



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: December 14, 2007
RE: Dutch Made, Inc. / 003-21796-00236

Matthew Stuckey, Deputy Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot12/03/07



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100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
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Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**Dutch Made, Inc.
10415 Roth Road
Grabill, Indiana 46741**

(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. 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.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70, Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 003-21796-00236	
Issued by: Original Signed By: Matthew Stuckey, Deputy Branch Chief Permits Branch Office of Air Quality	Issuance Date: December 14, 2007 Expiration Date: December 14, 2012

TABLE OF CONTENTS

SECTION A	SOURCE SUMMARY	5
A.1	General Information [326 IAC 2-8-3(b)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3	Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(l)]	
A.4	FESOP Applicability [326 IAC 2-8-2]	
SECTION B	GENERAL CONDITIONS	7
B.1	Definitions [326 IAC 2-8-1]	
B.2	Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)]	
B.3	Term of Conditions [326 IAC 2-1.1-9.5]	
B.4	Enforceability [326 IAC 2-8-6]	
B.5	Severability [326 IAC 2-8-4(4)]	
B.6	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.7	Duty to Provide Information [326 IAC 2-8-4(5)(E)]	
B.8	Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]	
B.9	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.10	Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.11	Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]	
B.12	Emergency Provisions [326 IAC 2-8-12]	
B.13	Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.14	Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]	
B.15	Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]	
B.16	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]	
B.17	Permit Renewal [326 IAC 2-8-3(h)]	
B.18	Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]	
B.19	Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]	
B.20	Source Modification Requirement [326 IAC 2-8-11.1] [326 IAC 2-2-2] [326 IAC 2-3-2]	
B.21	Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-17-3-2] [IC 13-30-3-1]	
B.22	Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
B.23	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]	
B.24	Credible Evidence [326 IAC 2-8-4(3)] [326 IAC 2-8-5] [62 FR 8314] [326 IAC 1-1-6]	
SECTION C	SOURCE OPERATION CONDITIONS	16
	Emission Limitations and Standards [326 IAC 2-8-4(1)]	
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2	Overall Source Limit [326 IAC 2-8]	
C.3	Opacity [326 IAC 5-1]	
C.4	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5	Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.6	Fugitive Dust Emissions [326 IAC 6-4]	
C.7	Stack Height [326 IAC 1-7]	
C.8	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
	Testing Requirements [326 IAC 2-8-4(3)]	
C.9	Performance Testing [326 IAC 3-6]	

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

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

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS: Surface Coating..... 23

Emission Limitations and Standards [326 IAC 2-8-4(1)]

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

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

D.1.3 Hazardous Air Pollutants (HAPs) Limits [326 IAC 2-8] [326 IAC 2-4.1-1] [40 CFR 60,
Subpart JJ]

D.1.4 Particulate [326 IAC 6-3-2(d)] [326 IAC 2-8] [326 IAC 2-2]

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-4]
[326 IAC 8-1-2(a)]

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

D.1.7 Monitoring

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

D.1.8 Record Keeping Requirements

D.1.9 Reporting Requirements

SECTION D.2 FACILITY OPERATION CONDITIONS: Woodworking..... 27

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate [326 IAC 6-3-2] [326 IAC 2-2] [326 IAC 2-8]

D.2.2 Particulate Less Than 10 Microns (PM₁₀) [326 IAC 2-8] [326 IAC 2-2]

D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

D.2.4 Particulate Control

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

D.2.5 Visible Emissions Notations

D.2.6 Dust Collector Inspections

D.2.7 Broken or Failed Bag Detection

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

D.2.8 Record Keeping Requirements

Certification Form	30
Emergency/Occurrence Form	31
Quarterly Report Forms	33
Quarterly Deviation and Compliance Monitoring Report Form	36

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 2-8-3(b)]

The Permittee owns and operates a stationary cabinet manufacturing source.

Source Address:	10415 Roth Road, Grabill, Indiana 46741
Mailing Address:	P.O. Box 310, Grabill, Indiana 46741
General Source Phone Number:	(260) 657-3311
SIC Code:	2434
County Location:	Allen
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) One (1) stain application booth, identified as EU-1, constructed in 1975, equipped with HVLP spray applicators and dry filters for overspray control, exhausting to stack S-1, capacity: 100 doors or 20 boxes per hour.
- (b) One (1) sealer application booth, identified as EU-2, constructed in 1975, equipped with HVLP spray applicators and dry filters for overspray control, exhausting to stack S-2, capacity: 100 doors or 20 boxes per hour.
- (c) One (1) special coating application booth, identified as EU-3, constructed in 1995, equipped with HVLP spray applicators and dry filters for overspray control, exhausting to stack S-3, capacity: 100 doors or 20 boxes per hour.
- (d) One (1) doors and special coating application booth, identified as EU-4, constructed in 1975, equipped with HVLP spray applicators and dry filters for overspray control, exhausting to stack S-4, capacity: 100 doors or 20 boxes per hour.
- (e) One (1) topcoat application booth, identified as EU-5, constructed in 1975, equipped with HVLP spray applicators and dry filters for overspray control, exhausting to stack S-5, capacity: 100 doors or 20 boxes per hour.
- (f) One (1) clear seal application booth, identified as EU-6, constructed in 2000, equipped with HVLP spray applicators and dry filters for overspray control, exhausting to stack S-6, capacity: 100 doors or 20 boxes per hour.
- (g) One (1) stain application booth, identified as EU-7, constructed in 2000, equipped with HVLP spray applicators and dry filters for overspray control, exhausting to stack S-7, capacity: 100 doors or 20 boxes per hour.
- (h) One (1) special coating application booth, identified as EU-8, constructed in 2000, equipped

with HVLP spray applicators and dry filters for overspray control, exhausting to stack S-8, capacity: 100 doors or 20 boxes per hour.

- (i) One (1) stain application booth, identified as EU-9, constructed in 1987, equipped with HVLP spray applicators and dry filters for overspray control, exhausting to stack S-9, capacity: 100 doors or 20 boxes per hour.
- (j) One (1) topcoat application booth, identified as EU-10, constructed in 1987, equipped with HVLP spray applicators and dry filters for overspray control, exhausting to stack S-10, capacity: 100 doors or 20 boxes per hour.
- (k) One (1) glaze application booth, identified as EU-21, constructed in 2005, equipped with HVLP spray applicators and dry filters for overspray control, exhausting to stack S-21, capacity: 100 doors or 20 boxes per hour.
- (l) One (1) primer application booth, identified as EU-22, constructed in 2005, equipped with HVLP spray applicators and dry filters for overspray control, exhausting to stack S-22, capacity: 100 doors or 20 boxes per hour.
- (m) The following woodworking operations:
 - (1) Woodworking operations, equipped with a dust collection system, exhausting through stack S-20, capacity: 415 pounds of plywood and 246 pounds of hardwood per hour, total.
 - (2) Eight (8) downdraft sanding tables, each equipped with filters, capacity: 7.5 pounds of doors per hour, each.
 - (3) One (1) sanding room, equipped with filters, capacity: 20.0 pounds of doors and/or drawers per hour.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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

- (a) One (1) sawdust bin loadout.
- (b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, with a total heat input capacity of 22.875 million British thermal units per hour. There are no boilers.
- (c) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 Permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]

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 2-8-4(2)] [326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)]

-
- (a) This permit, F 003-21796-00236, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-8-6]

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 2-8-4(4)]

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 2-8-4(5)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U.S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

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

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (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. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (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 2-8-4(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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

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

B.12 Emergency Provisions [326 IAC 2-8-12]

- (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 except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or 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: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865
 - (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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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 2-8-4(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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) 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 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) 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.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury

to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

- (a) All terms and conditions of permits established prior to F 003-21796-00236 and issued pursuant to permitting programs approved into the state implementation plan have been either:

- (1) incorporated as originally stated,
- (2) revised, or
- (3) deleted.

- (b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

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 2-8-3(h) and 326 IAC 2-8-9.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating 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

2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 2-8-8(a)]
- (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 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(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 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (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 2-8-3. 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (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 2-8 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 Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10 (b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) 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 approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- 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, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make 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 2-8-15(b)(2), (c)(1), and (d).

- (b) **Emission Trades [326 IAC 2-8-15(c)]**
The Permittee may trade emissions increases and decreases at 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 2-8-15(c).
- (c) **Alternative Operating Scenarios [326 IAC 2-8-15(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 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) **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.20 Source Modification Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-17-3-2] [IC13-30-3-1]

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

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

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][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) 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.24 Credible Evidence [326 IAC 2-8-4(3)] [326 IAC 2-8-5] [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 2-8-4(1)]

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

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

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-3 (Emission Offset) not applicable;
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity

monitor) in a six (6) hour period.

C.4 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.

C.5 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.

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

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

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

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using ambient air quality modeling pursuant to 326 IAC 1-7-4.

C.8 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 two hundred sixty (260) linear feet on pipes or one hundred sixty (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
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

Testing Requirements [326 IAC 2-8-4(3)]

C.9 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

Compliance Requirements [326 IAC 2-1.1-11]

C.10 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 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.12 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 2-8-4] [326 IAC 2-8-5(a)(1)]

C.13 Risk Management Plan [326 IAC 2-8-4] [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.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely

recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

- (1) initial inspection and evaluation
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
- (1) monitoring results;
 - (2) review of operation and maintenance procedures and records;
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
- (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

- (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 twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.17 General Reporting Requirements [326 IAC 2-8-4(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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) 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.

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

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Surface Coating

- (a) One (1) stain application booth, identified as EU-1, constructed in 1975, equipped with HVLP spray applicators and dry filters for overspray control, exhausting to stack S-1, capacity: 100 doors or 20 boxes per hour.
- (b) One (1) sealer application booth, identified as EU-2, constructed in 1975, equipped with HVLP spray applicators and dry filters for overspray control, exhausting to stack S-2, capacity: 100 doors or 20 boxes per hour.
- (c) One (1) special coating application booth, identified as EU-3, constructed in 1995, equipped with HVLP spray applicators and dry filters for overspray control, exhausting to stack S-3, capacity: 100 doors or 20 boxes per hour.
- (d) One (1) doors and special coating application booth, identified as EU-4, constructed in 1975, equipped with HVLP spray applicators and dry filters for overspray control, exhausting to stack S-4, capacity: 100 doors or 20 boxes per hour.
- (e) One (1) topcoat application booth, identified as EU-5, constructed in 1975, equipped with HVLP spray applicators and dry filters for overspray control, exhausting to stack S-5, capacity: 100 doors or 20 boxes per hour.
- (f) One (1) clear seal application booth, identified as EU-6, constructed in 2000, equipped with HVLP spray applicators and dry filters for overspray control, exhausting to stack S-6, capacity: 100 doors or 20 boxes per hour.
- (g) One (1) stain application booth, identified as EU-7, constructed in 2000, equipped with HVLP spray applicators and dry filters for overspray control, exhausting to stack S-7, capacity: 100 doors or 20 boxes per hour.
- (h) One (1) special coating application booth, identified as EU-8, constructed in 2000, equipped with HVLP spray applicators and dry filters for overspray control, exhausting to stack S-8, capacity: 100 doors or 20 boxes per hour.
- (i) One (1) stain application booth, identified as EU-9, constructed in 1987, equipped with HVLP spray applicators and dry filters for overspray control, exhausting to stack S-9, capacity: 100 doors or 20 boxes per hour.
- (j) One (1) topcoat application booth, identified as EU-10, constructed in 1987, equipped with HVLP spray applicators and dry filters for overspray control, exhausting to stack S-10, capacity: 100 doors or 20 boxes per hour.
- (k) One (1) glaze application booth, identified as EU-21, constructed in 2005, equipped with HVLP spray applicators and dry filters for overspray control, exhausting to stack S-21, capacity: 100 doors or 20 boxes per hour.
- (l) One (1) primer application booth, identified as EU-22, constructed in 2005, equipped with HVLP spray applicators and dry filters for overspray control, exhausting to stack S-22, capacity: 100 doors or 20 boxes per hour.

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

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

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets at the one (1) stain application booth, identified as EU-9, the one (1) topcoat application booth, identified as EU-10, the one (1) special coating application booth, identified as EU-3, the one (1) clear seal application booth, identified as EU-6, the one (1) stain application booth, identified as EU-7, the one (1) special coating application booth, identified as EU-8, the one (1) glaze application booth, identified as EU-21, and the one (1) primer application booth, identified as EU-22, 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. This source uses HVLP spray applicators.

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

The total VOC usage at the twelve (12) surface coating booths, identified as EU-1 through EU-10, EU-21 and EU-22, shall be limited to less than 99.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This shall limit the potential to emit VOC to less than one hundred (100) tons per year from the entire source, including the VOC emissions from the insignificant combustion, rendering 326 IAC 2-7, Part 70, not applicable based on VOC emissions. This shall also render the requirements of 326 IAC 2-2, PSD, not applicable.

D.1.3 Hazardous Air Pollutants (HAPs) Limits [326 IAC 2-8] [326 IAC 2-4.1-1] [40 CFR 60, Subpart JJ]

- (a) The single HAP usage at the twelve (12) surface coating booths, identified as EU-1 through EU-10, EU-21 and EU-22, shall be limited to less than 9.0 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month. This shall limit the potential to emit each individual HAP to less than ten (10) tons per year from the entire source, including the HAP emissions from the insignificant combustion, rendering 326 IAC 2-7, Part 70, not applicable based on individual HAP emissions.
- (b) The total HAPs usage at the twelve (12) surface coating booths, identified as EU-1 through EU-10, EU-21 and EU-22, shall be limited to less than 24.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This shall limit the potential to emit each any combination of HAPs to less than twenty-five (25) tons per year from the entire source, including the HAP emissions from the insignificant combustion, rendering 326 IAC 2-7, Part 70, not applicable based on total HAPs emissions.

These limitations shall also render the requirements of 326 IAC 2-4.1-1, New Source Toxics Control, and 40 CFR 60, Subpart JJ, not applicable.

D.1.4 Particulate [326 IAC 6-3-2(d)] [326 IAC 2-8] [326 IAC 2-2]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating manufacturing processes shall be

controlled by dry particulate filters, and the Permittee shall operate the filters in accordance with manufacturer's specifications. In combination with Conditions D.2.1(a) and D.2.2, this shall render 326 IAC 2-7, Part 70, not applicable with respect to PM₁₀ emissions and 326 IAC 2-2, PSD, not applicable with respect to PM and PM₁₀ emissions.

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC and HAP usage limitations contained in Conditions D.1.2 and D.1.4 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 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.7 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 (S-1 through S-10, S-21 and S-22) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.1.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.2 and D.1.3, 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 and HAP usage limits and the VOC and HAP emission limits established in Conditions D.1.2 and D.1.3. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.
- (1) The VOC and HAP 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, individual HAP and total HAPs usage for each month; and
 - (5) The weight of VOCs, each individual HAP and total HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

Quarterly summaries of the information to document compliance with Conditions D.1.2 and D.1.3 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Woodworking

(m) The following woodworking operations:

- (1) Woodworking operations, equipped with a dust collection system, exhausting through stack S-20, capacity: 415 pounds of plywood and 246 pounds of hardwood per hour, total.
- (2) Eight (8) downdraft sanding tables, each equipped with filters, capacity: 7.5 pounds of doors per hour, each.
- (3) One (1) sanding room, equipped with filters, capacity: 20.0 pounds of doors and/or drawers per hour.

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate [326 IAC 6-3-2] [326 IAC 2-2] [326 IAC 2-8]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the woodworking operations, equipped with the dust collection system and exhausting through stack S-20, shall not exceed 1.95 pounds per hour, when operating at a process weight rate of 0.3305 tons per hour. The pounds per hour limitation was calculated with the following equation:

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:

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

In combination with Condition D.1.4, this shall also limit the potential to emit PM to less than one hundred (100) tons per year, rendering 326 IAC 2-2, PSD, and 326 IAC 2-7, Part 70, not applicable with respect to PM emissions.

- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the eight (8) downdraft sanding tables shall not exceed 0.551 pounds per hour, when operating at a process weight rate less than 100 tons per hour.
- (c) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the one (1) sanding room shall not exceed 0.551 pounds per hour, when operating at a process weight rate less than 100 tons per hour.

D.2.2 Particulate Less Than 10 Microns (PM₁₀) [326 IAC 2-8] [326 IAC 2-2]

The particulate emission rate from the woodworking operations, equipped with the dust collection system and exhausting through stack S-20, shall not exceed 1.95 pounds per hour. In combination with Condition D.1.4, this shall limit the potential to emit PM₁₀ to less than one hundred (100) tons per year, rendering 326 IAC 2-2, PSD, and 326 IAC 2-7, Part 70, not applicable with respect to PM₁₀ emissions.

D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.2.4 Particulate Control

- (a) In order to comply with Conditions D.2.1(a) and D.2.2, the dust collection system for particulate control shall be in operation and control emissions from the woodworking operations at all times that the woodworking is in operation.
- (b) In order to comply with Condition D.2.1(b), the filters for particulate control shall be in operation and control emissions from the eight (8) downdraft tables at all times that any of the eight (8) downdraft tables is in operation.
- (c) In order to comply with Condition D.2.1(c), the filters for particulate control shall be in operation and control emissions from the one (1) sanding room at all times that the sanding room is in operation.
- (d) In the event that bag failure is observed in a multi-compartment dust collector, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.2.5 Visible Emissions Notations

- (a) Visible emission notations of the woodworking stack (S-20) exhaust shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.2.6 Dust Collector Inspections

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. All defective bags shall be replaced.

D.2.7 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain a daily record of visible emission notations of the woodworking stack (S-20) exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the woodworking did not operate that day).

- (b) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6.

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

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Dutch Made, Inc.
Source Address: 10415 Roth Road, Grabill, Indiana 46741
Mailing Address: P.O. Box 310, Grabill, Indiana 46741
FESOP No.: F 003-21796-00236

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:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Dutch Made, Inc.
Source Address: 10415 Roth Road, Grabill, Indiana 46741
Mailing Address: P.O. Box 310, Grabill, Indiana 46741
FESOP No.: F 003-21796-00236

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">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), 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 Describe:
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**

FESOP Quarterly Report

Source Name: Dutch Made, Inc.
Source Address: 10415 Roth Road, Grabill, Indiana 46741
Mailing Address: P.O. Box 310, Grabill, Indiana 46741
FESOP No.: F 003-21796-00236
Facilities: Twelve (12) surface coating booths, identified as EU-1 through EU-10, EU-21 and EU-22
Parameter: Total VOC Usage
Limit: Less than 99.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

QUARTER: _____ YEAR: _____

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

- 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**

FESOP Quarterly Report

Source Name: Dutch Made, Inc.
Source Address: 10415 Roth Road, Grabill, Indiana 46741
Mailing Address: P.O. Box 310, Grabill, Indiana 46741
FESOP No.: F 003-21796-00236
Facilities: Twelve (12) surface coating booths, identified as EU-1 through EU-10, EU-21 and EU-22
Parameter: Total Individual HAP Usage
Limit: Less than 9.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

QUARTER: _____ YEAR: _____

Month	Individual HAP Usage (tons)	Individual HAP Usage (tons)	Individual HAP Usage (tons)
	This Month	Previous 11 Months	12 Month Total

- 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**

FESOP Quarterly Report

Source Name: Dutch Made, Inc.
Source Address: 10415 Roth Road, Grabill, Indiana 46741
Mailing Address: P.O. Box 310, Grabill, Indiana 46741
FESOP No.: F 003-21796-00236
Facilities: Twelve (12) surface coating booths, identified as EU-1 through EU-10, EU-21 and EU-22
Parameter: Total HAPs Usage
Limit: Less than 24.0 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month

QUARTER: _____ YEAR: _____

Month	Total HAPs Usage (tons)	Total HAPs Usage (tons)	Total HAPs Usage (tons)
	This Month	Previous 11 Months	12 Month Total

- 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**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Dutch Made, Inc.
Source Address: 10415 Roth Road, Grabill, Indiana 46741
Mailing Address: P.O. Box 310, Grabill, Indiana 46741
FESOP No.: F 003-21796-00236

Months: _____ to _____ Year: _____

Page 1 of 2

<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 ANo 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: _____

A certification is not required for this report.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a
Federally Enforceable State Operating Permit Renewal

Source Background and Description

Source Name:	Dutch Made, Inc.
Source Location:	10415 Roth Road, Grabill, Indiana 46741
County:	Allen
SIC Code:	2434
Permit Renewal No.:	F 003-21796-00236
Permit Reviewer:	CarrieAnn Paukowits/MES

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Dutch Made, Inc. relating to the operation of a cabinet manufacturing source.

History

On September 16, 2005, Dutch Made, Inc. submitted an application to the OAQ requesting to renew its operating permit. Dutch Made, Inc. was issued a FESOP Renewal (F 003-13985-00236) on September 5, 2001.

Permitted Emission Units and Pollution Control Equipment

- (a) One (1) stain application booth, identified as EU-1, constructed in 1975, equipped with HVLP spray applicators and dry filters for overspray control, exhausting to stack S-1, capacity: 100 doors or 20 boxes per hour.
- (b) One (1) sealer application booth, identified as EU-2, constructed in 1975, equipped with HVLP spray applicators and dry filters for overspray control, exhausting to stack S-2, capacity: 100 doors or 20 boxes per hour.
- (c) One (1) special coating application booth, identified as EU-3, constructed in 1995, equipped with HVLP spray applicators and dry filters for overspray control, exhausting to stack S-3, capacity: 100 doors or 20 boxes per hour.
- (d) One (1) doors and special coating application booth, identified as EU-4, constructed in 1975, equipped with HVLP spray applicators and dry filters for overspray control, exhausting to stack S-4, capacity: 100 doors or 20 boxes per hour.
- (e) One (1) topcoat application booth, identified as EU-5, constructed in 1975, equipped with HVLP spray applicators and dry filters for overspray control, exhausting to stack S-5, capacity: 100 doors or 20 boxes per hour.
- (f) One (1) clear seal application booth, identified as EU-6, constructed in 2000, equipped with HVLP spray applicators and dry filters for overspray control, exhausting to stack S-6, capacity: 100 doors or 20 boxes per hour.
- (g) One (1) stain application booth, identified as EU-7, constructed in 2000, equipped with HVLP spray applicators and dry filters for overspray control, exhausting to stack S-7, capacity: 100 doors or 20 boxes per hour.
- (h) One (1) special coating application booth, identified as EU-8, constructed in 2000, equipped with HVLP spray applicators and dry filters for overspray control, exhausting to stack S-8, capacity: 100 doors or 20 boxes per hour.

- (i) One (1) stain application booth, identified as EU-9, constructed in 1987, equipped with HVLP spray applicators and dry filters for overspray control, exhausting to stack S-9, capacity: 100 doors or 20 boxes per hour.
- (j) One (1) topcoat application booth, identified as EU-10, constructed in 1987, equipped with HVLP spray applicators and dry filters for overspray control, exhausting to stack S-10, capacity: 100 doors or 20 boxes per hour.
- (k) One (1) glaze application booth, identified as EU-21, constructed in 2005, equipped with HVLP spray applicators and dry filters for overspray control, exhausting to stack S-21, capacity: 100 doors or 20 boxes per hour.
- (l) One (1) primer application booth, identified as EU-22, constructed in 2005, equipped with HVLP spray applicators and dry filters for overspray control, exhausting to stack S-22, capacity: 100 doors or 20 boxes per hour.
- (m) The following woodworking operations:
 - (1) Woodworking operations, equipped with a dust collection system, exhausting through stack S-20, capacity: 415 pounds of plywood and 246 pounds of hardwood per hour, total.
 - (2) Eight (8) downdraft sanding tables, each equipped with filters, capacity: 7.5 pounds of doors per hour, each.
 - (3) One (1) sanding room, equipped with filters, capacity: 20.0 pounds of doors and/or drawers per hour.

The identification and description of each booth has been updated, but there have been no physical changes.

Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit

There are no unpermitted emission units.

Emission Units Removed from the Permit

One (1) spray booth, identified as EU-23, was never constructed.

Insignificant activities removed:

One (1) sawdust bin loadout and one (1) workstation

Insignificant Activities

- (a) One (1) sawdust bin loadout.
- (b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, with a total heat input capacity of 22.875 million British thermal units per hour. There are no boilers.
- (c) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

Existing Approvals

Since the issuance of the FESOP Renewal F 003-13985-00236 on September 5, 2001, the source has constructed or has been operating under the following approvals as well:

Administrative Amendment No. 003-21467-00236 issued on July 18, 2005.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

The following terms and conditions from previous approvals have been revised in this FESOP Renewal:

- (a) Condition D.1.4, Particulate Matter (PM) [326 IAC 6-3-2]: The PM from the EU1A through EU1E, EU4A through EU4E, and EU6A through EU6C 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:

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

or

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

$$E = 55.0 P^{0.11} - 40 \text{ where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour.}$$

Reason revised: The 326 IAC 6-3 revisions that became effective on June 12, 2002, were approved into the State Implementation Plan on September 23, 2005. This rule replaces the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP; therefore, the requirements of the previous version of 326 IAC 6-3-2 are no longer applicable to this source. The facilities at this source are subject to the requirements of the new version of the rule, and those requirements are incorporated into this permit (see "326 IAC 6-3-2" under the State Rule Applicability - Individual Facilities section of this document). Under the revised rule, particulate from the surface coating shall be controlled by dry particulate filters and the Permittee shall operate the control devices in accordance with manufacturer's specifications.

- (b) Condition D.2.1(a) and (b), Particulate Matter (PM) [326 IAC 6-3-2]:
- (a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from EU-3 shall not exceed 2.24 pounds per hour when operating at a process weight rate of 810 pounds per hour (0.405 tons per hour).
- (b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from EU-5 shall not exceed 2.16 pounds per hour when operating at a process weight rate of 770 pounds per hour (0.385 tons per hour).

Reason revised: Since that permit was issued, the Permittee has changed the configuration of the woodworking operations such that all woodworking exhausts to the same dust collection system. In addition, the total maximum process weight rate is lower. Therefore,

the limitation has been revised as shown under "326 IAC 6-3-2" under the State Rule Applicability - Individual Facilities section of this document.

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, were not incorporated into this FESOP Renewal:

Condition D.3.1, Particulate Matter (PM) [326 IAC 6-3-2]: Pursuant to 326 IAC 6-3-2, the allowable particulate matter from the two (2) sawdust bin loadouts and the workstation 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:

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

Reason not incorporated: The 326 IAC 6-3 revisions that became effective on June 12, 2002, were approved into the State Implementation Plan on September 23, 2005. This rule replaces the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP; therefore, the requirements of the previous version of 326 IAC 6-3-2 are no longer applicable to this source. The facilities at this source are subject to the requirements of the new version of the rule, and those requirements are incorporated into this permit (see "326 IAC 6-3-2" under the State Rule Applicability - Individual Facilities section of this document). One (1) sawdust bin loadout and the workstation have been removed. The potential PM emissions from the one (1) remaining sawdust bin loadout are less than 0.551 pounds per hour. Therefore, pursuant to 326 IAC 6-3-1(b)(14) of the revised rule, the one (1) sawdust bin loadout is exempt from the requirements of 326 IAC 6-3-2.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
S-1	One (1) stain application booth (EU-1)	24.0	2.0	9,375	Ambient
S-2	One (1) sealer application booth (EU-2)	24.0	2.0	9,375	Ambient
S-3	One (1) special coating application booth (EU-3)	24.0	2.83	7,813	Ambient
S-4	One (1) doors and special coating application booth (EU-4)	24.0	2.0	9,375	Ambient
S-5	One (1) topcoat application booth (EU-5)	24.0	2.83	7,813	Ambient
S-6	One (1) clear seal application booth (EU-6)	24.0	2.83	7,813	Ambient
S-7	One (1) stain application booth (EU-7)	24.0	2.83	7,813	Ambient
S-8	One (1) special coating application booth (EU-8)	24.0	2.83	7,813	Ambient
S-9	One (1) stain application booth (EU-9)	24.0	2.0	6,250	Ambient
S-10	One (1) topcoat application booth (EU-10)	24.0	2.83	7,813	Ambient
S-20	Woodworking	24.0	3.5	51,935	Ambient
S-21	One (1) glaze application booth (EU-21)	26.0	2.6	12,000	Ambient
S-22	One (1) primer application booth (EU-22)	26.0	3.6	20,000	Ambient

Emission Calculations

See Appendix A of this document for detailed emission calculations (5 pages).

County Attainment Status

The source is located in Allen County

Pollutant	Status
PM ₁₀	attainment
PM _{2.5}	attainment
SO ₂	attainment
NO _x	attainment
8-hour Ozone	attainment
CO	attainment
Lead	attainment

Note: On September 6, 2007 the Indiana Air Pollution Control Board finalized a temporary emergency rule to redesignate Allen, Clark, Elkhart, Floyd, LaPorte, St. Joseph as attainment for the 8-hour ozone standard.

- (a) Allen County has been classified as unclassifiable or attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM_{2.5} emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions. See the State Rule Applicability – Entire Source section.
- (b) 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 emissions and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Allen County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) Allen County has been classified as attainment in Indiana for all remaining 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 – Entire Source section.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	366
PM ₁₀	367
SO ₂	0.060
VOC	622
CO	8.42
NO _x	10.0

HAPs	tons/year
Formaldehyde	5.53
Hexane	0.180
Toluene	69.1
Ethyl benzene	11.7
Methanol	30.4
Glycol Ethers	1.00
Xylene	110
Cumene	4.19
Total	212

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM₁₀ and VOC is equal to or greater than one hundred (100) tons per year. The source is subject to the provisions of 326 IAC 2-7. However, the source has agreed to limit their PM₁₀ and VOC emissions to less than Title V levels, therefore the source will be issued a FESOP.

- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than one hundred (<100) tons per year.
- (c) 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 of HAPs is equal to or greater than twenty-five (25) tons per year. However, the source has agreed to limit their single HAP emissions and total HAP emissions below Title V limits. Therefore, the source will be issued a FESOP.

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1999 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	not reported
PM ₁₀	0
SO ₂	0
VOC	2
CO	0
NO _x	0
HAPs	not reported

Potential to Emit After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential To Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Surface Coating (EU-1 through EU-10, EU-21 and EU-22)	14.8	14.8	0.00	99.00	0.00	0.00	< 9.00 individual; <24.0 total
Woodworking	23.1	23.1	0.00	0.00	0.00	0.00	0.00
Insignificant Activities	0.212	0.769	0.060	0.551	8.42	10.0	0.180 individual (hexane); 0.189 total
Total Emissions	38.2	38.7	0.060	99.6	8.42	10.0	< 10 individual; < 25 total

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) **Fugitive Emissions**
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Federal Rule Applicability

The following federal rules are applicable to the source:

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (b) The potential to emit each individual HAP is limited to less than ten (10) tons per year and the potential to emit any combination of HAPs is limited to less than twenty-five (25) tons per year from this source. Therefore, this source is not a major source of HAPs and the requirements of the National Emission Standards for Wood Furniture Manufacturing Operations, 40 CFR 60.800, Subpart JJ, are not included in the permit.

State Rule Applicability – Entire Source

326 IAC 1-7 (Stack Height Provisions)

Potential PM emissions from the woodworking stack, identified as S20, are greater than twenty-five (25) tons per year. Therefore, the stack is subject to 326 IAC 1-7. The actual PM emissions are less than twenty-five (25) tons per year. Therefore, pursuant to 326 IAC 1-7-5(a), the stack is exempt from the good engineering practice (GEP) stack height provisions of 326 IAC 1-7-3(a). However, because the stack was not constructed prior to December 31, 1970, the Permittee must still comply with the ambient air quality modeling requirements of 326 IAC 1-7-4 if modeling is required in the future.

326 IAC 2-6 (Emission Reporting)

This source is located in Allen County and the potential to emit of each criteria pollutant is less than one hundred (<100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 2-8 (FESOP)

Pursuant to 326 IAC 2-8, the following limitations are applicable:

- (a) The total VOC usage at the twelve (12) surface coating booths, identified as EU-1 through EU-10, EU-21 and EU-22, shall be limited to less than 99.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This shall limit the potential to emit VOC to less than one hundred (100) tons per year from the entire source, including the VOC emissions from the insignificant combustion. Therefore, the requirements of 326 IAC 2-7, Part 70, are not applicable with respect to VOC emissions.
- (b) The PM₁₀ emissions from the woodworking operations, equipped with the dust collection system and exhausting through stack S-20, shall not exceed 1.95 pounds per hour, total, equivalent to 8.54 tons per year. The potential PM₁₀ emissions before control are 46.4 pounds per hour and the PM₁₀ emissions after control are 0.927 pounds per hour. Therefore, the dust collection system shall operate properly and control emissions from the woodworking operations at all times when the woodworking is in operation in order to comply with this limit. Pursuant to 326 IAC 6-3-2, particulate from the twelve (12) surface

coating booths, identified as EU-1 through EU-10, EU-21 and EU-22, shall be controlled by dry particulate filters and the Permittee shall operate the filters in accordance with manufacturer's specifications. These requirements limit the potential to emit PM₁₀ from the entire source to less than 100 tons per year, including the unrestricted potential emissions from the eight (8) downdraft tables, one (1) sanding room, combustion and sawdust loadout (8.54 tons/yr + 14.8 tons per year from coating after control + 0.761 tons/yr from combustion + 14.6 from the downdraft tables and sanding room + 0.008 tons/yr from the sawdust loadout = 38.2 tons/yr < 100 tons/yr) and render 326 IAC 2-7, Part 70, not applicable with respect to PM₁₀ emissions.

- (c) The single HAP usage at the twelve (12) surface coating booths, identified as EU-1 through EU-10, EU-21 and EU-22, shall be limited to less than 9.0 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month, and the total HAPs usage at the twelve (12) surface coating booths, identified as EU-1 through EU-10, EU-21 and EU-22, shall be limited to less than 24.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This shall limit the potential to emit each individual HAP to less than ten (10) tons per year and the potential to emit any combination of HAPs to less than twenty-five (25) tons per year from the entire source, including the HAP emissions from the insignificant combustion. Therefore, the requirements of 326 IAC 2-7, Part 70, are not applicable with respect to HAPs emissions.

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

- (a) Pursuant to 326 IAC 2-8, the potential to emit VOC is limited to less than one hundred (100) tons per year, which is less than two hundred fifty (250) tons per year. Therefore, this source is a minor source pursuant to 326 IAC 2-2, PSD, with respect to VOC.
- (b) Pursuant to 326 IAC 2-8, the potential to emit PM₁₀ is limited to less than one hundred (100) tons per year, which is less than two hundred fifty (250) tons per year. Therefore, this source is a minor source pursuant to 326 IAC 2-2, PSD, with respect to PM₁₀.
- (c) Pursuant to 326 IAC 6-3-2, the PM emissions from the woodworking operations, equipped with the dust collection system and exhausting through stack S-20, shall not exceed 1.95 pounds per hour, total, equivalent to 8.54 tons per year. The potential PM₁₀ emissions before control are 46.4 pounds per hour and the PM₁₀ emissions after control are 0.927 pounds per hour. Therefore, the dust collection system shall operate properly and control emissions from the woodworking operations at all times when the woodworking is in operation in order to comply with this limit. Pursuant to 326 IAC 6-3-2, particulate from the twelve (12) surface coating booths, identified as EU-1 through EU-10, EU-21 and EU-22, shall be controlled by dry particulate filters and the Permittee shall operate the filters in accordance with manufacturer's specifications. These requirements limit the potential to emit PM from the entire source to less than 100 tons per year, including the unrestricted potential emissions from the eight (8) downdraft tables, one (1) sanding room, combustion and sawdust loadout (8.54 tons/yr + 14.8 tons per year from coating after control + 0.190 tons/yr from combustion + 14.6 from the downdraft tables and sanding room + 0.022 tons/yr from the sawdust loadout = 38.7 tons/yr < 250 tons/yr) and render 326 IAC 2-2 not applicable with respect to PM emissions.

326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

State Rule Applicability – Individual Facilities

326 IAC 2-4.1-1 (New Source Toxics Control)

Some of the facilities (EU-6, EU-7, EU-8, EU-21 and EU-22) at this source were constructed after July 27, 1997 compliance date of this rule. However, the potential to emit each individual HAP is limited to less than ten (10) tons per year and the potential to emit any combination of HAPs is limited to less than twenty-five (25) tons per year from this source. Therefore, the requirements of 326 IAC 2-4.1-1 are not applicable.

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

- (a) Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating shall be controlled by dry particulate filters and the Permittee shall operate the control devices in accordance with manufacturer's specifications.
- (b) Pursuant to 326 IAC 6-3-2(e), particulate from the woodworking operations, equipped with the dust collection system and exhausting through stack S-20, shall not exceed 1.95 pounds per hour, when operating at a process weight rate of 0.3305 tons per hour. The potential PM emissions before control are 46.4 pounds per hour and the PM emissions after control are 0.927 pounds per hour. Therefore, the dust collection system shall operate properly and control emissions from the woodworking operations at all times when the woodworking is in operation in order to comply with this limit.

The limit is calculated using 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:

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

- (c) Pursuant to 326 IAC 6-3-2(e), particulate from the eight (8) downdraft sanding tables shall not exceed 0.551 pounds per hour, when operating at a process weight rate less than 100 tons per hour. The potential PM emissions before control are 2.64 pounds per hour and the PM emissions after control are 0.011 pounds per hour. Therefore, the filters shall operate properly and control emissions from the eight (8) downdraft tables at all times when any of the downdraft tables are in operation in order to comply with this limit.
- (d) Pursuant to 326 IAC 6-3-2(e), particulate from the one (1) sanding room shall not exceed 0.551 pounds per hour, when operating at a process weight rate less than 100 tons per hour. The potential PM emissions before control are 0.667 pounds per hour and the PM emissions after control are 0.017 pounds per hour. Therefore, the filters shall operate properly and control emissions from the one (1) sanding room at all times when the sanding room is in operation in order to comply with this limit.
- (e) The potential PM emissions from the sawdust loadout and insignificant combustion are less than 0.551 pounds per hour. Therefore, pursuant to 326 IAC 6-3-1(b)(14), those units are exempt from the requirements of 326 IAC 6-3.

326 IAC 8-2-12 (Wood Furniture and cabinet coating)

- (a) The one (1) stain application booth, identified as EU-1, one (1) sealer application booth, identified as EU-2, one (1) doors and special coating application booth, identified as EU-4, and one (1) topcoat application booth, identified as EU-5, were all constructed prior to November 1, 1980 in Allen County. Therefore, the requirements of 326 IAC 8-2-12 are not applicable to those booths.
- (b) The one (1) stain application booth, identified as EU-9, and the one (1) topcoat application booth, identified as EU-10, were constructed after November 1, 1980 in Allen County and have the potential to emit more than twenty-five (25) tons per year of VOC. Therefore, the two (2) booths, identified as EU-9, and EU-10, are subject to the requirements of 326 IAC 8-2-12. The one (1) special coating application booth, identified as EU-3, one (1) clear seal application booth, identified as EU-6, one (1) stain application booth, identified as EU-7, one (1) special coating application booth, identified as EU-8, one (1) glaze application booth, identified as EU-21, and one (1) primer application booth, identified as EU-22, were all constructed after January 1, 1990 and have actual VOC emissions greater than fifteen (15) pounds per day. Therefore, they are also subject to 326 IAC 8-2-12.

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets in these booths 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. This source uses HVLP spray applicators.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a 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 Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements 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 determination requirements applicable to this source are as follows:

- (a) The surface coating has applicable compliance determination conditions as specified below:

Compliance with the VOC content and usage limitations and HAP usage limitations contained in the permit 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.

- (b) The woodworking has applicable compliance determination conditions as specified below:

- (1) In order to comply with 326 IAC 6-3-2 and the limitations that render 326 IAC 2-2 not applicable, the dust collection system for particulate control shall be in operation and control emissions from the woodworking operations at all times that the woodworking is in operation.
- (2) In order to comply with 326 IAC 6-3-2, the filters for particulate control shall be in operation and control emissions from the eight (8) downdraft tables at all times that any of the eight (8) downdraft tables is in operation.
- (3) In order to comply with 326 IAC 6-3-2, the filters for particulate control shall be in operation and control emissions from the one (1) sanding room at all times that the sanding room is in operation.
- (4) In the event that bag failure is observed in a multi-compartment dust collector, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

- (a) The surface coating has applicable compliance monitoring conditions as specified below:

- (1) 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 (S-1 through S-10, S-21 and S-22) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (2) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of over-

spray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

These monitoring conditions are necessary because the dry filters for the surface coating must operate properly to ensure compliance with 326 IAC 6-3-2 and 326 IAC 2-8, and the limitations that render 326 IAC 2-2 not applicable.

- (b) The woodworking has applicable compliance monitoring conditions as specified below:
- (1) Visible emission notations of the woodworking stack (S-20) exhaust shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
 - (2) An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. All defective bags shall be replaced.
 - (3) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions).
 - (4) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks or dust traces.

These monitoring conditions are necessary because the dust collector for the woodworking must operate properly to ensure compliance with 326 IAC 6-3-2 and 326 IAC 2-8, and the limitations that render 326 IAC 2-2 not applicable.

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on September 16, 2005. Additional information was received on August 30, September 14, and October 12, 2007.

Conclusion

The operation of this cabinet manufacturing source shall be subject to the conditions of the attached **FESOP Renewal No. F 003-21796-00236**.

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

**Company Name: Dutch Made, Inc.
Address City IN Zip: 10415 Roth Road, Grabill, Indiana 46741
Permit Number: F 003-21796-00236
Reviewer: CarrieAnn Paukowitz
Date: October 17, 2007**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
EU-1																
Honey Stain	6.98	79.0%	0.0%	79.0%	0.0%	13.1%	0.025	100	5.51	5.51	13.79	330.85	60.38	4.82	42.09	70%
Aristoccoat T/C	7.81	63.45%	0.0%	63.45%	0.0%	28.5%	0.0235	100.00								
Catalyst	7.21	78.30%	0.0%	78.30%	0.0%	17.9%	0.0015	100.00								
Aristoccoat T/C RTS	7.77	64.26%	0.00%	64.26%	0.0%	27.9%	0.025	100.00	5.00	5.00	12.49	299.76	54.71	9.13	17.92	70%
Venetian Glaze	7.87	62.0%	0.0%	62.0%	0.0%	25.8%	0.025	100	4.88	4.88	12.20	292.76	53.43	9.82	18.91	70%
EU-2																
Vinyl Sealer	7.57	76.8%	0.0%	76.8%	0.0%	16.8%	0.025	100	5.81	5.81	14.53	348.83	63.66	5.77	34.61	70%
EU-3																
White Paint	9.72	28.80%	0.0%	28.80%	0.0%	60.8%	0.0243	100.00								
Laquer Reducer	6.52	74.00%	0.0%	74.00%	0.0%	0.0%	0.0007	100.00								
Pearl White Aristoccoat RTS	9.63	29.66%	0.00%	29.66%	0.0%	59.1%	0.025	100.00	2.86	2.86	7.14	171.36	31.27	22.25	4.83	70%
EU-4																
White Paint	9.72	28.80%	0.0%	28.80%	0.0%	60.8%	0.0243	100.00								
Laquer Reducer	6.52	74.00%	0.0%	74.00%	0.0%	0.0%	0.0007	100.00								
Pearl White Aristoccoat RTS	9.63	29.66%	0.00%	29.66%	0.0%	59.1%	0.025	100.00	2.86	2.86	7.14	171.36	31.27	22.25	4.83	70%
EU-5																
Aristoccoat T/C	7.81	63.45%	0.0%	63.45%	0.0%	28.5%	0.0235	100.00								
Catalyst	7.21	78.30%	0.0%	78.30%	0.0%	17.9%	0.0015	100.00								
Aristoccoat T/C RTS	7.77	64.26%	0.00%	64.26%	0.0%	27.9%	0.025	100.00	5.00	5.00	12.49	299.76	54.71	9.13	17.92	70%
EU-6																
Vinyl Primer	8.90	59.10%	0.0%	59.10%	0.0%	21.5%	0.0243	100								
Laquer Reducer	6.52	74.00%	0.0%	74.00%	0.0%	0.0%	0.0007	100								
White Vinyl Primer RTS	8.83	59.41%	0.00%	59.41%	0.0%	20.9%	0.025	100	5.26	5.26	12.78	306.76	55.98	11.62	24.46	70%
Vinyl Sealer	7.57	76.8%	0.0%	76.8%	0.0%	16.8%	0.025	100	5.81	5.81	14.53	348.83	63.66	5.77	34.61	70%
EU-7																
Honey Stain	6.98	79.0%	0.0%	79.0%	0.0%	13.1%	0.025	100	5.51	5.51	13.79	330.85	60.38	4.82	42.09	70%
Venetian Glaze	7.87	62.0%	0.0%	62.0%	0.0%	25.8%	0.025	100	4.88	4.88	12.20	292.76	53.43	9.82	18.91	70%
EU-8																
White Paint	9.72	28.80%	0.0%	28.80%	0.0%	60.8%	0.0243	100.00								
Laquer Reducer	6.52	74.00%	0.0%	74.00%	0.0%	0.0%	0.0007	100.00								
Pearl White Aristoccoat RTS	9.63	29.66%	0.00%	29.66%	0.0%	59.1%	0.025	100.00	2.86	2.86	7.14	171.36	31.27	22.25	4.83	70%
EU-9																
Honey Stain	6.98	79.0%	0.0%	79.0%	0.0%	13.1%	0.025	100	5.51	5.51	13.79	330.85	60.38	4.82	42.09	70%
EU-10																
Aristoccoat T/C	7.81	63.45%	0.0%	63.45%	0.0%	28.5%	0.0235	100.00								
Catalyst	7.21	78.30%	0.0%	78.30%	0.0%	17.9%	0.0015	100.00								
Aristoccoat T/C RTS	7.77	64.26%	0.00%	64.26%	0.0%	27.9%	0.025	100.00	5.00	5.00	12.49	299.76	54.71	9.13	17.92	70%
EU-21																
Venetian Glaze	7.87	62.0%	0.0%	62.0%	0.0%	25.8%	0.025	100	4.88	4.88	12.20	292.76	53.43	9.82	18.91	70%
EU-22																
Vinyl Primer	8.90	59.10%	0.0%	59.10%	0.0%	21.5%	0.0243	100								
Laquer Reducer	6.52	74.00%	0.0%	74.00%	0.0%	0.0%	0.0007	100								
White Vinyl Primer RTS	8.83	59.41%	0.00%	59.41%	0.0%	20.9%	0.025	100	5.26	5.26	12.78	306.76	55.98	11.62	24.46	70%

PM Control Efficiency:	90.00%				
	Uncontrolled	142	3403	621	148
	Controlled	142	3403	621	14.8

METHODOLOGY

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

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

Company Name: Dutch Made, Inc.
Address City IN Zip: 10415 Roth Road, Grabill, Indiana 46741
Permit Number: F 003-21796-00236
Reviewer: CarrieAnn Paukowitz
Date: October 17, 2007

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Ethyl benzene	Weight % Formaldehyde	Weight % Methanol	Weight % Glycol Ethers	Weight % Toluene	Weight % Xylene	Weight % Cumene	Ethyl benzene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Methanol Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Cumene Emissions (ton/yr)	Total HAPs Emissions (ton/yr)
EU-1																		
Honey Stain	6.98	0.025	100	1.00%	0.00%	1.00%	0.00%	1.00%	10.00%	1.00%	0.76	0.00	0.76	0.00	0.76	7.64	0.76	9.94
Aristoccoat T/C	7.81	0.0235	100.00	1.00%	1.00%	0.00%	0.00%	10.00%	10.00%	0.00%	0.80	0.80	0.00	0.00	8.05	8.05	0.00	17.71
Catalyst	7.21	0.0015	100.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Aristoccoat T/C RTS		0.025	100.00															
Venetian Glaze	7.87	0.025	100	1.00%	0.00%	10.00%	0.00%	0.00%	1.00%	0.00%	0.86	0.00	8.62	0.00	0.00	0.86	0.00	10.34
EU-2																		
Vinyl Sealer	7.57	0.025	100	1.00%	0.00%	0.00%	0.00%	20.00%	3.00%	0.00%	0.83	0.00	0.00	0.00	16.58	2.49	0.00	19.89
EU-3																		
White Paint	9.72	0.0243	100.00	1.00%	1.00%	0.00%	0.00%	0.00%	13.00%	0.00%	1.03	1.03	0.00	0.00	0.00	13.45	0.00	15.52
Laquer Reducer	6.52	0.0007	100.00	1.00%	0.00%	30.00%	10.00%	10.00%	10.00%	0.00%	0.02	0.00	0.60	0.20	0.20	0.20	0.00	1.22
Pearl White Aristoccoat RTS		0.025	100.00															
EU-4																		
White Paint	9.72	0.0243	100.00	1.00%	1.00%	0.00%	0.00%	0.00%	13.00%	0.00%	1.03	1.03	0.00	0.00	0.00	13.45	0.00	15.52
Laquer Reducer	6.52	0.0007	100.00	1.00%	0.00%	30.00%	10.00%	10.00%	10.00%	0.00%	0.02	0.00	0.60	0.20	0.20	0.20	0.00	1.22
Pearl White Aristoccoat RTS		0.025	100.00															
EU-5																		
Aristoccoat T/C	7.81	0.0235	100.00	1.00%	1.00%	0.00%	0.00%	10.00%	10.00%	0.00%	0.80	0.80	0.00	0.00	8.05	8.05	0.00	17.71
Catalyst	7.21	0.0015	100.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Aristoccoat T/C RTS		0.025	100.00															
EU-6																		
Vinyl Primer	8.90	0.0243	100	1.00%	0.00%	0.00%	0.00%	10.00%	13.00%	1.00%	0.95	0.00	0.00	0.00	9.47	12.31	0.95	22.73
Laquer Reducer	6.52	0.0007	100	1.00%	0.00%	30.00%	10.00%	10.00%	10.00%	0.00%	0.02	0.00	0.60	0.20	0.20	0.20	0.00	1.22
White Vinyl Primer RTS		0.025	100															
Vinyl Sealer	7.57	0.025	100	1.00%	0.00%	0.00%	0.00%	20.00%	3.00%	0.00%	0.83	0.00	0.00	0.00	16.58	2.49	0.00	19.89
EU-7																		
Honey Stain	6.98	0.025	100	1.00%	0.00%	1.00%	0.00%	1.00%	10.00%	1.00%	0.76	0.00	0.76	0.00	0.76	7.64	0.76	9.94
Venetian Glaze	7.87	0.025	100	1.00%	0.00%	10.00%	0.00%	0.00%	1.00%	0.00%	0.86	0.00	8.62	0.00	0.00	0.86	0.00	10.34
EU-8																		
White Paint	9.72	0.0243	100.00	1.00%	1.00%	0.00%	0.00%	0.00%	13.00%	0.00%	1.03	1.03	0.00	0.00	0.00	13.45	0.00	15.52
Laquer Reducer	6.52	0.0007	100.00	1.00%	0.00%	30.00%	10.00%	10.00%	10.00%	0.00%	0.02	0.00	0.60	0.20	0.20	0.20	0.00	1.22
Pearl White Aristoccoat RTS		0.025	100.00															
EU-9																		
Honey Stain	6.98	0.025	100	1.00%	0.00%	1.00%	0.00%	1.00%	10.00%	1.00%	0.76	0.00	0.76	0.00	0.76	7.64	0.76	9.94
EU-10																		
Aristoccoat T/C	7.81	0.0235	100.00	1.00%	1.00%	0.00%	0.00%	10.00%	10.00%	0.00%	0.80	0.80	0.00	0.00	8.05	8.05	0.00	17.71
Catalyst	7.21	0.0015	100.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Aristoccoat T/C RTS		0.025	100.00															
EU-21																		
Venetian Glaze	7.87	0.025	100	1.00%	0.00%	10.00%	0.00%	0.00%	1.00%	0.00%	0.86	0.00	8.62	0.00	0.00	0.86	0.00	10.34
EU-22																		
Vinyl Primer	8.90	0.0243	100	1.00%	0.00%	0.00%	0.00%	10.00%	13.00%	1.00%	0.95	0.00	0.00	0.00	9.47	12.31	0.95	22.73
Laquer Reducer	6.52	0.0007	100	1.00%	0.00%	30.00%	10.00%	10.00%	10.00%	0.00%	0.02	0.00	0.60	0.20	0.20	0.20	0.00	1.22
White Vinyl Primer RTS		0.025	100															

11.65 5.52 30.38 1.00 69.10 109.62 4.19 211.69

METHODOLOGY

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

**Appendix A: Emission Calculations
Woodworking Operations**

Company Name: Dutch Made, Inc.
Address City IN Zip: 10415 Roth Road, Grabill, Indiana 46741
Permit Number: F 003-21796-00236
Reviewer: CarrieAnn Paukowits
Date: October 17, 2007

Unit(s)	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	PM Emission Rate before Controls (lb/hr)	PM Emission Rate before Controls (tons/yr)	PM Emission Rate after Controls (lb/hr)	PM Emission Rate after Controls (tons/yr)
Woodworking	98.0%	0.0021	52000	46.4	203	0.927	4.06

Methodology

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

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

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

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

Unit(s)	Control Efficiency (%)	Amount Collected (lbs/door or drawer)	Total Capacity (doors and/or drawers/hr)	PM Emission Rate before Controls (lbs/door)	PM Emission Rate before Controls (lbs/hr)	PM Emission Rate before Controls (tons/yr)	PM Emission Rate after Controls (lb/hr)	PM Emission Rate after Controls (tons/yr)
Eight (8) downdraft tables	90.0%	0.1000	24.00	0.1111	2.67	11.7	0.011	0.049
Sanding Room	90.0%	0.1500	4.00	0.1667	0.667	2.92	0.017	0.073
Total				0.278	3.33	14.6	0.0278	0.1217

PM Emission Rate before Controls (lbs/door or drawer) = Amount Collected (lbs/door) / 99.9%

PM Emission Rate before Controls (lbs/hr) = PM Emission Rate before Controls (lbs/door or drawer) x Total Capacity (doors and/or drawer/hr)

Process	Process Weight Rate (tons/hr)	Control Efficiency (%)	PM K	PM10 K	Moisture Content M (%)	Mean Wind Speed U (miles/hr)	PM Emission Factor E (lbs/ton)	PM10 Emission Factor E (lbs/ton)
Sawdust bin loadout	3.0	0%	1	0.35	6.00	10.0	0.002	0.0006

PTE PM before Control (lbs/hr)	PTE PM before Control (tons/yr)	PTE PM10 before Control (lbs/hr)	PTE PM11 before Control (tons/yr)	PTE PM after control (lbs/hr)	PTE PM after control (tons/yr)	PTE PM10 after Control (lbs/hr)	PTE PM11 after Control (tons/yr)
0.005	0.022	0.002	0.008	0.005	0.022	0.002	0.008

Emission factors for the loadout are calculated based on AP-42, 13.2.4.3 for a drop operation with a conservative process weight rate.

$$E = k \times 0.0032 \times (U/5)^{1.3} / (M/2)^{1.4}$$

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Insignificant Combustion Units**

Company Name: Dutch Made, Inc.
Address City IN Zip: 10415 Roth Road, Grabill, Indiana 46741
Permit Number: F 003-21796-00236
Reviewer: CarrieAnn Paukowits
Date: October 17, 2007

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

22.9

200

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100 **see below	5.50	84.0
Potential Emission in tons/yr	0.190	0.761	0.060	10.019	0.551	8.416

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	0.00210	0.00120	0.07500	1.80000	0.00340
Potential Emission in tons/yr	0.000210	0.000120	0.007514	0.180347	0.000341

Emission Factor in lb/MMcf	HAPs - Metals					Total
	Lead	Cadmium	Chromium	Manganese	Nickel	
	0.0005	0.0011	0.0014	0.0004	0.0021	
Potential Emission in tons/yr	0.00005	0.00011	0.00014	0.00004	0.00021	0.189

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

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

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

