



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

July 21, 2004

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

TO: Interested Parties / Applicant
RE: Adorn, LLC / 039-18363-00324
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, 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 and IC 13-15-6-1 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, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot 9/16/03



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July 21, 2004

Mr. Christopher Heaton
Adorn, LLC
2421 S. Nappanee St. Suite B
Elkhart, Indiana 46517

Re: 039-18363-00324
First Significant Source Modification to:
Part 70 permit No. T039-7650-00324

Dear Mr. Heaton:

Adorn, LLC was issued a Part 70 operating permit T039-18363-00324 on October 6, 1998 for a stationary wood countertops and cabinets manufacturing plant. An application to modify the source was received on November 24, 2003, and February 20, 2004. Pursuant to 326 IAC 2-7-10.5, the following emission units are approved for construction at the source:

- (r) One (1) woodworking facility (identified as C3-1) consisting of sanders, saws, and woodworking hand tools with a maximum throughput rate of 500 pounds of lumber per hour and 25 pounds of plastic per hour, controlled by a baghouse and exhausting at stack C3-1. These units will be installed in 2004.
- (s) One (1) adhesive coating facility (identified as S3-1) using airless/air assisted spray gun and roll coater, to apply adhesives with a maximum usage rate of 0.80 gallons per day, controlled by dry filters and exhausting at stack S3-1. This unit will be installed in 2004.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

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

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

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

The source may begin construction when the source modification has been issued. The source must comply with the requirements of 326 IAC 2-7-10.5(1)(2) and 326 IAC 2-7-12 before operation of any of the proposed emission units can begin.

Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Sanobar Durrani, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7810 to speak directly to Ms. Durrani. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Original Signed by

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

ERG/SD

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



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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

Adorn, LLC.
1808 West Hively Avenue
Elkhart, Indiana 46517

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

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.

| | |
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| Operation Permit No.: T039-7650-00324 | |
| Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality | Issuance Date: October 6, 1998 Expiration Date: October 6, 2003 |

First Significant Permit Modification No.: 039-11565, issued February 7, 2000
First Administrative Amendment No.: 039-12127, issued April 14, 2000
Second Administrative Amendment No.: 039-13886, issued February 14, 2001
First Reopening No.: R-039-13209, issued December 18, 2001
Third Administrative Amendment No.: 039-16653, issued April 26, 2002
Second Minor Permit Modification No.: 039-15410, issued June 18, 2002
Fourth Administrative Amendment No.: 093-16786, issued February 20, 2003
Fifth Administrative Amendment No.: 039-16890-00324, issued May 14, 2003

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|---|------------------------------|
| First Significant Source Modification No.: 039-18363-00324 | |
| Issued by: Original Signed by Paul Dubenetzky, Branch Chief Office of Air Quality | Issuance Date: July 21, 2004 |

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, A.3, and A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

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

Responsible Official: Todd Cleveland
Source Address: 1808 West Hively Avenue, Elkhart, Indiana 46517; and
57420 Nagy Drive, Elkhart, Indiana 46517
Mailing Address: 2421 South Napanee Street, Suite B, Elkhart, Indiana 46517
SIC Code: 2499
County Location: Elkhart
County Status: Nonattainment for ozone under the 8-hour standard
Attainment for all other criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

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

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

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

Since the three (3) plants are located on contiguous or adjacent properties, belong to the same industrial grouping, and under common control of the same entity, they are considered one (1) source

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

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

Plant 1 (W. Hively Avenue):

- (a) Woodworking equipment, with a maximum throughput of 25,000 pounds of wood per hour, using a cyclone/baghouse system to control particulate, and exhausting to one (1) stack, identified as B2;
- (b) Woodworking equipment, with a maximum throughput of 25,000 pounds of wood per hour, using a cyclone/baghouse system to control particulate, and exhausting to one (1) stack, identified as C5;
- (c) One (1) sawdust storage silo, with a capacity of 690 cubic yards, collecting sawdust from the control equipment, and venting to the atmosphere through one (1) cyclone, identified as C5;

- (d) One (1) adhesive spray booth and one (1) wood wrapping press, with a maximum capacity of laminating 39.143 linear feet per hour, utilizing a high volume low pressure (HVLP) application system, with dry filters for control of particulate matter, exhausting to one (1) stack, identified as E1;
- (e) One (1) dualtech automated back sealing machine, identified as D1, with a maximum capacity of 3,900 board feet per hour, consisting of eight (8) airless /air assisted spray guns, with PM emissions controlled by a water wall and water scrubber system, identified as D2, exhausting to stack A1, a flash off tunnel exhausting to stack A2, and a hot air drying tunnel exhausting to stack A3.
- (f) One (1) rototech automated staining machine, identified as D3, with a maximum capacity of 3,900 board feet per hour, consisting of twenty (20) airless/air assist spray guns, with PM emissions controlled by dry filters, exhausting to stacks A4 and A5, and an infrared drying tunnel exhausting to stack A6.
- (g) One (1) dualtech automated sealing machine, identified as D4, with a maximum capacity of 3,900 board feet per hour, consisting of eight (8) airless/air assist spray guns, with PM emissions controlled by a water wall and water scrubber system, identified as D5, exhausting to stack A7, with a flash off tunnel and a hot air drying tunnel exhausting to stack A8.
- (h) One (1) dualtech automated finishing machine, identified as D6, with a maximum capacity of 3,900 board feet per hour, consisting of eight (8) airless/air assist spray guns, with PM emissions controlled by a water wall and water scrubber system, identified as D7, exhausting to stack A9, a flash off tunnel exhausting to stacks A10 and A 11, a hot air drying tunnel exhausting to stack A12, and one (1) non-heated cooling hood exhausting to stack A13.
- (i) One (1) manual touch up booth, identified as TU1, with a maximum capacity of 1 gallon of stain, 2 gallons of sealer, and 2 gallons of topcoat per day, consisting of one (1) airless/air assist gun, with dry filters for control of particulate matter, exhausting to one (1) stack TU1.
- (j) One (1) Corian surface coating line, utilizing a hand application method, with a maximum capacity of 0.75 units per hour, and exhausting to one (1) stack identified as C5;
- (k) Two (2) denibbers for D1, with a maximum capacities of 3,900 board feet per hour with PM emissions collected by cyclone C5.
- (l) One (1) denibber for D4, with a maximum capacity of 3,900 board feet per hour, with PM emissions collected by cyclone C5.
- (m) One (1) rototech automated staining machine equipped with twenty (20) HVLP spray guns used for coating cabinet doors and a hot air drying tunnel operating at 120°F. The maximum throughput capacity for this unit is 3,900 board feet per hour. Emissions of particulate matter are controlled by dry filers exhausting at stack A14.

Plant 2 (Nagy Drive):

- (n) Four (4) wood wrapping machines, with a maximum capacity of 280 pounds of wood styles per hour, and exhausting inside the building;
- (o) One (1) wood panel laminating machine, with a maximum capacity of 1,500 pounds of wood panels per hour, using a baghouse/cyclone system to collect the large particulate matter, and exhausting inside the building; and

- (p) One (1) gypsum sheet laminating machine, with a maximum capacity of 2,250 pounds of gypsum sheets per hour, and exhausting inside the building.

Plant 3 (County Road No. 3)

- (q) One (1) MDF board laminating machine, utilizing a rollcoat application system, with a maximum capacity of 70 units per hour, and exhausting to one (1) stack (identified as A15).
- (r) One (1) woodworking facility (identified as C3-1) consisting of sanders, saws, and woodworking hand tools with a maximum throughput rate of 500 pounds of lumber per hour and 25 pounds of plastic per hour, controlled by a baghouse and exhausting at stack C3-1. These units will be installed in 2004.
- (s) One (1) adhesive coating facility (identified as S3-1) using airless/air assisted spray gun and roll coater, to apply adhesives with a maximum usage rate of 0.80 gallons per day, controlled by dry filters and exhausting at stack S3-1. This unit will be installed in 2004.

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

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

- (a) One (1) natural gas-fired boiler, rated at 0.4 MMBtu/hr, and exhausting to stack B1;
- (b) Three (3) natural gas-fired radiant heaters, each rated at 0.2 MMBtu/hr, and exhausting to stacks H1, H2 and H3, respectively; and
- (c) Three (3) natural gas-fired hot water boilers, identified as AB1, AB2, and AB3, with each rated at 1 MMBtu per hour, exhausting to stacks AB1, AB2, and AB3, respectively.
- (d) Woodworking equipment located in Plant 3, having a maximum throughput capacity of 25,000 pounds of wood per hour. Emissions of particulate matter are controlled using a cyclonic baghouse (identified as C6), which has an outlet grain loading of 0.001 grains per dry standard cubic feet of outlet air and an exhaust air flow of 50,000 cubic feet per minute.
- (e) Woodworking equipment located in Plant 1, having a maximum throughput capacity of 5,000 pounds of wood per hour. Emissions of particulate matter are controlled using a cyclonic baghouse (identified as C7), which has an outlet grain loading of 0.003 grains per dry standard cubic feet of outlet air and an exhaust air flow rate of 60,000 cubic feet per minute.

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

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

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

SECTION D.1

FACILITY OPERATION CONDITIONS

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

Plant 1 (W. Hively Avenue):

- (d) One (1) adhesive spray booth and one (1) wood wrapping press, with a maximum capacity of laminating 39.143 linear feet per hour, utilizing a high volume low pressure (HVLP) application system, with dry filters for control of particulate matter, exhausting to one (1) stack, identified as E1;
- (e) One (1) dualtech automated back sealing machine, identified as D1, with a maximum capacity of 3,900 board feet per hour, consisting of eight (8) airless /air assisted spray guns, with PM emissions controlled by a water wall and water scrubber system, identified as D2, exhausting to stack A1, a flash off tunnel exhausting to stack A2, and a hot air drying tunnel exhausting to stack A3.
- (f) One (1) rototech automated staining machine, identified as D3, with a maximum capacity of 3,900 board feet per hour, consisting of twenty (20) airless/air assist spray guns, with PM emissions controlled by dry filters, exhausting to stacks A4 and A5, and an infrared drying tunnel exhausting to stack A6.
- (g) One (1) dualtech automated sealing machine, identified as D4, with a maximum capacity of 3,900 board feet per hour, consisting of eight (8) airless/air assist spray guns, with PM emissions controlled by a water wall and water scrubber system, identified as D5, exhausting to stack A7, with a flash off tunnel and a hot air drying tunnel exhausting to stack A8.
- (h) One (1) dualtech automated finishing machine, identified as D6, with a maximum capacity of 3,900 board feet per hour, consisting of eight (8) airless/air assist spray guns, with PM emissions controlled by a water wall and water scrubber system, identified as D7, exhausting to stack A9, a flash off tunnel exhausting to stacks A10 and A 11, a hot air drying tunnel exhausting to stack A12, and one (1) non-heated cooling hood exhausting to stack A13.
- (i) One (1) manual touch up booth, identified as TU1, with a maximum capacity of 1 gallon of stain, 2 gallons of sealer, and 2 gallons of topcoat per day, consisting of one (1) airless/air assist gun, with dry filters for control of particulate matter, exhausting to one (1)stack TU1.
- (j) One (1) Corian surface coating line, utilizing a hand application method, with a maximum capacity of 0.75 units per hour, and exhausting to one (1) stack identified as C5.
- (m) One (1) rototech automated staining machine equipped with twenty (20) HVLP spray guns used for coating cabinet doors and a hot air drying tunnel operating at 120°F. The maximum throughput capacity for this unit is 3,900 board feet per hour. Emissions of particulate matter are controlled by dry filers exhausting at stack A14.

SECTION D.1 FACILITY OPERATION CONDITIONS (Continued)

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

Plant 2 (Nagy Drive):

- (n) Four (4) wood wrapping machines, with a maximum capacity of 280 pounds of wood styles per hour, and exhausting inside the building;
- (o) One (1) wood panel laminating machine, with a maximum capacity of 1,500 pounds of wood panels per hour, using a baghouse/cyclone system to collect the large particulate matter, and exhausting inside the building; and
- (p) One (1) gypsum sheet laminating machine, with a maximum capacity of 2,250 pounds of gypsum sheets per hour, and exhausting inside the building.

Plant 3 (County Road No. 3)

- (q) One (1) MDF board laminating machine, utilizing a rollcoat application system, with a maximum capacity of 70 units per hour, and exhausting to one (1) stack (identified as A15).
- (s) One (1) adhesive coating facility (identified as S3-1) using airless/air assisted spray gun and roll coater, to apply adhesives with a maximum usage rate of 0.80 gallons per day, controlled by dry filters and exhausting at stack S3-1. This unit will be installed in 2004.

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

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

D.1.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The one (1) adhesive coating facility (identified as S3-1), two (2) automated staining machines, back sealing, and sealing machines, and the touch-up booth, and pursuant to CP-039-8835-00324, issued on December 29, 1997, the remaining surface coating facilities shall not exceed 41,500 pounds of VOC, including coatings, adhesives, dilution solvents, and cleaning solvents, per month. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

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

- (a) Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets in the MDF laminating machine, Corian process, the dualtech automated back sealing machine, the two rototech automated staining machines, the dualtech sealing machine, and the touch-up booth 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.

- (b) The adhesive spray booth, the wood laminating machine, the gypsum laminating machine, one (1) adhesive coating facility (identified as S3-1) and the wood wrapping machines shall comply with the requirements of 326 IAC 8-2-12, if any change or modification to any of these facilities would increase actual emissions from the facility to above fifteen (15) pounds per day.

D.1.3 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

- (a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of December 7, 1998.
- (b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:
 - (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
 - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or
 - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or
 - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or
 - (D) Use a combination of (A), (B), and (C).
 - (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 1.8 pound VHAP per pound solids.
 - (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.
 - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.
 - (3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

A copy of this rule is enclosed.

D.1.4 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2 the dualtech automated back-sealing, the two rototech automated staining machines, the dualtech sealing machines, and the touch-up booth, and pursuant to CP-

039-4472-00324, issued on August 8, 1995, CP-039-4803-00324, issued on November 14, 1995, and CP-039-8835-00324, issued on December 29, 1997, the PM from the laminating machines and the adhesive booth, E1 shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.1.5 Work Practice Standards [40 CFR 63.803]

The owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. 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.1.6 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.1.7 Testing Requirements [326 IAC 2-7-6(1),(6)]

- (a) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 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.
- (b) The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.8 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitation contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) using formulation data supplied by the coating manufacturer. 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.1.9 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent month.

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

D.1.10 Particulate Matter (PM)

- (a) Pursuant to CP-039-4472-00324, issued on August 8, 1995, CP-039-4803-00324, issued on November 14, 1995, and CP-039-8835-00324, issued on December 29, 1997, the dry filters and baghouse/cyclone system for PM control shall be in operation at all times when the associated equipment is in operation.
- (b) The dry filters, water walls and scrubbers for PM control for the automated surface coating machines and the touch-up spray booth shall be in operation at all times when the associated equipment is in operation.

D.1.11 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters, and to verify the correct operation of the water walls and the correct flow of water to the water walls. To monitor the performance of the dry filters controls, weekly observations shall be made of the overspray from the surface coating stacks while one or more of these process 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 violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from all surface coating stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.12 Parametric Monitoring

The Permittee shall record the total static pressure drop across the scrubbers used in conjunction with the automated surface coating operations, at least once per shift when the associated machines are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the scrubbers shall be maintained within the range of 1 and 3 inches of water, 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 Specifications of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.13 Scrubber Inspections

An inspection shall be performed each calendar quarter of the scrubbers controlling the surface coating finishing operations when venting to the atmosphere. A scrubber inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are operational when venting to the indoors.

D.1.14 Scrubber Failure

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).

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

D.1.15 Record Keeping Requirements

- (a) To document compliance with Condition D.1.3, 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.1.3.
- (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.
- (b) To document compliance with Conditions D.1.1 and D.1.2(b), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.1.1.
- (1) The amount and VOC content of each coating and adhesive material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.

- (c) To document compliance with Condition D.1.11, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) To document compliance with Condition D.1.5, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (e) To document compliance with Condition D.1.12, the Permittee shall maintain the following:
 - (1) Records, taken once per shift, of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle: frequency and differential pressure.
 - (2) Documentation of all response steps implemented, per event.
 - (3) Operation and preventive maintenance logs, including work purchase orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
 - (8) Documentation of the dates vents are redirected.
- (f) To document compliance with Condition D.1.13, the Permittee shall maintain records of the results of the inspections required under Condition D.1.13, and the dates the vents are redirected.
- (g) All records shall be maintained in accordance with Section C- General Record Keeping Requirements, of this permit.

D.1.16 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.
- (b) A semi-annual Continuous Compliance Report to document compliance with Condition D.1.3 and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported.

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

- (1) January 1 through June 30.
 - (2) July 1 through December 31.
- (c) The reports required in (b) and (c) of this condition 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
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

SECTION D.5 FACILITY OPERATION CONDITIONS

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

Plant 3 (County Road 3)

- (r) One (1) woodworking facility (identified as C3-1) consisting of sanders, saws, and woodworking hand tools with a maximum throughput rate of 500 pounds of lumber per hour and 25 pounds of plastic per hour, controlled by a baghouse and exhausting at stack C3-1. These units will be installed in 2004.

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

Emission Limitations and Standards

D.5.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from one (1) woodworking facility shall not exceed 1.67 pounds per hour when operating at a process weight rate of 525 pounds per hour.

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

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

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

Compliance Determination Requirements

D.5.2 Particulate Control

In order to comply with condition D.5.1, the baghouse for particulate control shall be in operation and control emissions from the one (1) woodworking facility at all times that the woodworking facility is in operation.

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

D.5.3 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).

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document (TSD) for a Significant Source Modification and a Significant Permit Modification to a Part 70 Permit

Source Background and Description

| | |
|--------------------------------------|---|
| Source Name: | Adorn, LLC |
| Source Location: | 1808 West Hively Avenue, Elkhart, Indiana 46517 |
| County: | Elkhart |
| SIC Code: | 2499 |
| Operation Permit No.: | T039-7650-00324 |
| Operation Permit Issuance Date: | October 6, 1998 |
| Significant Source Modification No.: | 039-18363-00324 |
| Significant Permit Modification No.: | 039-18666-00324 |
| Permit Reviewer: | ERG/SD |

On May 24, 2004 the Indiana Department of Environmental Management (IDEM) and Office of Air Quality (OAQ) had a notice published in the Elkhart Truth of Elkhart, Indiana, stating that Adorn, LLC had applied for a Significant Source Modification and a Significant Permit Modification to a Part 70 Permit (Title V) to construct and operate one (1) woodworking facility and one (1) adhesive coating booth at their existing stationary wood counter top and cabinet manufacturing source. The notice also stated that IDEM, 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.

Upon further review, the 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).

1. This source is located in Elkhart County and is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program. Therefore, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2007 and every 3 years after. IDEM, OAQ has updated Condition C.18 (Emission Statement) as shown below.

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]
 (a) ~~The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual~~

~~emission statement shall meet the following requirements:~~

- ~~(1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);~~
- ~~(2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.~~
- ~~(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:~~

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

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

(a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2007 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);**
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.**

The statement must be submitted to:

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

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.

2. The section name in Condition B.26 (c) - Annual Fee Payment has been updated from "Technical Support and Modeling Section" to "Billing, Licensing, and Training Section" as shown below:

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

-
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, ~~Technical Support and Modeling Section~~ **Billing, Licensing, and Training Section (BLT)**), to determine the appropriate permit fee.

3. On April 15, 2004, the United States Environmental Protection Agency (U.S. EPA) named 23 Indiana counties and one partial county nonattainment for the new 8-hour ozone standard. The designations became effective on June 15, 2004. Elkhart County has been designated as nonattainment for the 8-hour ozone standard. The following has been added to Section A.1 General Information:

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

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

Responsible Official: Todd Cleveland
Source Address: 1808 West Hively Avenue, Elkhart, Indiana 46517; and
57420 Nagy Drive, Elkhart, Indiana 46517
Mailing Address: 2421 South Napanee Street, Suite B, Elkhart, Indiana 46517
SIC Code: 2499
County Location: Elkhart
County Status: **Nonattainment for ozone under the 8-hour standard**
Attainment for all **other** criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

| | |
|--------------------------------------|---|
| Source Name: | Adorn LLC |
| Source Location: | 1808 West Hively Avenue, Elkhart, Indiana 46517 |
| County: | Elkhart |
| SIC Code: | 2499 |
| Operation Permit No.: | T039-7650-00324 |
| Operation Permit Issuance Date: | October 6, 1998 |
| Significant Source Modification No.: | 039-18363-00324 |
| Significant Permit Modification No.: | 039-18666-00324 |
| Permit Reviewer: | ERG/SD |

The Office of Air Quality (OAQ) has reviewed a modification application from Adorn LLC relating to the construction of the following emission units and pollution control devices:

- (r) One (1) woodworking facility (identified as C3-1) consisting of sanders, saws, and woodworking hand tools with a maximum throughput rate of 500 pounds of lumber per hour and 25 pounds of plastic per hour, controlled by a baghouse and exhausting at stack C3-1. These units will be installed in 2004.
- (s) One (1) adhesive coating facility (identified as S3-1) using airless/air assisted spray gun and roll coater, to apply adhesives with a maximum usage rate of 0.80 gallons per day, controlled by dry filters and exhausting at stack S3-1. This unit will be installed in 2004.

HISTORY

Adorn, LLC was issued a Part 70 Permit No.: 039-7650-00324 on October 6, 1998. On November 10, 2003 Adorn LLC submitted a letter for review request for the construction of new emission units at their existing source. Based on IDEM, OAQ's review, on February 20, 2004, Adorn, LLC submitted an application to the OAQ requesting to add a woodworking and adhesive coating facilities from Bristol Laminating to their existing plant. The following modifications and revisions have been made to the Title V permit:

- (a) Minor Source Modification No.: 039-11334-00324, issued on January 3, 2000.
- (b) Significant Permit Modification No.: 039-11565-00324, issued on February 7, 2000.
- (c) First Administrative Amendment No.: 039-12127-00324, issued on April 14, 2000.
- (d) Second Administrative Amendment No.: 039-13886-00324, issued on February 14, 2001.
- (e) First Reopening to TV Permit No.: 039-13209-00324, issued on December 18, 2001.

- (f) Third Administrative Amendment No.: 039-15653, issued April 26, 2002.
- (g) Second Minor Permit Modification No.: 039-15410, issued June 18, 2002.
- (h) Fourth Administrative Amendment No.: 093-16786, issued February 20, 2003.
- (i) Fifth Administrative Amendment No.:039-16890-00324, issued May 14, 2003.

Source Definition

This source consists of three (3) plants:

- (a) Plant 1 is located at 1808 West Hively Avenue, Elkhart, Indiana 46517.
- (b) Plant 2 is located at 57420 Nagy Drive, Elkhart, Indiana 46517.
- (c) Plant 3 is located at 58038 CR3, Elkhart, Indiana 46517.

The technical support document (TSD) for the Title V permit No.: 039-7650-00324, issued October 6, 1998, determined that this stationary wood countertops and cabinets manufacturing company consisted of two (2) plants (Plant 1 and Plant 2) which are collocated. The Fifth Administrative Amendment No. :039-16890-00324, issued May 14, 2003, identified a Plant 3, consisting of one (1) MDF board laminating machine, as collocated to the source. The Permittee submitted an application on February 20, 2004 requesting an addition of a wood working facility and adhesive coating facility at Plant 3. As determined by IDEM, OAQ, all three (3) plants shall be considered one (1) source.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

| Stack ID | Operation | Height (feet) | Diameter (feet) | Flow Rate (acfm) | Temperature (°F) |
|----------|-----------------|---------------|-----------------|------------------|------------------|
| C3-1 | Woodworking | 46 | 12 | 50,000 | Ambient |
| S3-1 | Surface coating | 30 | 2.0 | 5,000 | Ambient |

Recommendation

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

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

An application for the purposes of this review was received on November 10, 2003. Additional information was received on February 20, 2004.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 and 2).

Potential To Emit of Modification

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

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

| Pollutant | Potential To Emit (tons/year) |
|-----------------|-------------------------------|
| PM | 53.7 |
| PM10 | 53.7 |
| SO ₂ | 0.00 |
| VOC | 0.08 |
| CO | 0.00 |
| NO _x | 0.00 |

There are no HAP emissions from this modification.

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Significant Source Modification pursuant to 326 IAC 2-7-10.5(f)(4)(A) because this modification results in potential to emit of PM10 greater than 25 tons per year. The permit modification is being performed through a Part 70 Significant Permit Modification pursuant to 326 IAC 2-7-12(d) because this is a modification under a provision of Title I of the CAA.

County Attainment Status

The source is located in Elkhart County.

| Pollutant | Status |
|-----------------|------------|
| PM10 | Attainment |
| SO ₂ | Attainment |
| NO ₂ | Attainment |
| Ozone | Attainment |
| CO | Attainment |
| Lead | Attainment |

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Elkhart County has been classified as attainment for all 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 in one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

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

| Pollutant | Emissions (tons/year) |
|-----------------|-----------------------|
| PM | 101 |
| PM10 | 101 |
| SO ₂ | 0.18 |
| VOC | <250 |
| CO | 0.00 |
| NO _x | 0.00 |

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.
- (b) These emissions are based upon the emission estimates provided in the Technical Support Document (TSD) to the Minor Source Modification permit No. 039-11334-00324, issued on January 3, 2000.

Potential to Emit of Modification After Issuance

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

| Emission Units | Potential to Emit (tons/year) | | | | | | |
|--|-------------------------------|-------|-----------------|-------|-------|-----------------|--|
| | PM | PM10 | SO ₂ | VOC | CO | NO _x | HAPs |
| PTE of the New Units | 0.53 | 0.53 | 0.00 | 0.08 | 0.00 | 0.00 | 0.00 |
| Total PTE of the Existing Units | 101 | 101 | 0.18 | 249 | 0.00 | 0.00 | Greater than 10 for a single HAP and greater than 25 for combination of HAPs |
| Total PTE of the Entire Source After This Modification | 101.5 | 101.5 | 0.18 | 249 | 0.00 | 0.00 | Greater than 10 for a single HAP and greater than 25 for combination of HAPs |
| PSD Significant Thresholds | < 250 | < 250 | < 250 | < 250 | < 250 | < 250 | NA |

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

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this modification.
- (b) This modification does not consist of surface coating operations to wood building products such as construction (either interior or exterior) of residential, commercial, or institutional building. The source surface coats wood and plastic countertops and cabinets. Therefore, the requirements of National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products (40 CFR Part 63.4680, Subpart QQQQ) are not applicable.
- (c) This modification is not subject to the requirements of National Emission Standards for Hazardous Air Pollutants for the Surface Coating of Plastic Parts and Products (40 CFR Part 63, Subpart PPPP) because the material used for coating of plastic parts does not contain any organic HAPs.
- (d) This existing wood countertops and cabinets manufacturing plant has HAP emissions greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for any combination of HAPs. Therefore, this source is subject to the National Emission Standards for Hazardous Air Pollutants: Wood Furniture Manufacturing Operations (326 IAC 20-14, 40 CFR Part 63.800 - 63.808, Subpart JJ). Since the new adhesive coating facility (identified as S3-1) will be used for wood furniture coating operations, it is subject to the requirements of 40 CFR 63, Subpart JJ. The requirements of this NESHAP were included in the source's Title V permit (T039-7650-00324, issued October 6,1998) and are described as shown below.

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

- (1) Limit the volatile hazardous air pollutants (VHAP) emissions from finishing operations as follows:
 - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound of solids; or
 - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of 1.0 pound VHAP per pound of solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a 3.0 percent maximum VHAP content by weight. Solvent and thinner mixtures used for other purposes have a ten percent (10.0%) maximum VHAP content by weight; or
 - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or
 - (D) Use a combination of (A), (B), and (C).
- (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 1.8 pound VHAP per pound solids.

- (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.
- (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.
- (3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.
- (4) The Permittee shall update the work practice implementation plan defining environmentally desirable work practices for the new automatic staining machine. The plan should address at a minimum each of the work practices defined in 40 CFR 63.803, including:
 - (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 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 that documents the ongoing compliance status of the wood furniture coating operations.
- (e) This significant modification does not involve a pollutant-specific emissions unit:
 - (1) with the potential to emit before controls equal to or greater than one hundred (100) tons per year, and
 - (2) that is subject to an emission limit and has a control device that is necessary to meet that limit.

Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable.

326 IAC 2-2 (Prevention of Significant Deterioration)

The source was constructed in 1998. At construction the potential to emit of VOC was greater than major source thresholds for PSD. However, in the Part 70 operating permit No.: 039-7650-00324, issued October 6, 1998, the existing surface coating facilities were limited to 41,500 pounds of VOC per month, including coatings, adhesives, dilution solvents, and cleaning solvents. This usage limit was required to limit the potential to emit of VOC to less than 250 tons per twelve

(12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit ensured that the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) were not applicable to the source. At the request of the source, the one (1) adhesive coating facility (identified as S3-1) will be included in this usage limit in order to make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable. The potential to emit of all other criteria pollutants remain less than 250 tons per year.

326 IAC 2-4.1-1 (Major Sources of HAPs: New Source Toxic Control)

The material used in the surface coating facility does not contain any HAPs. Therefore, 326 IAC 2-4.1-1 is not applicable to this modification.

State Rule Applicability – Adhesive Coating Facility

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

The potential VOC emissions from the one (1) adhesive coating facility (identified as S3-1) are less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable to this modification.

326 IAC 8-11-1(Wood Furniture Coating)

This modification is not subject to the requirements of 326 IAC 8-11-1(Wood Furniture Coating) because the source is not located in any of the counties listed under this rule.

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

The one (1) adhesive coating facility (identified as S3-1) is not subject to the requirements of 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating) because the actual VOC emissions from this facility are less than fifteen (15) pounds per day [326 IAC 8-2-1].

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

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date is 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.

Under the rule revision, the one (1) adhesive coating facility (identified as S3-1) is not subject to the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because this facility uses less than five (5) gallons of coating per day.

State Rule Applicability - Woodworking facility

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the wood working facility shall not exceed 1.67 pounds per hour when operating at a process weight rate of 525 pounds per hour.

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

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

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

where

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

The baghouse shall be in operation at all times the woodworking facility is in operation, in order to comply with this rule.

Compliance Requirements

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

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

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

1. The proposed woodworking facility has applicable compliance monitoring conditions as specified below:

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).

These monitoring conditions for the woodworking facility is necessary to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

Proposed Changes

Language with a line through it has been deleted and language in bold has been added.

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

.....

Plant 3 (County Road No. 3)

.....

- (r) **One (1) woodworking facility (identified as C3-1) consisting of sanders, saws, and woodworking hand tools with a maximum throughput rate of 500 pounds of lumber per hour and 25 pounds of plastic per hour, controlled by a baghouse and exhausting at stack C3-1. These units will be installed in 2004.**
- (s) **One (1) adhesive coating facility (identified as S3-1) using airless/air assisted spray gun and roll coater, to apply adhesives with a maximum usage rate of 0.80 gallons per day, controlled by dry filters and exhausting at stack S3-1. This unit will be installed in 2004.**

SECTION D.1 FACILITY OPERATION CONDITIONS (Continued)

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

Plant 2 (Nagy Drive):

- (n) Four (4) wood wrapping machines, with a maximum capacity of 280 pounds of wood styles per hour, and exhausting inside the building;
- (o) One (1) wood panel laminating machine, with a maximum capacity of 1,500 pounds of wood panels per hour, using a baghouse/cyclone system to collect the large particulate matter, and exhausting inside the building; and
- (p) One (1) gypsum sheet laminating machine, with a maximum capacity of 2,250 pounds of gypsum sheets per hour, and exhausting inside the building.

Plant 3 (County Road No. 3)

- (q) One (1) MDF board laminating machine, utilizing a rollcoat application system, with a maximum capacity of 70 units per hour, and exhausting to one (1) stack (identified as A15).
- (s) **One (1) adhesive coating facility (identified as S3-1) using airless/air assisted spray gun and roll coater, to apply adhesives with a maximum usage rate of 0.80 gallons per day, controlled by dry filters and exhausting at stack S3-1. This unit will be installed in 2004.**

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

D.1.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The **one (1) adhesive coating facility (identified as S3-1)**, two **(2)** automated staining machines, back sealing, and sealing machines, and the touch-up booth, and pursuant to CP-039-8835-00324, issued on December 29, 1997, the remaining surface coating facilities shall not exceed 41,500 pounds of VOC, including coatings, adhesives, dilution solvents, and cleaning solvents, per month. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

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

.....

- (b) The adhesive spray booth, the wood laminating machine, the gypsum laminating machine, **one (1) adhesive coating facility (identified as S3-1)** and the wood wrapping machines shall comply with the requirements of 326 IAC 8-2-12, if any change or modification to any of these facilities would increase actual emissions from the facility to above fifteen (15) pounds per day.

SECTION D.5 FACILITY OPERATION CONDITIONS

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

Plant 3 (County Road 3)

- (r) **One (1) woodworking facility (identified as C3-1) consisting of sanders, saws, and woodworking hand tools with a maximum throughput rate of 500 pounds of lumber per hour and 25 pounds of plastic per hour, controlled by a baghouse and exhausting at stack C3-1. These units will be installed in 2004.**

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

Emission Limitations and Standards

D.5.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from one (1) woodworking facility shall not exceed 1.67 pounds per hour when operating at a process weight rate of 525 pounds per hour.

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

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

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

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

Compliance Determination Requirements

D.5.2 Particulate Control

In order to comply with condition D.5.1, the baghouse for particulate control shall be in operation and control emissions from the one (1) woodworking facility at all times that the woodworking facility is in operation.

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

D.5.3 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).**

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 039-18363-00324.

**Appendix A: Emissions Calculations
VOC and PM/PM10
From Surface Coating Operations**

Company Name: Adorn, LLC
Address: 58038 CR3 (Plant 3), Elkhart, Indiana 46517
SSM: 039-18363
Plt ID: 039-00324
Reviewer: ERG/SD
Date: March 5, 2004

| Material | Density (lb/gal) | Weight % Volatile (H2O & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Volatiles (solids) | Max. Throughput (gal/hour) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | PTE of VOC (lb/hour) | PTE of VOC (lb/day) | PTE of VOC (tons/year) | PTE of PM/PM10 (ton/year) | * Transfer Efficiency | PTE PM/PM10 (lb/hour) |
|--------------|------------------|------------------------------------|----------------|-------------------|----------------|---------------------------------|----------------------------|---|----------------------------------|----------------------|---------------------|------------------------|---------------------------|-----------------------|-----------------------|
| Adhesive 1 | 8.67 | 45.0% | 43.0% | 2.00% | 54.0% | 46.0% | 0.05 | 0.38 | 0.17 | 0.01 | 0.2 | 0.04 | 0.57 | 45% | 0.13 |
| Adhesive 2 | 8.67 | 45.0% | 43.0% | 2.00% | 54.0% | 46.0% | 0.05 | 0.38 | 0.17 | 0.01 | 0.2 | 0.04 | 0.00 | 100% | 0.00 |
| TOTAL | | | | | | | | | | 0.02 | 0.42 | 0.08 | 0.57 | | |

Total PTE of VOC (ton/year) = 0.08
Total PTE of PM/PM10 (ton/year)= 0.57
Actual VOC (lbs/day) = 0.13

* Adhesive 1 is applied using airless spray gun, while Adhesive 2 is roll coated.
 Note: There are no HAPs emissions from the use of these adhesives

METHODOLOGY

Pounds of VOC per gallon coating less Water = Density (lb/gal) * Weight % Organics * 1/ (1-Volume % Water)
 Pounds of VOC per gallon coating = Density (lb/gal) * Weight % Organics
 PTE of VOC (lb/hour) = Pounds of VOC per Gallon coating (lb/gal) * Max. Throughput (gal/hour)
 PTE of VOC (lb/day) = Pounds of VOC per Gallon coating (lb/gal) * Max.Throughput (gal/hour) * 24 hour/day
 PTE of VOC (tons/year) = Pounds of VOC per Gallon coating (lb/gal) * Max. Throughput (gal/hour) * 8760 hours/year * 1 ton/2000 lbs
 PTE of PM/PM10 (tons/year) = Max. Throughput (gal/hour) * Density (lb/gal) * (1- Weight % Volatile) * (1-Transfer Efficiency %) * 8760 hours/year *1ton/2000 lbs
 PTE of PM/PM10 (lbs/hour) = Max. Throughput (gal/hour) * Density (lb/gal) * (1- Weight % Volatile) * (1-Transfer Efficiency %)
 Actual VOC (lbs/day) = PTE of VOC (lbs/hour) * Actual Hours of Opeation (2000 hours/year) * 1year/260 Days of Operation

**Appendix A: Emission Calculations
PM/PM10 Emissions
From Woodworking Facility**

Company Name: Adorn, LLC
Address: 58038 CR3 (Plant 3), Elkhart, Indiana 46517
SSM: 039-18363
Plt ID: 039-00324
Reviewer: ERG/SD
Date: March 5, 2004

POTENTIAL TO EMIT IN TONS PER YEAR USING AMOUNT OF DUST COLLECTED

| Emission Unit | * Dust Collected (lbs/hour) | PTE of PM/PM10 | |
|---------------|--------------------------------|----------------|-------------|
| | | (lbs/hour) | (tons/year) |
| Woodworking | 12.0 | 12.0 | 53.1 |
| | | 53.1 | |

* Assume all PM emissions are equal to PM10 emissions

Note: The source collects 10 pounds of dust per hour from the wood machining and 2 pounds of dust per hour from plastic machining.
 One (1) baghouse with a 99 % control efficiency

METHODOLOGY

PTE PM/PM10 (lbs/hour) = Dust collected (lbs/hour)

PTE PM/PM10 (tons/year) = Dust collected (lbs/hour) * 8760 hours/year * 1 ton/2000 lbs * 1/Control Efficiency %