



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: March 24, 2005
RE: Middlebury Hardwood / 039-18290-00245
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204.

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

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

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

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

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

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



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PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Middlebury Hardwood Products, Inc.
101 Joan Drive
Middlebury, Indiana 46540**

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

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

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

Operation Permit No.: T039-18290-00245	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: March 24, 2005 Expiration Date: March 24, 2010

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SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

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

Responsible Official:	Owner
Source Address:	101 Joan Drive, Middlebury, Indiana 46540
Mailing Address:	P.O. Box 1429, Middlebury, Indiana 46540
General Source Phone Number:	(574) 825-9524
SIC Code:	2434, 2499
County Location:	Elkhart
Source Location Status:	Nonattainment for 8-hour ozone standard Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, under Emission Offset Rules Major 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) Five (5) surface coating booths for wood furniture coating, identified as E1 through E5, constructed prior to 1995, each equipped with one (1) HVLP spray gun, with maximum capacities of 725 units per hour at spray booth E1, and 145 units per hour at spray booths E2 through E5, each using dry filters for overspray control and exhausting at stacks E1 through E5.
- (b) One (1) automated CEFLA profile surface coating booth, identified as E6, constructed in 2004, consisting of six (6) HVLP spray guns for wood furniture coating, with a maximum capacity of 7715 pounds of wood per hour, using dry filters for overspray control, and exhausting at stack E6.
- (c) An automated finishing coating machine, constructed in 2001, with a maximum rate of 1,050 parts per hour, at an approximate maximum wood substrate weight of 525 pounds of wood per hour, consisting of the following manufacturing stages:
 - (1) Three (3) spray machines, identified as units 2, 15, and 21, constructed in 2001, each having a water curtain scrubbing system for PM control and surrounded by a cabinet-like enclosure, exhausting to vents 7, 14, and 17, respectively, consisting of:
 - (A) A reciprocating machine (unit 2) that applies tinted sealer;
 - (B) A reciprocating machine (unit 15) that applies a sealer coat; and
 - (C) A reciprocating machine (unit 21) that applies the top coat.

- (2) One (1) rotary spray machine for stain application, identified as unit 9, constructed in 2001, with PM controlled by a double dry filter system and water curtain scrubbing system, and exhausting to vent 10.
- (3) One (1) brush wiping machine, identified as unit 10, constructed in 2001, to automatically wipe off excess stain applied by unit 9, exhausting to vent 11.
- (4) One (1) manual wiping station, identified as unit 11, constructed in 2001, manually operated as necessary, with no exhaust.
- (5) Seven (7) ovens used at various points on the process line, constructed in 2001, with each oven indirectly heated by boiler EU-8, consisting of:
 - (A) Two (2) tinted sealer ovens for flash off and curing, identified as units 3 and 4, and exhausting to vents 8 and 9, respectively.
 - (B) One (1) drying oven for stain, identified as unit 12, and exhausting to vent 13.
 - (C) Two (2) sealer coat ovens for flash off and curing/cooling, identified as units 16 and 17, and exhausting to vents 15 and 16, respectively.
 - (D) Two (2) top coat ovens for flash off and curing/cooling, identified as units 22 and 23, and exhausting to vents 18 and 19, respectively.
- (d) One (1) woodworking operation, identified as WW2, constructed prior to 1995, with a maximum capacity of less than 100 pounds of wood per hour, using a cyclone (P5) for particulate control exhausting internally and then to general ventilation.
- (e) One (1) wood-fired firetube boiler, identified as EU-8, constructed in 2001, with a maximum capacity of 19.13 MMBtu per hour, using a cyclone fly ash collector (with efficiency rated at 87%) for particulate control, and exhausting to stack 20.

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):

- (a) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (b) Two (2) woodworking operations, identified as WW1a and WW1b, both constructed prior to 1995, with maximum capacities of 6525 and 9788 pounds of wood per hour, respectively, with WW1a and WW1b each using a cyclone/baghouse system for particulate control, and exhausting through stacks P1 and P2, respectively, meeting the definition of Insignificant Woodworking Equipment in 326 IAC 2-7-1(21)(G)(xxx). [326 IAC 6-3-2]
- (c) Two (2) woodworking operations, identified as WW1c and WW1d, both constructed prior to 1995, each with maximum capacities of less than 100 pounds of wood per hour, with WW1c and WW1d each using a baghouse for particulate control, and exhausting internally through stacks P3 and P4, respectively, meeting the definition of Insignificant Woodworking Equipment in 326 IAC 2-7-1(21)(G)(xxx). [326 IAC 6-3-2]
- (d) Sanding Operations used in conjunction with the automated finishing coating machine, including:
 - (1) Three (3) sanding stations, identified as units 5, 8, and 18, constructed in 2001, with a maximum capacity of 535 pounds of wood per hour, using a cyclone in series with one (1) baghouse for particulate control, and exhausting to vent 12.

These sanding stations meet the definition of Insignificant Woodworking Equipment in 326 IAC 2-7-1(21)(G)(xxx).[326 IAC 6-3-2]

- (2) One (1) hand sanding station for the sanding of parts after the sealer coat has been applied, identified as unit 19, constructed in 2001, with a maximum capacity of 535 pounds of wood per hour, with no emissions controls, exhausting internally, with emissions of particulate matter (PM) less than or equal to 5 lbs/hour or 25lbs/day. [326 IAC 6-3-2]

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 13-15-6-3(a)]

- (a) This permit, 039-18290-00245, 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, and condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

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

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

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

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

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

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

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state

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

- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

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

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

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

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs, including any required record keeping as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.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 the Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM Main Office

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

Northern Regional Office

Telephone Number: 1-800-753-5519
Telephone Number: 574-245-4870
Facsimile Number: 574-245-4877

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

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

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) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
 - (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit

under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

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

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

- (a) All terms and conditions of permits established prior to T039-18290-00245, 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 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 4620

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

- (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.
- (d) If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

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
- Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

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

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
 - (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes 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 increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, and 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

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

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

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section (BLT)), to determine the appropriate permit fee.

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

Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on September 22, 1997. Pursuant to the plan, the Permittee shall use a retractable transfer sleeve on the silo unloading conveyor to control fugitive dust.

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

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Stack Height [326 IAC 1-7](Check Applicability)

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Demolition and renovation

The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

- (g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

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

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

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

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

- (a) 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.
- (b) Whenever a condition in this permit requires the measurement of a flow rate, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (2%) of full scale reading.

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

C.12 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

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

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

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

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

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on December 13, 1996.
- (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.16 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.17 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

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

- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

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

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

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- (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.19 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]

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- (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

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

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.
- (c) If there is a reasonable possibility that a "project" (as defined in 326 IAC 2-3-1 (II)) at a major source other than projects at a Clean Unit which is not part of a "major modification" (as defined in 326 IAC 2-3-1 (z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-3-1 (mm)) the Permittee shall comply with following:
 - (1) Before beginning actual construction of "project" (as defined in 326 IAC 2-3-1 (II)) document and maintain the following records:
 - (A) A description of the project;
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project;
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-3-1(mm)(2)(A)(3) and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
 - (2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any emissions unit identified in (1)(B) above; and
 - (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.21 General Reporting Requirements[326 IAC 2-7-5(3)(C)][326 IAC 2-1.1-11][326 IAC 2-3]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-3-1 (II)), and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
 - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1(xx), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report shall be submitted within sixty (60) days after the end of the year and contain the following:
 - (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-3-2(c)(3).
 - (4) Any other information that the Permittee deems fit to include in this report,

Reports required in this part shall be submitted to:

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

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

Stratospheric Ozone Protection

C.22 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:

- (a) Five (5) surface coating booths for wood furniture coating, identified as E1 through E5, constructed prior to 1995, each equipped with one (1) HVLP spray gun, with maximum capacities of 725 units per hour at spray booth E1, and 145 units per hour at spray booths E2 through E5, each using dry filters for overspray control and exhausting at stacks E1 through E5.
- (b) One (1) automated CEFLA profile surface coating booth, identified as E6, constructed in 2004, consisting of six (6) HVLP spray guns for wood furniture coating, with a maximum capacity of 7715 pounds of wood per hour, using dry filters for overspray control, and exhausting at stack E6.
- (c) An automated finishing coating machine, constructed in 2001, with a maximum rate of 1,050 parts per hour, at an approximate maximum wood substrate weight of 525 pounds of wood per hour, consisting of the following manufacturing stages:
 - (1) Three (3) spray machines, identified as units 2, 15, and 21, constructed in 2001, each having a water curtain scrubbing system for PM control and surrounded by a cabinet-like enclosure, exhausting to vents 7, 14, and 17, respectively, consisting of:
 - (A) A reciprocating machine (unit 2) that applies tinted sealer;
 - (B) A reciprocating machine (unit 15) that applies a sealer coat; and
 - (C) A reciprocating machine (unit 21) that applies the top coat.
 - (2) One (1) rotary spray machine for stain application, identified as unit 9, constructed in 2001, with PM controlled by a double dry filter system and water curtain scrubbing system, and exhausting to vent 10.
 - (3) One (1) brush wiping machine, identified as unit 10, constructed in 2001, to automatically wipe off excess stain applied by unit 9, exhausting to vent 11.
 - (4) One (1) manual wiping station, identified as unit 11, constructed in 2001, manually operated as necessary, with no exhaust.
 - (5) Seven (7) ovens used at various points on the process line, constructed in 2001, with each oven indirectly heated by boiler EU-8, consisting of:
 - (A) Two (2) tinted sealer ovens for flash off and curing, identified as units 3 and 4, and exhausting to vents 8 and 9, respectively.
 - (B) One (1) drying oven for stain, identified as unit 12, and exhausting to vent 13.
 - (C) Two (2) sealer coat ovens for flash off and curing/cooling, identified as units 16 and 17, and exhausting to vents 15 and 16, respectively.
 - (D) Two (2) top coat ovens for flash off and curing/cooling, identified as units 22 and 23, and exhausting to vents 18 and 19, respectively.

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

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

- (a) The input of VOC to the surface coating facilities shall not exceed 248 tons, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period, with compliance determined at the end of each month. This usage limit is required

to limit the potential to emit of VOC from the entire source to less than 250 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to Significant Permit Modification 039-11338-00011 and Significant Source Modification 039-12642-00011.

- (b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), the Permittee shall limit PM and PM10 emissions from the surface coating operations to the PM/PM10 emission rate in pounds per hour shown in the following table:

Emissions Unit	PM/PM10 Emission Rate (lbs/hr)
Unit 2 (Spray Machine for Tinted Sealer)	2.41
Unit 9 (Spray Machine for Stain)	0.43
Unit 15 (Spray Machine for Sealer)	2.12
Unit 21 (Spray Machine for Top Coat)	1.63
E1	4.66
E2	1.66
E3	1.66
E4	1.66
E5	1.66
E6	0.33

This limit, combined with PM and PM10 limits imposed on other facilities at this source, makes the source a minor source under 326 IAC 2-2 (Prevention of Significant Deterioration).

D.1.2 Part 70 Minor Source Modification Limit [326 IAC 2-7-10.5]

Pursuant to Significant Permit Modification 039-18316-00245, issued April 26, 2004, the use of VOC for paint booth E6, including coatings, dilution solvents, and cleaning solvents, shall be limited to less than 24 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Combined with the VOC emissions from the UV coating system, the VOC emissions from the modifications constructed in 2004 is less than 25 tons/yr. Therefore, the requirements of 326 IAC 2-7-10.5(f) (Part 70 Significant Source Modification) are not applicable.

D.1.3 Particulate Emissions [40 CFR 52, Subpart P]

Pursuant to 40 CFR 52, Subpart P, the PM emissions from each of the surface coating operations shall not exceed the allowable pound per hour emission rate established as E in the following formula:

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

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

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

Pursuant to 326 IAC 8-2-12, for all surface coating units, the surface coating applied to wood doors shall utilize one of the following application methods:

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

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply

coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.5 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR 63, Subpart A]

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

D.1.6 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

- (a) Pursuant to 40 CFR 63, Subpart JJ, wood furniture coating operations at the source shall comply with the following conditions:
- (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
 - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of eight-tenths (0.8) pound VHAP per pound solids; or
 - (B) Use compliant finishing materials in which all stains have a maximum VHAP content of 1.0 pound VHAP per pound solid, as applied. Use compliant finishing materials in which all washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of 0.8 pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a 3.0 percent maximum VHAP content by weight. All other thinners have a 10.0 percent maximum VHAP content by weight; or
 - (C) Use a combination of (A) and (B).
 - (2) Limit VHAP emissions contact adhesives as follows:
 - (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed two-tenths (0.2) pound VHAP per pound solids.
 - (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed two-tenths (0.2) pound VHAP per pound solids.
 - (3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

D.1.7 Work Practice Standards [40 CFR 63, Subpart JJ]

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

- (a) Operator training course.
- (b) Leak inspection and maintenance plan.
- (c) Cleaning and washoff solvent accounting system.
- (d) Chemical composition of cleaning and washoff solvents.
- (e) Spray booth cleaning.

- (f) Storage requirements.
- (g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
- (h) Line cleaning.
- (i) Gun cleaning.
- (j) Washoff operations.
- (k) Formulation assessment plan for finishing operations.

D.1.8 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.9 Testing Requirements [40 CFR 63, Subpart JJ]

Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 40 CFR 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.

D.1.10 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content and usage limitations contained in Conditions D.1.1(a), D.1.2, and D.1.5 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.1.11 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), the dry filters for PM control shall be in operation at all times when the surface coating booths, identified as E1 through E6, are in operation, and on the automated finishing line, the dry filters and water curtain scrubbing system for PM control shall be in operation at all times this line is in operation. The Permittee shall operate the control device in accordance with manufacturer's specifications.

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

D.1.12 Monitoring

- (a) Pursuant to SPM 039-12718-00245, issued on May 9, 2001, for the surface coating operations, the Permittee shall implement an operator-training program.
 - (1) All operators that perform painting operations or booth maintenance, shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within sixty (60) days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
 - (2) Training shall include proper filter alignment, filter inspection and maintenance, and troubleshooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within a reasonable time for inspection by IDEM.
 - (3) All operators shall be given refresher training annually.

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

D.1.13 Parametric Monitoring

- (a) The Permittee shall visually check for gaps in the water curtain used in conjunction with the scrubbers for the automated finishing line, at least once per shift when in operation when venting to the atmosphere. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water curtain. The Permittee shall monitor the flow rate of the scrubbers for the automated finishing line, at least once per shift when in operation when venting to the atmosphere. When for any one reading, the flow rate is less than 140 gallons per minute, or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when the water flow rate is below the above minimum. A flow rate that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) The instrument used for determining the flow rate shall comply with Section C - Pressure Gauge and Other 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.1.14 Scrubber Inspections

An inspection shall be performed each calendar quarter of the water curtains and scrubbers controlling the automated finishing line. Inspections required by this condition shall not be performed in consecutive months. In the event that parts in the scrubbers are found to be broken during inspection, the Permittee shall respond in accordance with the Compliance Response Plan and the provisions of Condition D.1.15.

D.1.15 Scrubber Failure

In the even that scrubber failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.1.16 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1(a), the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.1.1(a).
 - (1) The amount and VOC content of each coating material, dilution solvent, cleaning solvent and strippable booth coating used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) The total VOC usage for each month; and
 - (3) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.1.5.

- (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
 - (2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
 - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.
 - (4) The VHAP content in weight percent of each thinner used.
 - (5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (c) To document compliance with Condition D.1.7, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
 - (d) To document compliance with Condition D.1.12, the training program shall be written and retained on site. A log of the training program, the list of trained operators and training records, and additional inspections prescribed by the Preventative Maintenance Plan shall be maintained on site or available within one (1) hour for inspection by IDEM.
 - (e) To document compliance with Condition D.1.13, the Permittee shall maintain records of the flow rate as required under Condition D.1.13.
 - (f) To document compliance with Condition D.1.14, the Permittee shall maintain records of the results of the inspections required under Condition D.1.14.
 - (g) To document compliance with Conditions D.1.8 and D.1.12, the Permittee shall maintain records of those additional inspections prescribed by the Preventive Maintenance Plan.
 - (h) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.17 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.1.1(a) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) A semi-annual Continuous Compliance Report to document compliance with Condition D.1.5, and the Certification form, shall be submitted to the address listed in Section C - General Reporting Requirements of this permit, within thirty (30) days after the end of the six (6) months being reported.

The six (6) month periods shall cover the following months:

- (1) January 1 through June 30.
- (2) July 1 through December 31.

The report shall be submitted to:

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

Indianapolis, Indiana 46204

and

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

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (d) One (1) woodworking operation, identified as WW2, constructed prior to 1995, with a maximum capacity of less than 100 pounds of wood per hour, using a cyclone (P5) for particulate control, exhausting internally and then to general ventilation.

(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 PSD Minor Limit [326 IAC 2-2]

Pursuant to 326 IAC 2-2 (PSD), the Permittee shall limit PM and PM10 emissions from the significant woodworking operations (WW2) to less than 0.94 pounds per hour. This limit, combined with other PM and PM10 limits imposed on the facilities at this source, makes the source a minor source for PM and PM 10 under 326 IAC 2-2 (Prevention of Significant Deterioration).

D.2.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2) (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the significant woodworking facilities WW2 shall not exceed 0.551 pounds per hour when operating at a process weight rate of less than 100 pounds per hour. Pursuant to 326 IAC 6-3-2(e)(2), when the process weight rate is less than 100 pounds per hour, the allowable rate of emissions is five-hundred fifty-one thousandths (0.551) pound per hour.

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 this facility and its control devices.

Compliance Determination Requirements

D.2.4 Particulate Control

In order to comply with Conditions D.2.1 and D.2.2, the cyclones for particulate control shall be in operation and control emissions from the significant woodworking operation (WW2) at all times that this woodworking operation 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 significant woodworking operations stack exhausts (P5) shall be performed during normal daylight operations when venting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation,

Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.2.6 Cyclone Inspections

An inspection shall be performed each calendar quarter of all cyclones controlling the significant woodworking operation (WW2) 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.2.7 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. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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 significant woodworking operation (WW2) stack exhaust (P5).
- (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) To document compliance with Condition D.2.3, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS

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

Insignificant Activities:

- (b) Two (2) woodworking operations, identified as WW1a and WW1b, both constructed prior to 1995, with maximum capacities of 6525 and 9788 pounds of wood per hour, respectively, with WW1a and WW1b each using a cyclone/baghouse system for particulate control, and exhausting through stacks P1 and P2, respectively. [326 IAC 6-3-2]
- (c) Two (2) woodworking operations, identified as WW1c and WW1d, both constructed prior to 1995, each with maximum capacities of less than 100 pounds of wood per hour, with WW1c and WW1d each using a baghouse for particulate control, and exhausting internally through stacks P3 and P4, respectively. [326 IAC 6-3-2]
- (d) Sanding Operations used in conjunction with the automated finishing coating machine, including:
 - (1) Three (3) sanding stations, identified as units 5, 8, and 18, constructed in 2001, with a maximum capacity of 535 pounds of wood per hour, using a cyclone in series with one (1) baghouse for particulate control, and exhausting to vent 12. These sanding stations meet the definition of Insignificant Woodworking Equipment in 326 IAC 2-7-1(21)(G)(xxx). [326 IAC 6-3-2]
 - (2) One (1) hand sanding station for the sanding of parts after the sealer coat has been applied, identified as unit 19, constructed in 2001, with a maximum capacity of 535 pounds of wood per hour, with no emissions controls, exhausting internally, with emissions of particulate matter (PM) less than or equal to 5 lbs/hour or 25 lbs/day. [326 IAC 6-3-2]

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

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

D.3.1 PSD Minor Limit [326 IAC 2-2]

Pursuant to 326 IAC 2-2(Prevention of Significant Deterioration), the Permittee shall limit PM and PM10 emissions from the insignificant woodworking operations and sanding operations to the PM/PM10 emission rate in pounds per hour shown in the following table:

Emissions Unit	PM/PM10 Emission Rate (lbs/hr)
WW1a	14.1
WW1b	14.1
WW1c	1.21
WW1d	1.21
Sanding Stations 5, 8, 18 & 19	0.06

This limit, combined with other PM and PM10 limits imposed on the facilities at this source, makes the source a minor source for PM and PM10 under 326 IAC 2-2 (Prevention of Significant Deterioration).

D.3.2 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking facility WW1a shall not exceed 9.05 pounds per hour when operating at a process weight rate of 6,525 pounds per hour.

- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking facility WW1b shall not exceed 11.88 pounds per hour when operating at a process weight rate of 9,788 pounds per hour.
- (c) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking facilities WW1c and WW1d shall not exceed 0.551 pounds per hour each when operating at a process weight rate of less than 100 pounds per hour each.
- (d) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the sanding operations (5, 8, 18 and 19) shall not exceed 1.67 pounds per hour when operating at a process weight rate of 525 pounds per hour.

Pursuant to 326 IAC 6-3-2(e)(2), when the process weight rate is less than 100 pounds per hour, the allowable rate of emissions is five-hundred fifty-one thousandths (0.551) pound per hour.

Interpolation of the data for process weight rates greater than 100 pounds per hour and up to 60,000 pounds per hour shall be accomplished by use of the equation:

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

D.3.3 Baghouse Limitations [326 IAC 2-7-1(21)(G)(xxx)]

In order that the woodworking operations controlled by a baghouse (WWa, WWb, WWC, WWd, 5, 8 and 18) be considered an insignificant activity for Title V permitting, the baghouse operations shall meet the requirements of 326 IAC 2-7-1(21)(G)(xxx), including the following:

- (a) Each woodworking baghouse shall not exhaust to the atmosphere greater than forty thousand (40,000) cubic feet of air per minute and shall not emit particulate matter with a diameter less than ten (10) microns in excess of one-hundredth (0.01) grain per dry standard cubic foot of outlet air.
- (b) The opacity from each baghouse shall not exceed ten percent (10%).
- (c) Visible emissions from the baghouse stack exhausts (P1, P2, P3, P4 and vent 12) shall be observed daily using procedures in accordance with Method 22 and normal or abnormal emissions are recorded. In the event abnormal emissions are observed for greater than six (6) minutes in duration, the following shall occur:
 - (1) The baghouse shall be inspected.
 - (2) Corrective actions, such as replacing or reseating bags, are initiated, when necessary.

D.3.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.3.5 Particulate Control [326 IAC 2-7-21(1)(G)(xxx)(DD)]

- (a) Pursuant to CP-039-4959-00245, issued on March 21, 1996, and in order to comply with Conditions D.3.1, D.3.2(a), D.3.2(b), D.3.2(c) and D.3.3, the cyclone/baghouse systems and baghouses for particulate control shall be in operation and control emissions from the woodworking operations (WW1a, WW1b, WW1c and WW1d) at all times that these woodworking operations are in operation.

- (b) In order to comply with Conditions D.3.1 and D.3.2(d), the cyclone/baghouse system for particulate control shall be in operation and control emissions from the Sanding Operations (5, 8 and 18) at all times that their respective sanding operations are in operation.

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

D.3.6 Baghouse Inspections [326 IAC 2-7-21(1)(G)(xxx)(FF)]

An inspection shall be performed each calendar quarter of all bags controlling the insignificant woodworking operations and sanding 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.3.7 Cyclone Inspections

An inspection shall be performed each calendar quarter of all cyclones controlling the insignificant woodworking operations and sanding operations when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

D.3.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.3.9 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. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.3.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.3.6 and D.3.7, the Permittee shall maintain records of the results of the inspections required under Conditions D.3.3(c), D.3.6 and D.3.7 and the dates the vents are redirected.
- (b) To document compliance with Condition D.3.3(c), the Permittee shall maintain records of daily visible emission notations of the baghouse exhaust.
- (c) The Permittee shall maintain records of corrective actions to document compliance with 326 IAC 2-7-21(1)(G)(xxx)(GG)(dd).
- (d) To document compliance with Condition D.3.4, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.4 FACILITY OPERATION CONDITIONS

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

- (e) One (1) wood-fired firetube boiler, identified as EU-8, constructed in 2001, with a maximum capacity of 19.13 MMBtu per hour, using a cyclone fly ash collector (with efficiency rated at 87%) for particulate control, and exhausting to stack 20.

(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.4.1 General Provisions Relating to NSPS [326 IC 12-1] [40 CFR 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 60, Subpart Dc.

D.4.2 PSD Minor Limit [326 IAC 2-2]

- (a) Pursuant to 326 IAC 2-2 (PSD), the Permittee shall limit PM and PM10 emissions from the wood-fired boiler to less than 3.42 pounds per hour. This limit, combined with other PM and PM10 limits imposed on the facilities at this source, will make this source a minor source for PM and PM10 under PSD.
- (b) Pursuant to 326 IAC 2-2 (PSD), the Permittee shall limit VOC emissions from the wood-fired boiler to less than 3.25 pounds per hour.

D.4.3 Particulate Matter Limitation [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating: emission limitations for facilities specified in 326 IAC 6-2-1(c)), particulate emissions from the wood-fired boiler EU-8 shall be limited to 0.51 pounds of PM emitted per million Btu heat input as shown by the following equation, when Q equals 19.13 MMBtu per hour:

$$Pt = \frac{1.09}{Q^{0.26}} \quad \text{where } Pt = \text{pounds of particulate matter emitted per million Btu (lb/mmBtu) heat input; and}$$
$$Q = \text{total source maximum operating capacity rating in million Btu per hour (mmBtu/hr).}$$

D.4.4 Fuel Usage

Pursuant to Significant Source Modification 039-12718-00245, issued May 9, 2001, the wood-fired boiler, identified as EU-8, shall use only wood as fuel.

D.4.5 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 this facility and its control device.

Compliance Determination Requirements

D.4.6 Particulate Matter (PM)

In order to comply with Conditions D.4.3(a) and D.4.4, the cyclone for PM and PM10 control shall be in operation and control emissions from the boiler at all times that the boiler is in operation.

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

D.4.7 Visible Emissions Notations

- (a) Visible emission notations of the wood-fired boiler (EU-8) stack exhaust shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

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

D.4.8 Cyclone Inspections

An inspection shall be performed each calendar quarter of the cyclone controlling the boiler (EU-8). Inspections required by this condition shall not be performed in consecutive months.

D.4.9 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. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.4.10 Record Keeping Requirements [40 CFR 60, Subpart Dc]

- (a) Pursuant to 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial- Institutional Steam Generating Units), records for the boiler shall be maintained of the amount of fuel combusted during each day. All records shall be maintained for a period of five (5) years.
- (b) To document compliance with Condition D.4.7, the Permittee shall maintain records of once per shift visible emission notations of the boiler stack exhaust.
- (c) To document compliance with Condition D.4.8, the Permittee shall maintain records of the results of the inspections required under Condition D.4.8.
- (d) To document compliance with Condition D.4.5, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) 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**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Middlebury Hardwood Products, Inc.
Source Address: 101 Joan Drive, Middlebury, Indiana 46540
Mailing Address: P.O. Box 1429, Middlebury, Indiana 46540
Part 70 Permit No.: T039-18290-00245

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
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Middlebury Hardwood Products, Inc.
Source Address: 101 Joan Drive, Middlebury, Indiana 46540
Mailing Address: P.O. Box 1429, Middlebury, Indiana 46540
Part 70 Permit No.: T039-18290-00245

This form consists of 2 pages

Page 1 of 2

- | |
|--|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">C The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); andC The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16. |
|--|

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

Part 70 Quarterly Report

Source Name: Middlebury Hardwood Products, Inc.
Source Address: 101 Joan Drive, Middlebury, Indiana 46540
Mailing Address: P.O. Box 1429, Middlebury, Indiana 46540
Part 70 Permit No.: T039-18290-00245
Facility: Surface Coating Booths E1 through E5, the automated CEFLA profile surface coating booth (E6) and the automated finishing coating machine.
Parameter: VOC
Limit: Less than 248 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR:

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Middlebury Hardwood Products, Inc.
Source Address: 101 Joan Drive, Middlebury, Indiana 46540
Mailing Address: P.O. Box 1429, Middlebury, Indiana 46540
Part 70 Permit No.: T039-18290-00245
Facility: The automated CEFLA profile surface coating booth (E6).
Parameter: VOC
Limit: Less than 24 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR:

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Usage Report

Semi-Annual Report
 VOC and VHAP Usage - Wood Furniture NESHAP

Source Name: Middlebury Hardwood Products, Inc.
 Source Address: 101 Joan Drive, Middlebury, Indiana 46540
 Mailing Address: P.O. Box 1429, Middlebury, Indiana 46540
 Part 70 Permit No.: T039-18290-00245
 Facility: Surface Coating Booths E1 through E5, the automated CEFLA profile surface coating booth (E6) and the automated finishing coating machine.
 Parameter: VOC and VHAPs - NESHAP
 Limit: (1) Finishing operations -1.0 lb VHAP/lb Solids
 (2) Thinners used for on-site formulation of washcoats, basecoats and enamels - 3% VHAP content by weight
 (3) All other thinners - 10% VHAP content by weight
 (4) Foam adhesives meeting the upholstered seating flammability requirements - 1.8 lb VHAP/lb Solids
 (5) All other contact adhesives - 1.0 lb VHAP/lb Solids
 (6) Strippable spray booth material - 0.8 pounds VOC per pound solids

Year _____

Month	Finishing Operations (lb VHAP /lb Solid)	Thinners Used for On-Site Formulation (% by weight)	All Other Thinners (% by weight)	Foam Adhesives (upholstered) (lb VHAP/ lb Solid)	Contact Adhesives (lb VHAP/ lb Solid)	Strippable Spray Booth Material (lb VOC / lb Solid)
1						
2						
3						
4						
5						
6						

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

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

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

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

Source Name: Middlebury Hardwood Products, Inc.
 Source Address: 101 Joan Drive, Middlebury, Indiana 46540
 Mailing Address: P.O. Box 1429, Middlebury, Indiana 46540
 Part 70 Permit No.: T039-18290-00245

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

Page 1 of 2

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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 (Title V) Operating Permit Renewal

Source Background and Description

Source Name: Middlebury Hardwood Products, Inc.
Source Location: 101 Joan Drive, Middlebury, Indiana 46540
County: Elkhart
SIC Code: 2434, 2499
Operation Permit No.: T039-18290-00245
Permit Reviewer: ERG/ST

On January 29, 2005, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Middlebury Hardwood Products, Inc. had applied for a Part 70 (Title V) Operating Permit Renewal to operate a stationary wood furniture 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 31, 2005, Middlebury Hardwood Products, Inc. submitted comments on the proposed Part 70 (Title V) Renewal. The summary of the comments is as follows:

Comment 1: The 19.13 MMBtu/hr wood-fired boiler (EU-8) is a firetube boiler. Therefore, it is not subject to the requirements of 40 CFR 63, Subpart DDDDD.

Response to Comment 1: Firetube boilers are subject to 40 CFR 63, Subpart DDDDD, but, pursuant to 40 CFR 63.7506(c), there are no applicable requirements for this firetube boiler under 40 CFR 63, Subpart DDDDD because this firetube boiler belongs to the small solid fuel subcategory. The permit has been changed as follows (bolded language has been added, the language with a line through it has been deleted):

Section A.2 has been changed 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:

...

- (e) One (1) wood-fired **firetube** boiler, identified as EU-8, constructed in 2001, with a maximum capacity of 19.13 MMBtu per hour, using a cyclone fly ash collector (with efficiency rated at 87%) for particulate control, and exhausting to stack 20.

Section D.4 has been changed as follows:

SECTION D.4 FACILITY OPERATION CONDITIONS

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

- (e) One (1) wood-fired **firetube** boiler, identified as EU-8, constructed in 2001, with a maximum capacity of 19.13 MMBtu per hour, using a cyclone fly ash collector (with efficiency rated at 87%) for particulate control, and exhausting to stack 20.

(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.4.1 General Provisions Relating to NSPS and NESHAP [326 IC 12-1] ~~[326 IAC 20-1]~~ [40 CFR 60, Subpart A] ~~[40 CFR Part 63, Subpart A]~~

- ~~(a) The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 60, Subpart Dc.~~
- ~~(b) The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section, as designated by 40 CFR 63.7490(a), except when otherwise specified in 40 CFR 63 Subpart DDDDD. The Permittee must comply with these requirements on and after September 13, 2004.~~
- ~~(c) Since the applicable requirements associated with the compliance options for the affected source for the large solid fuel subcategory are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition. This permit shield applies to Condition D.4.12 - Notification Requirements.~~

D.4.2 ~~National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters [40 CFR Part 63, Subpart DDDDD]~~

- ~~(a) Pursuant to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, (40 CFR 63, Subpart DDDDD), the Permittee must comply with 40 CFR 63, Subpart DDDDD on and after September 13, 2007.~~
- ~~(b) The following emissions units comprise the affected facility for the large solid fuel subcategory: One (1) 19.13 MMBtu/hr wood-fired boiler (UB-1).~~
- ~~(c) The definitions of 40 CFR 63, Subpart DDDDD at 40 CFR 63.7575 are applicable to the affected facility.~~
- ~~(d) Since the applicable requirements associated with the compliance options for the large solid fuel subcategory are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition. The permit shield applies to Condition D.4.12 - Notification Requirements.~~

D.4.32 PSD Minor Limit [326 IAC 2-2]

- (a) Pursuant to 326 IAC 2-2 (PSD), the Permittee shall limit PM and PM10 emissions from the wood-fired boiler to less than 3.42 pounds per hour. This limit, combined with other PM and PM10 limits imposed on the facilities at this source, will make this source a minor source for PM and PM10 under PSD.

...

D.4.43 Particulate Matter Limitation [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating: emission limitations for facilities specified in 326 IAC 6-2-1(c)), particulate emissions from the wood-fired boiler EU-8 shall be limited to 0.51 pounds of PM emitted per million Btu heat input as shown by the following equation, when Q equals 19.13 MMBtu per hour:

...

D.4.54 Fuel Usage

Pursuant to Significant Source Modification 039-12718-00245, issued May 9, 2001, the wood-fired boiler, identified as EU-8, shall use only wood as fuel.

D.4.65 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 this facility and its control device.

Compliance Determination Requirements

D.4.76 Particulate Matter (PM)

In order to comply with Conditions D.4.32(a) and D.4.43, the cyclone for PM and PM10 control shall be in operation and control emissions from the boiler at all times that the boiler is in operation.

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

D.4.87 Visible Emissions Notations

- (a) Visible emission notations of the wood-fired boiler (EU-8) stack exhaust shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

...

D.4.98 Cyclone Inspections

An inspection shall be performed each calendar quarter of the cyclone controlling the boiler (EU-8). Inspections required by this condition shall not be performed in consecutive months.

D.4.109 Cyclone Failure Detection

In the event that cyclone failure has been observed:

...

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

D.4.140 Record Keeping Requirements [40 CFR 60, Subpart Dc]

- (a) Pursuant to 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial- Institutional Steam Generating Units), records for the boiler shall be maintained of the amount of fuel combusted during each day. All records shall be maintained for a period of ~~two~~ **five (5)** years.
- (b) To document compliance with Condition D.4.87, the Permittee shall maintain records of once per shift visible emission notations of the boiler stack exhaust.

- (c) To document compliance with Condition D.4.98, the Permittee shall maintain records of the results of the inspections required under Condition D.4.98.
- (d) To document compliance with Condition D.4.65, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

~~D.4.12 National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters - Notification Requirements [40 CFR 63, Subpart DDDDD]~~

- (a) Pursuant to 40 CFR 63.7545, the Permittee shall submit the notifications in 40 CFR 63.7(b) and (c), 63.8(e), (f)(4), and (f)(6), and 63.9(b) through (h) that apply to the affected facility (EU-8) for the large solid fuel subcategory and chosen compliance methods by the dates specified. These notifications include, but are not limited to, the following:
 - (1) An Initial Notification containing the information specified in 40 CFR 63.9(b)(2) not later than 120 days after September 13, 2004.
 - (2) If required to conduct a performance test, a notification of intent to conduct a performance test at least 60 days before the performance test is scheduled to begin as required by 40 CFR 63.7(b)(1) and 40 CFR 63.7545(d).
 - (3) If required to conduct an initial compliance demonstration as specified in 40 CFR 63.7530(a), a Notification of Compliance Status containing the information required by 40 CFR 63.9(h)(2)(ii) in accordance with 40 CFR 63.7545(e).
 - (A) For each initial compliance demonstration, the Permittee shall submit the Notification of Compliance Status, including all performance test results and fuel analyses, before the close of business on the 60th day following the completion of the performance test and/or other initial compliance demonstrations according to 40 CFR 63.10(d)(2).
 - (B) The Notification of Compliance Status shall contain the items in 40 CFR 63.7545(e)(1) through (9), as applicable.
 - (4) If required to use a continuous monitoring system (CMS), notification of a performance evaluation, if required, as specified in 40 CFR 63.9(g), by the date of submission of the notification of intent to conduct a performance test.
- (b) The notifications required by paragraph (a) shall be submitted to:

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

and

United States Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 West Jackson Boulevard

Chicago, Illinois 60604-3590

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

~~D.4.13 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]~~

~~The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Part 70 permit for the large solid fuel subcategory.~~

~~(a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart DDDDD, a description of the affected facility (EU-8) and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.~~

~~(b) The significant permit modification application shall be submitted no later than nine months prior to September 13, 2004 as specified in 40 CFR 63.7495(b).~~

~~(c) The significant permit modification application shall be submitted to:~~

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

Upon further review, IDEM, 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.

1. There are no emission units at this source subject to new source review. Condition B.13 has been changed as follows:

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

(a) All terms and conditions of permits established prior to T039-18290-00245, 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 ~~combined~~ permit, all previous registrations ~~all~~ and permits are superseded by this ~~combined new source review and Part 70 operating permit~~.

2. A required rule citation was inadvertently omitted from the titles for Conditions B.3 and B.21. Conditions B.3 and B.21 have been changed as follows:

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

...

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

...

3. An incorrect rule citation was inadvertently included in the title for Condition C.20. Condition C.20 has been changed as follows:

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6][~~326 IAC 2-2~~][326 IAC 2-3]

...

- (c) If there is a reasonable possibility that a "project" (as defined in 326 IAC 2-3-1 (ll)) at a major source other than projects at a Clean Unit which is not part of a "major modification" (as defined in 326 IAC 2-3-1 (z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-3-1 (mm)) the Permittee shall comply with following:

- (1) ~~Prior to commencing the construction~~ **Before beginning actual construction of a "project"** (as defined in 326 IAC 2-3-1(ll)) document and maintain the following records:

...

4. The 8 hour ozone nonattainment designations in 69 FR 23858 have been incorporated in 326 IAC 1-4-1 effective December 12, 2004. Therefore provisions of 326 IAC 2-3 are applicable in these areas. (Elkhart County is nonattainment for the 8-hour ozone standard and Middlebury Hardwood Products has PTE for VOC greater than 100 tons per year.) IDEM has deleted the Nonattainment NSR term from the permit and replaced it with appropriate term in 326 IAC 2-3 as Emissions Offset 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 cabinet door manufacturing plant.

Responsible Official:	Owner
Source Address:	101 Joan Drive, Middlebury, Indiana 46540
Mailing Address:	P.O. Box 1429, Middlebury, Indiana 46540
General Source Phone Number:	(574) 825-9524
SIC Code:	2434, 2499
County Location:	Elkhart
Source Location Status:	Nonattainment for 8-hour ozone standard Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, under Nonattainment NSR Emission Offset Rules; Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

5. The address for IDEM, OAQ has been updated throughout the permit.

**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:	Middlebury Hardwood Products, Inc.
Source Location:	101 Joan Drive, Middlebury, Indiana 46540
County:	Elkhart
SIC Code:	2434, 2499
Operation Permit No.:	039-7669-00245
Operation Permit Issuance Date:	September 23, 1999
Permit Renewal No.:	039-18290-00245
Permit Reviewer:	ERG/ST

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Renewal application from Middlebury Hardwood Products, Inc. relating to the operation of a stationary wood furniture manufacturing facility.

History and Background

Middlebury Hardwood Products, Inc. operates a wood cabinet door manufacturing plant. In 1995, the emissions units consisted of six paint booths and two woodworking operations. In 2001, the source added an automated finishing coating machine. In 2004, the source replaced an existing spray coating booth with an automated CEFLA profile paint booth and an automated CEFLA UV coating system.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Five (5) surface coating booths for wood furniture coating, identified as E1 through E5, constructed prior to 1995, each equipped with one (1) HVLP spray gun, with maximum capacities of 725 units per hour at spray booth E1, and 145 units per hour at spray booths E2 through E5, each using dry filters for overspray control and exhausting at stacks E1 through E5.
- (b) One (1) automated CEFLA profile surface coating booth, identified as E6, constructed in 2004, consisting of six (6) HVLP spray guns for wood furniture coating, with a maximum capacity of 7715 pounds of wood per hour, using dry filters for overspray control, and exhausting at stack E6.
- (c) An automated finishing coating machine, constructed in 2001, with a maximum rate of 1,050 parts per hour, at an approximate maximum wood substrate weight of 525 pounds of wood per hour, consisting of the following manufacturing stages:
 - (1) Three (3) spray machines, identified as units 2, 15, and 21, constructed in 2001, each having a water curtain scrubbing system for PM control and surrounded by a cabinet-like enclosure, exhausting to vents 7, 14, and 17, respectively, consisting of:

- (A) A reciprocating machine (unit 2) that applies tinted sealer;
 - (B) A reciprocating machine (unit 15) that applies a sealer coat; and
 - (C) A reciprocating machine (unit 21) that applies the top coat.
- (2) One (1) rotary spray machine for stain application, identified as unit 9, constructed in 2001, with PM controlled by a double dry filter system and water curtain scrubbing system, and exhausting to vent 10.
 - (3) One (1) brush wiping machine, identified as unit 10, constructed in 2001, to automatically wipe off excess stain applied by unit 9, exhausting to vent 11.
 - (4) One (1) manual wiping station, identified as unit 11, constructed in 2001, manually operated as necessary, with no exhaust.
 - (5) Seven (7) ovens used at various points on the process line, constructed in 2001, with each oven indirectly heated by boiler EU-8, consisting of:
 - (A) Two (2) tinted sealer ovens for flash off and curing, identified as units 3 and 4, and exhausting to vents 8 and 9, respectively.
 - (B) One (1) drying oven for stain, identified as unit 12, and exhausting to vent 13.
 - (C) Two (2) sealer coat ovens for flash off and curing/cooling, identified as units 16 and 17, and exhausting to vents 15 and 16, respectively.
 - (D) Two (2) top coat ovens for flash off and curing/cooling, identified as units 22 and 23, and exhausting to vents 18 and 19, respectively.
 - (d) One (1) woodworking operation, identified as WW2, constructed prior to 1995, with a maximum capacity of less than 100 pounds of wood per hour, using a cyclone (P5) for particulate control exhausting internally and then to general ventilation.
 - (e) One (1) wood-fired boiler, identified as EU-8, constructed in 2001, with a maximum capacity of 19.13 MMBtu per hour, using a cyclone fly ash collector (with efficiency rated at 87%) for particulate control, and exhausting to stack 20.

Unpermitted Emission Units and Pollution Control Equipment

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

Insignificant Activities

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

- (a) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (b) Two (2) woodworking operations, identified as WW1a and WW1b, both constructed prior to 1995, with maximum capacities of 6525 and 9788 pounds of wood per hour, respectively, with WW1a and WW1b each using a cyclone/baghouse system for particulate control, and exhausting through stacks P1 and P2, respectively, meeting the definition of Insignificant Woodworking Equipment in 326 IAC 2-7-1(21)(G)(xxx). [326 IAC 6-3-2]
- (c) Two (2) woodworking operations, identified as WW1c and WW1d, both constructed prior to 1995, each with maximum capacities of less than 100 pounds of wood per hour, with

WW1c and WW1d each using a baghouse for particulate control, and exhausting internally through stacks P3 and P4, respectively, meeting the definition of Insignificant Woodworking Equipment in 326 IAC 2-7-1(21)(G)(xxx). [326 IAC 6-3-2]

- (d) Sanding Operations used in conjunction with the automated finishing coating machine, including:
 - (1) Three (3) sanding stations, identified as units 5, 8, and 18, constructed in 2001, with a maximum capacity of 535 pounds of wood per hour, using a cyclone in series with one (1) baghouse for particulate control, and exhausting to vent 12. These sanding stations meet the definition of Insignificant Woodworking Equipment in 326 IAC 2-7-1(21)(G)(xxx). [326 IAC 6-3-2]
 - (2) One (1) hand sanding station for the sanding of parts after the sealer coat has been applied, identified as unit 19, constructed in 2001, with a maximum capacity of 535 pounds of wood per hour, with no emissions controls, exhausting internally with emissions of particulate matter (PM) less than or equal to 5 lbs/hour or 25 lbs/day. [326 IAC 6-3-2]
- (e) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, including:
 - (1) Eleven (11) radiant heaters, identified as H1 through H11, each rated at 0.125 MMBtu per hour.
 - (2) Eleven (11) radiant heaters, identified as H12 through H14 and H16 through H23, each rated at 0.1 MMBtu per hour.
 - (3) Three (3) radiant heaters, identified as H24 through H26, each rated at 0.075 MMBtu per hour.
 - (4) One (1) downflow furnace, identified as H15, rated at 0.135 MMBtu per hour.
 - (5) One (1) air make-up unit, identified as AM1, rated at 7.5 MMBtu per hour.
- (f) One (1) automated CEFLA UV coating system, constructed in 2004, consisting of four (4) HVLP spray guns and one (1) UV curing station, using non-VOC coatings, with a maximum capacity of 7715 pounds of wood per hour, with integral control of particulate (particulate captured and recycled inside the coating machine).
- (g) One (1) sawdust silo unloading conveyor, with emissions of PM less than or equal to 5 lbs/hour of 25 lbs/day.

Existing Approvals

The source has been operating under Part 70 permit (T039-7669-00245; issued September 23, 1999), and the following revisions:

- (a) Significant Source Modification 039-12718-00245, issued May 9, 2001,
- (b) Reopening 039-13259-00245, issued December 14, 2001,
- (c) Minor Source Modification 039-18247-00245, issued April 8, 2004; and
- (d) Significant Permit Modification 039-18316-00245, issued April 26, 2004.

All conditions from previous approvals have been incorporated into this Part 70 permit.

The following terms and conditions from previous approvals have been revised in this Part 70 permit:

- (a) PSD minor limits in Conditions D.1.1 and D.3.1 in SPM 039-12718-00245:

The PSD minor limits in Conditions D.1.1 and D.3.1 in SPM 039-12718-00245, limiting PM, PM10 and VOC emissions from the surface coating operations, woodworking operations and the wood-fired boiler, are not practically enforceable. These conditions have been replaced in the current permit with limits for PM, PM10 and VOC determined in units of "pounds per hour." The specific limits for each emissions unit are specified in the *State Rule Applicability – Entire Source – Prevention of Significant Deterioration* section of this TSD and in Conditions D.1.1, D.2.1, D.3.1 and D.4.3 of this permit.

Air Pollution Control Justification as an Integral part of the Process

The following justification was incorporated into this permit from Significant Source Modification 039-12718-00245, issued May 9, 2001:

- (a) The company previously submitted the following justification such that the spray machine (2, 9, 15, 21) enclosures be considered as an integral part of the automated finishing line process:

- (1) The primary purpose of the enclosure around the spray machine is to recover coating and solvent material from the belt conveyors for reuse. In order to capture overspray for the recovery, each spray area must be enclosed to ensure the maximum amount of overspray is captured. Estimating a normal transfer efficiency of 75% for HVLP spray application and 38% recovery of overspray*, this enclosure/recovery system saves and makes available for reuse 9.5 % ($0.25 * 0.38 = 0.095$) of the coating materials originally sprayed on the cabinet doors. This machine sprays 12.6 gallons of material per hour. Assuming a 2500 hour work year and material costs of \$25.00 per gallon of coating material, the recycling of coating material saves the company an estimated \$74,812.50 per year ($2,500 \text{ hrs/yr} \times 12.6 \text{ gal/hr} \times \$25.00 \text{ per gal} \times 9.5\% \text{ material recovered}$).
- (2) By design, the enclosures on the spray machines are required to be intact at all times the process is running. The intact enclosures create an almost completely sealed atmospheric chamber for the spray operations to occur within. The proper operation of the enclosure ensures that the equipment runs properly and the product standard is achieved. If the enclosure is leaking coating material, the integrity of the recovery system is compromised and the operation must be stopped for repairs. A leaking system means that coating material is being wasted which defeats the purpose of installing the recovery system altogether. The full enclosure also prevents buildup of coating on the inside of the machine. With the machine's enclosures intact, coating solvent vapor pressures are maintained at atmospheric saturation level, minimizing loss of the coating solvent due to evaporation and preventing the coating material overspray from "drying" on the inside of the machine. The overspray that settles on the internal surfaces of the spray machine remains liquid and can be recovered for reuse.
- (3) As a benefit, each enclosure also serves to protect the sensitive electronic components that spray the coating onto the substrate, as well as control the air flow in the spray area.

* These figures are the equipment manufacturer's specifications for this spray machine.

- (b) The company previously submitted the following justification such that the baghouse/cyclone system controlling particulate emissions from the automated finishing

line sanding areas be considered as an integral part of the automated finishing line process:

- (1) The dust from the sanding areas of the new automated finishing line must be removed from the substrate so that the coating quality is not compromised.
- (2) If the baghouse/cyclone system is not working properly, the product finish will not be up to standard resulting in wasted coating material, substrate, and labor, which all result in less profit.

IDEM, OAQ previously evaluated the justifications and determined in the technical source document for Significant Source Modification 039-12718-00245, issued May 9, 2001, that the particulate emission controls outlined above are considered as an integral part of the automated finishing line process. Therefore, the particulate emissions from these are determined using the potential to emit after the integral components, and compliance monitoring for the baghouse/cyclone system, spray enclosures, and the coating recovery system will not be necessary.

Also, the automated finishing line has dry filters on unit 9, and water curtain scrubbers associated with units 2, 9, 15 and 21 which will not be considered integral because they are installed to control overspray particulate exhausting to the atmosphere.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

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

An administratively complete Part 70 permit renewal application for the purposes of this review was received on December 1, 2003.

There was no notice of completeness letter mailed to the Permittee.

Emission Calculations

See Appendix A, pages 1 through 6, for emissions calculations for the woodworking operations, the surface coating operations, the wood-fired boiler and the space heaters. PTE calculations for the surface coating facilities are taken from the TSD documents prepared for the source's operating permit T039-7669-00245, issued September 23, 1999, the Significant Source Modification 039-12718-00245, issued May 9, 2001, and the Significant Permit Modification 039-18316-00245, issued April 26, 2004. Figures for PTE for emissions of PM and PM10 from the wood-fired boiler and woodworking operations represent the emission limit specified for these facilities in 326 IAC 6-2-4 and 326 IAC 6-3-2.

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 September 23, 1999. 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	CO	VOC	NO _x	HAPs
Surface Coating Booths (E1 – E5)	49.5	49.5	-	-	Less than 248	-	192
Automated CEFLA Profile Surface Coating Booth (E6)	1.43	1.43	-	-		-	0.95
Automated Finishing Coating Machine (2, 3, 4, 9, 10, 11, 12, 15, 16, 17, 21, 22, and 23)	28.9	28.9	-	-		-	49.8
Woodworking and Sanding Operations (WW1a-d, WW2, 5, 8, 18)*	139	139	-	-	-	-	-
Wood-Fired Boiler (EU-8)*	15.0	15.0	2.09	50.3	1.42	41.1	3.22
Natural Gas-Fired Heaters (H1-H15, H24-H26 and AM1)	0.34	0.34	-	3.80	0.25	4.53	-
Total PTE	234	234	2.09	54.1	Less than 250	45.6	246

* Emissions figures for PM and PM10 are based on allowable limits and not actual estimated emissions.

"-" Emissions are negligible (less than 0.1 tons per year).

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

Actual Emissions

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

Pollutant	Actual Emissions (tons/year)
PM	--
PM10	0
SO ₂	0
VOC	136
CO	0
NO _x	0
HAP (specify)	--

"--" Emissions data not reported.

County Attainment Status

The source is located in Elkhart County.

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

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for nonattainment new source review.
- (b) Elkhart County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.

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) Compliance Assurance Monitoring
The requirements of 40 CFR 64 (Compliance Assurance Monitoring) are not included in this permit for the surface coating operations. The surface coating operations at this source are regulated under emission limitations and standards (NESHAP) proposed by the Administrator after November 15, 1990.

The requirements of 40 CFR 64 (Compliance Assurance Monitoring) are not included in this permit for the woodworking operations (WW1c, WW1d, WW2) and the sanding stations (5, 8 and 18). The woodworking operations (WW1c, WW1d, WW2) and the sanding stations (5, 8 and 18) do not have the potential to emit before controls equal to or greater than the major source threshold for PM, PM10, SO₂, NO_x, VOC or CO.

The requirements of 40 CFR 64 (Compliance Assurance Monitoring) are not included in this permit for the wood-fired boiler (EU-8). The wood-fired boiler (EU-8) does not have

the potential to emit before controls equal to or greater than the major source threshold for PM, PM10, SO₂, NO_x, VOC or CO.

The woodworking operations (WW1a and WW1b) are subject to Compliance Assurance Monitoring under 40 CFR 64.2(b)(i), because these facilities have the potential to emit before controls equal to or greater than the major source threshold for PM10, are subject to an emission limitation or standard for PM10, and use a control device as defined in 40CFR Part 64.1 to comply with that emission limitation or standard. Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are applicable to the woodworking operations (WW1a and WW1b).

The CAM Plan for these emissions units is as follows:

- (1) Particulate emissions from the woodworking operations (WW1a and WW1b) shall be controlled with cyclone/baghouse systems. The cyclone/baghouse systems shall be in operation at all times that their respective woodworking operations are in operation.
 - (2) The monitoring determination methods shall consist of the following and shall be performed according to the following schedule:
 - (A) Daily visible emissions notations of the woodworking control device stack exhausts performed by a trained employee.
 - (B) Quarterly inspections shall be performed each calendar quarter of all bags and filters controlling the woodworking operations. Defective bags will be replaced as needed. Inspections shall be performed by a trained employee.
 - (3) Records shall be kept of the results of all inspections, notations, checks and actions performed under this plan. The CAM Plan is currently in operation and shall be ongoing.
- (b) The requirements of New Source Performance Standards for Surface Coating of Metal Furniture (40 CFR Part 60.310 - 60.316, Subpart EE) are not included in this permit. The source does not perform surface coating operations to metal furniture.
- (c) This existing wood furniture manufacturing plant has HAP emissions greater than 10 tons/yr for a single HAP and greater 25 tons/yr for any combination of HAPs. Therefore, this source is subject to the National Emission Standards for Wood Furniture Manufacturing Operations (326 IAC 20-14, 40 CFR 63.800 - 63.808, Subpart JJ).

This source is considered a new affected source for this NESHAP. Therefore, pursuant to 43 CFR 63, Subpart JJ, the Permittee shall comply with the following emission limits for the surface coating facilities at this source:

- (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from the finishing operations as follows:
 - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of eight-tenths (0.8) pound VHAP per pound solids; or
 - (B) Use compliant finishing materials in which all stains have a maximum VHAP content of (1.0) pound VHAP per pound solid, as applied. Use compliant finishing materials in which all washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of eight-tenths (0.8) pound VHAP per pound solid, as applied. Thinners used for on-site

formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or

- (C) Use a combination of (A) and (B).
- (2) Limit VHAP emissions from contact adhesives by using compliant contact adhesives as follows:
- (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pounds VHAP per pound solids.
 - (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed 1.0 pound VHAP per pound solid.
- (3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.
- (4) The Permittee shall prepare and maintain a work practice implementation plan that defines environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:
- (A) Operator training course.
 - (B) Leak inspection and maintenance plan.
 - (C) Cleaning and washoff solvent accounting system.
 - (D) Chemical composition of cleaning and washoff solvents.
 - (E) Spray booth cleaning.
 - (F) Storage requirements.
 - (G) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
 - (H) Line cleaning.
 - (I) Gun cleaning.
 - (J) Washoff operations.
 - (K) Formulation assessment plan for finishing operations.
- (5) A semi-annual summary report shall be prepared and submitted to IDEM, OAQ, and the U.S. EPA to document the ongoing compliance status of the wood furniture coating process.

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the wood furniture coating operation except when otherwise specified in 40 CFR 63 Subpart JJ.

- (d) The 19.13 MMBtu/hr wood-fired boiler (EU-8) is subject to the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, (326 IAC

12, 40 CFR 60, Subpart Dc) because it was constructed after June 9, 1989 and the heat input capacity is greater than 10 MMBtu per hour, but less than 100 MMBtu per hour. Since the boiler is rated at less than 30 MMBtu per hour of heat input, the requirements of 40 CFR 60.43c(c) do not apply. Since the boiler is fueled exclusively by wood, only the recordkeeping and reporting requirements of 40 CFR 60.48c apply.

Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall keep records of the amount of fuel combusted in the boiler during each day.

- (e) The 19.13 MMBtu/hr wood-fired boiler (EU-8) is subject to the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD. The 19.13 MMBtu/hr wood-fired boiler (EU-8) comprises one existing affected source for the large solid fuel subcategory, as defined by 40 CFR 63.7506(b), because it meets the criteria in the definition in 40 CFR 63.7575 for the large solid fuel subcategory. The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the affected sources after September 13, 2004, except when otherwise specified in 40 CFR 63 Subpart DDDDD. A copy of the signed, final rule is available at <http://www.epa.gov/ttn/atw/boiler/boilerpg.html>.

This rule has a future compliance date; therefore, the specific details of the rule and how the Permittee will demonstrate compliance for the affected source for the large solid fuel subcategory are not provided in the permit. The Permittee shall submit an application for a significant permit modification nine months prior to the compliance date for the MACT that will specify the option or options for the emission limitations and standards and methods for determining compliance chosen by the Permittee. At that time, IDEM, OAQ will include the specific details of the rule and how the Permittee will demonstrate compliance.

Pursuant to 40 CFR 63, Subpart DDDDD, the Permittee shall submit:

- (1) An Initial Notification containing the information specified in 40 CFR 63.9(b)(2) not later than 120 days after September 13, 2004, as required by 40 CFR 63.7545(b).
- (2) If required to conduct a performance test, a notification of intent to conduct a performance test at least 60 days before the performance test is scheduled to begin as required by 40 CFR 63.7(b)(1) and 40 CFR 63.7545(d).
- (3) If required to conduct an initial compliance demonstration as specified in 40 CFR 63.7530(a), a Notification of Compliance Status containing the information required by 40 CFR 63.9(h)(2)(ii) in accordance with 40 CFR 62.7545(e).
 - (A) For each initial compliance demonstration, the Permittee shall submit the Notification of Compliance Status, including all performance test results and fuel analyses, before the close of business on the 60th day following the completion of the performance test and/or other initial compliance demonstrations according to 40 CFR 63.10(d)(2).
 - (B) The Notification of Compliance Status shall contain the items in 40 CFR 63.7545(e)(1) through (9), as applicable.
- (4) If required to use a continuous monitoring system (CMS), notification of a performance evaluation, if required, as specified in 40 CFR 63.9(g), by the date of submission of the notification of intent to conduct a performance test.

State Rule Applicability – Entire Source

326 IAC 2-1.1-5 (Nonattainment New Source Review)

This source is located in Elkhart County. Elkhart County has been redesignated as a nonattainment area for the 8-hour ozone standard in June 2004. The potential to emit of VOC of this source, after limits, is greater than 100 tons per year. Therefore, this source is a major source under Nonattainment NSR.

326 IAC 2-2 Prevention of Significant Deterioration (PSD) and 326 IAC 2-3 (Emission Offset)

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

This source was initially constructed between 1977 and 1995. At construction, the source consisted of six surface coating booths and several woodworking facilities. The principle emissions from these facilities were PM, PM₁₀ and VOC. At the time of construction, Elkhart County was designated as attainment for PM and PM₁₀ and nonattainment for the 1-hour ozone standard. The construction permit 039-4082-00245, issued to the source on March 9, 1995, included limits for VOC and particulate matter emissions that made the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-3 (Emission Offset) not applicable. The source was a minor source under PSD and emission offset after this permit was issued.

In 1995, EPA re-designated Elkhart County as an attainment area for the 1 hour ozone standard.

On March 21, 1996 IDEM issued the source construction permit 039-4959-00245. This permit superceded the previous construction permit and relaxed the source-wide VOC limit to less than 250 tons per year. The 250 ton per year VOC limit in construction permit 039-4959-00245 made the source minor with respect to PSD for future modifications.

In 2001, IDEM issued the source Significant Source Modification 039-12718-00245. This permit allowed the Permittee to add an automated finishing coating machine and a wood-fired boiler. These modifications to the booths increased VOC emissions greater than 40 tons per year. These modifications did not trigger PSD review because the Permittee took limits on VOC, PM and PM₁₀ emissions for these modifications and for the entire source. These limits limited emissions of PM, PM₁₀ and VOC from the entire source to less than 250 tons per year. These limits also made the source a minor source under PSD regulations.

In April 2004, IDEM issued the source Minor Source Modification 039-18247-00245. This permit allowed the Permittee to replace an existing surface coating booth with an automated CEFLA profile surface coating booth and an automated CEFLA UV coating system. These modifications did not trigger PSD review because the Permittee took limits on VOC, PM and PM₁₀ emissions for these modifications and for the entire source. These limits limited emissions of PM, PM₁₀ and VOC from the entire source to less than 250 tons per year. These limits also made the source a minor source under PSD after these modifications.

In June 2004, Elkhart County was designated as a nonattainment area for the 8-hour ozone statement.

The current potential to emit for PM, PM₁₀, NO_x, SO₂ and CO for the entire source, considering all limits, is less than 250 tons per year. This source is a minor source under PSD for PM, PM₁₀, SO₂ and CO. The current PTE for VOC for the entire source is greater than 100 tons per year and the source is located in Elkhart County, which has been designated as a nonattainment area for the 8-hour ozone standard in June 2004. Any future modifications that increase VOC or NO_x emissions must be reviewed in accordance with 326 IAC 2-3 and 326 IAC 2-1.1-5.

The following limits apply to this source:

- (a) The use of VOC at the entire source, including coatings, dilution solvents and cleaning solvents shall be less than 250 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to Significant Source Modification 039-12718-00245 and Minor Source Modification 039-18247-00245.

The following limits have been included in this permit:

- (a) CP 039-4959-00245, issued on March 21, 1996, and Significant Source Modification 039-12718-00245, issued on May 9, 2001, limited the use of VOC in the surface coating operations to no more than 248.9 tons of VOC, including coatings, dilution solvents, cleaning solvents and solvents used in top rubbing, per twelve (12) consecutive month period. However, since other facilities (combustion) contribute to the total PTE for VOC from this source, the surface coating operations shall be limited to less than 248 tons of VOC per twelve consecutive month period in order to keep total VOC emissions from the source to under 250 tons per year. Compliance with this limit makes the source a minor source under 326 IAC 2-2 (Prevention of Significant Deterioration).
- (b) Pursuant to Significant Source Modification 039-12718-00245, issued May 9, 2001, 326 IAC 2-2 (Prevention of Significant Deterioration), and in order to remain a PSD minor source, the Permittee shall limit PM and PM10 emissions from the surface coating operations, woodworking operations and the boiler to the PM/PM10 emission rate in pounds per hour shown in the following table:

Emissions Unit	PM/PM10 Emission Rate (lbs/hr)	PM/PM10 Emission Rate (tons/yr)
WW1a	14.1	61.9
WW1b	14.1	61.9
WW1c	1.21	5.30
WW1d	1.21	5.30
WW2	0.94	4.12
Sanding Stations 5, 8, 18 & 19	0.06	0.26
Unit 2 (Spray Machine for Tinted Sealer)	2.41	10.6
Unit 9 (Spray Machine for Stain)	0.43	1.87
Unit 15 (Spray Machine for Sealer)	2.12	9.30
Unit 21 (Spray Machine for Top Coat)	1.63	7.15
E1	4.66	20.4
E2	1.66	7.28
E3	1.66	7.28
E4	1.66	7.28
E5	1.66	7.28
E6	0.33	1.43
Wood-fired Boiler (EU-8)	3.42	15.0
Total	53.3	234

The dry filters and water curtains shall be in operation at all times that the surface coating operations are in operation, in order to comply with this limit. The cyclones and baghouses for emissions control shall be in operation at all times that the respective woodworking operations that they control are in operation in order to comply with this limit. The cyclone for particulate control shall be in operation at all times that the wood-fired boiler is in operation in order to comply with this limit.

Combined with other sources of particulate emissions at this source, PM and PM10 emissions will be less than 250 tons per twelve (12) consecutive month period. Compliance with this limit makes the source a minor source under 326 IAC 2-2 (Prevention of Significant Deterioration).

326 IAC 2-4.1 (New Source Toxic Control)

This source has constructed a major source of HAPs after July 27, 1997. The automated finishing coating line, constructed in 2001, has potential emissions of a single HAP greater than

10 tons per year and has potential emissions of a combination of HAPs greater than 25 tons per year. However, all of the surface coating facilities at this source are subject to 40 CFR 63, Subpart JJ, which is a regulation under a standard issued pursuant to Section 112(d) of the Clean Air Act. Therefore, pursuant to the exemption specified in 326 IAC 2-4.1-1(b)(2), the requirements of 326 IAC 2-4.1 (MACT) are not applicable.

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 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)

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

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

326 IAC 6-4 (Fugitive Dust Emissions)

Pursuant to 326 IAC 6-4, the source shall not generate fugitive dust to the extent that some portion of the material escapes beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located. A violation of this section would occur if air crossing the downwind boundaries of the site were to contain fugitive dust concentrations greater than sixty-seven percent (67%) in excess of ambient upwind concentrations.

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

This source is subject to 326 IAC 6-5 because it is a source of fugitive particulate matter emissions and has not received all of the necessary preconstruction approvals before December 13, 1985. Pursuant to 326 IAC 6-5, the source shall control fugitive dust from the sawdust silo's unloading conveyor according to the plan submitted on September 22, 1997. This plan consists of using a retractable transfer sleeve on the silo unloading conveyor to control fugitive dust.

State Rule Applicability – Surface Coating Facilities (Surface Coating Booths (E1 through E5), Automated CEFLA Profile Paint Booth (E6) and the Automated Finishing Coating Machine)

326 IAC 2-7-10.5(d) (Part 70 Minor Source Modification)

Pursuant to Minor Source Modification 039-18316-00245, issued on April 26, 2004, the use of VOC for paint booth E6, including coatings, dilution solvents, and cleaning solvents, shall be limited to less than 24 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Combined with the VOC emissions from the UV coating system, the VOC emissions from the modification in 2004 is less than 25 tons/yr. Therefore, the requirements of 326 IAC 2-7-10.5(f) (Part 70 Significant Source Modification) are not applicable to the modifications performed under Minor Source Modification 039-18316-00245.

326 IAC 6-3-2 (Process Operations)

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

SIP will remain applicable requirements until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

Pursuant to Operating Permit 039-7669-00245, issued on September 23, 1999, Significant Source Modification 039-12718-00245, issued on May 9, 2001, Significant Permit Modification 039-18316-00245, issued on April 26, 2004, 326 IAC 6-3-2 and 40 CFR 52 Subpart P, the particulate matter (PM) from the surface coating facilities, including the surface coating booths (E1 through E5), the automated CEFLA profile paint booth (E6) and the automated finishing coating machine shall be limited by the following:

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

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

Under the rule revision, particulate from the surface coating booths (E1 through E5), and the automated CEFLA profile paint booth (E6) shall be controlled by a dry particulate filter. Particulate from the automated finishing coating machine shall be controlled by a dry particulate filter and/or water curtain scrubbing system. The Permittee shall operate the control devices in accordance with manufacturer's specifications.

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

The wood furniture and cabinet surface coating facilities at this source were constructed after July 1, 1990 and their potential to emit VOC is greater than 15 pounds per day. Therefore, they are subject to 326 IAC 8-2-12. Pursuant to 326 IAC 8-2-12, 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.

326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)

The potential VOC emissions from the surface coating facilities at this source are greater than 25 tons per year. Since the requirements of 326 IAC 8-2-12 apply to these surface coating operations, the requirements of 326 IAC 8-1-6 are not applicable.

State Rule Applicability - Automated CEFLA UV Coating System (Insignificant)

There are no specifically applicable requirements for this unit. Therefore, this unit is only documented in this TSD and will not be listed in the source's Part 70 permit.

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

The Automated CEFLA UV coating system is not subject to the requirements of 326 IAC 6-3-2 because the machine utilizes integral control of particulate matter in which particulate from the coating application is captured and recycled inside the machine. The Automated CEFLA UV

coating system machine is considered an insignificant activity, pursuant to 326 IAC 2-7-1(21). Therefore, the requirements of 326 IAC 6-3-2 do not apply.

326 IAC 8-2-12 (Surface Coating Emissions Limitations)

The Automated CEFLA UV coating system is not subject to the requirements of 326 IAC 8-2-12 because, pursuant to 326 IAC 8-2-1, the actual emissions of VOC from the Automated CEFLA UV coating system are less than 15 pounds per day. The Automated CEFLA UV coating system uses a non-VOC coating. The Automated CEFLA UV coating system machine is considered an insignificant activity, pursuant to 326 IAC 2-7-1(21). Therefore, the requirements of 326 IAC 8-2-12 do not apply.

State Rule Applicability – Wood-Fired Boiler (EU-8)

326 IAC 6-2-4 (Particulate Emissions Limitations for Sources of Indirect Heating)

The 19.13 MMBtu/hr wood-fired boiler (EU-8) is subject to 326 IAC 6-2-4 because it is a source of indirect heating and it was constructed after September 21, 1983. Pursuant to 326 IAC 6-2-4, the particulate emissions from the wood fired boiler shall be limited by the following equation:

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

Where:

Pt = Pounds of particulate matter (PM) emitted per million Btu (lb/MMBtu) heat input.

Q = Total source maximum operating capacity rating in million Btu (MMBtu) heat input.

$$Pt = \frac{1.09}{(19.13)^{0.26}} = 0.51 \text{ lb/MMBtu.}$$
$$19.13 \text{ MMBtu/hr} \times 0.51 \text{ lb/MMBtu} = 9.68 \text{ lbs/hr.}$$

Pursuant to 326 IAC 6-2-4, the particulate matter emissions from the wood-fired boiler shall be limited to 0.51 lb per MMBtu of heat input. This is equivalent to 9.68 pounds of PM per hour when operating at maximum capacity. Since the PM potential emission rate of 11.07 pounds per hour for boiler EU-8 is more than the allowable limit of 9.68 pounds per hour, the cyclone must be in operation at all times that boiler EU-8 is in operation.

326 IAC 9-1-2 (Carbon Monoxide Emission Requirements)

This source is not among the listed source categories in 326 IAC 9-1-2. Therefore, the requirements of 326 IAC 9-1-2 are not applicable to this boiler.

326 IAC 10-1-3 (Nitrogen Oxide Emission Requirements)

This source is not located in Clark or Floyd County. Therefore, the requirements of 326 IAC 10-1-3 are not applicable to this boiler.

State Rule Applicability – Woodworking and Sanding Operations (WW1a, WW1b, WW1c, WW1d, WW2, 5, 8, 18 and 19)

Construction Permit 039-4082-00245

Pursuant to Construction Permit 039-4082-00245, issued on March 9, 1995, the visible emissions due to wood processing and woodworking (WW1a, WW1b, WW1c, WW1d) shall not exceed 10% opacity.

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

Pursuant to CP 039-4959-00245, issued on March 21, 1996, SSM 039-12718-00245, issued on May 9, 2001 and 326 IAC 6-3-2, the particulate from the woodworking and sanding operations (WW1a, WW1b, WW1c, WW1d, WW2, 5, 8, 18 and 19) shall be limited by values shown in the following table:

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

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

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

Emissions Unit ID	Process Weight (lbs/hr)	Allowable Emissions (lbs/hr)
WW1a	6,525	9.05
WW1b	9,788	11.88
WW1c	Less than 100	0.551
WW1d	Less than 100	0.551
WW2	Less than 100	0.551
5, 8, 18 and 19	525	1.67

Note: Pursuant to 326 IAC 6-3-2(e)(2), when the process weight rate is less than 100 pounds per hour, the allowable rate of emissions is five-hundred fifty-one thousandths (0.551) pound per hour.

The cyclone/baghouse systems, baghouses and cyclone shall be in operation at all times their respective woodworking facilities are in operation, in order to comply with this limit.

Testing Requirements

The Permittee is not required to perform compliance stack tests on the surface coating facilities because there are no VOC control devices in operation and records must be kept of all VOCs used at the source.

The Permittee is not required to perform compliance stack tests for the woodworking cyclones and baghouses. Conditions in this permit require that visible emissions from the stack exhausts for emission units WW1a, WW1b, WW1c and WW1d are limited to 10% opacity. This requirement was included in the original construction permit CP 039-4959-00245, issued on March 21, 1996. Visible emission notations, quarterly inspection, cyclone failure and bag failure requirements have been added consistent with current compliance monitoring requirements for Title V woodworking sources.

The Permittee is not required to perform compliance stack testing for the wood-fired boiler for PM, NOx, VOC and CO because the emission factors for these pollutants are from AP-42 and have a high rating. The wood-fired boiler at this source does not have a testing requirement for PM10 because this emissions unit accounts for a minority of the total potential to emit for PM10 from the source before controls.

IDEM may require compliance testing when necessary to determine if these facilities are in compliance. If testing is required by IDEM, compliance with the PM limits specified in the permit shall be determined by a performance test conducted in accordance with methods approved by the Commissioner.

Compliance Requirements

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

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance

Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

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

1. The surface coating booths for wood furniture coating (emission units E1 through E5) have applicable compliance monitoring conditions as specified below:
 - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters controlling emissions from spray booths E1 through E5. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks E1 through E5 while the respective booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
 - (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
 - (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for the spray booths must operate properly to ensure compliance with 326 IAC 2-2 (PSD), 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), and 40 CFR 52, Subpart P.

2. The woodworking operations (WW1a, WW1b, WW1c, WW1d, WW2) and sanding operations (5, 8 and 18) have applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emission notations of the woodworking and sanding operations stack exhausts (P1, P2, P3, P4, P5 and vent 12) shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
 - (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
 - (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
 - (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (f) An inspection shall be performed each calendar quarter of all bags controlling the woodworking operations (WW1a, WW1b, WW1c, WW1d) and sanding operations (5, 8 and 18). Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.
- (g) In the event that bag failure has been observed:
 - (1) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
 - (2) 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).
- (h) An inspection shall be performed each calendar quarter of all cyclones controlling the woodworking operations (WW1a, WW1b, WW2) and sanding operations (5, 8 and 18).
- (i) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the cyclones and baghouses for the woodworking operations must operate properly to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-7 (Part 70).

- 3. The 19.13 MMBtu/hr wood-fired boiler has applicable compliance monitoring conditions as specified below:

- (a) Visible emission notations of the wood-fired boiler stack exhaust shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (f) An inspection shall be performed each calendar quarter of the cyclone controlling the 19.13 MMBtu/hr wood-fired boiler.
- (g) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the 19.13 MMBtu/hr wood-fired boiler and the cyclone controlling particulate emissions from the boiler must operate properly to ensure compliance with 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70).

- 4. The scrubbers for PM overspray control on spray units 2, 9, 15, and 21, and dry filters on unit 9, are subject to the following:
 - (a) Pursuant to Significant Permit Modification 039-12718-00245, issued on May 9, 2001, for the dry filters on unit 9, the Permittee shall implement an operator-training program.
 - (1) All operators that perform painting operations or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within sixty (60) days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
 - (2) Training shall include proper filter alignment, filter inspection and maintenance, and troubleshooting practices.
 - (3) All operators shall be given refresher training annually.
 - (b) For the dry filters on unit 9, the Permittee shall:
 - (1) Perform daily inspections to verify the placement, integrity and particle loading of the dry filters controlling emissions from spray booth 9. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack (10) while the booth is in operation. The Compliance Response Plan shall be

followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

- (2) Perform monthly inspections of the coating emissions from the exhaust stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) For the spray area water curtain and scrubbers on units 2, 9, 15 and 21, the Permittee shall:
- (1) Visually check for gaps in the water curtain used in conjunction with the scrubbers for the automated finishing coating machine, at least once per shift when in operation when venting to the atmosphere. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water curtain. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the scrubber flow rate shall be maintained at 140 gallons per minute or more, or a range established for each during the latest stack tests. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.
 - (2) Perform an inspection each calendar quarter of the water curtains and scrubbers controlling the automated finishing coating machine. Inspections are optional when venting to the indoors.
 - (3) In the event that scrubber failure has been observed, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions).
- (d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters, spray area water curtain and scrubbers for the automated finishing coating machine must operate properly to ensure compliance with 326 IAC 2-2 (PSD), 326 IAC 6-3-2 (Particulate Emission Limitation for Manufacturing Processes) and 40 CFR 52, Subpart P.

5. The automated CEFLA profile surface coating booth (E6) has applicable compliance monitoring conditions as specified below:

- (a) Pursuant to Significant Permit Modification 039-12783-00245, issued on May 9, 2001, the Permittee shall implement an operator-training program, including the following:
- (1) All operators that perform painting operations or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within sixty (60) days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
 - (2) Training shall include proper filter alignment, filter inspection and maintenance, and troubleshooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within a reasonable time for inspection by IDEM.
 - (3) All operators shall be given refresher training annually.
- (b) For the dry filters on the automated CEFLA profile surface coating booth (E6), the Permittee shall:
- (1) Perform daily inspections to verify the placement, integrity and particle loading of the dry filters controlling emissions from spray booth E6. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth exhaust stack (E6) while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
 - (2) Perform monthly inspections of the coating emissions from the exhaust stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for this booth must operate properly to ensure compliance with 326 IAC 2-2 (PSD), 326 IAC 6-3-2 (Particulate Emission Limitation for Manufacturing Processes) 40 CFR 52, Subpart P.

Conclusion

The operation of this stationary wood cabinet door manufacturing plant shall be subject to the conditions of this Part 70 permit 039-18290-00245.

Appendix A: Emission Calculations
Particulate Emissions - Woodworking and Sanding Operations

Company Name: Middlebury Hardwood Products, Inc.
Address: 101 Joan Dr., Middlebury, IN 46540
Title V: 039-18290-00245
Reviewer: ERG/ST
Date: December 17, 2004

1. PTE for Woodworking and Sanding Operations

Unit ID	Control Device	Outlet Grain Loading (gr/dscf)	Maximum Air Flow Rate (scfm)	Control Efficiency (%)	PTE of PM/PM10 After Control (lbs/hr)	PTE of PM/PM10 After Control (tons/yr)	PTE of PM/PM10 Before Control (lbs/hr)	PTE of PM/PM10 Before Control (tons/yr)
WW1a	Cyclone/baghouse	0.01	30000	99.0%	2.57	11.3	257	1126
WW1b	Cyclone/baghouse	0.01	30000	99.0%	2.57	11.3	257	1126
WW1c	Baghouse	0.01	2514	99.0%	0.22	0.94	21.5	94.4
WW1d	Baghouse	0.01	2514	99.0%	0.22	0.94	21.5	94.4
WW2	Cyclone	0.01	2000	87.0%	0.17	0.75	1.32	5.78
Sanding Stations 5, 8, 18	Cyclone/baghouse	0.0000166	5000	99.0%	0.001	0.003	0.07	0.31
Total						25.2		2447

Assume all PM emissions equal PM10 emissions.

Methodology

PTE of PM/PM10 After Control (tons/yr) = Grain Loading (gr/dscf) x Max. Air Flow Rate (scfm) x 60 mins/hr x 1/7000 lb/gr x 8760 hr/yr x 1 ton/2000 lbs
PTE of PM/PM10 Before Control (tons/yr) = PTE of PM/PM10 After Control (tons/yr) / (1-Control Efficiency)

2. Compliance with 326 IAC 6-3-2(e) - Particulate Matter Emissions Limitations

Pursuant to 326 IAC 6-3-2(e), the Maximum Allowable Emissions = $E = 4.10 * P^{0.67}$ Where: P= Process Rate in tons per hour
E = Rate of Emissions in pounds per hour

If the process weight is less than 100 pounds per hour, the allowable emissions rate shall be less than 0.551 pounds per hour.

Emission Unit ID	Process Rate (lbs/hr)	Maximum Allowable Emissions (lbs/hr)	Calculated Emissions Before Controls (lbs/hr)	Calculated Emissions After Controls (lbs/hr)
WW1a	6525	9.05	257	2.57
WW1b	9788	11.9	257	2.57
WW1c	less than 100	0.55	21.5	0.22
WW1d	less than 100	0.55	21.5	0.22
WW2	less than 100	0.55	1.32	0.17
Sanding Stations 5, 8, 18	525	1.67	0.07	0.001

The cyclones and baghouses must be in operation at all times that the woodworking operations are in operation in order to ensure compliance with 326 IAC 6-3-2(e).

Appendix A: Emission Calculations
VOC, HAP and PM emissions: Automated Finishing Coating Machine

Company Name: Middlebury Hardwood Products, Inc.
Address: 101 Joan Dr., Middlebury, IN 46540
Title V: 039-18290-00245
Reviewer: ERG/ST
Date: December 17, 2004

Emissions Unit and Worst Case Material	Density (lb/gal)	Weight % VOC	Weight % Water	Weight % HAPs	Weight % Solids	Gallons of Material Per Unit	Maximum Units Per Hour	Potential to Emit (tons/yr)			
								PTE VOC (tons/yr)	PTE HAPs (tons/yr)	PTE PM After Recovery (tons/yr)	PTE PM After Controls (tons/yr)
Unit 2 (Spray Machine for Tinted Sealer)											
Tinted precoat, NUB0030	7.69	49.9%	0.00%	16.48%	50.1%	0.0035	1050	38.3	12.6	9.61	1.92
Unit 9 (Spray Machine for Stain)											
Wiping stain, BO-96030	7.26	83.7%	0.00%	27.63%	16.3%	0.0020	1050	34.7	11.4	1.68	0.34
Unit 15 (Spray Machine for Sealer)											
Sealer coat, AUF0566	7.75	60.8%	0.00%	20.05%	39.2%	0.0030	1050	40.3	13.3	6.50	1.30
Acid catalyst, CXC0066	9.09	39.4%	0.00%	0.00%	60.7%	0.0005	1050	5.1	0.0	1.96	0.39
Unit 21 (Spray Machine for Top Coat)											
Top coat, AUF0566	7.75	60.5%	0.28%	18.67%	39.2%	0.0030	1050	40.1	12.4	6.50	1.30
Totals								158	49.8	26.3	5.25

Assume a transfer efficiency of 75 % for the HVLP spray guns on the automated finishing coating machine.

Assume a recovery efficiency of 38 % for sprayed coating that does not transfer to material (according to manufacturer's specifications).

Assume a control efficiency of 80 % for the water curtain scrubbing system and dry particulate filters.

Assume all VOC and HAP volatilizes and is emitted.

Methodology

PTE VOC (tons/yr) = Density (lb/gal) x Weight % VOC x Gallons of Material Per Unit (gal/unit) x Maximum Units Per Hour (units/hr) x (1 - Recovery Efficiency%) x 8760 (hr/yr) x 1/2000 (ton/lbs)

PTE HAPs (tons/yr) = Density (lb/gal) x Weight % HAPs x Gallons of Material Per Unit (gal/unit) x Maximum Units Per Hour (units/hr) x (1 - Recovery Efficiency%) x 8760 (hr/yr) x 1/2000 (ton/lbs)

PTE PM After Recovery (tons/yr) = Density (lb/gal) x Weight % Solids x Gallons of Material Per Unit (gal/unit) x Maximum Units Per Hour (units/hr) x (1 - Transfer Efficiency) x (1 - Recovery Efficiency%) x 8760 (hr/yr) x 1/2000 (ton/lbs)

**Appendix A: Emission Calculations
VOC and PM/PM10 Emissions
From the Paint Booths E1 through E5**

Company Name: Middlebury Hardwood Products, Inc.

Address: 101 Joan Dr., Middlebury, IN 46540

Title V: 039-18290-00245

Reviewer: ERG/ST

Date: December 17, 2004

Emissions Unit(s)	Material	Density (lbs/gal)	Weight % Solids	Weight % VOC	Weight % HAPs	Maximum Usage (gal/unit)	Maximum Throughput (units/hr)	PTE of VOC (tons/yr)	PTE of HAPs (tons/yr)	**Transfer Efficiency	PM/PM10 Control Efficiency	PTE of PM/PM10 Before Control (tons/yr)	PTE of PM/PM10 After Control (tons/yr)
E1	Lacquer Thinner	7.02	0.0%	100%	100%	0.0005	725	11.1	11.1	65%	80%	0.00	0.00
	Durovar Plus 45 Lacquer	9.40	50.6%	49.4%	20.0%	0.0005	725	7.37	2.98	65%	80%	2.65	0.53
	Stain 711	7.80	20.4%	79.6%	79.6%	0.0090	725	177	177	65%	80%	15.9	3.18
E2 - E5	Catalyst Care SN 19L P	8.70	9.00%	65.7%	0.00%	0.0221	145	80.2	0.00	65%	80%	3.85	0.77
	Durovar Plus 45 Catalyst	9.34	49.3%	50.7%	0.00%	0.0221	145	66.5	0.00	65%	80%	22.6	4.52
Total								343	192			45.0	9.01

Assume all the PM emissions are PM10 emissions.

Assume all VOC and HAP volatilizes and is emitted.

METHODOLOGY

PTE of VOC (tons/yr) = Density (lbs/gal) x Weight % VOC x Maximum Usage (gal/hr) x 8760 (hrs/yr) x 1/2000 (ton/lbs)

PTE of HAPs (tons/yr) = Density (lbs/gal) x Weight % HAPs x Maximum Usage (gal/hr) x 8760 (hrs/yr) x 1/2000 (ton/lbs)

PTE of PM/PM10 Before Control (tons/yr) = Density (lbs/gal) x Weight % Solids x Maximum Usage x 8760 (hrs/yr) x 1/2000 (ton/lbs) x (1-Transfer efficiency %)

PTE of PM/PM10 After Control (lbs/hr) = PTE of PM/PM10 Before Control (tons/yr) x (1 - PM/PM10 Control Efficiency %)

**Appendix A: Emission Calculations
VOC and PM/PM10 Emissions
From the Paint Booth E6 and the UV Coating System**

**Company Name: Middlebury Hardwood Products, Inc.
Address: 101 Joan Dr., Middlebury, IN 46540
Title V: 039-18290-00245
Reviewer: ERG/ST
Date: December 17, 2004**

Unit	Material	Density (lbs/gal)	Weight % Solids	Weight % VOC	Weight % HAPs	Maximum Usage (gal/hr)	PTE of VOC (tons/yr)	PTE of HAPs (tons/yr)	**Transfer Efficiency	PM/PM10 Control Efficiency	PTE of PM/PM10 Before Control (tons/yr)	PTE of PM/PM10 After Control (tons/yr)
Paint Booth E6	Rose Stain	7.57	8.5%	91.5%	1.65%	1.33	40.3	0.73	65%	80%	1.31	0.26
UV Coating System	Clear Coat	9.21	98.9%	1.06%	0.41%	1.33	0.57	0.22	100%	NA	NA	NA
Total							40.9	0.95			1.31	0.26

*Assume all the PM emissions are PM10 emissions.

** This is provided by the source. The UV coating system captures and recycles all the excess solid coatings. Assume all VOC and HAP volatilizes and is emitted.

METHODOLOGY

PTE of VOC (tons/yr) = Density (lbs/gal) x Weight % VOC x Maximum Usage (gal/hr) x 8760 (hrs/yr) x 1/2000 (ton/lbs)

PTE of HAPs (tons/yr) = Density (lbs/gal) x Weight % HAPs x Maximum Usage (gal/hr) x 8760 (hrs/yr) x 1/2000 (ton/lbs)

PTE of PM/PM10 Before Control (tons/yr) = Density (lbs/gal) x Weight % Solids x Maximum Usage x 8760 (hrs/yr) x 1/2000 (ton/lbs) x (1-Transfer efficiency)

PTE of PM/PM10 After Control (lbs/hr) = PTE of PM/PM10 Before Control (tons/yr) x (1 - Control Efficiency %)

**Appendix A: Emission Calculations
Combustion Emissions - 19.13 MMBtu Wood-Fired Boiler**

**Company Name: Middlebury Hardwood Products, Inc.
Address: 101 Joan Dr., Middlebury, IN 46540
Title V: 039-18290-00245
Reviewer: ERG/ST
Date: December 17, 2004**

Heat Input Capacity (MMBtu/hr) = 19.13

	Pollutant							
	PM *	PM10 *	SO ₂	NOx	CO	VOC	HAP (metals)	HAP (other)
Emission Factor (lbs/MMBtu)	4.17E-01	3.77E-01	2.50E-02	4.90E-01	6.00E-01	1.70E-02	1.75E-03	3.66E-02
PTE Before Controls (tons/yr)	34.9	31.6	2.09	41.1	50.3	1.42	0.15	3.07
PTE After Controls** (tons/yr)	4.54	4.11	2.09	41.1	50.3	1.42	0.15	3.07

	HAP Emissions							
	Acetaldehyde	Acrolin	Benzene	Formaldehyde	Hydrogen Chloride	Styrene	Lead	Manganese
Emission Factor (lbs/MMBtu)	8.3E-04	4.0E-03	4.2E-03	4.4E-03	1.9E-02	1.9E-03	4.8E-05	1.6E-03
PTE (tons/yr)	0.07	0.34	0.35	0.37	1.59	0.16	0.00	0.13

Dry wood has a heat value of 8,000 Btu / lb.

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

** The control efficiency of the cyclone controlling particulate emissions from the 19.13 MMBtu/hr boiler is 87% according to manufacturer's specifications. Emission Factors are from AP-42, Chapter 1.6 - Wood Residue Combustion in Boilers, (dry wood) Tables 1.6-1, 1.6-2, 1.6-3 and 1.6-4 (9/03).

Methodology

PTE Before Controls for PM/PM10 (tons/yr) = Heat Input Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8760 (hr/yr) x (1/2000) (tons/lb).

PTE After Controls for PM/PM10 (tons/yr) = Heat Input Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8760 (hr/yr) x (1/2000) (tons/lb) x (1 - Control Efficiency%).

PTE for SO₂, NOx, CO, VOC and HAPs (tons/yr) = Heat Input Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8760 (hr/yr) x (1/2000) (tons/lb).

Appendix A: Emission Calculations
Combustion Emissions from the Natural Gas-fired Space Heaters, Air Makeup Units and Water Heater

Company Name: Middlebury Hardwood Products, Inc.
Address: 101 Joan Dr., Middlebury, IN 46540
Title V: 039-18290-00245
Reviewer: ERG/ST
Date: December 17, 2004

Description	Emission Unit ID	Heat Input Capacity (MMBtu/hr)	Max. Potential Throughput (MMCF/yr)
Eleven (11) Radiant Heaters	H1-H11	1.38	12.0
Eleven (11) Radiant Heaters	H12-H14, H16-H23	1.10	9.6
Three (3) Radiant Heaters	H24-H26	0.225	2.0
One (1) Downflow Furnace	H15	0.135	1.18
One (1) Air Makeup Unit	AM1	7.50	65.70

Pollutant Emission Factors (lbs/MMCF)						
PM*	PM10*	SO ₂	NO _x **	CO	VOC	HAPs
7.6	7.6	0.6	100.0	84.0	5.5	0.09

Potential To Emit (tons/yr)							
Emission Unit ID	PM	PM10	SO ₂	NO _x	CO	VOC	HAPs
H1-H11	0.05	0.05	0.004	0.60	0.51	0.03	0.0005
H12-H14, H16-H23	0.04	0.04	0.003	0.48	0.40	0.03	0.0004
H24-H26	0.01	0.01	0.001	0.10	0.08	0.01	0.0001
H15	0.00	0.00	0.000	0.06	0.05	0.00	0.0001
AM1	0.25	0.25	0.020	3.29	2.76	0.18	0.0029
Totals	0.34	0.34	0.027	4.53	3.80	0.25	0.0039

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

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

Emission Factors from AP-42, Chapter 1.4 - Natural Gas Combustion, Tables 1.4-1, 1.4-2, 1.4-3 and 1.4-4. SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.

(AP-42 Supplement D 7/98)

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF - 1,000,000 Cubic Feet of Gas

1000 Btu per cubic foot of natural gas

Methodology

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

PTE for PM, PM10, NO_x, SO₂, CO, VOC and HAPs (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Total HAP emissions from the space heaters and water heater are negligible.