkerton, IN 46574
Permit Number: T141-17524-00144
Reviewer: ERG/ST
Date: 8/15/2006

Heat Input Capacity (MMBtu/hr)
25.0

Potential Throughput (MMCF/yr)
219.0

Emission Factor (lbs/MMCF)	Pollutant						
	PM*	PM10*	SO2	NOx	VOC	CO	Total HAPs
	1.9	7.6	0.6	100	5.5	84.0	1.89
PTE (tons/yr)	0.21	0.83	0.07	11.0	0.60	9.20	0.21

**Emission factor for NOx: Uncontrolled = 100

All emission factors are based on normal firing.

Emission factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, 1.4-4, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Methodology

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

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