



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

November 6, 2003

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

TO: Interested Parties / Applicant

RE: Mohawk Flush Doors, Inc. / SPM 141-18045-00058

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

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER-MOD.dot 9/16/03



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

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

November 6, 2003

Mr. Mark Sanderson
Mohawk Flush Doors, Inc.
402 N. Sheridan
South Bend, Indiana 46619

Re: **141-18045**
First Significant Permit Modification to
Part 70 No.: T 141-7805-00058

Dear Mr. Sanderson:

Mohawk Flush Doors, Inc. was issued a Part 70 Operating Permit (T 141-7805-00058) on November 17, 1998 for the wood door manufacturing plant. A letter requesting changes to this permit was received on July 29, 2003. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the construction and operation of the following:

Machining and woodworking equipment, including one (1) single sided edge bander, one (1) sander planer, one (1) straight line rip saw and one (1) KVAL D1 line, equipped with a single baghouse dust collector (DC2) and exhausting to stack DCX, with captured saw dust conveyed to a storage bin, capacity: 18,700 pounds of raw materials (wood and plastic) per hour.

The changes in the Part 70 Operating Permit are documented in the Technical Support Document. All other conditions of the permit shall remain unchanged and in effect. For your convenience, the entire revised Title V Operating Permit, with all modifications and amendments made to it, is being provided.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact CarrieAnn Paukowits, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 ext. 18, or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

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

Attachments

CAP/MES

cc: File - St. Joseph County
U.S. EPA, Region V
St. Joseph County Health Department
Northern Regional Office
Air Compliance Section Inspector - Rick Reynolds

Mohawk Flush Doors, Inc.
South Bend, Indiana
Permit Reviewer: CAP/MES

Page 2 of 2
Permit Modification: 141-18045-00058

Compliance Branch - Karen Nowak
Administrative and Development
Technical Support and Modeling - Michele Boner



Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

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

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Mohawk Flush Doors, Inc.
402 N. Sheridan
South Bend, Indiana 46619**

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

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

Operation Permit No.: T141-7805-00058	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: November 17, 1998 Expiration Date: November 17, 2003

- First Minor Permit Modification No.:141-10708-00058, issued on April 20, 1999
- First Minor Source Modification No.: 141-10950-00058, issued on August 10, 1999
- First Administrative Amendment No.:141-12140-00058, issued on May 26, 2000
- Second Administrative Amendment No.: 141-12953-00058, issued on February 19, 2001
- Third Administrative Amendment No.: 141-13951-00058, issued on April 18, 2001
- Fourth Administrative Amendment No.: 141-14367-00058, issued on June 18, 2001
- First Reopening No.: 141-13472-00058, issued on April 16, 2002
- Fifth Administrative Amendment No.: 141-15517-00058, issued on July 16, 2002

First Significant Permit Modification No.: 141-18045-00058	Pages Affected: 1 through 5, 5a is added, 19, 28, 31 through 32, 32a is added (All of Section C is renumbered, but only the page with a change is shown)
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: November 6, 2003

TABLE OF CONTENTS

A SOURCE SUMMARY

- A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
- A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
- A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

B GENERAL CONDITIONS

- B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]
- B.2 Definitions [326 IAC 2-7-1]
- B.3 Permit Term [326 IAC 2-7-5(2)]
- B.4 Enforceability [326 IAC 2-7-7(a)]
- B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]
- B.6 Severability [326 IAC 2-7-5(5)]
- B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
- B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]
- B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]
- B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]
- B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]
- B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3)and (13)][326 IAC 2-7-6(1)and(6)]
- B.13 Emergency Provisions [326 IAC 2-7-16]
- B.14 Permit Shield [326 IAC 2-7-15]
- B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]
- B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]
- B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
- B.18 Permit Renewal [326 IAC 2-7-4]
- B.19 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]
- B.20 Permit Revision Under Economic Incentives and Other Programs
- B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]
- B.22 Operational Flexibility [326 IAC 2-7-20]
- B.23 Construction Permit Requirement [326 IAC 2]
- B.24 Inspection and Entry [326 IAC 2-7-6(2)]
- B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]
- B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]
- B.27 Enhanced New Source Review [326 IAC 2]
- B.28 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]

C SOURCE OPERATION CONDITIONS

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

- C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]
- C.2 Opacity [326 IAC 5-1]
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
- C.7 Stack Height [326 IAC 1-7]
- C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

Testing Requirements [326 IAC 2-7-6(1)]

- C.9 Performance Testing [326 IAC 3-6]

Mohawk Flush Doors, Inc.
South Bend, Indiana
Permit Reviewer: Bryan Sheets

First Significant Permit Modification No.: 141-18045
Modified by: MES

Page 4 of 38
OP No. T141-7805-00058

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

- C.10 Compliance Schedule [326 IAC 2-7-6(3)]
- C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.12 Monitoring Methods [326 IAC 3]

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

- C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5]
- C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

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

- C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
- C.18 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]
- C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)]
- C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

Stratospheric Ozone Protection

- C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1 FACILITY OPERATION CONDITIONS - Surface Coating Booths

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

- D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]
- D.1.2 Particulate Matter (PM) [326 IAC 6-1-2]
- D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)]
- D.1.5 Volatile Organic Compounds (VOC)
- D.1.6 VOC Emissions

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

- D.1.7 Particulate Matter (PM)
- D.1.8 Monitoring

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

- D.1.9 Record Keeping Requirements
- D.1.10 Reporting Requirements

D.2 FACILITY OPERATION CONDITIONS - Woodworking operations

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

- D.2.1 Particulate Matter (PM and PM₁₀) [326 IAC 6-1-2] [326 IAC 2-2]
- D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)]
- D.2.4 Particulate Matter (PM)

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

- D.2.5 Visible Emissions Notations

- D.2.6 Baghouse Inspections
- D.2.7 Broken Bag or Failure Detection

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

- D.2.8 Record Keeping Requirements

Certification

Emergency/Deviation Occurrence Report

Quarterly Compliance Monitoring Report

VOC Quarterly Report

SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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

Responsible Official: Mark Sanderson, General Manager
Source Address: 402 N. Sheridan, South Bend, Indiana 46619
Mailing Address: 402 N. Sheridan, South Bend, Indiana 46619
SIC Code: 2431
County Location: St. Joseph
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules;
Minor Source, Section 112 of the Clean Air Act

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

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

- (a) Machining and woodworking equipment, including saws, routers, sanders, planers, one (1) edge bander, one (1) profiler, one (1) panel saw, hardware assembly, and a wood chipper, with a maximum capacity of 15,000 pounds per hour, controlled by a cyclone/baghouse system, identified as DC1, and exhausting to stack DCX, with captured sawdust conveyed to a storage bin.
- (b) One (1) two-stage spray booth, identified as AB, with a maximum capacity of 103 units per hour, utilizing a high volume low pressure (HVLP) application system, with particulate matter overspray controlled by dry filters, and exhausting to either stack A or B.
- (c) One (1) spray booth, identified as C, with a maximum capacity of 103 units per hour, utilizing a high volume low pressure (HVLP) application system, with particulate matter overspray controlled by dry filters, and exhausting to stack C.
- (d) One (1) spray booth, identified as D, with a maximum capacity of 103 units per hour, utilizing a high volume low pressure (HVLP) application system, with particulate matter overspray controlled by dry filters, and exhausting to stack D.
- (e) One (1) spray booth, identified as E, with a maximum capacity of 103 units (doors) per hour, utilizing a high volume low pressure (HVLP) application system with particulate matter overspray controlled by dry filters and exhausting to stack E. The booth will have two (2) spray guns; however only one (1) gun will be used at any one time. The second gun is for back-up only.
- (f) Machining and woodworking equipment, including one (1) single sided edge bander, one (1)

sander planer, one (1) straight line rip saw and one (1) KVAL D1 line, equipped with a single baghouse dust collector (DC2) and exhausting to stack DCX, with captured saw dust conveyed to a storage bin, capacity: 18,700 pounds of raw materials (wood and plastic) per hour.

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

The total source potential to emit of VOC and PM is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of thirty percent (30%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

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

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

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

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

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

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

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

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 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.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) One (1) two-stage spray booth, identified as AB, with a maximum capacity of 103 units per hour, utilizing a high volume low pressure (HVLP) application system, with particulate matter overspray controlled by dry filters, and exhausting to either stack A or B;
- (b) One (1) spray booth, identified as C, with a maximum capacity of 103 units per hour, utilizing a high volume low pressure (HVLP) application system, with particulate matter overspray controlled by dry filters, and exhausting to stack C; and
- (c) One (1) spray booth, identified as D, with a maximum capacity of 103 units per hour, utilizing a high volume low pressure (HVLP) application system, with particulate matter overspray controlled by dry filters, and exhausting to stack D.
- (d) One (1) spray booth, identified as E, with a maximum capacity of 103 units (doors) per hour, utilizing a high volume low pressure (HVLP) application system with particulate matter overspray controlled by dry filters and exhausting to stack E. The booth will have two (2) spray guns; however only one (1) gun will be used at any one time. The second gun is for back-up only.

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

- (a) Spray booths C and D shall use less than twenty-five (25) tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 8-1-6 (General Reduction Requirements for New Facilities) not applicable.
- (b) Any change or modification which may increase the potential VOC emissions to 25 tons per year or more from spray booths A-B or E must be approved by the Office of Air Quality (OAQ) before such change may occur.

D.1.2 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the surface coating facilities shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.

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 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limits specified in Conditions D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (a) Machining and woodworking equipment, including saws, routers, sanders, planers, one (1) edge bander, one (1) profiler, one (1) panel saw, hardware assembly, and a wood chipper, with a maximum capacity of 15,000 pounds per hour, controlled by a cyclone/baghouse system, identified as DC1, and exhausting to stack DCX, with captured sawdust conveyed to a storage bin.
- (f) Machining and woodworking equipment, including one (1) single sided edge bander, one (1) sander planer, one (1) straight line rip saw and one (1) KVAL D1 line, equipped with a single baghouse dust collector (DC2) and exhausting to stack DCX, with captured saw dust conveyed to a storage bin, capacity: 18,700 pounds of raw materials (wood and plastic) per hour.

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

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

D.2.1 Particulate Matter (PM and PM₁₀) [326 IAC 6-1] [326 IAC 2-2]

- (a) Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the machining and woodworking equipment exhausting to cyclone/baghouse DC1 shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.
- (b) Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the machining and woodworking equipment exhausting to baghouse dust collector DC2 shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.
- (c) The PM₁₀ emissions from the machining and woodworking equipment exhausting to cyclone/baghouse DC1 shall be limited to 0.03 grain per dry standard cubic foot of exhaust air, and the PM₁₀ emissions from the machining and woodworking equipment exhausting to baghouse dust collector DC2 shall be limited to 0.03 grain per dry standard cubic foot of exhaust air. The flow rate at the machining and woodworking equipment exhausting to cyclone/baghouse DC1 shall not exceed 60,677 dry standard cubic feet and the flow rate at the machining and woodworking equipment exhausting to baghouse dust collector DC2 shall not exceed 46,760 dry standard cubic feet. These limitations, in conjunction with the limitations in (a) and (b) of this condition, shall limit the potential to emit PM and PM₁₀ to 27.6 pounds per hour, equivalent to 121 tons per year from the machining and woodworking operations, and less than 250 tons per year from the entire source. Therefore, the requirements of 326 IAC 2-2 are not applicable.

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

Within one hundred and eighty (180) days after initial startup, in order to demonstrate compliance with Condition D.2.1, the Permittee shall perform PM and PM₁₀ testing for the machining and woodworking

equipment exhausting to baghouse dust collector DC2 utilizing methods as approved by the Commissioner. PM_{10} includes filterable and condensable PM_{10} . Testing shall be conducted in accordance with Section C- Performance Testing.

D.2.4 Particulate Matter (PM)

- (a) Pursuant to CP-141-2833-00058, issued on January 11, 1993, the cyclone/baghouse system (DC1) for PM control shall be in operation at all times when the machining or woodworking equipment exhausting to that cyclone/baghouse system is in operation and exhausting to the outside atmosphere.
- (b) In order to demonstrate compliance with Condition D.2.1, the baghouse dust collector (DC2) for particulate control shall be in operation and control emissions from the machining and woodworking equipment exhausting to that baghouse at all times that the machining and woodworking equipment are 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 machining and woodworking stack (DCX) exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.2.6 Baghouse Inspections

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

D.2.7 Broken Bag or Failure Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C -

Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

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

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the machining and woodworking stack (DCX) exhaust.
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for Significant Source and Significant Permit Modifications to a Part 70 Operating Permit

Source Name:	Mohawk Flush Doors, Inc.
Source Location:	402 N. Sheridan, South Bend, Indiana 46619
County:	St. Joseph
SIC Code:	2431
Operation Permit No.:	T 141-7805-00058
Operation Permit Issuance Date:	November 17, 1998
Significant Source Modification No.:	141-17748
Significant Permit Modification No.:	141-18045
Permit Reviewer:	CarrieAnn Paukowits

On September 12, 2003, the Office of Air Quality (OAQ) had a notice published in the South Bend Tribune, South Bend, Indiana, stating that Mohawk Flush Doors, Inc. had applied for Significant Source and Significant Permit Modifications to a Part 70 Operating Permit to construct and operate additional machining and woodworking equipment, with a baghouse dust collector as control, at the existing wood door manufacturing plant. The notice also stated that OAQ proposed to issue a Significant Source Modification and a Significant Permit Modification and provided information on how the public could review the proposed Significant Source and Significant Permit Modifications 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 Significant Source Modification to a Part 70 Operating Permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following change to the Significant Source and Significant Permit Modifications to a Part 70 Operating Permit. The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

Change 1:

Condition D.2.7, Broken Bag or Failure Detection, has been revised so that an emission unit does not necessarily have to shutdown when a broken bag occurs that causes visible emissions. The Permittee must notify IDEM, OAQ, if the broken bag will not be fixed within ten (10) days. Changes are as follows:

D.2.7 Broken Bag or Failure Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. ~~Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions).~~ Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with

Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit. **If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.**

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

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name:	Mohawk Flush Doors, Inc.
Source Location:	402 N. Sheridan, South Bend, Indiana 46619
County:	St. Joseph
SIC Code:	2431
Operation Permit No.:	T 141-7805-00058
Operation Permit Issuance Date:	November 17, 1998
Significant Source Modification No.:	141-17748
Significant Permit Modification No.:	141-18045
Permit Reviewer:	CarrieAnn Paukowits

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

Machining and woodworking equipment, including one (1) single sided edge bander, one (1) sander planer, one (1) straight line rip saw and one (1) KVAL D1 line, equipped with a single baghouse dust collector (DC2) and exhausting to stack DCX, with captured saw dust conveyed to a storage bin, capacity: 18,700 pounds of raw materials (wood and plastic) per hour.

History

On July 29, 2003, Mohawk Flush Doors, Inc., submitted an application to the OAQ requesting to add new machining and woodworking equipment to their existing plant. Mohawk Flush Doors, Inc. was issued a Part 70 permit (T141-7805-00058) on November 17, 1998. A Minor Permit Modification (141-10708) was issued on April 20, 1999, a Minor Source Modification (141-10950) was issued on August 10, 1999, and Administrative Amendments 141-12140, 141-12953, 141-13951, 141-14367, and 141-15517 were issued on May 26, 2000, February 19, 2001, April 18, 2001, June 18, 2001, and July 16, 2002, respectively. A first reopening(141-13472) was issued on April 16, 2002. The applicant also applied for a Title V permit renewal in February 2003. That application is pending.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (?F)
DCX	Machining and woodworking	20.0	5.5	47,600	68

Recommendation

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

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

An application for the purposes of this review was received on July 29, 2003.

Emission Calculations

See page 1 of 1 of Appendix A of this document for detailed emissions calculations.

Potential To Emit of Modification

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

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

Pollutant	Potential To Emit (tons/year)
PM	1,053
PM ₁₀	1,053
SO ₂	-
VOC	-
CO	-
NO _x	-

HAPs	Potential To Emit (tons/year)
Individual	-
TOTAL	-

Justification for Modification

The Part 70 Operating Permit is being modified through a Part 70 Significant Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(f)(4)(A), any modification with a potential to emit greater than or equal to twenty-five (25) tons per year of PM or PM₁₀. The proposed operating conditions shall be incorporated into the Part 70 Operating Permit as a Significant Permit Modification

(SPM 141-18045-00058) in accordance with 326 IAC 2-7-12(d)(1). The Significant Permit Modification will give the source approval to operate the proposed emission unit.

County Attainment Status

The source is located in St. Joseph County.

Pollutant	Status
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	maintenance
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. St. Joseph County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) St. Joseph County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Fugitive Emissions
 Since this type of operation is not one of the 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 PM emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

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

Pollutant	Emissions (tons/year)
PM	76.1
PM ₁₀	76.1
SO ₂	negligible
VOC	48.6
CO	0.64

Mohawk Flush Doors, Inc.
South Bend, Indiana
Permit Reviewer: CAP/MES

Page 4 of 13
Source Modification: 141-17748-00058
Permit Modification: 141-18045-00058

NO _x	0.76
-----------------	------

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon the Technical Support Documents for T141-7805-00058, issued on November 17, 1998, and minor permit modification 141-10708, issued on April 20, 1999.

Potential to Emit of Modification After Issuance

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

Process/facility	Potential to Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Proposed Modification	52.6	52.6	-	-	-	-	-
PSD Threshold Level	250	250	250	250	250	250	-

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

Federal Rule Applicability

- (a) This significant permit modification does involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 for PM₁₀ (surrogate parameter is PM):
 - (1) with the potential to emit before controls equal to or greater than the major source threshold for PM;
 - (2) that is subject to an emission limitation or standard for PM; and
 - (3) uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are applicable to this modification. The pollutant-specific emission unit is not a "large unit" as described in 40 CFR 64.5. Therefore, the owner or operator shall submit a CAM plan pursuant to 40 CFR 64 as part of the Part 70 renewal application.

- (b) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20, 40 CFR 61 and 40 CFR Part 63) applicable to this proposed modification.

State Rule Applicability - Individual Facilities

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the existing machining and woodworking equipment exhausting to cyclone/ baghouse DC1 shall be limited to 0.03 grain per dry standard cubic foot of exhaust air, and particulate matter (PM) emissions from the proposed machining and woodworking equipment exhausting to baghouse dust collector DC2 shall be limited to 0.03 grain per dry standard cubic foot of exhaust air (see 326 IAC 6-1, below). Since PM₁₀ emissions are not more than PM emissions from this type of facility, the PM₁₀ emissions from the existing machining and woodworking equipment exhausting to cyclone/baghouse DC1 and the proposed machining and woodworking equipment exhausting to baghouse dust collector DC shall also be limited to 0.03 grain per dry standard cubic foot of exhaust air. The flow rate at the machining and woodworking equipment exhausting to DC1 shall not exceed 60,677 dry standard cubic feet and the flow rate at the machining and woodworking equipment exhausting to DC2 shall not exceed 46,760 dry standard cubic feet. Those flow rates represent the maximum flow rates provided by the applicant. This will limit the potential to emit PM and PM₁₀ to 27.6 pounds per hour, equivalent to 121 tons per year from the machining and woodworking operations, and 129 tons per year, which is less than 250 tons per year, from the entire source. Therefore, the proposed modification will not increase the potential to emit PM or PM₁₀ to 250 tons per year or more, and this source is still not a major source pursuant to 326 IAC 2-2, PSD.

326 IAC 6-1 (County Specific Particulate Matter Limitations)

According to Condition D.2.2 for 326 IAC 6-1 of the existing permit, "Any change or modification which will increase actual PM emissions to 10 tons per year or more from the woodworking equipment must be approved by the Office of Air Quality (OAQ) before such change may occur." This source, which is not specifically listed in 326 IAC 6-1-8.1 through 18, has a potential to emit more than 100 tons per year of particulate. Therefore, although the actual particulate emissions may still be less than 10 tons per year, the requirements of 326 IAC 6-1 are applicable.

- (a) Pursuant to 326 IAC 6-1-2(a), the particulate from the proposed machining and woodworking, exhausting through baghouse dust collector DC2 shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)). This is equivalent to 12.0 pounds per hour when operating at a flow rate of 46,760 acfm. The potential PM emissions after control by the baghouse dust collector are 0.024 pound per hour, and, according to the information supplied by the applicant, the outlet grain loading is 0.00006 grains per dry standard cubic foot. Therefore, the proposed machining and woodworking operations will comply with this rule.
- (b) Pursuant to 326 IAC 6-1-2(a), the particulate from the existing machining and woodworking equipment controlled by a cyclone/baghouse system identified as DC1 shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)). This is equivalent to 15.6 pounds per hour when operating at a flow rate of 60,677 acfm. The potential PM emissions after control by the cyclone/baghouse are 0.99 pound per hour, and, according to the information supplied by the applicant, the outlet grain loading is 0.0019 grains per dry standard cubic foot. Therefore, the existing machining and woodworking operations will comply with this rule.
- (c) Pursuant to 326 IAC 6-1-2(a), the particulate from the existing surface coating operations shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-

hundredths (0.03) grain per dry standard cubic foot (dscf)). The coating facilities, equipped with dry filters, shall comply with this rule.

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

The facilities at this source are subject to the requirements of 326 IAC 6-1. Therefore, pursuant to 326 IAC 6-3-1(c)(3), the requirements of 326 IAC 6-3 are not applicable.

Compliance Requirements

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

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

The compliance monitoring requirements applicable to this source are as follows:

- (a) There is no change in the monitoring requirements applicable to the surface coating operations.
- (b) The machining and woodworking operations have applicable compliance monitoring conditions as specified below:
 - (1) Daily visible emission notations of the machining and woodworking stack (DCX) exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

- (2) An inspection shall be performed each calendar quarter of all bags controlling the machining and woodworking operations when venting to the atmosphere. A baghouse inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.
- (3) In the event that bag failure has been observed:
 - (A) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
 - (B) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the baghouse dust collector for the proposed machining and woodworking and the cyclone/baghouse for the existing machining and woodworking must operate properly to ensure compliance with 326 IAC 6-1 (County Specific Particulate Matter Limitations) and 326 IAC 2-7 (Part 70).

Proposed Changes

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

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) Machining and woodworking equipment, including saws, routers, sanders, planers, one (1) edge bander, one (1) profiler, one (1) panel saw, hardware assembly, and a wood chipper, with a maximum capacity of 15,000 pounds per hour, controlled by a cyclone/baghouse system, identified as DC1, and exhausting to stack DCX, with captured sawdust conveyed to a storage bin.

- (b) One (1) two-stage spray booth, identified as AB, with a maximum capacity of 103 units per hour, utilizing a high volume low pressure (HVLP) application system, with particulate matter overspray controlled by dry filters, and exhausting to either stack A or B.
- (c) One (1) spray booth, identified as C, with a maximum capacity of 103 units per hour, utilizing a high volume low pressure (HVLP) application system, with particulate matter overspray controlled by dry filters, and exhausting to stack C. ~~and~~
- (d) One (1) spray booth, identified as D, with a maximum capacity of 103 units per hour, utilizing a high volume low pressure (HVLP) application system, with particulate matter overspray controlled by dry filters, and exhausting to stack D.
- (e) One (1) spray booth, identified as E, with a maximum capacity of 103 units (doors) per hour, utilizing a high volume low pressure (HVLP) application system with particulate matter overspray controlled by dry filters and exhausting to stack E. The booth will have two (2) spray guns; however only one (1) gun will be used at any one time. The second gun is for back-up only.
- (f) **Machining and woodworking equipment, including one (1) single sided edge bander, one (1) sander planer, one (1) straight line rip saw and one (1) KVAL D1 line, equipped with a single baghouse dust collector (DC2) and exhausting to stack DCX, with captured saw dust conveyed to a storage bin, capacity: 18,700 pounds of raw materials (wood and plastic) per hour.**

~~C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]~~

~~Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.~~

~~D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)] [326 IAC 6-1-2]~~

~~Pursuant to 326 IAC 6-3-2(c), the PM emissions from these facilities shall not exceed the pound per hour emission rate established as E in the following formula:~~

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

$$E = 4.10 P^{0.67}$$

~~where E = rate of emission in pounds per hour; and~~

~~P = process weight rate in tons per hour~~

Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the surface coating facilities shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (a) Machining and woodworking equipment, including saws, routers, sanders, planers, one (1) edge bander, one (1) profiler, one (1) panel saw, hardware assembly, and a wood chipper, with a maximum capacity of 15,000 pounds per hour, controlled by a cyclone/baghouse system, identified as DC1, and exhausting to stack DCX, with captured sawdust conveyed to a storage bin.
- (f) **Machining and woodworking equipment, including one (1) single sided edge bander, one (1) sander planer, one (1) straight line rip saw and one (1) KVAL D1 line, equipped with a single baghouse dust collector (DC2) and exhausting to stack DCX, with captured saw dust conveyed to a storage bin, capacity: 18,700 pounds of raw materials (wood and plastic) per hour.**

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

~~D.2.1 Particulate Matter (PM) [326 IAC 6-3]~~

~~Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the woodworking facilities shall not exceed 15.8 pounds per hour when operating at a process weight rate of 15,000 pounds per hour.~~

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

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

$$E = 4.10 P^{0.67}$$

~~where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour~~

D.2.21 Particulate Matter (PM and PM₁₀) [326 IAC 6-1-2] [326 IAC 2-2]

~~Any change or modification which will increase actual PM emissions to 10 tons per year or more from the woodworking equipment must be approved by the Office of Air Quality (OAQ) before such change may occur.~~

- (a) Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the machining and woodworking equipment exhausting to cyclone/baghouse DC1 shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.
- (b) Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the machining and woodworking equipment exhausting to baghouse dust collector DC2 shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.
- (c) The PM₁₀ emissions from the machining and woodworking equipment exhausting to cyclone/baghouse DC1 shall be limited to 0.03 grain per dry standard cubic foot of exhaust air, and the PM₁₀ emissions from the machining and woodworking equipment exhausting to baghouse dust collector DC2 shall be limited to 0.03 grain per dry standard cubic foot of exhaust air. The flow rate at the machining and woodworking

equipment exhausting to cyclone/baghouse DC1 shall not exceed 60,677 dry standard cubic feet and the flow rate at the machining and woodworking equipment exhausting to baghouse dust collector DC2 shall not exceed 46,760 dry standard cubic feet. These limitations, in conjunction with the limitations in (a) and (b) of this condition, shall limit the potential to emit PM and PM₁₀ to 27.6 pounds per hour, equivalent to 121 tons per year from the machining and woodworking operations, and less than 250 tons per year from the entire source. Therefore, the requirements of 326 IAC 2-2 are not applicable.

D.2.3 2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

D.2.4 3 Testing Requirements [326 IAC 2-7-6(1),(6)]

~~The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.~~

Within one hundred and eighty (180) days after initial startup, in order to demonstrate compliance with Condition D.2.1, the Permittee shall perform PM and PM₁₀ testing for the machining and woodworking equipment exhausting to baghouse dust collector DC2 utilizing methods as approved by the Commissioner. PM₁₀ includes filterable and condensable PM₁₀. Testing shall be conducted in accordance with Section C- Performance Testing.

D.2.5 4 Particulate Matter (PM)

- (a)** Pursuant to CP-141-2833-00058, issued on January 11, 1993, the cyclone/baghouse system **(DC1)** for PM control shall be in operation at all times when the machining or woodworking equipment **exhausting to that cyclone/baghouse system** is in operation and exhausting to the outside atmosphere.
- (b)** **In order to demonstrate compliance with Condition D.2.1, the baghouse dust collector (DC2) for particulate control shall be in operation and control emissions from the machining and woodworking equipment exhausting to that baghouse at all times that the machining and woodworking equipment are in operation.**

D.2.6 5 Visible Emissions Notations

- (a)** Daily visible emission notations of the machining and woodworking stack **(DCX)** exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b)** For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c)** In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d)** A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.2.7 6 Baghouse Inspections

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

D.2.8 7 Broken Bag or Failure Detection

In the event that bag failure has been observed:

- (a) ~~The affected compartments will be shut down immediately until the failed units have been repaired or replaced. For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.~~ **For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.**
- (b) ~~Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.~~ **For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition ~~D-2-6~~ **D.2.5**, the Permittee shall maintain records of daily visible emission notations of the machining and woodworking stack **(DCX)** exhaust.
- (b) To document compliance with Condition ~~D-2-7~~ **D.2.6**, the Permittee shall maintain records of the results of the inspections required under Condition ~~D-2-7~~ **D.2.6** and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping

Requirements, of this permit.

The remainder of Section C has been renumbered accordingly.

Conclusion

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 141-17748-00058 and Significant Permit Modification No. 141-18045-00058.