



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant
DATE: October 10, 2006
RE: Dutch Mills / 039-18777-00505
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted 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 03/23/06



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

MINOR SOURCE OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Dutch Mills
1901 East Kercher Road
Goshen, Indiana 46526**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No.: MSOP 039-18777-00505	
Issued by: Original signed by Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date:October 10, 2006 Expiration Date:October 10, 2011

TABLE OF CONTENTS

A	SOURCE SUMMARY	4
A.1	General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]	
A.2	Emission Units and Pollution Control Equipment Summary	
B	GENERAL CONDITIONS	8
B.1	Definitions	
B.2	Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.3	Term of Conditions [326 IAC 2-1.1-9.5]	
B.4	Enforceability	
B.5	Severability	
B.6	Property Rights or Exclusive Privilege	
B.7	Duty to Provide Information	
B.8	Certification	
B.9	Annual Notification [326 IAC 2-6.1-5(a)(5)]	
B.10	Preventive Maintenance Plan [326 IAC 1-6-3]	
B.11	Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.12	Termination of Right to Operate [326 IAC 2-6.1-7(a)]	
B.13	Permit Renewal [326 IAC 2-6.1-7]	
B.14	Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]	
B.15	Source Modification Requirement	
B.16	Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2] [IC 13-17-3-2][IC 13-30-3-1]	
B.17	Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]	
B.18	Annual Fee Payment [326 IAC 2-1.1-7]	
B.19	Credible Evidence [326 IAC 1-1-6]	
C	SOURCE OPERATION CONDITIONS.....	13
C.1	Particulate Emission Limitation For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2]	
C.2	Permit Revocation [326 IAC 2-1.1-9]	
C.3	Opacity [326 IAC 5-1]	
C.4	Fugitive Dust Emissions [326 IAC 6-4]	
C.5	Stack Height [326 IAC 1-7]	
C.6	Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]	
C.7	Performance Testing [326 IAC 3-6]	
C.8	Compliance Requirements [326 IAC 2-1.1-11]	
C.9	Compliance Monitoring [326 IAC 2-1.1-11]	
C.10	Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]	
C.11	Instrument Specifications [326 IAC 2-1.1-11]	
C.12	Response to Excursions or Exceedances	
C.13	Actions Related to Noncompliance Demonstrated by a Stack Test	
	Record Keeping and Reporting Requirements	
C.14	Malfunctions Report [326 IAC 1-6-2]	
C.15	General Record Keeping Requirements [326 IAC 2-6.1-2]	
C.16	General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]	
D.1	EMISSIONS UNIT OPERATION CONDITIONS - Paint Booths	19
	Emission Limitations and Standards	
D.1.1	Volatile Organic Compounds (VOC) [326 IAC 8-2-12]	
D.1.2	Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs)	
D.1.3	Particulate [326 IAC 6-3-2(d)]	

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.5 Record Keeping Requirements

D.2 EMISSIONS UNIT OPERATION CONDITIONS - Woodworking operations..... 21

Emission Limitations and Standards

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

D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

Compliance Determination Requirements

D.2.3 Particulate Control

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.2.4 Visible Emissions Notations

D.2.5 Broken or Failed Bag Detection

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.2.6 Record Keeping Requirements

Annual Notification 27
Malfunction Report 28

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 and A.2 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 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

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

Authorized Individual: Plant Manager
Source Address: 1901 East Kercher Road, Goshen, Indiana 46526
Mailing Address: P.O. Box 805, Goshen, Indiana 46527-0805
General Source Phone: (574) 533-03888
SIC Code: 2434, 1751
County Location: Elkhart
Source Location Status: Basic Nonattainment for Ozone under the 8-hr standard
Attainment area for all other criteria pollutants
Source Status: Minor Source Operating Permit
Minor Source, under PSD and Emission Offset;
Minor Source, Section 112 of the Clean Air Act

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

Surface Coating Operations (all existing as of 1990)

- (a) Five (5) spray booths, identified as:
- (1) Spray booth1, consisting of one spray gun, identified as SG1, with a maximum capacity of 70.66 pounds of stain per hour, and exhausting to stack SB1X.
 - (2) Spray booth2, consisting of two spray guns, identified as SG2 and SG3, with a maximum capacity of 141.32 pounds of primer per hour combined, and exhausting to stack SB2X.
 - (3) Spray booth3, consisting of two spray guns, identified as SG4 and SG5, with a maximum capacity of 141.32 pounds of varnish per hour combined and exhausting to stack SB3X.
 - (4) Spray booth4, consisting of one spray gun, identified as SG6, with a maximum capacity of 70.66 pounds of topcoat per hour, and exhausting to stack SB4X.
 - (5) Spray booth5, consisting of one spray gun, identified as SG7, with a maximum capacity of 70.66 pounds of varnish per hour, and exhausting to stack SB5X.
- (b) Ten (10) siphon cup guns, identified as SG8, SG9, SG10, SG11, SG12, SG13, SG14, SG15, SG16, and SG17, with a maximum capacity of 49.74 pounds per hour for each unit, and exhausting to stacks SB1X, SB2X, SB3X, SB4X and SB5X.

Woodworking Operations (all existing as of 1990)

All woodworking operations are controlled by baghouse DC1 with emissions exhausting through stack DCX1.

- (c) One (1) Busellato CNC Mill, identified as CNC1, with a maximum capacity of 169.59 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.
- (d) Seven (7) table saws, identified as:
 - (1) Power-Matic 10" table saw, identified as Tsaw1, with a maximum capacity of 71.68 pounds per hour.
 - (2) Delta 10" table saw, identified as Tsaw2, with a maximum capacity of 19.50 pounds per hour.
 - (3) Delta 10" table saw, identified as Tsaw3, with a maximum capacity of 36.05 pounds per hour.
 - (4) Delta 10" table saw, identified as Tsaw4, with a maximum capacity of 36.23 pounds per hour.
 - (5) Delta table saw, identified as Tsaw5, with a maximum capacity of 7.21 pounds per hour.
 - (6) One (1) Delta DWC table saw, identified as DWCTSaw1, with a maximum capacity of 3.60 pounds per hour.
 - (7) One (1) EMA sliding table saw, identified as SlidTabSw1, with a maximum capacity of 36.05 pounds per hour.
- (e) Two (2) drill presses, identified as:
 - (1) Delta drill press, identified as Dpress1, with a maximum capacity of 1.19 pounds per hour.
 - (2) Delta drill press, identified as Dpress2, with a maximum capacity of 0.12 pounds per hour.
- (f) Seven (7) sanders, identified as:
 - (1) One (1) Costa wide belt sander, identified as WBSand1, with a maximum capacity of 216.29 pounds per hour.
 - (2) One (1) Haney orbital sander, identified as OrbSand1, with a maximum capacity of 216.29 pounds per hour.
 - (3) One (1) Quickwood De-Neb sander, identified as DNebSand1, with a maximum capacity of 216.29 pounds per hour.
 - (4) One (1) Whirlwind oscillator edge sander, identified as OscSand1, with a maximum capacity of 36.05 pounds per hour.
 - (5) One (1) Progress edge sander, identified as EdgSand1, with a maximum capacity of 7.21 pounds per hour.

- (6) One (1) Progress float sander, identified as FloatSand1, with a maximum capacity of 3.60 pounds per hour.
- (g) Seven (7) shapers, identified as:
 - (1) One (1) Power-Matic shaper, identified as Shap1, with a maximum capacity of 36.05 pounds per hour.
 - (2) One (1) Power-Matic shaper, identified as Shap2, with a maximum capacity of 36.05 pounds per hour.
 - (3) One (1) EMA shaper, identified as Shap3, with a maximum capacity of 36.05 pounds per hour.
 - (4) One (1) Power-Matic shaper, identified as Shap4, with a maximum capacity of 36.05 pounds per hour.
 - (5) One (1) Delta shaper, identified as Shap5, with a maximum capacity of 18.02 pounds per hour.
 - (6) One (1) Delta shaper, identified as Shap6, with a maximum capacity of 18.02 pounds per hour.
 - (7) One (1) Mocar shaper, identified as Shap7, with a maximum capacity of 18.02 pounds per hour.
- (h) Two (2) Pin routers, identified as:
 - (1) One (1) EMA pin router, identified as PinR1, with a maximum capacity of 8.44 pounds per hour.
 - (2) One (1) Rockwell/SLM pin router, identified as PinR2, with a maximum capacity of 8.44 pounds per hour.
- (i) One (1) HER-SAF panel router, identified as PanelRout1, with a maximum capacity of 4.83 pounds per hour.
- (j) One (1) panel saw, identified as PanwISw1, with a maximum capacity of 118.66 pounds per hour.
- (k) Three (3) chop saws, identified as ChopSw1, ChopSw2 and ChopSw3, with a maximum capacity of 252.34 pounds per hour for each unit.
- (l) One (1) Dodds Dovetailer, identified as DvTail1, with a maximum capacity of 18.02 pounds per hour.
- (m) One (1) Balestrini single end tenoner, identified as SingTenoner1, with a maximum capacity of 18.02 pounds per hour.
- (n) One (1) Balestrini Mortising machine, identified as Mortising1, with a maximum capacity of 18.02 pounds per hour.
- (o) One (1) Voonwood shaper/sander, identified as ShapSand1, with a maximum capacity of 54.07 pounds per hour.

- (p) One (1) EMA planer, identified as Plane1, with a maximum capacity of 216.29 pounds per hour.
- (q) One (1) EMA shaper with a sliding table, identified as ShapSlid1, with a maximum capacity of 36.05 pounds per hour.
- (r) One (1) Dutch Mills double end tenoner, identified as DoubTenoner, with a maximum capacity of 18.02 pounds per hour.
- (s) One (1) Retter boring machine, identified as BorMach1, with a maximum capacity of 2.46 pounds per hour.
- (t) One (1) OGM Gang-rip saw, identified as GangRipSw1, with a maximum capacity of 360.48 pounds per hour.
- (u) Three (3) miter saws, identified as:
 - (1) One (1) DeWalt 12" miter saw, identified as MiterSw1, with a maximum capacity of 2.42 pounds per hour.
 - (2) One (1) DeWalt 12" miter saw, identified as MiterSw2, with a maximum capacity of 3.60 pounds per hour.
 - (3) One (1) Hitachi miter saw, identified as MiterSw3, with a maximum capacity of 18.02 pounds per hour.
- (v) Two (2) Groovers, identified as Groove1 and Groove2, with a maximum capacity of 7.21 pounds per hour for each unit.
- (w) One (1) Delta Notcher, identified as Notch1, with a maximum capacity of 3.60 pounds per hour.
- (x) One (1) Power-Matic band saw, identified as BandSw1, with a maximum capacity of 1.80 pounds per hour.
- (y) One (1) Weinig moulder, identified as Moulder1, with a maximum capacity of 270.36 pounds per hour.
- (z) Two (2) Powermatic 10" Table Saws, Model 66.
- (aa) One (1) CEHISA Edge Bander, Model 305 PC.
- (bb) One (1) Mayer Panel Saw, Model PS9Z.

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, 039-18777-00505, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue,
Indianapolis, 46204-2251
- (c) The notification 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.

B.10 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to 039-18777-00505 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least ninety (90) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.13 Permit Renewal [326 IAC 2-6.1-7]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
- (1) Submitted at least ninety (90) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.15 Source Modification Requirement

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

B.16 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.17 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.18 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.19 Credible Evidence [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

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

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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

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

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

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

C.5 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

C.7 Performance Testing [326 IAC 3-6]

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

C.9 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.11 Instrument Specifications [326 IAC 2-1.1-11]

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

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records;
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

C.14 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.15 General Record Keeping Requirements[326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNITS OPERATION CONDITIONS

Emissions Unit Description:

Surface Coating Operations (all existing as of 1990)

- (a) Five (5) spray booths, identified as:
- (1) Spray booth1, consisting of one spray gun, identified as SG1, with a maximum capacity of 70.66 pounds of stain per hour, and exhausting to stack SB1X.
 - (2) Spray booth2, consisting of two spray guns, identified as SG2 and SG3, with a maximum capacity of 141.32 pounds of primer per hour combined, and exhausting to stack SB2X.
 - (3) Spray booth3, consisting of two spray guns, identified as SG4 and SG5, with a maximum capacity of 141.32 pounds of varnish per hour combined and exhausting to stack SB3X.
 - (4) Spray booth4, consisting of one spray gun, identified as SG6, with a maximum capacity of 70.66 pounds of topcoat per hour, and exhausting to stack SB4X.
 - (5) Spray booth5, consisting of one spray gun, identified as SG7, with a maximum capacity of 70.66 pounds of varnish per hour, and exhausting to stack SB5X.
- (b) Ten (10) siphon cup guns, identified as SG8, SG9, SG10, SG11, SG12, SG13, SG14, SG15, SG16, and SG17, with a maximum capacity of 49.74 pounds per hour for each unit, and exhausting to stacks, SB1X, SB2X, SB3X, SB4X and SB5X.

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

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

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

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.2 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)

- (a) Any change or modification which may increase the potential to emit to 100 tons per year or more of volatile organic compounds must be approved of Office of Air Quality, IDEM before any such change may occur.
- (b) Any change or modification which may increase the potential to emit of any single HAP to 10 tons per year or more and of any combination of HAPs to 25 tons per year or more, must be approved of Office of Air Quality, IDEM before any such change may occur.

D.1.3 Particulate [326 IAC 6-3-2(d)]

- (a) Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.5 Record Keeping Requirements

- (a) To document compliance with Condition D.1.3, the Permittee shall maintain a log of inspections and any actions taken as required by Condition D.1.3.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Woodworking Operations (all existing as of 1990)

All woodworking operations are controlled by baghouse DC1 with emissions exhausting through stack DCX1.

- (c) One (1) Busellato CNC Mill, identified as CNC1, with a maximum capacity of 169.59 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.
- (d) Seven (7) table saws, identified as:
 - (1) Power-Matic 10" table saw, identified as Tsaw1, with a maximum capacity of 71.68 pounds per hour.
 - (2) Delta 10" table saw, identified as Tsaw2, with a maximum capacity of 19.50 pounds per hour.
 - (3) Delta 10" table saw, identified as Tsaw3, with a maximum capacity of 36.05 pounds per hour.
 - (4) Delta 10" table saw, identified as Tsaw4, with a maximum capacity of 36.23 pounds per hour.
 - (5) Delta table saw, identified as Tsaw5, with a maximum capacity of 7.21 pounds per hour.
 - (6) One (1) Delta DWC table saw, identified as DWCTSaw1, with a maximum capacity of 3.60 pounds per hour.
 - (7) One (1) EMA sliding table saw, identified as SlidTabSw1, with a maximum capacity of 36.05 pounds per hour.
- (e) Two (2) drill presses, identified as:
 - (1) Delta drill press, identified as Dpress1, with a maximum capacity of 1.19 pounds per hour.
 - (2) Delta drill press, identified as Dpress2, with a maximum capacity of 0.12 pounds per hour.

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

Emissions Unit Description:

- (f) Seven (7) sanders, identified as:
- (1) One (1) Costa wide belt sander, identified as WBSand1, with a maximum capacity of 216.29 pounds per hour.
 - (2) One (1) Haney orbital sander, identified as OrbSand1, with a maximum capacity of 216.29 pounds per hour.
 - (3) One (1) Quickwood De-Neb sander, identified as DNebSand1, with a maximum capacity of 216.29 pounds per hour.
 - (4) One (1) Whirlwind oscillator edge sander, identified as OscSand1, with a maximum capacity of 36.05 pounds per hour.
 - (5) One (1) Progress edge sander, identified as EdgSand1, with a maximum capacity of 7.21 pounds per hour.
 - (6) One (1) Progress float sander, identified as FloatSand1, with a maximum capacity of 3.60 pounds per hour.
- (g) Seven (7) shapers, identified as:
- (1) One (1) Power-Matic shaper, identified as Shap1, with a maximum capacity of 36.05 pounds per hour.
 - (2) One (1) Power-Matic shaper, identified as Shap2, with a maximum capacity of 36.05 pounds per hour.
 - (3) One (1) EMA shaper, identified as Shap3, with a maximum capacity of 36.05 pounds per hour.
 - (4) One (1) Power-Matic shaper, identified as Shap4, with a maximum capacity of 36.05 pounds per hour.
 - (5) One (1) Delta shaper, identified as Shap5, with a maximum capacity of 18.02 pounds per hour.

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

Emissions Unit Description:

- (6) One (1) Delta shaper, identified as Shap6, with a maximum capacity of 18.02 pounds per hour.
- (7) One (1) Mocar shaper, identified as Shap7, with a maximum capacity of 18.02 pounds per hour.
- (h) Two (2) Pin routers, identified as:
 - (1) One (1) EMA pin router, identified as PinR1, with a maximum capacity of 8.44 pounds per hour.
 - (2) One (1) Rockwell/SLM pin router, identified as PinR2, with a maximum capacity of 8.44 pounds per hour.
- (i) One (1) HER-SAF panel router, identified as PanelRout1, with a maximum capacity of 4.83 pounds per hour.
- (j) One (1) panel saw, identified as PanwISw1, with a maximum capacity of 118.66 pounds per hour.
- (k) Three (3) chop saws, identified as ChopSw1, ChopSw2 and ChopSw3, with a maximum capacity of 252.34 pounds per hour for each unit.
- (l) One (1) Dodds Dovetailer, identified as DvTail1, with a maximum capacity of 18.02 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.
- (m) One (1) Balestrini single end tenoner, identified as SingTenoner1, with a maximum capacity of 18.02 pounds per hour.
- (n) One (1) Balestrini Mortising machine, identified as Mortising1, with a maximum capacity of 18.02 pounds per hour.
- (o) One (1) Voonwood shaper/sander, identified as ShapSand1, with a maximum capacity of 54.07 pounds per hour.
- (p) One (1) EMA planer, identified as Plane1, with a maximum capacity of 216.29 pounds per hour.
- (q) One (1) EMA shaper with a sliding table, identified as ShapSlid1, with a maximum capacity of 36.05 pounds per hour.
- (r) One (1) Dutch Mills double end tenoner, identified as DoubTenoner, with a maximum capacity of 18.02 pounds per hour.
- (s) One (1) Retter boring machine, identified as BorMach1, with a maximum capacity of 2.46 pounds per hour.
- (t) One (1) OGM Gang-rip saw, identified as GangRipSw1, with a maximum capacity of 360.48 pounds per hour.

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

Emissions Unit Description:

- (u) Three (3) miter saws, identified as:
 - (1) One (1) DeWalt 12" miter saw, identified as MiterSw1, with a maximum capacity of 2.42 pounds per hour.
 - (2) One (1) DeWalt 12" miter saw, identified as MiterSw2, with a maximum capacity of 3.60 pounds per hour.
 - (3) One (1) Hitachi miter saw, identified as MiterSw3, with a maximum capacity of 18.02 pounds per hour.
- (v) Two (2) Groovers, identified as Groove1 and Groove2, with a maximum capacity of 7.21 pounds per hour for each unit.
- (w) One (1) Delta Notcher, identified as Notch1, with a maximum capacity of 3.60 pounds per hour.
- (x) One (1) Power-Matic band saw, identified as BandSw1, with a maximum capacity of 1.80 pounds per hour.
- (y) One (1) Weinig moulder, identified as Moulder1, with a maximum capacity of 270.36 pounds per hour.
- (z) Two (2) Powermatic 10" Table Saws, Model 66.
- (aa) One (1) CEHISA Edge Bander, Model 305 PC.
- (bb) One (1) Mayer Panel Saw, Model PS9Z.

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking facilities shall not exceed 5.04 pounds per hour when operating at a process weight rate of 2720 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

D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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 Control

- (a) Pursuant to MSOP 039-10529-00505, issued on June 1, 1999, and in order to comply with Condition D.2.1 the baghouse DC1 for particulate control shall be in operation and control emissions from the woodworking facilities at all times that the woodworking facilities are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (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.

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

D.2.4 Visible Emissions Notations

- (a) Daily visible emission notations of the baghouse DC1 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) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.2.5 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For a single compartment baghouse controlling emissions from a process operated continuously a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced.
- (b) For a single compartment baghouse controlling emissions from a batch process the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line.

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, or dust traces.

Record Keeping and Reporting Requirement [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.2.6 Record Keeping Requirements

- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the baghouse stack exhaust.

- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Dutch Mills
Address:	1901 East Kercher Road, Goshen, Indiana 46526
City:	Goshen, Indiana
Phone #:	(574) 533-0388
MSOP #:	039-18777-00505

I hereby certify that Dutch Mills is still in operation.
 no longer in operation.

I hereby certify that Dutch Mills is in compliance with the requirements of MSOP **039-18777-00505**.
 not in compliance with the requirements of MSOP **039-18777-00505**.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

**Indiana Department of Environmental Management
Office of Air Quality**

**Addendum to the
Technical Support Document for
Minor Source Operating Permit Renewal**

Source Name: Dutch Mills
Source Location: 1901 East Kercher Road, Goshen, Indiana 46526
County: Elkhart
Operation Permit No.: 039-18777-00505
SIC Code: 2434, 1751
Permit Reviewer: Linda Quigley/EVP

On October 4, 2005, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Dutch Mills had applied for a Minor Source Operating Permit (MSOP) Renewal to operate a wood kitchen cabinet and counter top manufacturing operation. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review IDEM, OAQ has made the following changes to the MSOP (additions in bold, deletions in ~~strikeout~~):

- (1) Condition B.1, Permit No Defense, has been removed. A decision has been made to move the statements of this condition to the cover page. The following paragraph has been added to the cover page of the permit as follows:

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

- (2) Condition B.3, Permit Term and Renewal, has been replaced by B.2 Permit Term, B.12 Termination of Right to Operate, and B.13 Permit Renewal.
- (3) The following conditions have been added to the permit: B.4, Enforceability, B.5, Severability, B.6, Property Rights or Exclusive Privilege, B.7, Duty to Provide Information, B.8, Certification, and B.15, Source Modification Requirement
- (4) Condition B.6, now re-numbered B.9, Annual Notification was revised to reflect the requirements of 326 IAC 2-6.1-5(a)(5).
- (5) Upon further review, IDEM has decided to remove (d) concerning nonroad engines from B.8 Permit Revision, now re-numbered B.14 and titled Permit Amendment or Revision. 40 CFR 89, Appendix A specifically indicates that states are not precluded from regulating the use and operation of nonroad engines, such as regulations on hours of usage, daily mass emission limits, or sulfur limits on fuel; nor are permits regulating such operations precluded, once the engine is no longer new.

- (6) Condition B.10, Transfer of Ownership or Operation, now re-numbered B.17 and titled Transfer of Ownership or Operational Control, has been revised.
- (7) Upon further review, IDEM has decided to include updates to further address and clarify the permit term and the term of the conditions. This includes the addition of the conditions: B.3, Term of Conditions [326 IAC 2-1.1-9.5] and B.11, Prior Permits Superseded [326 IAC 2-1.1-9.5]. Condition B.3, Effective Date of the Permit, and condition B.5, Modification to Permit, have been removed.
- (8) IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. Therefore, IDEM has deleted paragraph (b) of Section B – Preventive Maintenance and included the word “prepare” under (a) “...Permittee shall **prepare**, maintain, and implement Preventive Maintenance Plans...”
- (9) IDEM realizes that the specifications of Condition C.11 can only be practically applied to analog units, and has therefore clarified the condition to state that the condition only applies to analog units. Upon further review, IDEM has also determined that the accuracy of the instruments is not nearly as important as whether the instrument has a range that is appropriate for the normal expected reading of the parameter. Therefore, the accuracy requirements have been removed from the condition.
- (10) IDEM has reconsidered the requirement to develop and follow a Compliance Response Plan. The Permittee will still be required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. Replacing the requirement to develop and follow a Compliance Response Plan with a requirement to take reasonable response steps will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated.

The following sections B and C of the MSOP shown in ~~strikeout~~ have been removed and replaced with the sections shown in **bold** as follows:

SECTION B GENERAL CONDITIONS

~~THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.~~

~~B.1 Permit No Defense [IC 13]~~

~~This permit to operate 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.~~

~~B.2 Definitions~~

~~Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.~~

~~B.3 Effective Date of the Permit [IC13-15-5-3]~~

~~Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.~~

~~B.4 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]~~

~~This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions of this permit do not affect the expiration date.~~

~~The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.~~

~~B.5 Modification to Permit [326 IAC 2]~~

~~All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).~~

~~B.6 Annual Notification [326 IAC 2-6.1-5(a)(5)]~~

- ~~(a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.~~
- ~~(b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.~~
- ~~(c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:~~

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

- ~~(d) The notification 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.~~

~~B.7 Preventive Maintenance Plan [326 IAC 1-6-3]~~

- ~~(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:~~
- ~~(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;~~
 - ~~(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and~~
 - ~~(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.~~
- ~~(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.~~

- (c) ~~A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~
- (d) ~~To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.~~

~~B.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]~~

- (a) ~~Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.~~
- (b) ~~Any application requesting an amendment or modification of this permit shall be submitted to:~~

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

~~Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1.~~

- (c) ~~The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]~~
- (d) ~~No permit amendment or modification is required for the addition, operation or removal of a non-road engine, as defined in 40 CFR 89.2.~~

~~B.9 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2]
[IC 13-17-3-2][IC 13-30-3-1]~~

~~Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:~~

- (a) ~~Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;~~
- (b) ~~As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;~~
- (c) ~~As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;~~
- (d) ~~As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and~~

- (e) ~~As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.~~

~~B.10 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]~~

~~Pursuant to [326 IAC 2-6.1-6(d)(3)]:~~

- (a) ~~In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.~~
- (b) ~~The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).~~
- (c) ~~IDEM, OAQ, shall issue a revised permit.~~

~~The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.~~

~~B.11 Annual Fee Payment [326 IAC 2-1.1-7]~~

- (a) ~~The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.~~
- (b) ~~The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.~~

~~B.12 Credible Evidence [326 IAC 1-1-6]~~

~~For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.~~

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

~~Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.~~

~~C.2 Permit Revocation [326 IAC 2-1.1-9]~~

~~Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:~~

- (a) ~~Violation of any conditions of this permit.~~
- (b) ~~Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.~~

- (c) ~~Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.~~
- (d) ~~Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.~~
- (e) ~~For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.~~

C.3 ~~Opacity [326 IAC 5-1]~~

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

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

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

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

C.5 ~~Stack Height [326 IAC 1-7]~~

~~The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using good engineering practices (GEP) pursuant to 326 IAC 1-7-3.~~

C.6 ~~Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]~~

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

~~(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).~~

~~(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).~~

~~All required notifications shall be submitted to:~~

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

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

~~(e) Procedures for Asbestos Emission Control~~

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

~~(f) Demolition and renovation~~

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

~~(g) Indiana Accredited Asbestos Inspector~~

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

Testing Requirements

~~C.7 Performance Testing [326 IAC 3-6]~~

~~(a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.~~

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

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

~~no later than thirty-five (35) days prior to the intended test date.~~

- (b) ~~The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14 days) prior to the actual date.~~
- (c) ~~Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ (and local agency) not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, (and local agency), if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.~~

Compliance Requirements [326 IAC 2-1.1-11]

C.8 ~~Compliance Requirements [326 IAC 2-1.1-11]~~

~~The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.~~

Compliance Monitoring Requirements

C.9 ~~Compliance Monitoring [326 IAC 2-1.1-11]~~

~~Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.~~

C.10 ~~Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]~~

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

C.11 ~~Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11]~~

- (a) ~~Whenever a condition in this permit requires the measurement of total static pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (2%) of full scale reading.~~
- (b) ~~The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.~~

C.12 ~~Compliance Response Plan - Preparation and Implementation~~

- (a) ~~The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:~~
- (1) ~~Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.~~

- (2) ~~If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan, the Permittee shall amend its Compliance Response Plan to include such response steps taken.~~
- (b) ~~For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:~~

 - (1) ~~Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or~~
 - (2) ~~If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.~~
 - (3) ~~If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.~~
 - (4) ~~Failure to take reasonable response steps shall be considered a deviation from the permit.~~
- (c) ~~The Permittee is not required to take any further response steps for any of the following reasons:~~

 - (1) ~~A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.~~
 - (2) ~~The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.~~
 - (3) ~~An automatic measurement was taken when the process was not operating.~~
 - (4) ~~The process has already returned or is returning to operating within "normal" parameters and no response steps are required.~~
- (d) ~~Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.~~

~~C.13 — Actions Related to Noncompliance Demonstrated by a Stack Test~~

- ~~(a) — When the results of a stack test performed in conformance with Section C — Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected emissions unit while the response actions are being implemented.~~
- ~~(b) — A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that re-testing in one hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the re-testing deadline.~~
- ~~(c) — IDEM, OAQ reserves the authority to take any actions allowed under law in response to non-compliant stack tests.~~

~~The response action documents submitted pursuant to this condition do not require the certification by an “authorized individual” as defined by 326 IAC 2-1.1-1.~~

~~C.14 — Malfunctions Report [326 IAC 1-6-2]~~

~~Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):~~

- ~~(a) — A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.~~
- ~~(b) — When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.~~
- ~~(c) — Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).~~
- ~~(d) — Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]~~

~~C.15 — General Record Keeping Requirements [326 IAC 2-6.1-5]~~

- ~~(a) — Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.~~
- ~~(b) — Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.~~

~~C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]~~

~~(a) Reports required by conditions in Section D of this permit shall be submitted to:~~

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

~~(b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.~~

~~(c) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report(s) does (do) not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

~~(d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.~~

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, 039-18777-00505, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue,
Indianapolis, 46204-2251

- (c) The notification 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.

B.10 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to 039-18777-00505 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least ninety (90) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.13 Permit Renewal [326 IAC 2-6.1-7]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

**Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251**

- (b) A timely renewal application is one that is:
- (1) Submitted at least ninety (90) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251**
- Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.15 Source Modification Requirement

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

B.16 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.17 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.18 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.19 Credible Evidence [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

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

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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

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

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

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

C.5 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

C.7 Performance Testing [326 IAC 3-6]

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

C.9 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.11 Instrument Specifications [326 IAC 2-1.1-11]

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

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.**
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:**
 - (1) initial inspection and evaluation;**
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or**
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.**
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:**
 - (1) monitoring results;**
 - (2) review of operation and maintenance procedures and records;**
 - (3) inspection of the control device, associated capture system, and the process.**
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.**
- (e) The Permittee shall maintain the following records:**
 - (1) monitoring data;**
 - (2) monitor performance data, if applicable; and**
 - (3) corrective actions taken.**

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

C.14 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.15 General Record Keeping Requirements[326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) **Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.**

C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) **Reports required by conditions in Section D of this permit shall be submitted to:**
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251**
- (b) **Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.**
- (c) **Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).**
- (d) **Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.**
- (11) Condition D.2.4 has been revised to reflect the replacement of the requirement to develop and follow a Compliance Response Plan with a requirement to take reasonable response steps that will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated.
- (12) Upon further review, IDEM has determined that it is the Permittee's responsibility to include routine control device inspection requirements in the applicable preventive maintenance plan. Since the Permittee is in the best position to determine the appropriate frequency of control device inspections and the details regarding which components of the control device should be inspected, the conditions requiring control device inspections have been removed from the permit. In addition, the requirement to keep records of the inspections has been removed.
- (13) Paragraph (a) of the Broken or Failed Baghouse condition has been deleted. For multi-compartment baghouses, the permit will not specify what actions the Permittee needs to take in response to a broken bag. However, a requirement has been added to Condition D.2.3 requiring the Permittee to notify IDEM if a broken bag is detected and the control device will not be repaired for more than ten (10) days. This notification allows IDEM to take any appropriate actions if the emission unit will continue to operate for a long period of time while the control device is not operating in optimum condition.

The following D Section Conditions have been revised as described above:

Compliance Determination Requirements

D.2.3 Particulate Control

- (a) Pursuant to MSOP 039-10529-00505, issued on June 1, 1999, and in order to comply with Condition D.2.1 the baghouse DC1 for particulate control shall be in operation and control emissions from the woodworking facilities at all times that the woodworking facilities are in operation.

- (b) **In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (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.**

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

D.2.4 Visible Emissions Notations

- (a) Daily visible emission notations of the baghouse DC1 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~~ **If abnormal emissions is are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances.** Failure to take response steps in accordance with ~~Section C - Compliance Response Plan—Preparation, Implementation, Records and Reports~~ **Response to Excursions or Exceedances** shall be considered a deviation from this permit.

D.2.5 Baghouse Inspections

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

D.2.65 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 and Implementation 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)(a) For a single compartment baghouses **controlling emissions from a process operated continuously**, 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 a failed units and the associated process **shall** be shut down immediately until the failed units **have has** been repaired or replaced.~~
- ~~(b) For a single compartment baghouses **controlling emissions from a batch process**, 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 **the feed to the process** failed units and the associated process **will shall** be shut down immediately until the failed units **have has** been repaired or replaced. **The emissions unit shall be shut down no later than the completion of the processing of the material in the line.**~~

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, or dust traces.

Record Keeping and Reporting Requirement [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.2.76 Record Keeping Requirements

- ~~(a) To document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the baghouse stack exhaust.~~
- ~~(b) To document compliance with Condition D.2.5, the Permittee shall maintain records of the results of the inspections required under Condition D.2.5 and the dates the vents are redirected.~~
- ~~(c) To document compliance with Condition D.2.2, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.~~

~~(d)~~**(b)** All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**Indiana Department of Environmental Management
Office of Air Quality**

**Technical Support Document (TSD) for
a Minor Source Operating Permit (MSOP) Renewal**

Source Background and Description

Source Name:	Dutch Mills
Source Location:	1901 East Kercher Road, Goshen, Indiana 46526
County:	Elkhart
SIC Code:	2434, 1751
Operation Permit No.:	039-10529-00505
Operation Permit Issuance Date:	June 1, 1999
Permit Renewal No.:	039-18777-00505
Permit Reviewer:	Linda Quigley/EVP

The Office of Air Quality (OAQ) has reviewed an application from Dutch Mills relating to the operation of a wood kitchen cabinet and counter top manufacturing operation.

Permitted Emission Units and Pollution Control Equipment

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

Surface Coating Operations (all existing as of 1990)

- (a) Five (5) spray booths, identified as:
- (1) Spray booth1, consisting of one spray gun, identified as SG1, with a maximum capacity of 70.66 pounds of stain per hour, and exhausting to stack SB1X.
 - (2) Spray booth2, consisting of two spray guns, identified as SG2 and SG3, with a maximum capacity of 141.32 pounds of primer per hour combined, and exhausting to stack SB2X.
 - (3) Spray booth3, consisting of two spray guns, identified as SG4 and SG5, with a maximum capacity of 141.32 pounds of varnish per hour combined and exhausting to stack SB3X.
 - (4) Spray booth4, consisting of one spray gun, identified as SG6, with a maximum capacity of 70.66 pounds of topcoat per hour, and exhausting to stack SB4X.
 - (5) Spray booth5, consisting of one spray gun, identified as SG7, with a maximum capacity of 70.66 pounds of varnish per hour, and exhausting to stack SB5X.
- (b) Ten (10) siphon cup guns, identified as SG8, SG9, SG10, SG11, SG12, SG13, SG14, SG15, SG16, and SG17, with a maximum capacity of 49.74 pounds per hour for each unit, and exhausting to stacks SB1X, SB2X, SB3X, SB4X and SB5X.

Woodworking Operations (all existing as of 1990)

All woodworking operations are controlled by baghouse DC1 with emissions exhausting through stack DCX1

- (c) One (1) Busellato CNC Mill, identified as CNC1, with a maximum capacity of 169.59 pounds per hour.
- (d) Seven (7) table saws, identified as:
 - (1) Power-Matic 10" table saw, identified as Tsaw1, with a maximum capacity of 71.68 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1.
 - (2) Delta 10" table saw, identified as Tsaw2, with a maximum capacity of 19.50 pounds per hour.
 - (3) Delta 10" table saw, identified as Tsaw3, with a maximum capacity of 36.05 pounds per hour.
 - (4) Delta 10" table saw, identified as Tsaw4, with a maximum capacity of 36.23 pounds per hour.
 - (5) Delta table saw, identified as Tsaw5, with a maximum capacity of 7.21 pounds per hour.
 - (6) One (1) Delta DWC table saw, identified as DWCTSaw1, with a maximum capacity of 3.60 pounds per hour.
 - (7) One (1) EMA sliding table saw, identified as SlidTabSw1, with a maximum capacity of 36.05 pounds per hour.
- (e) Two (2) drill presses, identified as:
 - (1) Delta drill press, identified as Dpress1, with a maximum capacity of 1.19 pounds per hour.
 - (2) Delta drill press, identified as Dpress2, with a maximum capacity of 0.12 pounds per hour.
- (f) Seven (7) sanders, identified as:
 - (1) One (1) Costa wide belt sander, identified as WBSand1, with a maximum capacity of 216.29 pounds per hour.
 - (2) One (1) Haney orbital sander, identified as OrbSand1, with a maximum capacity of 216.29 pounds per hour.
 - (3) One (1) Quickwood De-Neb sander, identified as DNebSand1, with a maximum capacity of 216.29 pounds per hour.
 - (4) One (1) Whirlwind oscillator edge sander, identified as OscSand1, with a maximum capacity of 36.05 pounds per hour.
 - (5) One (1) Progress edge sander, identified as EdgSand1, with a maximum capacity of 7.21 pounds per hour.
 - (6) One (1) Progress float sander, identified as FloatSand1, with a maximum capacity of 3.60 pounds per hour.

- (g) Seven (7) shapers, identified as:
 - (1) One (1) Power-Matic shaper, identified as Shap1, with a maximum capacity of 36.05 pounds per hour.
 - (2) One (1) Power-Matic shaper, identified as Shap2, with a maximum capacity of 36.05 pounds per hour.
 - (3) One (1) EMA shaper, identified as Shap3, with a maximum capacity of 36.05 pounds per hour.
 - (4) One (1) Power-Matic shaper, identified as Shap4, with a maximum capacity of 36.05 pounds per hour.
 - (5) One (1) Delta shaper, identified as Shap5, with a maximum capacity of 18.02 pounds per hour.
 - (6) One (1) Delta shaper, identified as Shap6, with a maximum capacity of 18.02 pounds per hour.
 - (7) One (1) Mocar shaper, identified as Shap7, with a maximum capacity of 18.02 pounds per hour.
- (h) Two (2) Pin routers, identified as:
 - (1) One (1) EMA pin router, identified as PinR1, with a maximum capacity of 8.44 pounds per hour.
 - (2) One (1) Rockwell/SLM pin router, identified as PinR2, with a maximum capacity of 8.44 pounds per hour.
- (i) One (1) HER-SAF panel router, identified as PanelRout1, with a maximum capacity of 4.83 pounds per hour.
- (j) One (1) panel saw, identified as PanwISw1, with a maximum capacity of 118.66 pounds per hour.
- (k) Three (3) chop saws, identified as ChopSw1, ChopSw2 and ChopSw3, with a maximum capacity of 252.34 pounds per hour for each unit.
- (l) One (1) Dodds Dovetailer, identified as DvTail1, with a maximum capacity of 18.02 pounds per hour.
- (m) One (1) Balestrini single end tenoner, identified as SingTenoner1, with a maximum capacity of 18.02 pounds per hour.
- (n) One (1) Balestrini Mortising machine, identified as Mortising1, with a maximum capacity of 18.02 pounds per hour.
- (o) One (1) Voonwood shaper/sander, identified as ShapSand1, with a maximum capacity of 54.07 pounds per hour.
- (p) One (1) EMA planer, identified as Plane1, with a maximum capacity of 216.29 pounds per hour.
- (q) One (1) EMA shaper with a sliding table, identified as ShapSlid1, with a maximum capacity of 36.05 pounds per hour.

- (r) One (1) Dutch Mills double end tenoner, identified as DoubTenoner, with a maximum capacity of 18.02 pounds per hour.
- (s) One (1) Retter boring machine, identified as BorMach1, with a maximum capacity of 2.46 pounds per hour.
- (t) One (1) OGM Gang-rip saw, identified as GangRipSw1, with a maximum capacity of 360.48 pounds per hour.
- (u) Three (3) miter saws, identified as:
 - (1) One (1) DeWalt 12" miter saw, identified as MiterSw1, with a maximum capacity of 2.42 pounds per hour.
 - (2) One (1) DeWalt 12" miter saw, identified as MiterSw2, with a maximum capacity of 3.60 pounds per hour.
 - (3) One (1) Hitachi miter saw, identified as MiterSw3, with a maximum capacity of 18.02 pounds per hour.
- (v) Two (2) Groovers, identified as Groove1 and Groove2, with a maximum capacity of 7.21 pounds per hour for each unit.
- (w) One (1) Delta Notcher, identified as Notch1, with a maximum capacity of 3.60 pounds per hour.
- (x) One (1) Power-Matic band saw, identified as BandSw1, with a maximum capacity of 1.80 pounds per hour.

Existing Emission unit that has been replaced with the following:

- (y) One (1) Watkin moulder, identified as Moulder1, with a maximum capacity of 270.36 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1 has been replaced with a Weinig moulder with the same capacities and exhausting to the same baghouse and stack.

Exempt facilities added to the source

- (z) Two (2) Powermatic 10" Table Saws, Model 66
- (aa) One (1) CEHISA Edge Bander, Model 305 PC
- (bb) One (1) Mayer Panel Saw, Model PS9Z

Facilities removed from the source

- (a) One (1) Jet disc sander, identified as DiscSand1, with a maximum capacity of 1.80 pounds per hour, using baghouse DC1 to control particulate matter emissions and exhausting to stack DCX1

Unpermitted Emission Units and Pollution Control Equipment

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

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) SSOA 039-9970-00505, issued on August 17, 1998; and
- (b) MSOP 039-10529-00505, issued on June 1, 1999.

All conditions from previous approvals were incorporated into this permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the operation 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.

A complete application for the purposes of this review was received on March 03, 2004.

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 4 of Appendix A).

Potential to Emit of the Source Before Controls

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

Pollutant	Potential to Emit (tons/yr)
PM	83.98
PM ₁₀	83.98
SO ₂	0
VOC	33.90
CO	0
NO _x	0

HAPs	Potential to Emit (tons/yr)
Ethyl Benzene	0.87
Formaldehyde	0.13
Methanol	0.02
MIBK	0.07
Propylene Glycol	0.0001
Propylene Glycol Monomethyl Ether	0.03
Toluene	0.80
Xylene (single Worst Case)	5.17
Total	7.09

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC, PM and PM₁₀ are greater than 25 tons per year and less than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM _{2.5}	Attainment
PM ₁₀	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-hour Ozone	Maintenance
8-hour Ozone	Basic, Nonattainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) Elkhart County has been classified as unclassifiable or attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as surrogate for PM_{2.5} emissions. See the State Rule Applicability for the source section.
- (c) Elkhart County has been classified as attainment or unclassifiable for PM₁₀, SO₂, NO₂, CO and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section

Source Status

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

Pollutant	Emissions (tons/yr)
PM	5.63
PM ₁₀	5.63
SO ₂	0.00
VOC	33.90
CO	0.00
NO _x	0.00
Single HAP	5.17
Combination HAPs	7.09

- (a) This existing source is not a major stationary source under 326 IAC 2-2 (PSD) because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.
- (b) This existing source is not a major stationary source under 326 IAC 2-3 (Emission Offset) because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or greater and it is not in one of the 28 listed source categories.

Actual Emissions

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

Pollutant	Actual Emissions (tons/year)
PM	No data
PM-10	0.02
SO ₂	No data
VOC	5.66
CO	No data
NO _x	No data
Single HAP	No data
Combination HAPs	No data

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit 039-18777-00505, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons per year.

This status is based on all the air approvals issued to the source. This status has been verified by the OAQ inspector assigned to the source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) incorporated into this permit.

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 20 and 40 CFR Parts 61, 63) applicable to this source. The surface coating operations are not subject to the requirements of 40 CFR 63, Subpart JJ (National Emission Standards for Wood Furniture Manufacturing Operations) because the source is not considered a "major" source pursuant to 40 CFR 63, Subpart A.

State Rule Applicability – Entire Source

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1, this source is not subject to this rule because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake or Porter counties, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

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

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

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The surface coating operations emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

State Rule Applicability – Individual Facilities

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

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating operations shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

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

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

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

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

The source is in compliance because "Air Assisted Airless Spray Application" one of the permitted application methods listed above is used.

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

Pursuant to 326 IAC 6-3-2(e), the particulate from the woodworking operations all controlled by baghouse DC1 shall be limited by the following:

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

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

$$E = 4.10 (1.36)^{0.67} = 5.04 \text{ pounds per hour.}$$

The baghouse DC1 shall be in operation at all times the woodworking operations are in operation, in order to comply with this limit.

Compliance Requirements

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

1. The woodworking facilities have applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emission notations of the baghouse DC1 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 Response Plan – Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.
- (f) An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.
- (g) In the event that bag failure has been observed:
 - (I) 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 and Implementation 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.
 - (II) 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.

These monitoring conditions are necessary because the baghouse for the woodworking facilities must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).

Conclusion

The operation of this wood kitchen cabinet and counter top manufacturing operation shall be subject to the conditions of the **Minor Source Operating Permit 039-18777-00505**.

Appendix A: Emission Calculations

Company Name: Dutch Mills
 Address City IN Zip: 1901 East Kercher Road, Goshen, Indiana 46526
 Permit Number: 039-18777-00505
 Plt ID: 039-00505
 Reviewer: Linda Quigley/EVP
 Date: 09/29/2004

Uncontrolled Potential Emissions (tons/year)			
Emissions Generating Activity			
Pollutant	Surface Coating Operations	Woodworking Operations	TOTAL
PM	4.84	79.14	83.98
PM ₁₀	4.84	79.14	83.98
SO ₂	0.00	0.00	0.00
NO _x	0.00	0.00	0.00
VOC	33.90	0.00	33.90
CO	0.00	0.00	0.00
total HAPs	7.09	0.00	7.09
worst case single HAP	5.17	0.00	5.17
Total emissions based on rated capacity at 8,760 hours/year.			
Controlled Potential Emissions (tons/year)			
Emissions Generating Activity			
Pollutant	Surface Coating Operations	Woodworking Operations	TOTAL
PM	4.84	0.79	5.63
PM ₁₀	4.84	0.79	5.63
SO ₂	0.00	0.00	0.00
NO _x	0.00	0.00	0.00
VOC	33.90	0.00	33.90
CO	0.00	0.00	0.00
total HAPs	7.09	0.00	7.09
worst case single HAP	5.17	0.00	5.17
Total emissions based on rated capacity at 8,760 hours/year, after control.			

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

Company Name: Dutch Mills
Address City IN Zip: 1901 East Kercher Road, Goshen, Indiana 46526
Permit Number: 039-18777-00505
Plt ID: 039-00505
Reviewer: Linda Quigley/EVP
Date: 09/29/2004

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Weight % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
Auburn L-4740	6.8	86.54%	0.0%	86.5%	0.0%	13.46%	1.00	0.00375	5.89	5.89	0.02	0.53	0.10	0.01	65%
Auburn Dye DYE-1131	6.8	99.00%	0.0%	99.0%	0.0%	1.00%	1.00	0.00900	6.75	6.75	0.06	1.46	0.27	0.00	65%
Autumn L-3700	6.5	93.82%	0.0%	93.8%	0.0%	6.18%	1.00	0.00050	6.07	6.07	0.00	0.07	0.01	0.00	65%
Barley Barley	6.8	99.23%	0.0%	99.2%	0.0%	0.77%	1.00	0.00100	6.71	6.71	0.01	0.16	0.03	0.00	65%
Bicuit Stain L-3480	6.1	95.96%	0.0%	96.0%	0.0%	4.04%	1.00	0.00550	5.89	5.89	0.03	0.78	0.14	0.00	65%
Black Cherry L-3583	6.9	71.50%	0.0%	71.5%	0.0%	28.50%	1.00	0.00100	4.93	4.93	0.00	0.12	0.02	0.00	65%
Black Glaze 14-6116	8.6	61.00%	0.0%	61.0%	0.0%	39.00%	1.00	0.00171	5.27	5.27	0.01	0.22	0.04	0.01	65%
Buckskin Buckskin	5.2	67.93%	0.0%	67.9%	0.0%	32.07%	1.00	0.00075	3.52	3.52	0.00	0.06	0.01	0.00	65%
Butyl Acetate Butylace	7.3	100.00%	0.0%	100.0%	0.0%	0.00%	1.00	0.16250	7.30	7.30	1.19	28.49	5.20	0.00	65%
Carmel AL-2862	7.9	81.57%	0.0%	81.6%	0.0%	18.43%	1.00	0.00250	6.43	6.43	0.02	0.39	0.07	0.01	65%
Catalyst 399-5003	7.9	82.00%	0.0%	82.0%	0.0%	18.00%	1.00	0.01475	6.47	6.47	0.10	2.29	0.42	0.03	65%
Cherry Blossom L-3742	6.5	93.15%	0.0%	93.1%	0.0%	6.86%	1.00	0.00400	6.03	6.03	0.02	0.58	0.11	0.00	65%
Cherry Mist Cherry Mist	5.7	76.98%	0.0%	77.0%	0.0%	23.02%	1.00	0.00425	4.35	4.35	0.02	0.44	0.08	0.01	65%
Coffee Coffee	5.5	73.87%	0.0%	73.9%	0.0%	26.13%	1.00	0.00075	4.08	4.08	0.00	0.07	0.01	0.00	65%
Cranberry Cranberry	6.8	97.99%	0.0%	98.0%	0.0%	2.01%	1.00	0.00175	6.64	6.64	0.01	0.28	0.05	0.00	65%
Dk. Cherry STWS Stain 14-8494	7.8	75.00%	0.0%	75.0%	0.0%	25.00%	1.00	0.00075	5.85	5.85	0.00	0.11	0.02	0.00	65%
Desert LT-1032	7.6	68.65%	0.0%	68.7%	0.0%	31.35%	1.00	0.00650	5.24	5.24	0.03	0.82	0.15	0.02	65%
Fawn AL-4081	7.7	92.40%	0.0%	92.4%	0.0%	7.60%	1.00	0.00125	7.13	7.13	0.01	0.21	0.04	0.00	65%
Folkstone LS-1306	8.3	61.11%	0.0%	61.1%	0.0%	38.89%	1.00	0.00500	5.05	5.05	0.03	0.61	0.11	0.02	65%
15 Sheen Low HAPS Topcoat 15 Sheen	5.0	63.53%	0.0%	63.5%	0.0%	36.47%	1.00	0.15500	3.16	3.16	0.49	11.74	2.14	0.43	65%
30 Sheen Resistovar Topcoat LH B1 30 Sheen	7.8	80.50%	0.0%	80.5%	0.0%	19.50%	1.00	0.18350	6.28	6.28	1.15	27.66	5.05	0.43	65%
60 Sheen Topcoat 60 Sheen	5.0	63.85%	0.0%	63.9%	0.0%	36.15%	1.00	0.00050	3.17	3.17	0.00	0.04	0.01	0.00	65%
L.H. Sealer LIC-5601	7.6	68.22%	0.0%	68.2%	0.0%	31.78%	1.00	0.39850	5.15	5.15	2.05	49.28	8.99	1.47	65%
Maize Mist Maize Mist	5.0	62.33%	0.0%	62.3%	0.0%	37.67%	1.00	0.00050	3.11	3.11	0.00	0.04	0.01	0.00	65%
Merlot Dye Dye-1182	6.8	99.33%	0.0%	99.3%	0.0%	0.67%	1.00	0.00225	6.75	6.75	0.02	0.36	0.07	0.00	65%
L-5032 Merlot	6.9	78.93%	0.0%	78.9%	0.0%	21.07%	1.00	0.00125	5.44	5.44	0.01	0.16	0.03	0.00	65%
Mocha AL-2986	7.6	91.50%	0.0%	91.5%	0.0%	8.50%	1.00	0.00050	6.99	6.99	0.00	0.08	0.02	0.00	65%
Parchment Mist LS-1335	8.5	57.63%	0.0%	57.6%	0.0%	42.37%	1.00	0.03750	4.93	4.93	0.18	4.43	0.81	0.21	65%
Primer Surfacer E63W5	10.5	63.00%	0.0%	63.0%	0.0%	37.00%	1.00	0.14500	6.59	6.59	0.96	22.93	4.18	0.86	65%
Catalyst 1048	9.0	39.00%	0.0%	39.0%	0.0%	61.00%	1.00	0.01750	3.53	3.53	0.06	1.48	0.27	0.15	65%
Russet L-4268	6.6	96.28%	0.0%	96.3%	0.0%	3.72%	1.00	0.00225	6.39	6.39	0.01	0.35	0.06	0.00	65%
Spruce Mist T-153-7	5.2	67.46%	0.0%	67.5%	0.0%	32.54%	1.00	0.00350	3.50	3.50	0.01	0.29	0.05	0.01	65%
Taupe AL-2982	8.5	74.27%	0.0%	74.3%	0.0%	25.73%	1.00	0.00050	6.35	6.35	0.00	0.08	0.01	0.00	65%
Teak L-3723	6.6	92.34%	0.0%	92.3%	0.0%	7.66%	1.00	0.01675	6.05	6.05	0.10	2.43	0.44	0.01	65%
Wheat Wheat	6.8	99.42%	0.0%	99.4%	0.0%	0.58%	1.00	0.00400	6.71	6.71	0.03	0.64	0.12	0.00	65%
Pigmented Conversion Varnish - Custom Colors	9.5	46.88%	0.0%	46.9%	0.0%	53.13%	1.00	0.05513	4.47	4.47	0.25	5.92	1.08	0.43	65%
Van Dyke Brown Glaze 14-6102	8.2	65.00%	0.0%	65.0%	0.0%	35.00%	1.00	0.01140	5.34	5.34	0.06	1.46	0.27	0.05	65%
White Mist White Mist	5.0	57.72%	0.0%	57.7%	0.0%	42.28%	1.00	0.00500	2.87	2.87	0.01	0.34	0.06	0.02	65%
Parchment Mist LS-1335	8.5	57.63%	0.0%	57.6%	0.0%	42.37%	1.00	0.00450	4.93	4.93	0.02	0.53	0.10	0.02	65%
Pigmented Conversion Varnish - Forest Green	8.6	63.00%	0.0%	63.0%	0.0%	37.00%	1.00	0.00300	5.44	5.44	0.02	0.39	0.07	0.01	65%
Pigmented Conversion Varnish - Parchment Cream H66XXY3372-1944	9.5	63.00%	0.0%	63.0%	0.0%	37.00%	1.00	0.11300	5.96	5.96	0.67	16.17	2.95	0.61	65%
Pigmented Conversion Varnish - Wineberry H66XXY1009-1011	8.1	60.00%	0.0%	60.0%	0.0%	40.00%	1.00	0.00100	4.88	4.88	0.00	0.12	0.02	0.00	65%
Methyl n-Amyl Ketone MAK	6.7	100.00%	0.0%	100.0%	0.0%	0.00%	1.00	0.00700	6.72	6.72	0.05	1.13	0.21	0.00	65%

State Potential Emissions Add worst case coating to all solvents 7.74 185.74 33.90 4.84

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

**Appendix A: Emission Calculations
HAP Emission Calculations**

Company Name: Dutch Mills
Address City IN Zip: 1901 East Kercher Road, Indiana 46526
Permit Number: 039-18777-00505
Plt ID: 039-00505
Permit Reviewer: Linda Quigley/EVP
Date: 09/29/2004

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Ethyl Benzene	Weight % Formaldehyd	Weight % Methy Ethyl Ketone (MEK)	Weight % Methanol	Weight % MIBK	Weight % Propylene Glycol	Weight % Propylene Glycol Monomethyl Ether	Weight % Toluene	Weight % Xylene	Ethyl Benzene Emissions (ton/yr)	Formaldehyd Emissions (ton/yr)	MEK Emissions (ton/yr)	Methanol Emissions (ton/yr)	MIBK Emissions (ton/yr)	Propylene Glycol Emissions (ton/yr)	Propylene Glyco Monomethyl Ether Emissions (ton/yr)	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Total HAP Emissions (ton/yr)
Auburn L-4740	6.8	1.000	0.00375	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	9.00%	14.00%	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0101	0.0157	0.0257
Autumn L-3700	6.5	1.000	0.00050	0.00%	0.00%	0.00%	0.00%	0.00%	1.00%	1.80%	0.00%	0.00%	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0001	0.0003	0.0000	0.0000
Bicut Stain L-3480	6.1	1.000	0.00550	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.40%	0.00%	0.00%	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0021	0.0000	0.0000	0.0021
Butyl Acetate Butylace	7.3	1.000	0.16250	1.20%	0.24%	0.00%	0.00%	0.00%	0.00%	0.00%	2.00%	5.80%	0.0624	0.0123	0.0000	0.0000	0.0000	0.0000	0.0000	0.1040	0.3015	0.4801
Russet L-4268	9.0	1.000	0.00225	0.00%	0.00%	0.00%	18.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.0000	0.0000	0.0000	0.0160	0.0000	0.0000	0.0000	0.0000	0.0000	0.0160
Dk. Cherry STWS Stain 14-8494	7.8	1.000	0.00075	0.00%	0.00%	0.00%	0.00%	0.00%	2.40%	3.60%	0.00%	0.00%	0.0000	0.0000	0.0000	0.0000	0.0000	0.0006	0.0009	0.0000	0.0000	0.0015
Desert LT-1032	7.6	1.000	0.00650	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	4.00%	26.00%	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0087	0.0565	0.0652
Fawn AL-4081	7.7	1.000	0.00125	1.20%	3.73%	0.00%	0.00%	0.00%	0.00%	0.00%	11.40%	9.60%	0.0005	0.0016	0.0000	0.0000	0.0000	0.0000	0.0000	0.0048	0.0041	0.0110
15 Sheen Low HAPS Topcoat 15 Sheen	5.0	1.000	0.15500	1.00%	0.20%	0.00%	0.00%	0.00%	0.00%	0.00%	1.70%	5.00%	0.0337	0.0068	0.0000	0.0000	0.0000	0.0000	0.0000	0.0573	0.1686	0.2664
30 Sheen Resistovar Topcoat LH B1 30 Sheen	7.8	1.000	0.18350	2.30%	0.14%	0.00%	0.00%	0.00%	0.00%	0.00%	1.50%	10.70%	0.1442	0.0088	0.0000	0.0000	0.0000	0.0000	0.0000	0.0941	0.6710	0.9181
60 Sheen Topcoat 60 Sheen	5.0	1.000	0.00050	4.00%	1.00%	0.00%	0.00%	0.00%	0.00%	0.00%	4.00%	8.00%	0.0004	0.0001	0.0000	0.0000	0.0000	0.0000	0.0000	0.0004	0.0009	0.0019
L.H. Sealer LIC-5601	7.6	1.000	0.39850	2.80%	0.15%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	13.00%	0.3691	0.0192	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	1.7138	2.1022
Maize Mist Maize Mist	5.0	1.000	0.00050	2.00%	0.24%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	11.00%	0.0002	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0012	0.0014
Merlot Dye Dye-1182	6.8	1.000	0.00225	1.10%	0.21%	0.00%	0.00%	0.00%	0.00%	0.00%	1.80%	5.20%	0.0007	0.0001	0.0000	0.0000	0.0000	0.0000	0.0000	0.0012	0.0035	0.0056
L-5032 Merlot	6.9	1.000	0.00125	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.30%	0.00%	0.00%	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0005	0.0000	0.0000	0.0005
Primer Surfacer E63WS	10.5	1.000	0.14500	0.00%	0.37%	0.00%	0.00%	0.00%	0.00%	0.00%	3.00%	9.00%	0.0000	0.0246	0.0000	0.0000	0.0000	0.0000	0.0000	0.1993	0.5978	0.8216
Catalyst 1048	9.0	1.000	0.01750	0.00%	1.00%	0.00%	0.00%	10.00%	0.00%	0.00%	0.00%	2.00%	0.0000	0.0069	0.0000	0.0000	0.0693	0.0000	0.0000	0.0000	0.0139	0.0901
Taupe AL-2982	8.5	1.000	0.00050	1.20%	0.23%	0.00%	0.00%	0.00%	0.00%	0.00%	1.90%	5.70%	0.0002	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0004	0.0011	0.0017
Pigmented Conversion Varnish - Custom Colors H66XX	9.5	1.000	0.05513	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.10%	0.00%	0.00%	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0254	0.0000	0.0000	0.0254
Van Dyke Brown Glaze 14-6102	8.2	1.000	0.01140	2.00%	0.60%	0.00%	0.00%	1.00%	0.00%	0.00%	0.00%	10.00%	0.0082	0.0025	0.0000	0.0000	0.0041	0.0000	0.0000	0.0000	0.0410	0.0558
Parchment Mist LS-1335	8.5	1.000	0.00450	0.90%	0.19%	0.00%	0.00%	0.00%	0.00%	0.00%	1.60%	4.60%	0.0015	0.0003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0027	0.0078	0.0123
Pigmented Conversion Varnish - Parchment Cream H66XX3372	9.5	1.000	0.11300	2.00%	1.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	10.00%	0.0937	0.0468	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.4683	0.6088
Pigmented Conversion Varnish - Wineberry H66XXR1992-1944	8.1	1.000	0.00100	2.00%	1.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	9.00%	0.0007	0.0004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0032	0.0043
Lacquer Thinner 11-155-1	7.0	1.000	0.25650	2.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	4.00%	14.00%	0.1567	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.3133	1.0966	1.5666
Lacquer Thinner 11-155-1	0.0	0.000	0.00000	0.00%	0.00%	10.00%	20.00%	10.00%	0.00%	0.00%	60.00%	0.00%	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

Total State Potential Emissions	0.87	0.13	0.00	0.02	0.07	0.001	0.03	0.80	5.17
Worst Case Single HAP Emission									5.17
Total Combined HAP Emissions									7.085

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

**Appendix A: Process Particulate Emissions
Woodworking Activities**
Company Name: Dutch Mills
Address City IN Zip: 1901 East Kercher Road, Goshen, Indiana 46526
Permit Number: 039-18777-00505
Plt ID: 039-00505
Reviewer: Linda Quigley/EVP
Date: 05/04/2004

Uncontrolled Potential Emissions (tons/year)						
DUST COLLECTOR						
Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Air to Cloth Ratio Air Flow (acfm/ft ²)	Total Filter Area (ft ²)	Control Efficiency	Total (tons/yr)
DC1	1	0.0017	12400.0	1	99.00%	79.14
Total Emissions Based on Rated Capacity at 8,760 Hours/Year						79.14
Controlled Potential Emissions (tons/year)						
DUST COLLECTOR						
Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Air to Cloth Ratio Air Flow (acfm/ft ²)	Total Filter Area (ft ²)	Control Efficiency	Total (tons/yr)
DC1	1	0.00170	12400.0	1	99.00%	0.79
Total Emissions Based on Rated Capacity at 8,760 Hours/Year and source controls						0.79
Allowable Emission (lb/hr) = 4.10 X [1.36]^{u.br} = 5.04 pounds per hour						
Methodology:						
Potential Emission (uncontrolled):						
Potential Emission(tons/yr) = No. Units * Loading (grains/acf) * Air/Cloth Ratio (acfm/ft ²) * Filter Area (ft ²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)						
Potential Emission (controlled):						
Potential Emission (tons/yr) = No. Units * Loading (grains/acf) * Air/Cloth Ratio (acfm/ft ²) * Filter Area (ft ²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)						