



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: April 28, 2005
RE: Rainbow Designs / 087-19523-00058
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, 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 1/10/05



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**NEW SOURCE CONSTRUCTION PERMIT
and MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR QUALITY**

**Rainbow Designs
9585 W. 700 South
Topeka, Indiana 46571**

(herein known as the Permittee) is hereby authorized to construct and 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 2-5.1 if new source), 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

This permit is also issued under the provisions of 326 IAC 2-2 (Prevention of Significant Deterioration), and 40 CFR 124 with conditions listed on the attached pages.

Operation Permit No.: MSOP 087-19523-00058	
Issued by: Original Signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: April 28, 2005 Expiration Date: April 28, 2010

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 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 wood cabinet door woodworking and surface coating source.

Authorized Individual:	Owner
Source Address:	9585 W. 700 South, Topeka, Indiana 46571
Mailing Address:	9585 W. 700 South, Topeka, Indiana 46571
General Source Phone:	260 - 463 - 1465
SIC Code:	2434
County Location:	LaGrange
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD

A.2 Emissions Units and Pollution Control Equipment Summary

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

- (a) Four (4) surface coating booths, identified as B1 through B4, equipped with air-assisted airless spray applicators and dry filters for particulate control, exhausting to Stacks B1 through B4, respectively, capacity: 250 units per hour, each.
- (b) One (1) adhesive application station, identified as AA1, using roll, brush, and manual application methods, capacity: 250 units per hour.
- (c) Woodworking operations for board laminating, identified as WW1, equipped with a bag-house, identified as DC1, for particulate control, capacity: 1,019.629 lb/hr.
- (d) Woodworking operations for cabinet assembly, identified as WW2, equipped with a cyclone identified as DC2, for particulate control, exhausting to Stack DC2, capacity: 1,014.143 pounds per hour.
- (e) Woodworking operations for cabinet assembly, identified as WW3, equipped with a bag-house identified as DC3, for particulate control, capacity: 1,011.829 pounds per hour.
- (f) Two (2) diesel powered electric generators, identified as G1 and G2, exhausting to Stacks G1 and G2, respectively, capacity: 0.2046 million British thermal units per hour, each.
- (g) One (1) diesel powered electric generator, identified as G3, exhausting to Stack G3 capacity: 0.0512 million British thermal units per hour.
- (h) One (1) wood fired boiler, identified as WH1, exhausting to Stack WH1, capacity: 0.1 million British thermal units per hour.
- (i) Eight (8) propane space heaters, identified as HH1-HH8, capacity: 0.02 million British thermal units per hour, each.

- (j) Four (4) propane space heaters, identified as WMH1-WHM4, capacity: 0.03 British thermal units per hour, each.
- (k) One (1) propane air makeup unit, identified as AM1, capacity: 2.2 million British thermal units per hour.

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

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

B.3 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

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 Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section.
 - (1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
 - (2) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2-6.1-6 and 326 IAC 2-2 or 326 IAC 2-3 and an Operation Permit Validation Letter is issued.
- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.
- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).

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 prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each emissions unit:
 - (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.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 PMP's 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 PMP 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] [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 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 one hundred (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 construct and 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 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.6 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, not later than forty-five (45) days after the completion of the testing. An extension may be granted by the 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.7 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.

C.8 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.

Record Keeping and Reporting Requirements

C.9 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.10 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.11 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 reports (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, 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

- (a) Four (4) surface coating booths, identified as B1 through B4, equipped with air-assisted airless spray applicators and dry filters for particulate control, exhausting to Stacks B1 through B4, respectively, capacity: 250 units per hour, each.
- (b) One (1) adhesive application station, identified as AA1, using roll, brush, and manual application methods, capacity: 250 units per hour.

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

Emission Limitations and Standards

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 cabinets by the surface coating booths, identified as B1-B4, 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 Particulate [326 IAC 6-3-2(d)]

- (a) Particulate from the surface coating booths, identified as B1-B4, shall be controlled by dry filters, 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.1.3 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 these facilities and their control devices.

Compliance Determination Requirements

There are no compliance determination requirements applicable to these facilities.

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

There are no compliance monitoring requirements for these facilities.

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

D.1.4 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.2 and D.1.3, the Permittee shall maintain records of any inspections required by Condition D.1.2(c), and those additional inspections prescribed by the Preventive Maintenance Plan.
- (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

- (c) Woodworking operations for board laminating, identified as WW1, using baghouse DC1 for particulate control, capacity: 1,019.629 pounds per hour.
- (d) Woodworking operations for cabinet assembly, identified as WW2, using a cyclone DC2 for particulate control, exhausting to stack DC2, capacity: 1,014.143 pounds per hour.
- (e) Woodworking operations for cabinet assembly, identified as WW3, using baghouse DC3 for particulate control, capacity: 1,011.829 pounds per hour.

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

Emission Limitations and Standards

D.2.1 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the woodworking operations, identified as WW1, shall not exceed 2.62 pounds per hour when operating at a process weight rate of 0.511 tons per hour.
- (b) Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the woodworking operations, identified as WW2, shall not exceed 2.61 pounds per hour when operating at a process weight rate of 0.508 tons per hour.
- (c) Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the woodworking operations, identified as WW3, shall not exceed 2.60 pounds per hour when operating at a process weight rate of 0.507 tons per hour.
- (d) The pounds per hour limitations were calculated with the following equation:

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

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

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 these facilities and their control devices.

Compliance Determination Requirements

D.2.3 Particulate Control

In order to comply with Condition D.2.1, the baghouses, identified as DC1 and DC3, for particulate control shall be in operation and control emissions from the woodworking operations, identified as WW1 and WW3 at all times that the woodworking operations are in operation.

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

There are no compliance monitoring requirements applicable for these facilities.

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

There are no record keeping and reporting requirements applicable to these facilities.

SECTION D.3

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Combustion Units

- (f) One (1) wood fired boiler, identified as WH1, exhausting to Stack WH1, capacity: 0.1 million British thermal units per hour.
- (g) Two (2) diesel powered electric generators, identified as G1 and G2, exhausting to Stacks G1 and G2, respectively, capacity: 0.2046 million British thermal units per hour, each.
- (h) One (1) diesel powered electric generator, identified as G3, exhausting to Stack G3 capacity: 0.0512 million British thermal units per hour.
- (i) Eight (8) propane space heaters, identified as HH1-HH8, capacity: 0.02 million British thermal units per hour, each.
- (j) Four (4) propane space heaters, identified as WMH1-WHM4, capacity: 0.03 British thermal units per hour, each.
- (k) One (1) propane air makeup unit, identified as AM1, capacity: 2.2 million British thermal units per hour.

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

Emission Limitations and Standards

D.3.1 Particulate [326 IAC 6-2-4(a)]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) the PM emissions from the 0.10 million British thermal units per hour heat input wood boiler (WH1) shall be limited to 0.60 pounds per million British thermal units heat input because the value of Q is less than 10 million British thermal units per hour.

D.3.2 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 the wood fired boilers and the electric generators, identified as WH1 and G1-G3, respectively.

Compliance Determination Requirements

There are no compliance determinations applicable to these facilities.

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

There are no compliance monitoring requirements applicable to these facilities.

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

There are no record keeping requirements applicable to these facilities.

**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:	Rainbow Designs
Address:	9585 W. 700 South
City:	Topeka, Indiana 46571
Phone #:	260 - 463 - 1465
MSOP #:	087-19523-00058

I hereby certify that **Rainbow Designs** is still in operation.
 no longer in operation.

I hereby certify that **Rainbow Designs** is in compliance with the requirements of MSOP **087-19523-00058**.
 not in compliance with the requirements of MSOP **087-19523-00058**.

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:

Mail to: Permit Administration & Development Section
Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

Rainbow Designs
9585 W. 700 South
Topeka, Indiana 46571

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)
4. I hereby certify that Rainbow Designs, 9585 W. 700 South, Topeka, Indiana 46571, completed construction of the wood cabinet door woodworking and surface coating source on _____ in conformity with the requirements and intent of the Construction Permit application received by the Office of Air Quality on August 4, 2004 and as permitted pursuant to **MSOP No. 087-19523, Plant ID No. 087-00058** issued on _____.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature

Date

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana on this _____ day of _____, 20 _____.

My Commission expires: _____.

Signature

Name (typed or printed)

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

Technical Support Document (TSD) for a New Source Construction and Minor Source
Operating Permit

Source Background and Description

Source Name:	Rainbow Designs
Source Location:	9585 W. 700 South, Topeka, Indiana 46571
County:	LaGrange
SIC Code:	2434
Operation Permit No.:	M 087-19523-00058
Permit Reviewer:	Brian J. Pedersen

The Office of Air Quality (OAQ) has reviewed an application from Rainbow Designs relating to the construction and operation of a wood cabinet door woodworking and surface coating source.

Permitted Emission Units and Pollution Control Equipment

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

Unpermitted Emission Units and Pollution Control Equipment

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

New Emission Units and Pollution Control Equipment

The application includes information relating to the construction and operation of the following equipment:

- (a) Four (4) surface coating booths, identified as B1 through B4, equipped with air-assisted airless spray applicators and dry filters for particulate control, exhausting to Stacks B1 through B4, respectively, capacity: 250 wood cabinet doors per hour, each.
- (b) One (1) adhesive application station, identified as AA1, using roll, brush, and manual application methods, capacity: 250 wood cabinet doors per hour.
- (c) Woodworking operations for board laminating, identified as WW1, equipped with a baghouse, identified as DC1, for particulate control, capacity: 1,019.629 pounds of wood per hour.
- (d) Woodworking operations for cabinet assembly, identified as WW2, equipped with a cyclone identified as DC2, for particulate control, exhausting to Stack DC2, capacity: 1,014.143 pounds of wood per hour.
- (e) Woodworking operations for cabinet assembly, identified as WW3, equipped with a baghouse identified as DC3, for particulate control, capacity: 1,011.829 pounds of wood per hour.

- (f) Two (2) diesel powered electric generators, identified as G1 and G2, exhausting to Stacks G1 and G2, respectively, capacity: 0.2046 million British thermal units per hour, each.
- (g) One (1) diesel powered electric generator, identified as G3, exhausting to Stack G3 capacity: 0.0512 million British thermal units per hour.
- (h) One (1) wood fired boiler, identified as WH1, exhausting to Stack WH1, capacity: 0.1 million British thermal units per hour.
- (i) Eight (8) propane space heaters, identified as HH1-HH8, capacity: 0.02 million British thermal units per hour, each.
- (i) Four (4) propane space heaters, identified as WMH1-WHM4, capacity: 0.03 British thermal units per hour, each.
- (k) One (1) propane air makeup unit, identified as AM1, capacity: 2.2 million British thermal units per hour.

Existing Approvals

The source has no previous IDEM, OAQ approvals.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
B1	Surface Coating	26.0	2.00	7,500	Ambient
B2	Surface Coating	20.0	2.00	7,500	Ambient
B3	Surface Coating	20.0	2.00	7,500	Ambient
B4	Surface Coating	20.0	2.00	7,500	Ambient
DC2	Woodworking (WW2)	21.0	1.00	5,400	Ambient
G1	Generator	10.0	1.00	500	350
G2	Generator	10.0	1.00	500	350
G3	Generator	12.0	0.250	500	350
WH1	Wood Fired Boiler	12.0	1.00	1,500	500

Recommendation

The staff recommends to the Commissioner that the construction and 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 August 31, 2004.

Emission Calculations

See Pages 1 through 8 of Appendix A of this document for detailed emission calculations

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	91.6
PM ₁₀	91.6
SO ₂	1.79
VOC	56.2
CO	2.40
NO _x	10.7

HAPs	Potential to Emit (tons/yr)
Xylene	8.93
Vinyl Acetate	0.026
Acrolein	0.002
Benzene	0.002
Formaldehyde	0.002
HCl	0.008
Styrene	0.001
Total	8.97

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of each criteria pollutant is less than one hundred (100) tons per year. In addition, 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 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.

(b) 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 LaGrange County.

Pollutant	Status
PM ₁₀	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-Hour Ozone	Attainment
8-Hour Ozone	Attainment
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 ozone. LaGrange County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x 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.
- (b) LaGrange County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. 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.
- (c) Fugitive Emissions
Since this type of operation is not one of the twenty eight (28) listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

New Source PSD 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	2.43
PM ₁₀	2.42
SO ₂	1.79
VOC	56.2
CO	2.40
NO _x	10.7
Single HAP (Xylene)	8.93
Combination HAPs	8.97

- (a) This new source is not a major stationary source because no attainment pollutant is emitted at a rate of two hundred fifty (250) tons per year or greater and it is not in one of the twenty eight (28) listed source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (b) Emissions were based on the MSOP application submitted by the company.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

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

This is the first air approval issued to this source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) The four (4) surface coating booths, identified as B1-B4, are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20 and 40 CFR 63 Subpart (JJ) due to the source is not a major source of HAPs. This source is not considered an area source because under the definition in 40 CFR 63.800, an area source is one who is a major source of HAPs and decides to comply with certain criteria and specific limits. The source is not a major source and therefore does not have to comply with these requirements.

State Rule Applicability – Entire Source

326 IAC 2-6 (Emission Reporting)

This source is not located in Lake or Porter County with the potential to emit greater than twenty-five (25) tons per year of NO_x, does not emit five (5) tons per year or more of lead and does not require a Part 70 Operating Permit. Therefore, the requirements of 326 IAC 2-6 do 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.

State Rule Applicability – Individual Facilities

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

The one (1) wood fired boiler, identified as WH1, exhausting at Stack WH1, rated at 0.10 million British thermal units per hour must comply with the requirements of 326 IAC 6-2-4. The emission limitation is based on the following equation:

$$Pt = 1.09/Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/mmBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the name-plate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

For the wood fired boiler (WH1):

$$Pt = 1.09/(0.1)^{0.26} = 1.98 \text{ lb/mmBtu heat input}$$

Based on page 3 of Appendix A, potential PM emission rate is:

$$0.145 \text{ ton/yr} \times (2000 \text{ lbs/ton} / 8760 \text{ hrs/yr}) = 0.033 \text{ lb/hr}$$

$$(0.033 \text{ lb/hr} / 0.1 \text{ mmBtu/hr}) = 0.331 \text{ lb PM per mmBtu}$$

Pursuant to 326 IAC 6-2-4, since the value of Q is less than ten (10) million British thermal units per hour Pt shall not exceed 0.6 pounds per million British thermal units. Therefore, Pt=0.6 lb/mmBtu heat input. The PM emissions from the one (1) wood fired boiler (WH1) are 0.331 pounds of PM per million British thermal units, which is less than the allowable of 0.6 pounds per million British thermal units. Therefore, the one (1) wood fired boiler (WH1) is in compliance with this rule.

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

- (a) Particulate from the four (4) surface coating booths, identified as B1-B4, shall be controlled by dry filters, 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:

- (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.

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.

- (b) The one (1) adhesive application station, identified as AA1, uses brush, and manual application methods. Pursuant to 326 IAC 6-3-1(b)(application method), this emission unit is exempt and the requirements of 326 IAC 6-3 do not apply.

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

- (a) The particulate from the woodworking operations, identified as WW1, 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:

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

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the woodworking operations, identified as WW1, shall not exceed 2.62 pounds per hour when operating at a process weight rate of 0.511 tons per hour. The baghouse, identified as DC1, shall be in operation at all times the woodworking operations are in operation in order to comply with this limit.

- (b) The particulate from the woodworking operations, identified as WW3, 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:

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

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the woodworking operations shall not exceed 2.60 pounds per hour when operating at a process weight rate of 0.507 tons per hour. The baghouse, identified as DC3, shall be in operation at all times the woodworking operations are in operation in order to comply with this limit.

- (c) The particulate from the woodworking operations, identified as WW2, 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:

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

Pursuant to 326 IAC 6-3-2, the PM emission rate before controls (2.31 pounds per hour) with a process weight rate of 0.508 tons per hour, is less than the limit that would be applied (2.61 pounds per hour), therefore the cyclone, identified as DC2, is not required to be in operation to comply with 326 IAC 6-3-2.

326 IAC 7-1 (Sulfur Dioxide Limitations)

Pursuant to 326 IAC 7-1, each of the combustion units at this source do not have the potential to emit twenty five (25) tons per year or ten (10) pounds per hour of SO₂. Therefore, this rule does not apply.

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

The four (4) surface coating booths, identified as B1-B4, are subject to the requirements of 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating). Pursuant to this rule, the coatings applied to wood furnishings shall utilize one (1) or more of the following application systems:

- 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 with this rule because the four (4) surface coating booths, identified as B1-B4, use an air-assisted airless spray application system.

Conclusion

The construction and operation of this wood cabinet door woodworking and surface coating source shall be subject to the conditions of the New Source Construction and Minor Source Operating Permit **M 087-19523-00058**.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a New Construction and a Minor Source Operating Permit

Source Name: Rainbow Designs
Source Location: 9585 W. 700 South, Topeka, Indiana 46571
County: LaGrange
Construction Permit No.: MSOP 087-19523-00058
SIC Code: 2434
Permit Reviewer: Brian J. Pedersen

On December 11, 2004, the Office of Air Quality (OAQ) had a notice published in the LaGrange Standard, LaGrange, Indiana, stating that Rainbow Designs had applied for a construction and operating permit to construct and operate a wood cabinet door woodworking and surface coating source with bag-houses, dry filters, and cyclones for particulate control. The notice also stated that OAQ proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On December 28, 2004, Dave Kriegel, a resident of Mishawaka, submitted comments on the proposed construction operating permit. The summary of the comments and corresponding responses are as follows: The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded**.

Comment 1:

I protest the application for, and the possible awarding of any permit to pollute by Rainbow Designs. My reason is that by operating, and polluting the atmosphere both by surface coating and open burning, the Owners of Rainbow designs has profited without complying with the laws of the land in the past. Permits have been required by IDEM since at least 1999. How many years have the owners been operating without a permit? How many tons of unrecorded VOCs and HAPs have been placed into our atmosphere?

To operate until "caught" is simply not right, correct honest or fair.

Response 1:

The application submitted by Rainbow Designs did not indicate any prior construction nor does it authorize open burning. A copy of this addendum will be provided to the OAQ inspector for a follow up. If it is determined that Rainbow Designs has been operating without a permit or performing open burning, this matter will be referred to the IDEM's Office of Compliance and Enforcement. This branch will determine the appropriate enforcement actions. There are no changes made to the proposed permit due to this comment.

Comment 2:

If they are granted the right to further pollute, I want to know what financial and other penalties will be or have been imposed on them and what safeguards will be in place to prevent them from exceeding the limits of their permit!

Response 2:

The proposed MSOP does contain limits on opacity (Condition C.3), limits PM emissions from the wood fired boiler (Condition D.3.1), limits PM emissions from woodworking (Condition D.2.1), and requires dry filters as control on surface coating operations (Condition D.1.1). Also, Preventive

Maintenance Plans are required for the surface coating operations/control devices, woodworking operations/control devices, the wood fired boiler, and the three (3) diesel powered electric generators. These plans help to ensure that process equipment and control devices are working properly by requiring the Permittee to prepare and maintain the following information on each emissions unit:

- (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.

Furthermore, the permit requires that if any overspray from surface coating 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.

Also an annual notification, required by Condition B.6, shall be submitted to the Office of Air Quality stating whether or not the source is in compliance with the terms and conditions contained in this permit. Violations of permit conditions will be referred to the Office of Enforcement for further actions. Any modifications that increase the potential to emit from this source are subject to prior approval from IDEM, OAQ.

If it is determined that the source is in violation, IDEM can negotiate a settlement, which may include fees as high as \$25,000 per day. The primary goal of IDEM enforcement is to get Permittees back into compliance and having them stay in compliance. There are a number of factors that go into determining the severity of a fine. A fine is intended to make sure that the Permittee realizes that the company shouldn't violate permit conditions or State of Indiana rules. If a Permittee has violated a rule or permit condition in the past, then the fine for a repeat offense would be higher the second time around. Cost avoidance, which is the money saved by not being in compliance, is taken into account when calculating the penalty. For example, if it is cheaper for the source to operate without the control device, then the penalty includes both any cost avoidance by the company by not being in compliance, and an additional penalty added to be a disincentive for being out of compliance. Any permanent, ongoing requirements established in an agreement or as a result of hearing and Commissioner's order will become incorporated into the operating permit. The enforcement order can act outside the permit to make sure that the Permittee complies in the future. The IDEM Civil Penalty Policy (Enforcement-99-0002-NPD) is available at <http://www.IN.gov/ide/oe/nrp/civil.html>. You have been added to the mailing list and as such will be sent a copy of the Notice of Decision for this permit, as well as any decisions regarding enforcement actions.

There are no changes made to the proposed permit due to this comment.

Upon further review, the OAQ has decided to make the following changes to the construction permit: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

Change 1:

Condition D.1.4 has been added to require record keeping requirements that are specified in Condition D.1.2(c) and those additional inspections prescribed by the plan are required by Condition D.1.3.

D.1.4 Record Keeping Requirements

- (a) **To document compliance with Conditions D.1.2 and D.1.3, the Permittee shall maintain records of any inspections required by Condition D.1.2(c), and those additional inspections prescribed by the Preventive Maintenance Plan.**
- (b) **All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

Change 2:

The grammar in Condition D.2.2 has been corrected as follows:

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 these facilities and ~~its~~ **their** control devices.

Change 3:

The P.O. Box has been deleted from the IDEM, OAQ mailing address and the zip code has been changed as follows:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, ~~P. O. Box 6015~~
Indianapolis, Indiana 46204 ~~6-6015~~

The address has been changed throughout the permit document.

Change 4:

Condition B.23 has been added to the permit in order to include rule 326 IAC 1-1-6, which became effective March 16, 2005:

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.

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

**Company Name: Rainbow Designs
Address City IN Zip: 9585 W. 700 South, Topeka, Indiana 46571
MSOP: 087-19523
Pit ID: 087-00058
Reviewer: Brian J. Pedersen
Application Date: August 24, 2004**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % 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)	lb VOC/gal solids	Transfer Efficiency
B1																
Stain - Orange Oak	6.98	94.4%	0.00%	94.4%	0.00%	3.81%	0.001	250	6.59	6.59	1.65	39.5	7.22	0.107	173	75%
B2																
Sealer - LV 40	7.73	70.1%	0.00%	70.1%	0.00%	22.8%	0.003	250	5.42	5.42	3.39	81.3	14.8	1.58	23.7	75%
B3																
Topcoat - LV65	7.73	69.5%	0.00%	69.5%	0.00%	23.5%	0.003	250	5.37	5.37	3.36	80.6	14.7	1.62	22.9	75%
Thinner	7.13	100%	0.00%	100%	0.00%	0.00%	0.0003	250	7.13	7.13	0.446	10.7	1.95	0.00	N/A	75%
B4																
Topcoat - LV65	7.73	69.5%	0.00%	69.5%	0.00%	23.5%	0.003	250	5.37	5.37	3.36	80.6	14.7	1.62	22.9	75%
Thinner	7.13	100%	0.00%	100%	0.00%	0.00%	0.0003	250	7.13	7.13	0.446	10.7	1.95	0.00	N/A	75%
Cleanup																
Acetone	6.67	0.00%	0.00%	0.00%	0.00%	0.00%	0.0002	250	0.00	0.00	0.00	0.00	0.00	0.00	N/A	100%
Adhesive																
Adhesive 5460	9.50	57.1%	57.0%	0.100%	0.00%	35.0%	0.003	250	0.010	0.01	0.006	0.143	0.026	0.00	N/A	100%

PM Control Efficiency: 95.00%

State Potential Emissions

Add worst case coating to all solvents

Uncontrolled	12.6	303.5	55.4	4.92
Controlled	12.6	303.5	55.4	0.246

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: Rainbow Designs
Address City IN Zip: 9585 W. 700 South, Topeka, Indiana 46571
MSOP: 087-19523
Plt ID: 087-00058
Permit Reviewer: Brian J. Pedersen
Application Date: August 24, 2004

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Vinyl Acetate	Xylene Emissions (ton/yr)	Vinyl Acetate Emissions (ton/yr)
B1							
Stain - Orange Oak	6.98	0.001	250	0.00%	0.00%	0.00	0.00
B2							
Sealer - LV 40	7.73	0.003	250	12.0%	0.00%	2.54	0.00
B3							
Topcoat - LV65	7.73	0.003	250	10.5%	0.00%	2.22	0.00
Thinner	7.13	0.0003	250	50.0%	0.00%	0.976	0.00
B4							
Topcoat - LV65	7.73	0.003	250	10.5%	0.00%	2.22	0.00
Thinner	7.13	0.0003	250	50.0%	0.00%	0.976	0.00
Cleanup							
Acetone	6.67	0.0002	250	0.00%	0.00%	0.00	0.00
Adhesive							
Adhesive 5460	9.50	0.003	250	0.00%	0.100%	0.00	0.026

Total State Potential Emissions **8.93** **0.026**

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: Emissions Calculations
External Combustion Boiler
Wood Waste Combustion (uncontrolled)
Wet Wood**

**Company Name: Rainbow Designs
Address City IN Zip: 9585 W. 700 South, Topeka, Indiana 46571
MSOP: 087-19523
Plt ID: 087-00058
Reviewer: Brian J. Pedersen
Application Date: August 24, 2004**

Wood Fired Boiler (WH1)

Capacity (MMBtu/hr)

0.10

	Pollutant						
	PM*	PM10*	PM2.5*	SO ₂	NO _x	VOC	CO
Emission Factor in lb/MMBtu	0.33	0.307	0.267	0.025	0.22	0.013	0.6
Potential Emissions in tons/yr	0.145	0.134	0.117	0.011	0.096	0.006	0.263

Wet wood is considered to be greater than or equal to 20% moisture content. Dry wood is considered to be less than 20% moisture content.

*The PM10 and PM2.5 emission factors include the condensible PM emission factor of 0.017 lb/MMBtu, measured by EPA Method 202 (or equivalent) and the appropriate filterable PM emission factor, measured by EPA Method 5 (or equivalent). The PM emission factor is filterable PM measured by EPA Method 5 (or equivalent).

Methodology

To convert from tons/hr capacity to MMBtu/hr capacity:

$$\text{Heat Input Capacity (MMBtu/hr)} = \text{Capacity (tons/hr)} \times \text{Higher Heating Value of wood fuel (Btu/lb)} \times (1 \text{ MMBtu}/106 \text{ Btu}) \times 2000 \text{ lbs}/1 \text{ ton}$$

Emission Factors are from AP-42 Chapter 1.6 (revised 3/02), SCCs #1-0X-009-YY where X = 1 for utilities, 2 for industrial, and 3 for commercial/institutional; Y = 01 for bark-fired boilers, 02 for bark and wet wood-fired boilers, 03 for wet wood-fired boilers, and 08 for dry wood-fired boilers

$$\text{Emissions (tons/yr)} = \text{Capacity (MMBtu/hr)} \times \text{Emission Factor (lb/MMBtu)} \times 8760\text{hrs/yr} \times 1\text{ton}/2000\text{lbs}$$

**Appendix A: HAPs Emissions Calculations
External Combustion Boiler
Wood Waste Combustion (uncontrolled)
All Wood Waste Fuel Types**

**Company Name: Rainbow Designs
Address City IN Zip: 9585 W. 700 South, Topeka, Indiana 46571
MSOP: 087-19523
Plt ID: 087-00058
Reviewer: Brian J. Pedersen
Application Date: August 24, 2004**

Wood Fired Boiler (WH1)

Capacity (MMBtu/hr) 0.1

Emission Factor in lb/MMBtu	Selected Hazardous Air Pollutants				
	Acrolein	Benzene	Formaldehyde	Hydrogen Chloride	Styrene
Potential Emissions in tons/yr	0.002	0.002	0.002	0.008	0.001

Methodology

To convert from tons/hr capacity to MMBtu/hr capacity:

Heat Input Capacity (MMBtu/hr) = Capacity (tons/hr) x Higher Heating Value of wood fuel (Btu/lb) x (1 MMBtu/106 Btu) x 2000 lbs/1 ton

Emission Factors are from AP-42 Chapter 1.6 (revised 3/02), SCCs #1-0X-009-YY where X = 1 for utilities, 2 for industrial, and 3 for commercial/institutional; Y = 01 for bark-fired boilers, 02 for bark and wet wood-fired boilers, 03 for wet wood-fired boilers, and 08 for dry wood-fired boilers

Emissions (tons/yr) = Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8760hrs/yr x 1ton/2000lbs

These factors include the five HAPs with the highest AP-42 emission factors.

Appendix A: Emission Calculations
LPG-Propane - Commercial Boilers
 (Heat input capacity: < 10 MMBtu/hr)

Company Name: Rainbow Designs
Address City IN Zip: 9585 W. 700 South, Topeka, Indiana 46571
MSOP: 087-19523
Plt ID: 087-00058
Reviewer: Brian J. Pedersen
Application Date: August 24, 2004

Unit ID	Individual Unit Capacity	#of units	Total Capacities (MMBtu/hr)
H1-H8	0.020	8	0.160
WMH1-WMH4	0.030	4	0.120
AM1	2.20	1	2.20
Total	-	-	2.48

Heat Input Capacity
MMBtu/hr

Potential Throughput
kgals/year

SO2 Emission factor = 0.10 x S
 S = Sulfur Content = 100.00 grains/100ft³

2.48

237.43

Emission Factor in lb/kgal	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	0.4	0.4	10.0 (0.10S)	14.0	0.5 **TOC value	1.9
Potential Emission in tons/yr	0.047	0.047	1.19	1.66	0.059	0.226

*PM emission factor is filterable PM only. PM10 emission factor is assumed to be the same as PM based on a footnote in Table 1.5-1, therefore PM10 is filterable only as well.

**The VOC value given is TOC. The methane emission factor is 0.2 lb/kgal.

Methodology

1 gallon of LPG has a heating value of 94,000 Btu

1 gallon of propane has a heating value of 91,500 Btu (use this to convert emission factors to an energy basis for propane)

(Source - AP-42 (Supplement B 10/96) page 1.5-1)

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.0915 MMBtu

Emission Factors are from AP42 (Supplement B 10/96), Table 1.5-1 (SCC #1-02-010-02)

Emission (tons/yr) = Throughput (kgals/yr) x Emission Factor (lb/kgal) / 2,000 lb/ton

**Appendix A: Emission Calculations
Internal Combustion Engines - Diesel Fuel
Turbine (>250 and <600 HP)
Reciprocating**

Company Name: Rainbow Designs
Address City IN Zip: 9585 W. 700 South, Topeka, Indiana 46571
MSOP: 087-19523
Plt ID: 087-00058
Reviewer: Brian J. Pedersen
Application Date: August 24, 2004

Unit ID	Capacity (mm Btu/hr)
G1	0.205
G2	0.205
G3	0.051
Total	0.460

Diesel Powered Electric Generators (G1-G3)

Heat Input Capacity
MM Btu/hr

0.460

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMBtu	0.31	0.31	0.29	4.41	0.4	0.95
Potential Emission in tons/yr	0.625	0.625	0.585	8.89	0.726	1.92

Methodology

Potential Througput (hp-hr/yr) = hp * 8760 hr/yr

Emission Factors are from AP42 (Supplement B 10/96), Table 3.3-2

Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 8760 hr/yr / (2,000 lb/ton)

*PM emission factors are assumed to be equivalent to PM10 emission factors. No information was given regarding which method was used to determine the factor or the fraction of PM10 which is condensable.

**Appendix A: Emission Calculations
Woodworking Operations**

Company Name: Rainbow Designs
Address City IN Zip: 9585 W. 700 South, Topeka, Indiana 46571
MSOP: 087-19523
Plt ID: 087-00058
Reviewer: Brian J. Pedersen
Application Date: August 24, 2004

Unit ID/Control Device	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	PM Emission Rate before Controls (lb/hr)	PM Emission Rate before Controls (tons/yr)	PM Emission Rate after Controls (lb/hr)	PM Emission Rate after Controls (tons/yr)
WW1/DC1	99.0%	0.001	6,400	5.49	24.0	0.055	0.240
WW2/DC2	94.0%	0.003	5,400	2.31	10.1	0.139	0.608
WW3/DC3	99.0%	0.001	13,800	11.8	51.8	0.118	0.518
Total					86.0		1.37

Methodology

Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (cub. ft./min.) (60 min/hr) (lb/7000 grains)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Appendix A: Emissions Calculations

Summary of Emissions

Company Name: Rainbow Designs
 Address City IN Zip: 9585 W. 700 South, Topeka, Indiana 46571
 MSOP: 087-19523
 Plt ID: 087-00058
 Reviewer: Brian J. Pedersen
 Date: August 24, 2004

Criteria Pollutants: Unrestricted Potential Emissions

Unit ID/Control Device	Process	Potential PM (tons/yr)	Potential PM10 (tons/yr)	Potential SO2 (tons/yr)	Potential NOx (tons/yr)	Potential VOC (tons/yr)	Potential CO (tons/yr)
B1-B4, AA1	Surface Coating	4.92	4.92	0.00	0.00	55.4	0.00
WW1/DC1	Woodworking 1	24.0	24.0	0.00	0.00	0.00	0.00
WW2/DC2	Woodworking 2	10.1	10.1	0.00	0.00	0.00	0.00
WW3/DC3	Woodworking 3	51.8	51.8	0.00	0.00	0.00	0.00
AM1, HH1-HH8	Propane Heaters	0.047	0.047	1.19	1.66	0.059	0.226
WH1	Wood-fired Boiler	0.145	0.134	0.011	0.096	0.006	0.263
G1-G3	Generators	0.625	0.625	0.585	8.89	0.726	1.92
	Total	91.6	91.6	1.79	10.65	56.17	2.40

Criteria Pollutants: After Controls Potential Emissions

Unit ID	Process	Potential PM (tons/yr)	Potential PM10 (tons/yr)	Potential SO2 (tons/yr)	Potential NOx (tons/yr)	Potential VOC (tons/yr)	Potential CO (tons/yr)
B1-B4, AA1	Surface Coating	0.246	0.246	0.00	0.00	55.4	0.00
WW1	Woodworking 1	0.240	0.240	0.00	0.00	0.00	0.00
WW2	Woodworking 2	0.608	0.608	0.00	0.00	0.00	0.00
WW3	Woodworking 3	0.518	0.518	0.00	0.00	0.00	0.00
AM1, HH1-HH8	Propane Heaters	0.047	0.047	1.19	1.66	0.059	0.226
WH1	Wood-fired Boiler	0.145	0.134	0.011	0.096	0.006	0.263
G1-G3	Generators	0.625	0.625	0.585	8.89	0.726	1.92
	Total	2.43	2.42	1.79	10.6	56.2	2.40

HAPs: Unrestricted Potential Emissions

Unit ID	Process	Potential Xylene (tons/yr)	Potential Vinyl Acetate (tons/yr)	Potential Acrolein (tons/yr)	Potential Benzene (tons/yr)	Potential Formaldehyde (tons/yr)	Potential HCl (tons/yr)	Potential Styrene (tons/yr)
B1-B4, AA1	Surface Coating	8.93	0.026	0.000	0.000	0.000	0.000	0.000
WW1/DC1	Woodworking 1	0.000	0.000	0.000	0.000	0.000	0.000	0.000
WW2/DC2	Woodworking 2	0.000	0.000	0.000	0.000	0.000	0.000	0.000
WW3/DC3	Woodworking 3	0.000	0.000	0.000	0.000	0.000	0.000	0.000
AM1, HH1-HH8	Propane Heaters	0.000	0.000	0.000	0.000	0.000	0.000	0.000
WH1	Wood-fired Boiler	0.000	0.000	0.002	0.002	0.002	0.008	0.001
G1-G3	Generators	0.000	0.000	0.000	0.000	0.000	0.000	0.000
		0.000	0.000	0.000	0.000	0.000	0.000	0.000
	Total	8.93	0.026	0.002	0.002	0.002	0.008	0.001
	Combined HAPs	8.97						