



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

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Doors Plus, Inc.
2100 Industrial Parkway
Elkhart, Indiana 46516**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions.

Operation Permit No.: T039-20089-00617	
Issued by: Paul Dubenetzky, Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:

TABLE OF CONTENTS

A	SOURCE SUMMARY.....	5
A.1	General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]	
A.3	Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]	
A.4	Part 70 Permit Applicability [326 IAC 2-7-2]	
B	GENERAL CONDITIONS.....	7
B.1	Definitions [326 IAC 2-7-1]	
B.2	Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]	
B.3	Term of Conditions [326 IAC 2-1.1-9.5]	
B.4	Enforceability [326 IAC 2-7-7]	
B.5	Severability [326 IAC 2-7-5(5)]	
B.6	Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]	
B.7	Duty to Provide Information [326 IAC 2-7-5(6)(E)]	
B.8	Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]	
B.9	Annual Compliance Certification [326 IAC 2-7-6(5)]	
B.10	Preventive Maintenance Plan [326 IAC 2-7-5(1),(3)and (13)][326 IAC 2-7-6(1)and(6)] [326 IAC 1-6-3]	
B.11	Emergency Provisions [326 IAC 2-7-16]	
B.12	Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]	
B.13	Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]	
B.14	Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]	
B.15	Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]	
B.16	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]	
B.17	Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]	
B.18	Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]	
B.19	Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]	
B.20	Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]	
B.21	Source Modification Requirement [326 IAC 2-7-10.5]	
B.22	Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]	
B.23	Transfer of Ownership or Operational Control [326 IAC 2-7-11]	
B.24	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]	
B.25	Advanced Source Modification Approval [326 IAC 2-7-5(16)] [326 IAC 2-7-10.5]	
B.26	Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]	
C	SOURCE OPERATION CONDITIONS	18
	Emission Limitations and Standards [326 IAC 2-7-5(1)]	
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [40 CFR 52 Subpart P][326 IAC 6-3-2]	
C.2	Opacity [326 IAC 5-1]	
C.3	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.4	Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.5	Fugitive Dust Emissions [326 IAC 6-4]	
C.6	Operation of Equipment [326 IAC 2-7-6(6)]	
C.7	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	

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

C.8 Performance Testing [326 IAC 3-6]

Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

C.11 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

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

C.12 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

C.13 Compliance Response Plan - Preparation, Implementation, Records, and Reports
[326 IAC 2-7-5] [326 IAC 2-7-6]

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

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

C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
[326 IAC 2-6]

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1 FACILITY OPERATION CONDITIONS – Surface Coating Operations 25

General Construction Conditions

D.1.1 Permit No Defense

D.1.2 Effective Date of the Permit [IC13-15-5-3]

D.1.3 Modification to Construction Conditions [326 IAC 2]

Emission Limitations and Standards

D.1.4 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

D.1.5 NESHAP for Surface Coating of Wood Building Products [326 IAC 20-1-1] [40 CFR Part
63, Subpart QQQQ]

D.1.6 Emission Limits [326 IAC 20-1-1] [40 CFR Part 63, Subpart QQQQ]

D.1.7 Volatile Organic Compounds (VOC) [326 IAC 2-3]

D.1.8 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

D.1.9 Particulate Matter (PM) [40 CFR 52 Subpart P]

D.1.10 Particulate [326 IAC 6-3-2(d)]

D.1.11 Preventive Maintenance Plan [326 IAC 1-6-3]

Compliance Determination Requirements

D.1.12 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

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

D.1.13 General Compliance Requirements [40 CFR 63.4700]

D.1.14 Compliance Requirements for the Compliant Material Option [40 CFR 63.4740, 4741, and
4742]

D.1.15 Compliance Requirements for the Emission Rate Without Add-On Controls Option [40
CFR 63.4750, 4751, and 4752]

D.1.16 Monitoring

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

D.1.17 Record Keeping Requirements

D.1.18 Notification Requirements [40 CFR Part 63.4710]

D.1.19 Recordkeeping Requirements [40 CFR Part 63.4730 and 4731]

D.1.20 Reporting Requirements [40 CFR Part 63.4720]

D.1.21 Reporting Requirements

D.2 EMISSIONS UNIT OPERATION CONDITIONS - Insignificant Activities 37

General Construction Conditions

D.2.1 Permit No Defense

D.2.2 Effective Date of the Permit [IC13-15-5-3]

D.2.3 Modification to Construction Conditions [326 IAC 2]

Emission Limitations and Standards

D.2.4 Particulate [326 IAC 6-3-2]

D.2.5 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Certification 39

Emergency Occurrence Report..... 40

Quarterly Report 42

Quarterly Deviation and Compliance Monitoring Report 43

SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary wood manufacturing and surface coating operation.

Authorized Individual:	General Manager
Source Address:	2100 Industrial Parkway, Elkhart, Indiana 46516
Mailing Address:	2100 Industrial Parkway, Elkhart, Indiana 46516
General Source Phone:	(574) 264 - 1230
SIC Code:	2499
County Location:	Elkhart
Source Location Status:	Nonattainment for 8-hour ozone standard Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD and Emission Offset Rules; Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) Two (2) surface coating spray booths identified as EU27 and EU28 (to be constructed in 2005), each using air-assisted spray guns with a maximum coating capacity of 14.4 wood doors and 120.2 wood moldings per hour, both equipped with dry filters for particulate control, and exhausting through stacks SV-27 and SV-28, respectively.
- (b) One (1) surface coating spray machine, identified as EU24 (to be constructed in 2005), using air-assisted airless spray guns, equipped with dry filters for particulate control, and exhausting through stack SV-26.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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

- (a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
 - (1) Woodworking operations identified as EU20 through EU23, and EU37, with particulate emissions controlled by three (3) separate baghouses and one (1) torit filter system, and exhausting through three (3) stacks identified as SV37, SV38, and SV40. [326 IAC 6-3-2]

- (2) Sanding, priming, buffing, coating, and curing, equipped with a dust collection system for particulate control. [326 IAC 6-3-2]
- (b) Other categories with emissions below insignificant thresholds (i.e. less than 5 pounds per hour particulates and less than 3 pounds per hour VOC).
 - (1) Two (2) continuous UV vacuum coating lines, identified as VA1 and VA2, with particulate emissions controlled by an internal return air baghouse. [326 IAC 6-3-2]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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

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

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

- (a) This permit, T039-20089-00617, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, 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 [326 IAC 2-7-7]

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

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

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

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

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

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

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

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

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

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

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

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

and

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

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

- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, 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.

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 the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs, including any required record keeping as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

IDEM Northern Regional Office Telephone Number: 574-245-4870

IDEM Northern Regional Office Telephone Number: 574-245-4877

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

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an

emergency has the burden of proof.

- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

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

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T039-20089-00617 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this combined permit, all previous registrations and permits are superseded by this combined new source review and part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its

equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204
- Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

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

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

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

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the

required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) **Emission Trades [326 IAC 2-7-20(c)]**
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) **Alternative Operating Scenarios [326 IAC 2-7-20(d)]**
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

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

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

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

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

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

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

B.25 Advanced Source Modification Approval [326 IAC 2-7-5(16)] [326 IAC 2-7-10.5]

- (a) The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

B.26 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [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 2-7-5(1)]

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

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

C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

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

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

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

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

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

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

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

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

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

C.8 Performance Testing [326 IAC 3-6]

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

Compliance Requirements [326 IAC 2-1.1-11]

C.9 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 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) of permit issuance. If required by

Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

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

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.11 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.

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

C.12 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.13 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

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

prevail.

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

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

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

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2007 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
 - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

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

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the

private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) 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.
- (h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) Two (2) surface coating spray booths identified as EU27 and EU28 (to be constructed in 2005), each using air-assisted spray guns with a maximum coating capacity of 14.4 wood doors and 120.2 wood moldings per hour, both equipped with dry filters for particulate control, and exhausting through stacks SV-27 and SV-28, respectively.
- (b) One (1) surface coating spray machine, identified as EU24 (to be constructed in 2005), using air-assisted airless spray guns, equipped with dry filters for particulate control, and exhausting through stack SV-26.

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

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-7-10.5, WITH CONDITIONS LISTED BELOW.

Construction Conditions

General Construction Conditions

D.1.1 Permit No Defense

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

D.1.2 Effective Date of the Permit [IC13-15-5-3]

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

D.1.3 Modification to Construction Conditions [326 IAC 2]

All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for modifications pursuant to 326 IAC 2.

Emission Limitations and Standards

D.1.4 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

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

D.1.5 NESHAP for Surface Coating of Wood Building Products [326 IAC 20-1-1] [40 CFR Part 63, Subpart QQQQ]

Pursuant to 40 CFR 63.4682, the provisions of 40 CFR 63, Subpart QQQQ - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Wood Building apply to this source since this source is commencing construction after June 21, 2002, and therefore, considered a new affected source and engages in surface coating of wood building products (i.e., doors, finished doorskins, and door components).

D.1.6 Emission Limits [326 IAC 20-1-1] [40 CFR Part 63, Subpart QQQQ]

- (a) The Permittee must limit organic HAP emissions to the atmosphere to no more than the applicable emission limit(s) in Table 1 of this subpart, determined according to the requirements in 40 CFR 63.4741, 63.4751, or 63.4761.
- (b) If the affected source applies coatings to products that are in different subcategories as described in 40 CFR 63.4681(a), then the Permittee must demonstrate initial and continuous compliance by selecting one of the approaches described in paragraphs (c)(1) and (2) of 40 CFR 63.4690.
 - (1) Conduct separate compliance demonstrations for each applicable subcategory emission limit and reflect these separate determinations in notifications, reports, and records required by 40 CFR 63.4710, 63.4720, and 63.4730, respectively.
 - (2) Demonstrate compliance with the most stringent of the applicable subcategory emission limits.
- (c) The Permittee must include all coatings, thinners, and cleaning materials used in the affected source when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in 40 CFR 63.4690. To make this determination, the Permittee must use the following two compliance options:
 - (1) Compliant material option: Demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable emission limit(s) in 40 CFR 63.4690, and that each thinner and each cleaning material used contains no organic HAP. The Permittee must meet all the requirements of 40 CFR 63.4740, 63.4741, and 63.4742 to demonstrate compliance with the emission limit using this option.
 - (2) Emission rate without add-on controls option: Demonstrate that, based on the coatings, thinners, and cleaning materials used in the coating operation(s), the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit(s) in 40 CFR 63.4690, calculated as a rolling 12-month emission rate and determined on a monthly basis. The Permittee must meet all the requirements of 40 CFR 63.4750, 63.4751, and 63.4752 to demonstrate compliance with the emission limit using this option.

D.1.7 Volatile Organic Compounds (VOC) [326 IAC 2-3]

The total VOC input usage, including coatings, dilution solvents, and cleaning solvents at the paint spray booths (EU24, EU27, and EU28) shall not exceed 96 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.

D.1.8 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 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.1.9 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the PM from the paint spray booths (EU24, EU27, and EU28) shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.1.10 Particulate [326 IAC 6-3-2(d)]

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. This requirement to operate the control is not federally enforceable.

D.1.11 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.

Compliance Determination Requirements

D.1.12 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC content and usage limitations contained in Condition D.1.7 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4

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

D.1.13 General Compliance Requirements [40 CFR 63.4700]

Pursuant to 40 CFR 63.4700, the Permittee shall comply with the following requirements:

- (a) The Permittee must be in compliance with the emission limitations in this subpart as specified in paragraph (a)(1) of 40 CFR 63.4700.
 - (1) Any coating operation(s) for which the Permittee uses the compliant material option or the emission rate without add-on controls option, as specified in 40 CFR 63.4691(a) and (b), must be in compliance with the applicable emission limit in 40 CFR 63.4690 at all times.

- (b) The Permittee must always operate and maintain the affected source, including all air pollution control and monitoring equipment used for purposes of complying with this subpart, according to the provisions in 40 CFR 63.6(e)(1)(i).

D.1.14 Compliance Requirements for the Compliant Material Option [40 CFR 63.4740, 4741, and 4742]

- (a) The Permittee may use the compliant material option for any individual coating operation, for any group of coating operations in the affected source, or for all the coating operations in the affected source. The Permittee must use either the emission rate without add-on controls option or the emission rate with add-on controls option for any coating operation in the affected source for which the Permittee does not use this option.
- (b) To demonstrate initial compliance using the compliant material option, the coating operation or group of coating operations must use no coating with an organic HAP content that exceeds the applicable emission limit in 40 CFR 63.4690 and must use no thinner or cleaning material that contains organic HAP as determined according to this section. Any coating operation for which the Permittee uses the compliant material option is not required to meet the operating limits or work practice standards required in 40 CFR 63.4692 and 63.4693, respectively.
- (c) To demonstrate initial compliance with the emission limitations using the compliant material option, the Permittee must meet all the requirements of 40 CFR 63.4741 for the coating operation or group of coating operations using this option. Use the procedures in 40 CFR 63.4741 on each coating, thinner, and cleaning material in the condition it is in when it is received from its manufacturer or supplier and prior to any alteration.
- (d) The Permittee does not need to re-determine the mass of organic HAP in coatings, thinners, or cleaning materials that have been reclaimed onsite and reused in the coating operation(s) for which the Permittee uses the compliant material option, provided these materials in their condition as received were demonstrated to comply with the compliant material option.
- (e) If the mass fraction of organic HAP of a coating equals zero, determined according to paragraph (a) of 40 CFR 63.4741, and the compliant material option is used, the Permittee is not required to comply with paragraphs (b) and (c) of 40 CFR 60.4741 for that coating.
 - (1) The Permittee must determine the mass fraction of organic HAP for each coating, thinner, and cleaning material used during the compliance period by using one of the options in paragraphs (a)(1) through (5) of 40 CFR 63.4741.
 - (2) The Permittee must determine the volume fraction of coating solids (liters of coating solids per liter of coating) for each coating used during the compliance period by one of the methods specified in paragraph (b)(1), (2), or (3) of 40 CFR 63.4741.
 - (3) The Permittee must determine the density of each coating used during the compliance period from test results using ASTM Method D1475-90 or information from the supplier or manufacturer of the material. If there is disagreement

between ASTM Method D1475-90 test results and the supplier's or manufacturer's information, the test results will take precedence.

- (4) Calculate the organic HAP content, grams organic HAP per liter coating solids, of each coating used during the compliance period, using Equation 2 of this 40 CFR 63.4741.

- (5) Compliance demonstration: The organic HAP content for each coating used during the initial compliance period, determined using Equation 2 of 40 CFR 63.4741, must be less than or equal to the applicable emission limit in 40 CFR 63.4690; and each thinner and cleaning material used during the initial compliance period must contain no organic HAP, determined according to paragraph (a) of 40 CFR 63.4741. The Permittee must keep all records required by 40 CFR 63.4730 and 63.4731. As part of the Notification of Compliance Status required in 40 CFR 63.4710, the Permittee must identify the coating operation(s) for which the Permittee used the compliant material option and submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the initial compliance period because the Permittee used no coatings for which the organic HAP content exceeded the applicable emission limit in 40 CFR 63.4690, and the Permittee used no thinners or cleaning materials that contained organic HAP, determined according to paragraph (a) of 40 CFR 63.4741.

- (f) The Permittee must complete the initial compliance demonstration for the initial compliance period according to the requirements in 40 CFR 63.4741. The initial compliance period begins on the applicable compliance date specified in 40 CFR 63.4683 and ends on the last day of the 12th month following the compliance date. If the compliance date occurs on any day other than the first day of a month, then the initial compliance period extends through the end of that month plus the next 12 months. The initial compliance demonstration includes the calculations according to 40 CFR 63.4741 and supporting documentation showing that during the initial compliance period, the Permittee used no coating with an organic HAP content that exceeded the applicable emission limit in 40 CFR 63.4690, and that the Permittee used no thinners or cleaning materials that contained organic HAP.

- (g) Pursuant to 40 CFR 63.4742, the Permittee shall comply with the following requirements to demonstrate continuous compliance:
 - (1) For each compliance period to demonstrate continuous compliance, the Permittee must use no coating for which the organic HAP content determined using Equation 2 of 40 CFR 63.4741 exceeds the applicable emission limit in 40 CFR 63.4690; and use no thinner or cleaning material that contains organic HAP, determined according to 40 CFR 63.4741(a). A compliance period consists of 12 months. Each month after the end of the initial compliance period described in 40 CFR 63.4740 is the end of a compliance period consisting of that month and the preceding 11 months.

 - (2) The use of any coating, thinner, or cleaning material that does not meet the criteria specified in paragraph (a) of 40 CFR 63.4742 is a deviation from the

emission limitations that must be reported as specified in 40 CFR 63.4710(c)(6) and 63.4720(a)(5).

- (3) As part of each semiannual compliance report required by 40 CFR 63.4720, the Permittee must identify the coating operation(s) for which the Permittee used the compliant material option. If there were no deviations from the emission limitations in 40 CFR 63.4690, submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because the Permittee used no coating for which the organic HAP content exceeded the applicable emission limit in 40 CFR 63.4690, and the Permittee used no thinner or cleaning material that contained organic HAP, determined according to 40 CFR 63.4741(a).
- (4) The Permittee must maintain records as specified in 40 CFR 63.4730 and 63.4731.

D.1.15 Compliance Requirements for the Emission Rate Without Add-On Controls Option [40 CFR 63.4750, 4751, and 4752]

- (a) The Permittee may use the emission rate without add-on controls option for any individual coating operation, for any group of coating operations in the affected source, or for all the coating operations in the affected source. The Permittee must use either the compliant material option or the emission rate with add-on controls option for any coating operation in the affected source for which the Permittee does not use this option.
- (b) To demonstrate initial compliance using the emission rate without add-on controls option, the coating operation or group of coating operations must meet the applicable emission limit in 40 CFR 63.4690. Any coating operation for which the Permittee uses the emission rate without add-on controls option is not required to meet the operating limits or work practice standards required in 40 CFR 63.4692 and 63.4693, respectively.
- (c) The Permittee must meet all the requirements of 40 CFR 63.4751 to demonstrate initial compliance with the applicable emission limit in 40 CFR 63.4690 for the coating operation(s). When calculating the organic HAP emission rate according to 40 CFR 63.4751, do not include any coatings, thinners, or cleaning materials used on coating operations for which the Permittee uses the compliant material option or the emission rate with add-on controls option.
- (d) The Permittee does not need to re-determine the mass of organic HAP in coatings, thinners, or cleaning materials that have been reclaimed onsite and reused in the coating operation(s) for which the Permittee uses the emission rate without add-on controls option.
 - (1) Determine the mass fraction of organic HAP for each coating, thinner, and cleaning material used during each month according to the requirements in 40 CFR 63.4741(a).
 - (2) Determine the volume fraction of coating solids for each coating used during each month according to the requirements in 40 CFR 63.4741(b).
 - (3) Determine the density of each coating, thinner, and cleaning material used during each month from test results using ASTM Method D1475-90, information from the supplier or manufacturer of the material, or reference sources providing density or

specific gravity data for pure materials. If there is disagreement between ASTM Method D1475-90 test results and such other information sources, the test results will take precedence.

- (4) Determine the volume (liters) of each coating, thinner, and cleaning material used during each month by measurement or usage records.
 - (5) Calculate the mass of organic HAP emissions. The mass of organic HAP emissions is the combined mass of organic HAP contained in all coatings, thinners, and cleaning materials used during each month minus the organic HAP in certain waste materials. Calculate it using Equation 1 of 40 CFR 63.4751.
 - (6) Calculate the total volume of coating solids used. Determine the total volume of coating solids used which is the combined volume of coating solids for all the coatings used during each month, using Equation 2 of 40 CFR 63.4751:
 - (7) Calculate the organic HAP emission rate for the 12-month compliance period, grams organic HAP per liter coating solids used, using Equation 3 of 40 CFR 63.4751.
 - (8) Compliance demonstration. The organic HAP emission rate for the initial 12-month compliance period, calculated using Equation 3 of 40 CFR 63.4751, must be less than or equal to the applicable emission limit in 40 CFR 63.4690. The Permittee must keep all records as required by 40 CFR 63.4730 and 63.4731. As part of the Notification of Compliance Status required by 40 CFR 63.4710, the Permittee must identify the coating operation(s) for which the Permittee used the emission rate without add-on controls option and submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the initial compliance period because the organic HAP emission rate was less than or equal to the applicable emission limit in 40 CFR 63.4690, determined according to this section.
- (e) The Permittee must complete the initial compliance demonstration for the initial compliance period according to the requirements of 40 CFR 63.4751. The initial compliance period begins on the applicable compliance date specified in 40 CFR 63.4683 and ends on the last day of the 12th month following the compliance date. If the compliance date occurs on any day other than the first day of a month, then the initial compliance period extends through the end of that month plus the next 12 months. The Permittee must determine the mass of organic HAP emissions and volume of coating solids used each month and then calculate a 12-month organic HAP emission rate at the end of the initial 12-month compliance period. The initial compliance demonstration includes the calculations according to 40 CFR 63.4751 and supporting documentation showing that during the initial compliance period the organic HAP emission rate was equal to or less than the applicable emission limit in 40 CFR 63.4690.
- (f) Pursuant to 40 CFR 63.4752, the Permittee shall comply with the following requirements to demonstrate continuous compliance:
- (1) To demonstrate continuous compliance, the organic HAP emission rate for each compliance period, calculated using Equation 3 of 40 CFR 63.4751, must be less than or equal to the applicable emission limit in 40 CFR 63.4690. A compliance period consists of 12 months. Each month after the end of the initial compliance period described in 40 CFR 63.4750 is the end of a compliance period consisting of that month and the preceding 11 months. The Permittee must perform the

calculations in 40 CFR 63.4751(a) through (g) on a monthly basis using data from the previous 12 months of operation.

- (2) If the organic HAP emission rate for any 12-month compliance period exceeded the applicable emission limit in 40 CFR 63.4690, this is a deviation from the emission limitations for that compliance period and must be reported as specified in 40 CFR 63.4710(c)(6) and 63.4720(a)(6).
- (3) As part of each semiannual compliance report required by 40 CFR 63.4720, the Permittee must identify the coating operation(s) for which the Permittee used the emission rate without add-on controls option. If there were no deviations from the emission limitations, the Permittee must submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to the applicable emission limit in 40 CFR 63.4690, determined according to 40 CFR 63.4751(a) through (g).
- (4) The Permittee must maintain records as specified in 40 CFR 63.4730 and 63.4731.

D.1.16 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (SV26, SV27, and SV28) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.17 Record Keeping Requirements

- (a) To document compliance with Condition D.1.7, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.7. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The VOC content of each coating material and solvent used.

- (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (3) The cleanup solvent usage for each month;
- (4) The total VOC usage for each month; and
- (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.16, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.18 Notification Requirements [40 CFR Part 63.4710]

Pursuant to 40 CFR 63.4710, the Permittee shall comply with the following notification requirements:

- (a) General: The Permittee must submit the notifications in 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply by the dates specified in those sections, except as provided in paragraphs (b) and (c) of 40 CFR 63.4710.
- (b) Initial Notification: The Permittee must submit the Initial Notification required by 40 CFR 63.9(b) for a new or reconstructed affected source no later than 120 days after initial startup.
- (c) Notification of Compliance Status: The Permittee must submit the Notification of Compliance Status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4740, 40 CFR 63.4750, or 40 CFR 63.4760 that applies to the affected source. The Notification of Compliance Status must contain the information specified in paragraphs (c)(1) through (9) of 40 CFR 63.4710 and in 40 CFR 63.9(h).
 - (1) Company name and address.
 - (2) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
 - (3) Date of the report and beginning and ending dates of the reporting period. The reporting period is the initial compliance period described in 40 CFR 63.4740, 40 CFR 63.4750, or 40 CFR 63.4760 that applies to the affected source.
 - (4) Identification of the compliance option or options specified in 40 CFR 63.4691 that the Permittee used on each coating operation in the affected source during the initial compliance period.
 - (5) Statement of whether or not the affected source achieved the emission limitations for the initial compliance period.
 - (6) If the Permittee had a deviation, include the information in paragraphs (c)(6)(i) and (ii) of 40 CFR 63.4710.
 - (7) For each of the data items listed in paragraphs (c)(7)(i) through (iv) of 40 CFR 4710 that is required by the compliance option(s) used to demonstrate compliance

with the emission limit, include an example of how the value was determined, including calculations and supporting data. Supporting data can include a copy of the information provided by the supplier or manufacturer of the example coating or material or a summary of the results of testing conducted according to 40 CFR 63.4741(a), (b), or (c). The Permittee does not need to submit copies of any test reports.

- (8) The calculation of grams organic HAP emitted per liter coating solids used (lb organic HAP emitted per gallon coating solids used) for the compliance option(s) used, as specified in paragraphs (c)(8)(i) through (iii) of 40 CFR 63.4710.

D.1.19 Recordkeeping Requirements [40 CFR Part 63.4730 and 4731]

Pursuant to 40 CFR 63.4730, the Permittee shall comply with the following recordkeeping requirements:

The Permittee must collect and keep records of the data and information specified in this section. Failure to collect and keep these records is a deviation from the applicable standard.

- (a) A copy of each notification and report that the Permittee submitted to comply with this subpart, and the documentation supporting each notification and report.

- (b) A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner, and cleaning material and the volume fraction of coating solids for each coating. If the Permittee conducted testing to determine mass fraction of organic HAP, density, or volume fraction of coating solids, the Permittee must keep a copy of the complete test report. If the Permittee uses information provided by the manufacturer or supplier of the material that was based on testing, then the Permittee must keep the summary sheet of results provided by the manufacturer or supplier. The Permittee is not required to obtain the test report or other supporting documentation from the manufacturer or supplier.

- (c) For each compliance period, the records specified in paragraphs (c)(1) through (4) of 40 CFR 63.4730.
 - (1) A record of the coating operations at which the Permittee used each compliance option and the time periods (beginning and ending dates and times) the Permittee used each option.
 - (2) For the compliant material option, a record of the calculation of the organic HAP content for each coating, using Equation 2 of 40 CFR 63.4741.
 - (3) For the emission rate without add-on controls option, a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners, and cleaning materials used each month, using Equations 1, 1A through 1C, and 2 of 40 CFR 63.4751; and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to 40 CFR 63.4751(e)(4); the calculation of the total volume of coating solids used each month, using Equation 2 of 40 CFR 63.4751; and the calculation of each 12-month organic HAP emission rate, using Equation 3 of 40 CFR 63.4751.

- (d) A record of the name and volume of each coating, thinner, and cleaning material used during each compliance period.

- (e) A record of the mass fraction of organic HAP for each coating, thinner, and cleaning material used during each compliance period.
- (f) A record of the volume fraction of coating solids for each coating used during each compliance period.
- (g) A record of the density for each coating used during each compliance period; and, if the Permittee uses either the emission rate without add-on controls or the emission rate with add-on controls compliance option, the density for each thinner and cleaning material used during each compliance period.
- (h) If the Permittee uses an allowance in Equation 1 of 40 CFR 63.4751 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to 40 CFR 63.4751(e)(4), the Permittee must keep records of the information specified in paragraphs (h)(1) through (3) of 40 CFR 4730.
- (i) The Permittee must keep records of the date, time, and duration of each deviation.
- (j) The records must be in a form suitable and readily available for expeditious review, according to 40 CFR 63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database.
- (k) As specified in 40 CFR 63.10(b)(1), the Permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
- (l) The Permittee must keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1). The Permittee may keep the records off-site for the remaining 3 years.

D.1.20 Reporting Requirements [40 CFR Part 63.4720]

Pursuant to 40 CFR 63.4720, the Permittee shall comply with the following reporting requirements:

- (a) Semiannual compliance reports: The Permittee must submit semiannual compliance reports for each affected source according to the requirements of paragraphs (a)(1) through (6) of 40 CFR 4720. The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in paragraph (a)(2) of 40 CFR 63.4720.
 - (1) Dates: Unless IDEM, OAQ has approved a different schedule for submission of reports under 40 CFR 63.10(a), the Permittee must prepare and submit each semiannual compliance report according to the dates specified in paragraphs (a)(1)(i) through (iv) of 40 CFR 63.4720. Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
 - (2) Inclusion with title V report: Each Permittee that has obtained a title V operating permit pursuant to 40 CFR part 70 or 40 CFR part 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If the Permittee submits a semiannual compliance report pursuant to this section along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR

71.6(a)(3)(iii)(A), and the semiannual compliance report includes all required information concerning deviations from any emission limitation in this subpart, its submission shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a semiannual compliance report shall not otherwise affect any obligation the Permittee may have to report deviations from permit requirements to IDEM, OAQ.

- (3) General requirements: The semiannual compliance report must contain the information specified in paragraphs (a)(3)(i) through (v) of 40 CFR 63.4720, and the information specified in paragraphs (a)(4) through (7) and (c)(1) of 40 CFR 63.4720 that is applicable to the Permittee.
- (4) No deviations: If there were no deviations from the emission limitations in 40 CFR 63.4690, 63.4692, and 63.4693 that applies to the Permittee, the semiannual compliance report must include a statement that there were no deviations from the emission limitations during the reporting period.
- (5) Deviations: compliant material option. If the Permittee used the compliant material option, and there was a deviation from the applicable emission limit in 40 CFR 63.4690, the semiannual compliance report must contain the information in paragraphs (a)(5)(i) through (iv) of 40 CFR 63.4720.
- (6) Deviations: emission rate without add-on controls option. If the Permittee used the emission rate without add-on controls option and there was a deviation from the applicable emission limit in 40 CFR 63.4690, the semiannual compliance report must contain the information in paragraphs (a)(6)(i) through (iii) of 40 CFR 63.4720.

D.1.21 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.7 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities

- (a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (1) Woodworking operations identified as EU20 through EU23, and EU37, with particulate emissions controlled by three (3) separate baghouses and one (1) torit filter system, and exhausting through three (3) stacks identified as SV37, SV38, and SV40. [326 IAC 6-3-2]
- (2) Sanding, priming, buffing, coating, and curing, equipped with a dust collection system for particulate control. [326 IAC 6-3-2]
- (b) Other categories with emissions below insignificant thresholds (i.e. less than 5 pounds per hour particulates and less than 3 pounds per hour VOC).
- (1) Two (2) continuous UV vacuum coating lines, identified as VA1 and VA2, with particulate emissions controlled by an internal return air baghouse. [326 IAC 6-3-2]

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

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-7-10.5, WITH CONDITIONS LISTED BELOW.

Construction Conditions

General Construction Conditions

D.2.1 Permit No Defense

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

D.2.2 Effective Date of the Permit [IC13-15-5-3]

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

D.2.3 Modification to Construction Conditions [326 IAC 2]

All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for modifications pursuant to 326 IAC 2.

Emission Limitations and Standards

D.2.4 Particulate [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 operations identified as EU20 through EU23, and EU37 shall not exceed 0.87 pounds per hour when operating at a process weight rate of 200 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.2.5 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(e), the allowable particulate emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour. This includes the following operations:

- (1) Two (2) continuous UV vacuum coating lines, identified as VA1 and VA2, with particulate emissions controlled by an internal return air baghouse.
- (2) Sanding, priming, buffing, coating, and curing, equipped with a dust collection system for particulate control. [326 IAC 6-3-2]

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Doors Plus, Inc.
Source Address: 2100 Industrial Parkway, Elkhart, Indiana 46516
Mailing Address: 2100 Industrial Parkway, Elkhart, Indiana 46516
Part 70 Permit No.: T039-20089-00617

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)
- Report (specify)
- Notification (specify)
- Affidavit (specify)
- Other (specify)

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Doors Plus, Inc.
Source Address: 2100 Industrial Parkway, Elkhart, Indiana 46516
Mailing Address: 2100 Industrial Parkway, Elkhart, Indiana 46516
Part 70 Permit No.: T039-20089-00617

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

Form Completed by:

Title / Position:

Date:

Phone:

A certification is not required for this report.

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

Part 70 Quarterly Report

Source Name: Doors Plus, Inc.
Source Address: 2100 Industrial Parkway, Elkhart, Indiana 46516
Mailing Address: 2100 Industrial Parkway, Elkhart, Indiana 46516
Part 70 Permit No.: T039-20089-00617
Facility: Surface coating booths (EU24, EU27, and EU28)
Parameter: VOC
Limit: The total VOC input usage, including coatings, dilution solvents, and cleaning solvents at the paint spray booths (EU24, EU27, and EU28) shall be limited to 96 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month

YEAR:

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

No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

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

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

Source Name: Doors Plus, Inc.
 Source Address: 2100 Industrial Parkway, Elkhart, Indiana 46516
 Mailing Address: 2100 Industrial Parkway, Elkhart, Indiana 46516
 Part 70 Permit No.: T039-20089-00617

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

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

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

Form Completed By:

Title/Position:

Date:

Phone:

Attach a signed certification to complete this report.

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

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	Doors Plus, Inc.
Source Location:	2100 Industrial Parkway, Elkhart, Indiana 46516
County:	Elkhart
SIC Code:	2499
Operation Permit No.:	039-20089-00617
Permit Reviewer:	Adeel Yousuf / EVP

The Office of Air Quality (OAQ) has reviewed an application from Doors Plus, Inc. relating to the construction and operation of a wood manufacturing and surface coating operation. This Part 70 operating permit contains provisions intended to satisfy the requirements of the construction permit rules.

History

Doors Plus, Inc. submitted an application on January 5, 2005 for the construction and operation of a new source to be located at 2100 Industrial Parkway, Elkhart, Indiana. Doors Plus, Inc. currently operates a similar source at 1000 North Main Street, Elkhart, Indiana, and is operating under the Part 70 No.T039-17569-00172, issued on February 27, 2004. The new source to be located at 2100 Industrial Parkway, Elkhart, Indiana will have all the existing operations moved from the existing location to the new location. Therefore, the source manufacturing capacity and operations will be identical to those reflected in the current Part 70 permit (T039-17569-00172). This application is reviewed as a new source review at the new location.

Permitted Emission Units and Pollution Control Equipment

This is an initial approval, and no previous permits, registrations, modifications, or exemptions have been issued to this source at its new location.

New Emission Units and Pollution Control Equipment

The application includes information relating to the construction and operation of the following emission units and pollution control devices:

- (a) Two (2) surface coating spray booths identified as EU27 and EU28 (to be constructed in 2005), each using air-assisted spray guns with a maximum coating capacity of 14.4 wood doors and 120.2 wood moldings per hour, both equipped with dry filters for particulate control, and exhausting through stacks SV-27 and SV-28, respectively.
- (b) One (1) surface coating spray machine, identified as EU24 (to be constructed in 2005), using air-assisted airless spray guns, equipped with dry filters for particulate control, and exhausting through stack SV-26.

Insignificant Activities

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.
 - (1) Two (2) natural gas fired unit heaters with each one rated at 0.075 MMBtu/hr.
 - (2) Five (5) natural gas fired unit heaters with each one rated at 0.625 MMBtu/hr.
 - (3) Eight (8) natural gas fired unit heaters with each rated at 0.150 MMBtu/hr.
 - (4) One (1) natural gas fired unit heater rated at 0.16 MMBtu/hr.
 - (5) Two (2) natural gas fired unit heaters with each rated at 0.175 MMBtu/hr.
 - (6) Three (3) natural gas fired unit heaters with each rated 0.30 MMBtu/hr.
 - (7) One (1) natural gas fired unit heater rated at 0.20 MMBtu/hr.
 - (8) One (1) natural gas fired unit heater rated at 0.10 MMBtu/hr.
 - (9) Two (2) natural gas fired air make-up units with each one rated at 4.0 MMBtu/hr.
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
 - (1) Woodworking operations identified as EU20 through EU23, and EU37, with particulate emissions controlled by three (3) separate baghouses and one (1) torit filter system, and exhausting through three (3) stacks identified as SV37, SV38, and SV40. [326 IAC 6-3-2]
 - (2) Sanding, priming, buffing, coating, and curing, equipped with a dust collection system for particulate control. [326 IAC 6-3-2]
- (c) Paved and unpaved roads and parking lots with public access.
- (d) Other categories with emissions below insignificant thresholds (i.e. less than 5 pounds per hour particulates and less than 3 pounds per hour VOC).
 - (1) Two (2) continuous UV vacuum coating lines, identified as VA1 and VA2, with particulate emissions controlled by an internal return air baghouse. [326 IAC 6-3-2]

Unpermitted Emission Units and Pollution Control Equipment

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

Existing Approvals

This new source has no existing approvals.

Enforcement Issue

There are no enforcement actions pending.

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 January 5, 2005.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (six (6) pages).

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	58.86
PM-10	59.15
SO ₂	0.03
VOC	230.19
CO	4.30
NO _x	5.12

HAPs	Potential to Emit (tons/yr)
Xylene	12.79
Toluene	12.38
MIBK	2.40
Ethylbenzene	1.89
Methanol	1.80
Hexane	0.092
Others	0.004
Total	31.36

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Nonattainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements of Emission Offset (326 IAC 2-3). See the State Rule Applicability for the source section.
- (b) Elkhart 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 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	0.18
PM-10	0.47
SO ₂	0.03
VOC	96.28
CO	4.30
NO _x	5.12
Single HAP	12.79
Combination HAPs	31.36

- (a) This new source is not a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater, and no nonattainment pollutant is emitted at a rate of 100 tons per year or greater. Therefore, pursuant to 326 IAC 2-2 and 2-3, the PSD and Emission Offset requirements do not apply.

Potential to Emit After Issuance

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

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Surface Coating Operation (EU24, EU27, EU28, VA1, and VA2)	0.02	0.02	--	96.00	--	--	12.79 (single) 31.26 (total)
Insignificant Woodworking Operation	0.06	0.06	--	--	--	--	--
Insignificant Activities (natural gas combustion)	0.10	0.39	0.03	0.28	4.30	5.12	0.092 (single) 0.10 (total)
Total Emissions	0.18	0.47	0.03	96.28	4.30	5.12	12.79 (single) 31.36 (total)

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.
- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants, 326 IAC 20, (40 CFR 63, Subpart JJ) are not included for the wood surface coating operation at this source. Subpart JJ, as per 40 CFR 63.801 (Definitions), applies to wood furniture manufacturing operations under any of the following standard industrial classification codes: 2434, 2511, 2512, 2517, 2519, 2521, 2531, 2541, 2599, or 5712. However, this source engages in manufacturing of wood doors and door moldings and operates under the non listed SIC code of 2499.
- (c) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable to this source. Such requirements apply to a pollutant-specific emissions unit (PSEU), as defined in 40 CFR 64.1, at a major source that is required to obtain a Part 70 or 71 permit if the PSEU meets the following criteria:

- (1) the unit is subject to an emission limitation or standard for an applicable regulated air pollutant,
- (2) the unit uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard, and
- (3) the unit has a potential to emit (PTE) before controls equal to or greater than 100 percent of the amount (tons per year) of the pollutant required for a source to be classified as a Part 70 major source.

The surface coating operations at this facility (EU24, EU27, EU28, VA1 and VA2) do not individually have the potential to emit greater than 100 tons per year of VOC. Additionally, none of these operations require the use of control device to achieve compliance with the representative emission limitations. Therefore the source is not subject to the provisions of 40 CFR 64, Compliance Assurance Monitoring.

- (d) This source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Surface Coating of Wood Building Products, 40 CFR 63.4680-63.4781 (Subpart QQQQ), and 326 IAC 20-1-1, because it conducts surface coating of wood building products (i.e., doors, finished doorskins, and door components); it is a major source of hazardous air pollutants; and it uses 1,100 gallons per year or more of coatings. Pursuant to ' 63.4682(c), since this source is commencing construction after June 21, 2002, this source is considered as a new affected source. Therefore, this is a new affected source [' 63.4682(c)], whose Subpart QQQQ compliance date is upon the startup of this new facility since this new affected source is being constructed after May 28, 2003 [' 63.4683(a)(2)].

This new facility is subject to National Emission Standards for Hazardous Air Pollutants for Surface Coating of Wood Building Products, 40 CFR 63, Subpart QQQQ with the following conditions:

- (I) 40 CFR 63.4682 Applicability and designation of affected facility:
 - (a) This subpart applies to each new, reconstructed, and existing affected source.
 - (b) The affected source is the collection of all of the items listed in paragraphs (b)(1) through (4) of this section that are used for surface coating of wood building products:
 - (1) All coating operations as defined in Sec. 63.4781;
 - (2) All storage containers and mixing vessels in which coatings, thinners, and cleaning materials are stored or mixed;
 - (3) All manual and automated equipment and containers used for conveying coatings, thinners, and cleaning materials; and
 - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
 - (c) An affected source is a new affected source if its construction commenced after June 21, 2002, and the construction is of a completely new wood building products surface coating source where previously no wood building products surface coating source had existed.

- (II) 40 CFR 63.4690 - 4693 Emission Limits and Work Practice Standards
- (a) For a new affected source, the Permittee must limit organic HAP emissions to the atmosphere to no more than the applicable emission limit(s) in Table 1 of this subpart, determined according to the requirements in 40 CFR 63.4741, 63.4751, or 63.4761.
- (b) If the affected source applies coatings to products that are in different subcategories as described in 40 CFR 63.4681(a), then the Permittee must demonstrate initial and continuous compliance by selecting one of the approaches described in paragraphs (c)(1) and (2) of 40 CFR 63.4690.
- (1) Conduct separate compliance demonstrations for each applicable subcategory emission limit and reflect these separate determinations in notifications, reports, and records required by 40 CFR 63.4710, 63.4720, and 63.4730, respectively.
- (2) Demonstrate compliance with the most stringent of the applicable subcategory emission limits.
- (c) The Permittee must include all coatings, thinners, and cleaning materials used in the affected source when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in 40 CFR 63.4690. To make this determination, the Permittee must use at least one of the three compliance options listed in paragraphs (a) through (c) of 40 CFR 63.4691. The Permittee may apply any of the compliance options to an individual coating operation or to multiple coating operations as a group or to the entire affected source. The Permittee may use different compliance options for different coating operations or at different times on the same coating operation. However, the Permittee may not use different compliance options at the same time on the same coating operation. If the Permittee switches between compliance options for any coating operation or group of coating operations, then the Permittee must document this switch as required by 40 CFR 63.4730(c), and the Permittee must report it in the next semiannual compliance report required in 40 CFR 63.4720.
- (1) Compliant material option: Demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable emission limit(s) in 40 CFR 63.4690, and that each thinner and each cleaning material used contains no organic HAP. The Permittee must meet all the requirements of 40 CFR 63.4740, 63.4741, and 63.4742 to demonstrate compliance with the emission limit using this option.
- (2) Emission rate without add-on controls option: Demonstrate that, based on the coatings, thinners, and cleaning materials used in the coating operation(s), the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit(s) in 40 CFR 63.4690, calculated as a rolling 12-month emission rate and determined on a monthly basis. The Permittee must meet all the requirements of 40 CFR 63.4750, 63.4751, and 63.4752 to demonstrate compliance with the emission limit using this option.

- (3) Emission rate with add-on controls option: Demonstrate that, based on the coatings, thinners, and cleaning materials used in the coating operation(s) and the emission reductions achieved by emission capture systems and add-on controls, the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit(s) in 40 CFR 63.4690, calculated as a rolling 12-month emission rate and determined on a monthly basis. If this compliance option is used, the Permittee must also demonstrate that all emission capture systems and add-on control devices for the coating operation(s) meet the operating limits required in 40 CFR 63.4692, except for solvent recovery systems for which the Permittee conducts liquid-liquid material balances according to 40 CFR 63.4761(j), and that the Permittee meets the work practice standards required in 40 CFR 63.4693. The Permittee must meet all the requirements of 40 CFR 63.4760 through 63.4768 to demonstrate compliance with the emission limits, operating limits, and work practice standards using this option.

This Permittee has decided to use the first two compliance options, the Compliant Material Option for most of the coating operations and the Emission Rate without the Add-on Controls Option for the remaining coatings which are not compliant as applied.

- (III) 40 CFR 63.4700 – General Compliance Requirements
 - (a) The Permittee must be in compliance with the emission limitations in this subpart as specified in paragraph (a)(1) of 40 CFR 63.4700.
 - (1) Any coating operation(s) for which the Permittee uses the compliant material option or the emission rate without add-on controls option, as specified in 40 CFR 63.4691(a) and (b), must be in compliance with the applicable emission limit in 40 CFR 63.4690 at all times.
 - (b) The Permittee must always operate and maintain the affected source, including all air pollution control and monitoring equipment used for purposes of complying with this subpart, according to the provisions in 40 CFR 63.6(e)(1)(i).

Compliance Requirements for the Compliant Material Option are required under 40 CFR 63.4740 through 63.4742 and for the Emission Rate without Add-On Controls Option are required under 40 CFR 63.4750 through 63.4752. Notifications, Reporting and Record Keeping requirements are required under 40 CFR 63.4710 through 63.4731.

State Rule Applicability – Entire Source

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

This new source, being constructed in 2005 after the August 7, 1977 rule applicability date, is not considered as a major source since it is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and the current potential to emit of PM, PM10, NOX, SO2 and CO for the entire source is less than 250 tons per year. Therefore, this source is a minor source under PSD.

The current PTE for VOC for the entire source is limited to less than 100 tons per year and the source is located in Elkhart County, which has been designated as a nonattainment area for the 8-hour ozone standard in June 2004. Therefore, this source is a minor source under Emissions Offset for VOC.

The following limits apply to this source:

The total VOC input usage, including coatings, dilution solvents, and cleaning solvents at the paint spray booths (EU24, EU27, and EU28) shall be limited to 96 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2007 and every 3 years after. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary 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 6-4 (Fugitive Dust Emissions)

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

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

This source is not subject to 326 IAC 6-5, for fugitive particulate matter emissions, because the fugitive particulate matter emissions from this source are less than 25 tons per year.

326 IAC 2-4.1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of any combination of HAPs, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). This source is subject to the National Emissions Standards for Hazardous Air Pollutants 40 CFR Part 63, Subpart QQQQ. Compliance with 40 CFR Part 63, Subpart QQQQ, as an applicable standard issued pursuant to Section 112(d) of the Clean Air Act, makes the requirements of 326 IAC 2-4.1 not applicable.

State Rule Applicability – Individual Facilities

326 IAC 6-3-2 (Process Operations)

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

Pursuant to 40 CFR 52 Subpart P the particulate matter (PM) from the surface coating operation (EU24, EU27, EU28) shall be limited by the following:

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

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

Under the rule revision, particulate from the spray coating operations shall be controlled by dry filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

326 IAC 8-1-6 (New Facilities)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, which have potential volatile organic compound (VOC) emissions of 25 tons per year or more and are not subject to other provisions of Article 8. This source has a wood surface coating operation (identified as EU24, EU27, and EU28) that is constructed after January 1, 1980, with potential uncontrolled VOC emissions in excess of 25 tons per year. However, the surface coating operations at this source are subject to the requirements of 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), therefore, this rule does not apply.

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

This source is subject to 326 IAC 8-2-12 for each of spray booths (EU24, EU27, and EU28), because they are constructed after 1990, and have the potential to emit more than 15 pounds per day of VOC. Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets at booths EU24, EU27, and EU28 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. Doors Plus, Inc. uses air assisted airless spray applications, therefore, this source is in compliance with 326 IAC 8-2-12.

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

The particulate from the woodworking operation 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:

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

$$E = 4.10 * (0.1)^{0.67} = 0.87 \text{ lbs PM/hour}$$

Based on the above equation, particulate emissions from the woodworking operation shall be limited to 0.87 pounds per hour.

Compliance calculation:

$$(0.06 \text{ tons PM/yr}) * (\text{yr}/8,760 \text{ hrs}) * (2,000 \text{ lbs/ton}) = 0.0137 \text{ lbs PM/hr}$$

Actual lbs PM/hr (0.0137) is less than the allowable lbs PM/hr (0.87), therefore the woodworking operation will comply with the requirements of 326 IAC 6-3-2.

The baghouses shall be in operation at all times the wood working operation is in operation, in order to comply with this limit.

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

The Grinding and Machining operations and UV vacuum coating lines (VA1 and VA2), each handles less than 100 pounds of material per hour. Pursuant to 326 IAC 6-3-2(e)(2), allowable particulate emissions from each operation shall not exceed 0.551 pounds per hour.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule applies to sources commencing operation after October 7, 1974 and prior to January 1, 1980, located anywhere in the state, with potential solvent VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This source was constructed after January 1, 1980. Therefore, this rule does not apply to this source.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)

The requirements of this rule apply to stationary sources located in Lake, Porter, Clark and Floyd Counties that emit or have the potential to emit VOCs at levels equal to or greater than 25 tons per year in Lake and Porter Counties; 100 tons per year in Clark and Floyd Counties; and to any coating facility that emits or has the potential to emit 10 tons per year or greater in Lake, Porter, Clark or Floyd County. The source is located in Elkhart County. Therefore, this rule is not applicable to this source.

326 IAC 8-11 (Wood Furniture Coatings)

This rule applies to any person performing wood furniture manufacturing operations in Lake, Porter, Clark, or Floyd County, with the wood furniture manufacturing operations having potential emissions of VOC of 25 tons or more per year and occurring at a source classified with a listed Standard Industrial Classification (SIC) code. This rule is not applicable to this source since it is located in Elkhart County.

There are no other 326 IAC 8 rules that apply.

Testing Requirements

Compliance testing is not required for this source since the coating material usage and related VOC and volatile organic HAP emissions assume an emission factor of 2,000 pounds of pollutant emitted per ton of pollutant input to the coating operation. And the woodworking operations are controlled by three (3) baghouses with emissions after control well below the allowable particulate matter emission rate.

Compliance Requirements

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

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

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

1. The spray paint booths (EU24, EU27, and EU28) have applicable compliance monitoring conditions as specified below:
 - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (SV26, SV27, and SV28) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
 - (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
 - (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the spray coating booths equipped with dry filters must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 5-1.

Conclusion

The construction and operation of this wood kitchen cabinet manufacturing source shall be subject to the conditions of the attached proposed Part 70 permit No. 039-20089-00617.