



Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

August 19, 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: Challenge Door of Indiana / 113-18715-00047

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

**August 19, 2004**

Bill O'Dell  
Challenge Door of Indiana  
P.O. Box 259  
Ligonier, Indiana 46767

Re: **113-18715-00047**  
First Significant Permit Revision to  
**FESOP 113-10260-00047**

Dear Mr. O'Dell:

Challenge Door of Indiana was issued a permit on May 15, 2002 for an insulated steel door manufacturing operation. A letter requesting a change was received on February 9, 2004. Pursuant to the provisions of 326 IAC 2-8-11.1, the permit is hereby revised as follows:

Challenge Door of Indiana has submitted an application to change Condition D.2.4 to allow testing of only one of the two burning units of core burning unit P004 because the two burning units (Core Burn Unit 1 and Core Burn Unit 2) are identical. Challenge Door states that the two units have the same design specifications, emboss identical pieces of expanded polystyrene door core material, operate at the same temperature, have identical stacks, and are equipped with identical in-stack filters and fan motors.

Since the two units of core burning unit P004 are identical, the Office of Air Quality has determined that testing of one of the units as a representative of the two identical units is acceptable. Therefore, the permit shall be changed as requested.

Condition D.2.4 currently requires the Permittee to perform emission testing of both units of core burning unit P004 to verify the type and amount of pollutants emitted, utilizing methods as approved by the Commissioner.

According to the Compliance Data Section of the Office of Air Quality, "utilizing methods as approved by the commissioner" only gives them the authority to determine the specific test methods to be used, not the authority to determine which units can be tested. Therefore, changing the testing requirements as requested requires a change to the existing testing condition (Condition D.2.4).

Changing the testing requirements to allow the testing of one representative unit instead of both units is a relaxation of the testing requirements which requires a Significant Permit Revision pursuant to 326 IAC 2-8-11.1(f).

Condition D.2.4 shall be revised to incorporate the proposed testing change. The Compliance Data Section of the Office of Air Quality has also stated that it is necessary to identify the pollutants that are to be tested and to require alternate testing of the respective units such that each unit is tested every other cycle.

Therefore, Condition D.2 shall be changed as follows.

#### D.2.4 Testing Requirements

---

Within 24 months of permit issuance, the Permittee shall perform **PM and PM10** emission testing on **one of the two (2) units of the** core burning unit (P004) ~~to verify the type and amount of pollutants emitted by this unit,~~ utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of this valid compliance demonstration, **with each subsequent test performed on the unit not tested in the most recent prior performance test conducted.**

Testing shall be conducted in accordance with Section C - Performance Testing.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Scott Fulton, at (800) 451-6027, press 0 and ask for Scott Fulton or extension (3-5691), or dial (317) 233-5691.

Sincerely,

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

#### Attachments

SDF

cc: File - Noble County  
U.S. EPA, Region V  
Noble County Health Department  
Northern Regional Office  
Air Compliance Section Inspector - Doyle Houser  
Compliance Data Section  
Administrative and Development  
Technical Support and Modeling - Michele Boner

**FEDERALLY ENFORCEABLE STATE  
OPERATING PERMIT (FESOP)  
OFFICE OF AIR QUALITY**

**Challenge Door of Indiana  
200 Gerber Street  
Ligonier, Indiana 46767**

(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 2-8 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.: F113-10260-00047	Date Issued: May 15, 2002 Expiration Date: May 15, 2007
Issued By: Paul Dubenetzky, Branch Chief, Office of Air Quality	

First Administrative Amendment No.:	113-15891-00047	Date Issued	May 28, 2002
First Minor Permit Revision No.:	113-16069-00047	Date Issued:	December 13, 2002

First Significant Permit Revision No.: 113-18715-00047	Affected Pages: 30, 31, and 32
Issued by: Original Signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Date Issued: August 19, 2004

## SECTION D.2 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (d) One (1) core burning emission unit, identified as P004, consisting of the following:
  - (1) Two (2) core burn units, identified as Core Burn Unit 1 and Core Burn Unit 2, for processing a maximum of 438 pounds of polystyrene sheet per hour on a daily average, and exhausting to two (2) stacks, identified as E5 and E6;
- (e) One (1) woodworking emission unit, identified as P005, utilizing a baghouse, identified as dust collector DC7 for particulate matter control, consisting of the following:
  - (1) One (1) table saw (M1);
  - (2) One (1) Miter saw (M2);
  - (3) One (1) rail machine (M4);
  - (4) One (1) Lockstile machine (M6);
  - (5) One (1) Hingestile machine (M7);
  - (6) One (1) tilting table saw (M9);
  - (7) One (1) planer (M13);
  - (8) One (1) beltsander (M14);
  - (9) One (1) lock block boring machine (M15), controlled by baghouse DC7 when boring wood materials and controlled by a cyclone, identified as CYC1, which vents to atmosphere, when boring polystyrene lock blocks;
  - (10) One (1) stile and rail machine (M16); and
  - (11) One (1) Alterna door sizer (M17).

(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 2-8-4(1)]

#### D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the woodworking facilities (P005) shall not exceed 7.85 pounds per hour when operating at a process weight rate of 5268 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:

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

#### D.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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.2.3 Particulate Matter (PM)

In order to comply with Condition D.2.1, the baghouse for PM control shall be in operation at all times that the woodworking operation (P005) is in operation.

#### D.2.4 Testing Requirements

---

Within 24 months of permit issuance, the Permittee shall perform PM and PM10 emission testing on one of the two (2) units of core burning unit (P004), utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of this valid compliance demonstration, with each subsequent test performed on the unit not tested in the most recent prior performance test conducted.

### **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

#### D.2.5 Visible Emissions Notations

---

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

#### D.2.6 Parametric Monitoring

---

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the woodworking process, at least once weekly when the woodworking process is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 0.0 and 2.5 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

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.

### **Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### D.2.7 Record Keeping Requirements

---

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the woodworking process stack exhaust.

- (b) To document compliance with Condition D.2.6, the Permittee shall maintain the following:
  - (1) Weekly records of the following operational parameters during normal operation when venting to the atmosphere:
    - (A) Differential static pressure across the fabric; and
    - (B) Verification of cleaning cycle operation.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.