



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: January 31, 2007
RE: Riegsecker Hardwoods / 087-22384-00015
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot 03/23/06



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

**Riegsecker Hardwoods
5660 N. SR 5
Shipshewana, Indiana 46565**

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

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

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

Operation Permit No.: M087-22384-00015	
Issued by: <i>Original document signed by</i> Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: January 31, 2007 Expiration Date: January 31, 2012

TABLE OF CONTENTS

A. SOURCE SUMMARY	4
A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]	
A.2 Emission Units and Pollution Control Equipment Summary	
B. GENERAL CONDITIONS	6
B.1 Definitions [326 IAC 2-1.1-1]	
B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.3 Term of Conditions [326 IAC 2-1.1-9.5]	
B.4 Enforceability	
B.5 Severability	
B.6 Property Rights or Exclusive Privilege	
B.7 Duty to Provide Information	
B.8 Certification	
B.9 Annual Notification [326 IAC 2-6.1-5(a)(5)]	
B.10 Preventive Maintenance Plan [326 IAC 1-6-3]	
B.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]	
B.13 Deviations from Permit Requirements and Conditions	
B.14 Permit Renewal [326 IAC 2-6.1-7]	
B.15 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]	
B.16 Source Modification Requirement	
B.17 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2] [IC 13-17-3-2][IC 13-30-3-1]	
B.18 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]	
B.19 Annual Fee Payment [326 IAC 2-1.1-7]	
B.20 Credible Evidence [326 IAC 1-1-6]	
C. SOURCE OPERATION CONDITIONS	11
Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]	
C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2 Permit Revocation [326 IAC 2-1.1-9]	
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 2-6.1-5(a)(2)]	
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 2-6.1-5(a)(2)]	
C.11 Compliance Monitoring [326 IAC 2-1.1-11]	
C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]	
C.13 Instrument Specifications [326 IAC 2-1.1-11]	
Corrective Actions and Response Steps	
C.14 Response to Excursions or Exceedances	
C.15 Actions Related to Noncompliance Demonstrated by a Stack Test	

- Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]
- C.16 Malfunctions Report [326 IAC 1-6-2]
- C.17 General Record Keeping Requirements [326 IAC 2-6.1-5]
- C.18 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

D.1 Emissions unit OPERATION CONDITIONS - Two (2) Paint Booths, PB₁ and PB₂..... 17

Emission Limitations and Standards

- D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]
- D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]
- D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

Compliance Determination Requirements

- D.1.4 Particulate Matter (PM)

Record Keeping and Reporting Requirements

- D.1.5 Record Keeping Requirements

D.2 Emissions unit OPERATION CONDITIONS - Woodworking operations..... 19

Emission Limitations and Standards

- D.2.1 Particulate Matter (PM)
- D.2.2 Preventive Maintenance Plan

Compliance Determination Requirements

- D.2.3 Particulate Matter (PM)

Compliance Monitoring Requirements

- D.2.4 Visible Emissions Notations
- D.2.5 Baghouse Inspections
- D.2.5 Broken Bag or Failure Detection

Record Keeping and Reporting Requirements

- D.2.6 Record Keeping Requirements

D.3 Emissions unit OPERATION CONDITIONS 21

Boilers

Certification Form	22
Annual Notification	23
Malfunction Report	24

SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary custom furniture manufacturing plant.

Authorized Individual:	Ryan Riegsecker
Source Address:	5660 N. SR 5, Shipshewana, Indiana 46565
Mailing Address:	P.O. Box 220, Shipshewana, Indiana 46565
General Source Phone Number:	260-768-4341
SIC Code:	2449
County Location:	LaGrange
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) surface coating spray booth, identified as B1, constructed in 1993 utilizing a HVLP spray application system, coating a maximum of 3 wood tables per hour, with dry filters for particulate matter overspray control, and exhausting through one (1) stack, identified as F1;
- (b) One (1) surface coating spray booth, identified as B2, constructed in 1993 utilizing an airmix spray application system, coating a maximum of 6 wood tables per hour, with dry filters for particulate matter overspray control, and exhausting through one (1) stack, identified as F2;
- (c) One (1) surface coating spray booth, identified as B3, constructed in 1993 utilizing an airmix spray application system, coating a maximum of 6 wood tables per hour, with dry filters for particulate matter overspray control, and exhausting through one (1) stack, identified as F3;
- (d) One (1) surface coating spray booth, identified as B4, constructed in 1997 utilizing a HVLP spray application system, coating a maximum of 3 wood tables per hour, with dry filters for particulate matter overspray control, and exhausting through one (1) stack, identified as F4;
- (e) One (1) surface coating spray (glazing) booth, identified as B5, utilizing a HVLP spray application system, coating a maximum of 3 wood tables per hour, with dry filters for particulate matter overspray control, and exhausting through one (1) stack, identified as F5, constructed in 2003;
- (f) One (1) woodworking operation, constructed in 1993 consisting of various woodworking equipment equipped with two (2) baghouses, identified as DC-1 and DC-2 for particulate matter control;
- (g) One (1) wood part assembly area, constructed in 1995 used for cutting wood parts and for

adhesive application;

- (h) One (1) natural gas fired forced air furnace, identified as H1, constructed in 1995 with a maximum heat input rate of 0.80 million (MM) British thermal units (Btu) per hour;
- (i) Four (4) natural gas fired space heaters, identified as H2 through H5, constructed in 1993 each with a maximum heat input rate of 0.2 MMBtu/hr, 0.1 MMBtu/hr, 0.15 MMBtu/hr and 0.16 MMBtu/hr, respectively;
- (j) One (1) natural gas fired boiler, identified as H6, constructed on January 7, 2000, with a maximum heat input rate of 0.232 MMBtu/hr; and
- (k) One (1) natural gas fired air make up unit, identified as H7, with a maximum heat input rate of 3.575 MMBtu/hr.

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, M087-22384-00015, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

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

B.8 Certification

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall

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

- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

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

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

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue,
Indianapolis, IN 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

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

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

- (a) All terms and conditions of permits established prior to M087-22384-00015 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,

(2) revised, or

(3) deleted

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

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

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

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

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

Request for renewal shall be submitted to:

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

(b) A timely renewal application is one that is:

(1) Submitted at least ninety (90) days prior to the date of the expiration of this permit; and

(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

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

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

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

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

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

B.15 Source Modification Requirement

- (a) A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.
- (b) Any modification at an existing major source is governed by the requirements of (for sources located in NA areas).

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

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

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

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

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

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

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

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

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

C.4 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.

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

All required notifications shall be submitted to:

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

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

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

- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

C.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
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 2-6.1-5(a)(2)]

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

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

C.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.

C.13 Instrument Specifications [326 IAC 2-1.1-11]

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

Corrective Actions and Response Steps

C.14 Response to Excursions or Exceedances

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

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

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

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

C.16 Malfunctions Report [326 IAC 1-6-2]

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

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

C.17 General Record Keeping Requirements [326 IAC 2-6.1-5]

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

C.18 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (e) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description

- (a) One (1) surface coating spray booth, identified as B1, constructed in 1993 utilizing a HVLP spray application system, coating a maximum of 3 wood tables per hour, with dry filters for particulate matter overspray control, and exhausting through one (1) stack, identified as F1;
- (b) One (1) surface coating spray booth, identified as B2, constructed in 1993 utilizing an airmix spray application system, coating a maximum of 6 wood tables per hour, with dry filters for particulate matter overspray control, and exhausting through one (1) stack, identified as F2;
- (c) One (1) surface coating spray booth, identified as B3, constructed in 1993 utilizing an airmix spray application system, coating a maximum of 6 wood tables per hour, with dry filters for particulate matter overspray control, and exhausting through one (1) stack, identified as F3;
- (d) One (1) surface coating spray booth, identified as B4, constructed in 1997 utilizing a HVLP spray application system, coating a maximum of 3 wood tables per hour, with dry filters for particulate matter overspray control, and exhausting through one (1) stack, identified as F4;
- (e) One (1) surface coating spray (glazing) booth, identified as B5, utilizing a HVLP spray application system, coating a maximum of 3 wood tables per hour, with dry filters for particulate matter overspray control, and exhausting through one (1) stack, identified as F5, constructed in 2003

(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

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

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

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

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system. Emission units B1, B4 and B5 use HVLP spray application.

Airmix Kremlin Model MX is an accepted alternative method of application of Air Assisted Airless Spray Application. Emission Units B2 and B3 use Airmix Kremlin Model MX.

D.1.2 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d) (Particulate Emission Limitations, Work Practices and Control Technologies):

- (a) Particulate from the spray booths identified as B1, B2, B3, B4 and B5 shall be controlled by dry filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.1.4 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when any of the five (5) surface coating spray booths (B1, B2, B3, B4 and B5) is in operation.

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

D.1.5 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with Condition D.1.2 (c).
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description

- (f) One (1) woodworking operation, constructed in 1993 consisting of various woodworking equipment equipped with two (2) baghouses, identified as DC-1 and DC-2 for particulate matter control;
- (g) One (1) wood part assembly area, constructed in 1995 used for cutting wood parts and for adhesive application;

(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

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

Pursuant to 326 IAC 6-3-2(e)(Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking facilities shall not exceed 1.28 pounds per hour when operating at a process weight rate of 0.175 tons per hour.

The pounds per hour limitation were calculated with the following equation:

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

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

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

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for this emissions unit and its control device.

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

D.2.3 Particulate Control

- (a) The dust collectors (DC 1 and DC 2) for PM control shall be in operation at all times when the woodworking operation is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.2.4 Visible Emissions Notations

- (a) To document compliance with condition D.2.1, visible emission notations of the woodworking baghouse (DC-1 and DC-2) stack exhaust shall be performed once per day during normal daylight operations or maintain a daily record of the reason why the visible emission notations were not taken. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or

shut down time.

- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.2.5 Baghouse Inspections

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

D.2.6 Broken or Failed Bag Detection

For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.

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

D.2.7 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.4, the Permittee shall maintain records of once per day visible emission notations of the stack exhaust, or the reason why the visible emission notations were not taken.
- (b) To document compliance with Condition D.2.5, the Permittee shall maintain records of the results of the baghouse inspections.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 Emissions unit OPERATION CONDITIONS

Emissions Unit Description

- (h) One (1) natural gas fired forced air furnace, identified as H1, constructed in 1995 with a maximum heat input rate of 0.80 million (MM) British thermal units (Btu) per hour;
- (i) Four (4) natural gas fired space heaters, identified as H2 through H5, constructed in 1993 each with a maximum heat input rate of 0.2 MMBtu/hr, 0.1 MMBtu/hr, 0.15 MMBtu/hr and 0.16 MMBtu/hr, respectively;
- (j) One (1) natural gas fired boiler, identified as H6, constructed on January 7, 2000, with a maximum heat input rate of 0.232 MMBtu/hr; and
- (k) One (1) natural gas fired air make up unit, identified as H7, with a maximum heat input rate of 3.575 MMBtu/hr.

(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

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

Pursuant to 326 IAC 6-2-4(a) (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the one (1) boiler (constructed on January 7, 2000), rated at 0.232 MMBtu per hour heat input shall be limited to 0.6 pounds per MMBtu heat input.

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

**MINOR SOURCE OPERATING PERMIT (MSOP)
CERTIFICATION**

Source Name: Riegsecker Hardwoods
Source Address: 5660 N. SR 5, Shipshewana, IN 46565
Mailing Address: 5660 N. SR 5, Shipshewana, IN 46565
MSOP Permit No.: M087-22384-00015

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 Notification
- 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 DATA SECTION**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	Riegsecker Hardwoods
Address:	5660 N. SR 5
City:	Shipshewana, IN 46565
Phone #:	(260) 768-7050
MSOP #:	087-22384-00015

I hereby certify that **Riegsecker Hardwoods** is still in operation.
 no longer in operation.

I hereby certify that **Riegsecker Hardwoods** is
 in compliance with the requirements of MSOP **087-22384-00015**.
 not in compliance with the requirements of MSOP **087-22384-00015**.

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

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

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY FAX NUMBER - 317 233-6865

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

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERM LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF >MALFUNCTION= AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/19____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/19____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

Indiana Department of Environmental Management Office of Air Quality

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

Source Name: Riegsecker Hardwoods
Source Location: 5660 N. SR 5, Shipshewana, IN 46565
County: LaGrange
SIC Code: 2449
Operation Permit No.: MSOP 087-22384-00015
Permit Reviewer: Teresa Freeman

On December 18, 2006, the Office of Air Quality (OAQ) had a notice published in the LaGrange Standard, LaGrange, Indiana, stating that Riegsecker Hardwoods had applied for a Minor Source Operating Permit renewal to a custom furniture manufacturing plant. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On December 28, 2006, Riegsecker Hardwoods submitted comments on the proposed Minor Source Operating Permit renewal. The comments and IDEM responses (with language added shown in bold and deleted language in strikeout) are as follows:

Comment 1

Source Contact should be changed from Chad Richer to Ryan Riegsecker.

Response 1

The contact information has been updated to reflect Ryan Riegsecker.

Comment 2

The company has requested that the monitoring requirements in Condition D.1.5 be modified to the updated monitoring requirements for surface coating currently being used by IDEM.

Response 2

Condition D.1.2 of the minor source operating permit contains the latest monitoring requirements for surface coating pursuant to 326 IAC 6-3-2(d). However, IDEM also agrees that the monitoring requirements in condition D.1.5 are redundant with Condition D.1.2. Condition D.1.5 has been removed as well as the corresponding recordkeeping requirements in condition D.1.6 (b) as follows:

~~D.1.5 Monitoring~~

~~(a) Pursuant to M0987-13688-00015 issued May 30, 2003, the Permittee shall implement an operator training program as follows:~~

~~(1) All operators that perform spray operations or booth maintenance shall be trained in the proper set-up and operation of the particulate matter control system. All existing operators shall be trained within 60 days of the issuance of this permit. All new operators shall be trained upon hiring or transfer.~~

~~(2) Training shall include proper filter alignment, filter inspection and maintenance, and~~

~~trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.~~

~~(3) All operators shall be given refresher training annually.~~

D.1.65 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with Condition D.1.2 (c).
- ~~(b) To document compliance with Condition D.1.5, the Permittee shall maintain records in accordance with Condition D.1.5 (a)(2).~~
- (eb)** All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Upon further review, the OAQ has made the following revisions to the permit (bolded language has been added and the language with a line through it has been deleted). The Table of Contents has been modified to reflect these changes. Miscellaneous grammar and spelling corrections have been made throughout the permit also.

Change 1

Condition D.1.2 has been changed to reflect the rule cite and title as follows:

D.1.2 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d) (Particulate Emission Limitations, Work Practices and Control Technologies):

- (a) Particulate from the spray booths identified as B1, B2, B3, B4 and B5 shall be controlled by dry filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

Change 2

Condition D.1.4 has been changed to state "when any of" the booths are in operation as follows:

D.1.4 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when **any of** the five (5) surface coating spray booths (B1, B2, B3, B4 and B5) is in operation.

Change 3

Condition D.2.1 has been changed to include the rule title as follows:

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

Pursuant to 326 IAC 6-3-2(e) (**Particulate Emission Limitations for Manufacturing Processes**), the allowable particulate emission rate from the woodworking facilities shall not exceed 1.28 pounds per hour when operating at a process weight rate of 0.175 tons per hour.

The pounds per hour limitation were calculated with the following equation:

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

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

Change 4

Condition D.2.4(a) has been changed to include that visible emission notations are required for compliance with D.2.1 and that a record should be made why the visible emission notation were not taken and condition D.2.7(a) includes a recordkeeping requirement as follows:

D.2.4 Visible Emissions Notations

- (a) **To document compliance with condition D.2.1, visible emission notations of the woodworking baghouse (DC-1 and DC-2) stack exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere or maintain a daily record of the reason why the visible emission notations were not taken.** A trained employee shall record whether emissions are normal or abnormal.

D.2.7 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.4, the Permittee shall maintain records of once per day visible emission notations of the stack exhaust, **or the reason why the visible emission notations were not taken.**

Change 5

Description box D.3 has been change to include equipment that had been inadvertently left out during public notice as follows:

SECTION D.3 Emissions unit OPERATION CONDITIONS

Emissions Unit Description

- (h) **One (1) natural gas fired forced air furnace, identified as H1, constructed in 1995 with a maximum heat input rate of 0.80 million (MM) British thermal units (Btu) per hour;**
- (i) **Four (4) natural gas fired space heaters, identified as H2 through H5, constructed in 1993 each with a maximum heat input rate of 0.2 MMBtu/hr, 0.1 MMBtu/hr, 0.15 MMBtu/hr and 0.16 MMBtu/hr, respectively;**
- (j) **One (1) natural gas fired boiler, identified as H6, constructed on January 7, 2000, with a maximum heat input rate of 0.232 MMBtu/hr; and**
- (k) One (1) natural gas fired air make up unit, identified as H7, with a maximum heat input rate of 3.575 MMBtu/hr.

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

Appendix A: Emission Summary

Company Name: Riegsecker Hardwoods
Address City IN Zip: 5660 N. SR 5, Shipshewana, IN 46565
MSOP: 087-22384
Plt ID: 087-00015
Reviewer: Teresa Freeman

Uncontrolled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Surface Coating	Woodworking Operation	Natural Gas Combustion	TOTAL
PM	4.44	26.54	0.04	31.02
PM10	4.44	26.54	0.15	31.13
SO2	0.00	0.00	0.01	0.01
NOx	0.00	0.00	1.97	1.97
VOC	34.49	0.00	0.11	34.60
CO	0.00	0.00	1.65	1.65
total HAPs	8.43	0.00	0.00	8.43
worst case single HAP	4.87	0.00	0.00	4.87
Total emissions based on rated capacity at 8,760 hours/year.				
Controlled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Surface Coating	Woodworking Operation	Natural Gas Combustion	TOTAL
PM	4.44	0.29	0.04	4.77
PM10	4.44	0.29	0.15	4.88
SO2	0.00	0.00	0.01	0.01
NOx	0.00	0.00	1.97	1.97
VOC	34.49	0.00	0.11	34.60
CO	0.00	0.00	1.65	1.65
total HAPs	8.43	0.00	0.00	8.43
worst case single HAP	4.87	0.00	0.00	4.87
Total emissions based on rated capacity at 8,760 hours/year, after control.				

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

Company Name: Riegsecker Hardwoods
Address City IN Zip: 5660 N. SR 5, Shipshewana, IN 46565
MSOP: 087-22384
Pit ID: 087-00015
Reviewer: Teresa Freeman

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
B1																
Fruitwood	6.54	98.170%	0.00%	98.2%	0.00%	7.170%	0.05640	3.000	6.42	6.42	1.09	26.07	4.76	0.02	89.54	75%
Wash thinner-blender 2739	7.02	100.000%	0.00%	100.0%	0.00%	0.000%	0.00240	3.000	7.02	7.02	0.05	1.21	0.22	0.00	0.00	100%
B2																
AC Aristovar	7.83	69.31%	0.00%	69.3%	0.00%	23.87%	0.05640	6.000	5.43	5.43	1.84	44.08	8.04	1.78	22.74	50%
Wash thinner-blender 2739	7.02	100.00%	0.00%	100.0%	0.00%	0.00%	0.00240	6.000	7.02	7.02	0.10	2.43	0.44	0.00	0.00	50%
B3																
AC Aristovar	7.83	69.31%	0.00%	69.3%	0.00%	23.87%	0.05640	6.000	5.43	5.43	1.84	44.08	8.04	1.78	22.74	50%
Wash thinner-blender 2739	7.02	100.00%	0.00%	100.0%	0.00%	0.00%	0.00240	6.000	7.02	7.02	0.10	2.43	0.44	0.00	0.00	50%
B4																
Fruitwood	6.54	98.170%	0.0%	98.2%	0.0%	7.170%	0.05640	3.000	6.42	6.42	1.09	26.07	4.76	0.02	89.54	75%
Wash thinner-blender 2739	7.02	100.000%	0.0%	100.0%	0.0%	0.000%	0.00240	3.000	7.02	7.02	0.05	1.21	0.22	0.00	0.00	75%
B5																
Van Dyke Brown Glaze	7.22	63.520%	0.0%	63.5%	0.0%	35.340%	0.05640	3.000	4.59	4.59	0.78	18.62	3.40	0.49	12.98	75%
Vinyl Sealer	7.58	75.580%	5.5%	70.1%	0.0%	16.930%	0.05640	3.000	5.31	5.31	0.90	21.57	3.94	0.34	31.37	75%
Wash thinner-blender 2739	7.02	100.000%	0.0%	100.0%	0.0%	0.000%	0.00240	3.000	7.02	7.02	0.05	1.21	0.22	0.00	0.00	75%

State Potential Emissions

Add worst case coating to all solvents

7.87

188.97

34.49

4.44

Note: Coatings in each booth are mutually exclusive

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

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

Company Name: Riegsecker Hardwoods
Address City IN Zip: 5660 N. SR 5, Shipshewana, IN 46565
MSOP: 087-22384
Plt ID: 087-00015
Reviewer: Teresa Freeman

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Ethyl Benzene	Weight % Cumene	Weight % Methyl Ethyl Ketone	Weight % Methanol	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Cumene Emissions (ton/yr)	Methanol Emissions (ton/yr)
B1																
Fruitwood	6.54	0.056400	3.00	1.80%	0.00%	0.00%	0.00%	1.80%	0.00%	0.00%	0.09	0.00	0.00	0.00	0.09	0.00
Wash thinner-blender 2739	7.02	0.002400	3.00	0.00%	55.00%	0.00%	0.00%	0.00%	20.00%	0.00%	0.00	0.12	0.00	0.00	0.00	0.00
B2																
AC Aristovar	7.83	0.056400	6.00	8.00%	4.00%	1.00%	4.00%	0.00%	0.00%	0.00%	0.93	0.46	0.12	0.46	0.00	0.00
Wash thinner-blender 2739	7.02	0.002400	6.00	0.00%	55.00%	0.00%	0.00%	0.00%	20.00%	0.00%	0.00	0.24	0.00	0.00	0.00	0.00
B3																
AC Aristovar	7.83	0.056400	6.00	8.00%	4.00%	1.00%	4.00%	0.00%	0.00%	0.00%	0.93	0.46	0.12	0.46	0.00	0.00
Wash thinner-blender 2739	7.02	0.002400	6.00	0.00%	55.00%	0.00%	0.00%	0.00%	20.00%	0.00%	0.00	0.24	0.00	0.00	0.00	0.00
B4																
Fruitwood	6.54	0.056400	3.00	1.80%	0.00%	0.00%	0.00%	1.80%	0.00%	0.00%	0.09	0.00	0.00	0.00	0.09	0.00
Wash thinner-blender 2739	7.02	0.002400	3.00	0.00%	55.00%	0.00%	0.00%	0.00%	20.00%	0.00%	0.00	0.12	0.00	0.00	0.00	0.00
B5																
Van Dyke Brown Glaze	7.22	0.056400	3.00	1.80%	0.00%	0.00%	0.00%	1.80%	0.00%	0.00%	0.10	0.00	0.00	0.00	0.10	0.00
Vinyl Sealer	7.58	0.056400	3.00	0.00%	55.00%	0.00%	0.00%	0.00%	20.00%	0.00%	0.00	3.09	0.00	0.00	0.00	0.00
Wash thinner-blender 2739	7.02	0.002400	3.00	0.00%	55.00%	0.00%	0.00%	0.00%	20.00%	0.00%	0.00	0.12	0.00	0.00	0.00	0.00

Total State Potential Emissions **2.13 4.87 0.23 0.93 0.27 0.00**

8.43

Note: Coatings in each booth are mutually exclusive

METHODOLOGY

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

Appendix A: Emissions Calculations
Process Particulate Emissions from Woodworking Operation

Company Name: Riegsecker Hardwoods
Address City IN Zip: 5660 N. SR 5, Shipshewana, IN 46565
MSOP: 087-22384
Plt ID: 087-00015
Reviewer: Teresa Freeman

Amount of sawdust collected by Plant 1 woodworking baghouse (tons/year)	9811.2
Amount of sawdust collected by Plant 1 woodworking baghouse	25.7
Amount of sawdust collected by DC 2	0.55
	99.00%
Efficiency of emission control equipment (DC 2)	95.00%
Amount of sawdust entering DC 1 (tons/year)	25.96
Uncontrolled emissions (tons/year)	#REF!
Controlled emissions (tons/year)	#REF!

Methodology

Amount of sawdust entering DC 1 (tons/year) = Amount of sawdust collected by DC 1 / Efficiency of emission control equipment (DC 1)

Amount of sawdust entering DC 2 (tons/year) = Amount of sawdust collected by DC 2 / Efficiency of emission control equipment (DC 2)

Uncontrolled emissions (tons/year) = Amount of sawdust entering DC 1 (tons/year) + Amount of sawdust entering DC 2 (tons/year)

Controlled emissions (tons/year) = (Amount of sawdust entering DC 1 (tons/year) * (1 - Efficiency of emission control equipment (DC 1))) + (Amount of sawdust entering DC 2 (tons/year) * (1 - Efficiency of emission control equipment (DC 2)))

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

Company Name: Riegsecker Hardwoods
Address City IN Zip: 5660 N. SR 5, Shipshewana, IN 46565
MSOP: 087-22384
Pit ID: 087-00015
Reviewer: Teresa Freeman

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

4.497

39.4

Facilities	MMBtu/hr
Forced Air Furnace (H1)	0.08
Space Heater (H2)	0.2
Space Heater (H3)	0.1
Space Heater (H4)	0.15
Space Heater (H5)	0.16
Boiler (H6)	0.232
Air Make Up (H7)	3.575
Total	4.497

Pollutant

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.04	0.15	0.01	1.97	0.11	1.65

*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

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

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

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

Source Background and Description

Source Name: Riegsecker Hardwoods
Source Location: 5660 N. SR 5, Shipshewana, IN 46565
County: LaGrange
SIC Code: 2449
Operation Permit No.: MSOP 087-22384-00015
Permit Reviewer: Teresa Freeman

The Office of Air Quality (OAQ) has reviewed an application from Riegsecker Hardwoods relating to the operation of a custom furniture manufacturing plant.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) surface coating spray booth, identified as B1, constructed in 1993 utilizing a HVLP spray application system, coating a maximum of 3 wood tables per hour, with dry filters for particulate matter overspray control, and exhausting through one (1) stack, identified as F1;
- (b) One (1) surface coating spray booth, identified as B2, constructed in 1993 utilizing an airmix spray application system, coating a maximum of 6 wood tables per hour, with dry filters for particulate matter overspray control, and exhausting through one (1) stack, identified as F2;
- (c) One (1) surface coating spray booth, identified as B3, constructed in 1993 utilizing an airmix spray application system, coating a maximum of 6 wood tables per hour, with dry filters for particulate matter overspray control, and exhausting through one (1) stack, identified as F3;
- (d) One (1) surface coating spray booth, identified as B4, constructed in 1997 utilizing a HVLP spray application system, coating a maximum of 3 wood tables per hour, with dry filters for particulate matter overspray control, and exhausting through one (1) stack, identified as F4;
- (e) One (1) woodworking operation, constructed in 1993 consisting of various woodworking equipment equipped with two (2) baghouses, identified as DC-1 and DC-2 for particulate matter control;
- (f) One (1) wood part assembly area, constructed in 1995 used for cutting wood parts and for adhesive application;
- (g) One (1) natural gas fired forced air furnace, identified as H1, constructed in 1995 with a maximum heat input rate of 0.80 million (MM) British thermal units (Btu) per hour;
- (h) Four (4) natural gas fired space heaters, identified as H2 through H5, constructed in 1993 each with a maximum heat input rate of 0.2 MMBtu/hr, 0.1 MMBtu/hr, 0.15 MMBtu/hr and 0.16 MMBtu/hr, respectively;
- (i) One (1) natural gas fired boiler, identified as H6, constructed on January 7, 2000, with a

maximum heat input rate of 0.232 MMBtu/hr; and

- (j) One (1) natural gas fired air make up unit, identified as H7, with a maximum heat input rate of 3.575 MMBtu/hr.

Unpermitted Emission Units and Pollution Control Equipment

This source also consists of the following unpermitted unit:

One (1) surface coating spray (glazing) booth, identified as B5, utilizing a HVLP spray application system, coating a maximum of 3 wood tables per hour, with dry filters for particulate matter overspray control, and exhausting through one (1) stack, identified as F5, constructed in 2003;

Existing Approvals

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

- (a) MSOP 087-13688-00015, issued on May 30, 2001.

All conditions from previous approvals were incorporated into this permit.

Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment*.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

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

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

A complete application for the purposes of this review was received on December 13, 2005.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 5).

Potential To Emit

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

Pollutant	Potential To Emit (tons/year)
PM	31.02
PM-10	31.13
SO ₂	0.01
VOC	34.6
CO	1.65
NO _x	1.97

HAP's	Potential To Emit (tons/year)
Xylene	2.13
Toluene	4.87
Formaldehyde	0.23
Ethyl benzene	0.93
Cumene	0.27
Methanol	0.0
TOTAL	8.43

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of regulated pollutants are less than one hundred (100) tons per year and the potential to emit of PM/PM10 are greater than twenty-five (25) tons per year. The potential to emit of hazardous air pollutants (HAPs) is less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.

Actual Emissions

No previous emission data has been received from the source.

Potential to Emit After Issuance

The table below summarizes the total potential to emit after issuance for the emission units.

Process/facility	Limited Potential to Emit (tons/year)							
	PM	PM-10	SO ₂	VOC	CO	NO _x	Single HAP	HAPs
Surface Coating (B1, B2, B3, B4 and B5)	4.44	4.44	0.00	34.49	0.00	0.00	4.87	8.43
Woodworking	0.29	0.29	0.00	0.00	0.00	0.00	0.00	0.00
Natural Gas Combustion (H1, H2, H3, H4, H5, H6 and H7)	0.04	0.15	0.01	0.11	1.65	1.97	0.00	0.00
Total Emissions	4.77*	4.88*	0.01	34.60	1.65	1.97	4.87	8.43

* Total emissions after control

County Attainment Status

The source is located in LaGrange County.

Pollutant	Status
PM-10	attainment
PM-2.5	attainment
SO ₂	attainment
NO ₂	attainment
8-hr Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Lagrange County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) Lagrange County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability for the source section.
- (c) Lagrange County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (d) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.
- (e) Effective October 25, 2006, the one hour ozone standard was revoked in Indiana.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, emissions specified in this permit MSOP-087-13688-00015, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

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

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

Federal Rule Applicability

- (a) The natural gas fired boiler, identified as H6, rated at 0.232 MMBtu per hour, is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc), because the boiler has a maximum heat input rate of less than 10 MMBtu/hr.

- (b) The National Emission Standards for Wood Furniture Manufacturing Operations 40 CFR 63, Subpart JJ, does not apply to the five (5) surface coating spray booths (B1, B2, B3, B4 and B5), because this source has single HAP usage of less than 10 tons per year and total HAPs usage of less than 25 tons per year.

State Rule Applicability - Entire Source

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

The five (5) surface coating spray booths (B1, B2, B3, B4 and B5) are not subject to 326 IAC 2-4.1-1 (New Source Toxic Control) because the single HAP usage is less than 10 tons per year and total HAPs usage of less than 25 tons per year.

326 IAC 2-6 (Emission Reporting)

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

326 IAC 5-1 (Opacity Limitations)

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

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

State Rule Applicability - Individual Facilities

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

Pursuant to 326 IAC 6-2-4(a) (Particulate Matter Emission Limitations for Sources of Indirect Heating), indirect heating units which have 10 MMBtu/hr or less and which began operation after September 21, 1983, shall in no case exceed 0.6 lb/MMBtu heat input or the emissions based on the following equation, whichever is lower.

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

where: Pt = maximum allowable particulate matter (PM) emitted per MMBtu heat input
Q = total source max. indirect heater input = 4.2 MMBtu/hr

$$Pt = 1.09/0.232^{0.26} = 1.59 \text{ lbs PM/MMBtu}$$

Therefore, the PM emissions from the one (1) boiler (constructed on January 7, 2000), rated at 0.232 MMBtu per hour heat input shall be limited to 0.6 pounds per MMBtu heat input.

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

Particulate emissions from the spray booths identified as B1, B2, B3, B4 and B5 shall be controlled by dry filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

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

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

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

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

The particulate matter (PM) from the woodworking operation shall be limited by the following:

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

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

$$E = 4.10 (0.175)^{0.67} = 1.28 \text{ lbs PM/hr}$$

Based on the above equation, particulate matter emissions from the woodworking operation shall be limited to 1.28 pounds per hour when operating at a process weight rate of 0.175 tons per hour.

Uncontrolled Compliance calculation:

$$(28.02 \text{ tons PM/yr}) * (\text{yr}/8,760 \text{ hrs}) * (2,000 \text{ lbs/ton}) = 6.40 \text{ lbs PM/hr}$$

Controlled Compliance calculation:

$$(0.28 \text{ tons PM/yr}) * (\text{yr}/8,760 \text{ hrs}) * (2,000 \text{ lbs/ton}) = 0.064 \text{ lbs PM/hr}$$

The woodworking operation will comply with the requirements of 326 IAC 6-3-2 by using dust collectors (DC 1 and DC 2) to control PM emissions.

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

The surface coating spray booths (identified as B1, B2, B3, B4 and B5) are applicable to this rule because potential VOC emissions are greater than twenty-five (25) tons per year.

The surface coating applied to the wood tables 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. Emission units B1, B4 and B5 use HVLP spray application; therefore, the three (3) booths are in compliance with this rule.

Airmix Kremlin Model MX is an accepted alternative method of application of Air Assisted Airless Spray Application. Emission Units B2 and B3 use Airmix Kremlin Model MX, therefore, the two (2) booths are in compliance with this rule.

Compliance Requirements

Permits issued under 326 IAC 2-6.1 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-6.1-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

- (a) Pursuant to M0987-13688-00015 issued May 30, 2003, the Permittee shall implement an operator-training program as follows:
- (1) All operators that perform spray operations or booth maintenance shall be trained in the proper set-up and operation of the particulate matter control system. All existing operators shall be trained within 60 days of the issuance of this permit. All new operators shall be trained upon hiring or transfer.
 - (2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.
 - (3) All operators shall be given refresher training annually.
- (b) Visible emission notations of the woodworking baghouse (DC-1 and DC-2) stack exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or 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.

Conclusion

The operation of this custom furniture manufacturing plant shall be subject to the conditions of the attached proposed Minor Source Operating Permit 087-22384-00015.