INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: April 26, 2006

RE: Genesis Products, Inc. / 039-22516-00582

FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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 from 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-AM.dot 03/23/06

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Mr. Dave Schmucker
Genesis Products Inc. – Hardwoods (Plant 3)
2515 Industrial Park Drive
Goshen, Indiana 46526

April 26, 2006

Re: 039-22516-00582
Third Notice-Only Change to
MSOP 039-17190-00582

Dear Mr. Schmucker:

Genesis Products Inc. – Hardwoods (Plant 3) was issued a Minor Source Operating Permit (MSOP) on September 12, 2003 for a stationary wood cabinet door manufacturing and surface coating source located at 2515 Industrial Park Drive, Goshen, Indiana 46526. A written request was received by the Office of Air Quality on January 17, 2006 to add a spray booth, identified as SB-1. The spray booth emissions are below exempt levels, therefore the permit is hereby revised through a notice only change as follows. The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded**.

Change 1:

The one (1) spray booth, identified as SB-1, has been added to Sections A.2 and D.1 as follows:

A.2 Emissions Units and Pollution Control Equipment Summary

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

(a) One (1) surface coating machine with a dryer, identified as SCLD, equipped with airless air assisted spray guns and dry filters to control particulate overspray, exhausting to Stacks SC1 and SC2, capacity: 250 wood cabinet doors per hour.

(b) One (1) woodworking operation, identified as WW, equipped with a dust collector, identified as DC, exhausting inside, capacity: 500 pounds of wood per hour.

(c) Source-wide natural gas-fired combustion, consisting of the following:

(1) Four (4) radiant space heaters, identified as SH1 - SH4, installed in 1988, exhausting to Stacks SH1 - SH4, capacity: 0.100 million British thermal units per hour each;

(2) One (1) radiant space heater, identified as SH5, installed in 1988, exhausting to Stack SH5, capacity: 0.050 million British thermal units per hour;

(3) Two (2) forced air furnaces, identified as SH6 and SH7, installed in 1988, exhausting to Stacks SH6 and SH7, capacity: 0.090 million British thermal units per hour each;

(4) One (1) water heater, identified as WH1, installed in 1988, exhausting to Stack SH7, capacity: 0.0525 million British thermal units per hour; and

(5) One (1) natural gas-fired air makeup unit, identified as AM1, capacity: 0.500 million British thermal units per hour.

(d) One (1) spray booth, identified as SB-1, utilizing an air assisted airless HVLP application system, equipped with dry filters for particulate control, exhausting to vent SB-1, capacity: 25 wood cabinet doors per hour.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description: Surface Coating Operations

(a) One (1) surface coating machine with a dryer, identified as SCLD, equipped with airless air assisted spray guns and dry filters to control particulate overspray, exhausting to Stacks SC1 and SC2, capacity: 250 wood cabinet doors per hour.

(d) One (1) spray booth, identified as SB-1, utilizing an air assisted airless HVLP application system, equipped with dry filters for particulate control, exhausting to vent SB-1, capacity: 25 wood cabinet doors per hour.

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

Change 2:

326 IAC 6-3-2 requires record keeping. Therefore, Condition D.1.4 Record Keeping Requirements has been added as follows:

D.1.4 Record Keeping Requirements

(a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with D.1.2.

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

Change 3:

The Annual Notification shall reflect the current name of the source Genesis Products Inc. – Hardwoods (Plant 3), formerly Creative Doors, Inc. The changes to the Annual Notification are as follows:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

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

Company Name:	~~Creative Doors, Inc.~~ **Genesis Products, Inc. – Hardwoods (Plant 3)**
Address:	2515 Industrial Park Drive
City:	Goshen, Indiana 46526
Phone #:	574 - 642-4887
MSOP #:	MSOP 039-17190-00582

I hereby certify that ~~Creative Doors, Inc.~~ **Genesis Products, Inc. – Hardwoods (Plant 3)** is
still in operation.
no longer in operation.

I hereby certify that ~~Creative Doors, Inc.~~ **Genesis Products, Inc. – Hardwoods (Plant 3)** is
in compliance with the requirements of MSOP 039-17190-00582
not in compliance with the requirements of MSOP 039-17190-00582.

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:

All other conditions of the permit shall remain unchanged and in effect. For your convenience, the entire approval has been printed with the revised pages.

This decision is subject to the Indiana Administrative Orders and Procedures Act- IC 4-21.5-3-5. If you have any questions on this matter, please contact Brian J. Pedersen, c/o OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204-2251, at 631-691-3395 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Original signed by
Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

Attachments
BJP/MES
cc: File - Elkhart County
U.S. EPA, Region V
Air Compliance Section Inspector - Paul Karkiewicz
Compliance Branch
Administrative and Development Section
Technical Support and Modeling - Michele Boner
Dave Schmucker - Plant Manager

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

Genesis Products, Inc. - Hardwoods (Plant 3)
2515 Industrial Park Drive
Goshen, Indiana 46526

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, (326 IAC 2-5.1 if new source), 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 039-17190-00582	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: September 12, 2003 Expiration Date: September 12, 2008

First Notice Only Change No.: 039-19980-00582, issued January 25, 2005
Second Notice Only Change No.: 039-22478-00582, issued January 23, 2006

Third Notice Only Change No.: 039-22516-00582	Sections/Conditions Affected: Sections A.2 and D.1
Issued by: Original signed by Nisha Sizemore, Chief Office of Air Quality	Issuance Date: April 26, 2006 Expiration Date: September 12, 2008

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary wood cabinet door manufacturing source.

Authorized Individual:	Plant Manager
Source Address:	2515 Industrial Park Drive, Goshen, Indiana 46526
Mailing Address:	2515 Industrial Park Drive, Goshen, Indiana 46526
General Source Phone:	574 - 975-0070
SIC Code:	2434
County Location:	Elkhart
Source Location Status:	Nonattainment for ozone under the 8 hour standard Attainment for all other criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emissions Units and Pollution Control Equipment Summary

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

(a) One (1) surface coating machine with a dryer, identified as SCLD, equipped with airless air assisted spray guns and dry filters to control particulate overspray, exhausting to Stacks SC1 and SC2, capacity: 250 wood cabinet doors per hour.

(b) One (1) woodworking operation, identified as WW, equipped with a dust collector, identified as DC, exhausting inside, capacity: 500 pounds of wood per hour.

(c) Source-wide natural gas-fired combustion, consisting of the following:

(1) Four (4) radiant space heaters, identified as SH1 - SH4, installed in 1988, exhausting to Stacks SH1 - SH4, capacity: 0.100 million British thermal units per hour each;

(2) One (1) radiant space heater, identified as SH5, installed in 1988, exhausting to Stack SH5, capacity: 0.050 million British thermal units per hour;

(3) Two (2) forced air furnaces, identified as SH6 and SH7, installed in 1988, exhausting to Stacks SH6 and SH7, capacity: 0.090 million British thermal units per hour each;

(4) One (1) water heater, identified as WH1, installed in 1988, exhausting to Stack SH7, capacity: 0.0525 million British thermal units per hour; and

(5) One (1) natural gas-fired air makeup unit, identified as AM1, capacity: 0.500 million British thermal units per hour.

(d) One (1) spray booth, identified as SB-1, utilizing an air assisted airless HVLP application system, equipped with dry filters for particulate control, exhausting to vent SB-1, capacity: 25 wood cabinet doors per hour.

SECTION B GENERAL CONDITIONS

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

B.1 Permit No Defense [IC 13]

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

B.2 Definitions

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

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

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

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

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

B.5 Permit Term and Renewal [326 IAC 2-6.1-7(a)] [326 IAC 2-1.1-9.5]

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

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

B.6 Modification to Permit [326 IAC 2]

Notwithstanding the Section B condition entitled “Minor Source Operating Permit”, all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.7 Minor Source Operating Permit [326 IAC 2-6.1]

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

(a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section.

(1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.

(2) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2-6.1-6 and an Operation Permit Validation Letter is issued.

(b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

(c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.

(d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).

B.8 Phase Construction Time Frame

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the IDEM may revoke this permit to construct if the:

Construction of the one (1) surface coating machine and dryer as well as the one (1) woodworking operation has not begun within eighteen (18) months from the effective date of this permit or if during the construction of the one (1) surface coating machine and dryer as well as the one (1) woodworking operation, work is suspended for a continuous period of one (1) year or more.

The OAQ may extend such time upon satisfactory showing that an extension, formally requested by the Permittee is justified.

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

(a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.

(c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

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

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

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

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.

(c) A copy of the PMP's shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMP whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

(a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.

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

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

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

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

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.12 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 13-20-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to

assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

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

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

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

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

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

B.13 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

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

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).

(c) IDEM, OAQ, shall issue a revised permit.

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

B.14 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.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 Particulate Emission Limitation 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 construct and operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

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 2-7-1(34).

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

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

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

Testing Requirements

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

(a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

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

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

Compliance Monitoring Requirements

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

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

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

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

C.11 Actions Related to Noncompliance Demonstrated by a Stack Test

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected emissions unit while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that 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 not require the certification by an “authorized individual” as defined by 326 IAC 2-1.1-1.

Record Keeping and Reporting Requirements

C.12 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.13 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 recordkeeping requirements not already legally required shall be implemented when operation begins.

C.14 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, any report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by an “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description: Surface Coating Operations

(a) One (1) surface coating machine with a dryer, identified as SCLD, equipped with airless air assisted spray guns and dry filters to control particulate overspray, exhausting to Stacks SC1 and SC2, capacity: 250 wood cabinet doors per hour.

(d) One (1) spray booth, identified as SB-1, utilizing an air assisted airless HVLP application system, equipped with dry filters for particulate control, exhausting to vent SB-1, capacity: 25 wood cabinet doors per hour.

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

Emission Limitations and Standards

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

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

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

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

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

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

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

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

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

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

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

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

Compliance Determination Requirements

There are no specific Compliance Determination Requirements applicable to this emission unit.

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

There are no specific Compliance Monitoring Requirements applicable to this emission unit.

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

D.1.4 Record Keeping Requirements

(a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with D.1.2.

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

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description: Woodworking Operations

(b) One (1) woodworking operation, identified as WW, equipped with a dust collector, identified as DC, exhausting inside, capacity: 500 pounds of wood per hour.

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

Emission Limitations and Standards

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the one (1) woodworking operation, identified as WW, shall not exceed 1.62 pounds per hour when operating at a process weight rate of 500 pounds per hour (0.250 tons per hour).

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

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

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

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

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

Compliance Determination Requirements

D.2.3 Particulate Control

In order to comply with Condition D.2.1, dust collector, identified as DC for particulate control shall be in operation and control emissions from the one (1) woodworking operation, identified as WW, at all times that the one (1) woodworking process is in operation.

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

There are no specific Compliance Monitoring Requirements applicable to this emission unit.

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

There are no specific Recordkeeping and Reporting Requirements applicable to this emission unit.

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-5967

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 ?_____, 100 TONS/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 PERMIT 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: _____/_____/ 20_____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 20____ _____ 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
COMPLIANCE BRANCH

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

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

Company Name:	**Genesis Products Inc. – Hardwoods (Plant 3)**
Address:	**2515 Industrial Park Drive**
City:	**Goshen, Indiana 46526**
Phone #:	**574 - 642-4887**
MSOP #:	**MSOP 039-17190-00582**

I hereby certify that Genesis Products Inc. – Hardwoods (Plant 3) is
still in operation.
no longer in operation.

I hereby certify that Genesis Products Inc. – Hardwoods (Plant 3) is
in compliance with the requirements of MSOP **039-17190-00582**
not in compliance with the requirements of MSOP **039-17190-00582**.

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:

Mail to: Permit Administration & Development Section
Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

Genesis Products, Inc.
2515 Industrial Park Drive
Goshen, Indiana 46526

Affidavit of Construction

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

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.

2. I hold the position of _____ for _____.
(Title) (Company Name)

3. By virtue of my position with _____ , I have personal knowledge of the
(Company Name)
representations contained in this affidavit and am authorized to make these representations on behalf of _____ .
(Company Name)

4. I hereby certify that Genesis Products, Inc., located at 2515 Industrial Park Drive, Goshen, Indiana 46526, completed construction of one (1) surface coating machine with a dryer (SCLD), one (1) woodworking operation (WW), and one (1) air makeup unit (AM1), on _____ in conformity with the requirements and intent of the Construction Permit application received by the Office of Air Quality on April 23, 2003 and as permitted pursuant to **MSOP No. 039-17190, Plant ID No. 039-00592** issued on _____ .

Further Affiant said not.

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

_____
Signature

_____
Date

STATE OF INDIANA)
)SS

COUNTY OF _____)

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

My Commission expires: _____ .

_____
Signature

_____
Name (typed or printed)

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Notice Only Change to a Minor Source Operating Permit

Source Background and Description

Source Name:	**Genesis Products Inc. – Hardwoods (Plant 3)**
Source Location:	**2515 Industrial Park Drive, Goshen, Indiana 46526**
County:	**Elkhart**
SIC Code:	**2434**
Operation Permit No.:	**M 039-17190-00582**
Operation Permit Issuance Date:	**September 12, 2003**
Notice Only Change No.:	**039-22516-00582**
Permit Reviewer:	**Brian J. Pedersen**

The Office of Air Quality (OAQ) has reviewed a Notice Only Change application from Genesis Products Inc. – Hardwoods (Plant 3) relating to the construction and operation of the following emission unit and pollution control devices:

One (1) spray booth, identified as SB-1, utilizing an air assisted airless HVLP application system, equipped with dry filters for particulate control, exhausting to vent SB-1, capacity: 25 wood doors per hour.

History

Genesis Products Inc. – Hardwoods (Plant 3) was issued an MSOP 039-17190-00582 on September 12, 2003. The surface coating emissions were based upon the stain and topcoat sealer being applied at the same time. According to this source, this was erroneous and the result was an overestimated emission total. The source can only apply one (1) coating at a time. Therefore VOC emissions from the source shall decrease from the previously calculated 96.7 tons per year to 87.7 tons per year. Therefore, the addition of the this new spray booth, identified as SB-1, with the added potential to emit of 3.84 tons of VOC per year, shall keep the VOC emissions below one hundred (100) tons per year. Therefore, this source shall remain a minor source under 326 IAC 2-3 Emission Offset and shall not be subject to Part 70 rules.

Stack Summary

There are no stack emissions associated with this Notice Only Change.

Recommendation

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

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

A complete application for the purposes of this review was received on January 17, 2006.

Emission Calculations

See pages 1 and 2 of Appendix A of this document for detailed emission calculations.

Potential to Emit of the Revision Before Controls

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

Pollutant	Potential to Emit (tons/yr)
PM	0.190
PM_{10}	0.190
SO_2	-
VOC	3.84
CO	-
NO_x	-

HAPs	Potential to Emit (tons/yr)
MEK	0.058
Toluene	0.003
Total	0.061

Justification for Revision

The MSOP is being revised through an MSOP Notice Only Change. This Notice Only Change is being performed pursuant to 326 IAC 2-6.1-6(d) because the potential to emit of PM_{10} and VOC is less than five (5) tons per year. The addition of the this new spray booth, identified as SB-1, with the added potential to emit of 3.84 tons of VOC per year, shall keep the VOC emissions below one hundred (100) tons per year. Also, the potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. All remaining criteria pollutants shall be less than one hundred (100) tons per year as well. Therefore, this source shall remain a minor source under 326 IAC 2-3 Emission Offset and shall not be subject to Part 70 rules.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
$PM_{2.5}$	Attainment
PM_{10}	Attainment
SO_2	Attainment
NO_2	Attainment
1-Hour Ozone	Attainment
8-Hour Ozone	Basic Nonattainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) and nitrogen oxides (NO_X) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_X emissions were reviewed pursuant to the requirements of 326 IAC 2-3, Emission Offset. See the State Rule Applicability - Entire Source section of this document.

(b) Elkhart County has been classified as unclassifiable or attainment for $PM_{2.5}$. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for $PM_{2.5}$ emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for $PM_{2.5}$ emissions, it has directed states to regulate PM_{10} emissions as a surrogate for $PM_{2.5}$ emissions. See the State Rule Applicability - Entire Source section of this document.

(c) Elkhart County has been classified as attainment or unclassifiable in Indiana for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section of this document.

(d) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this proposed Notice Only Change.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in the permit for this proposed Notice Only Change.

State Rule Applicability – Entire Source

326 IAC 2-3 (Emission Offset)

The unrestricted potential VOC emissions and the unrestricted potential NO_X emissions from the entire source, are each less than one-hundred (100) tons per year after this Notice Only Change. Therefore, this source is a minor source pursuant to 326 IAC 2-3, Emission Offset.

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

The potential to emit of all remaining criteria pollutants from the entire source, which is not one (1) of the twenty-eight (28) major source categories, after this Notice Only Change, is less than two-hundred fifty (250) tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) are not applicable.

State Rule Applicability – Individual Facilities

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

Pursuant to 326 IAC 6-3-2(d) particulate from the one (1) spray booth, identified as SB-1, shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

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

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

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

326 IAC 8-2-12 (Volatile Organic Compounds (VOC))

Pursuant to 326 IAC 8-2-12, the one (1) spray booth, identified as SB-1, will be constructed after 1990 and the actual VOC emissions from the booth are greater than fifteen (15) pounds per day. Therefore the one (1) spray booth, identified as SB-1, is subject to the requirements of 326 IAC 8-2-12. This rule requires that the Permittee of a wood furniture or cabinet coating operation apply all coating material, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repairs, using one (1) or more of the following application systems:

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

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system. Since the one (1) spray booth, identified as SB-1, will be using an HVLP application method, this facility shall comply with this rule.

Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in **bold**):

Change 1:

The one (1) spray booth, identified as SB-1 has been added to Sections A.2 and D.1 as follows:

A.2 Emissions Units and Pollution Control Equipment Summary

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

(a) One (1) surface coating machine with a dryer, identified as SCLD, equipped with airless air assisted spray guns and dry filters to control particulate overspray, exhausting to Stacks SC1 and SC2, capacity: 250 wood cabinet doors per hour.

(b) One (1) woodworking operation, identified as WW, equipped with a dust collector, identified as DC, exhausting inside, capacity: 500 pounds of wood per hour.

(c) Source-wide natural gas-fired combustion, consisting of the following:

(1) Four (4) radiant space heaters, identified as SH1 - SH4, installed in 1988, exhausting to Stacks SH1 - SH4, capacity: 0.100 million British thermal units per hour each;

(2) One (1) radiant space heater, identified as SH5, installed in 1988, exhausting to Stack SH5, capacity: 0.050 million British thermal units per hour;

(3) Two (2) forced air furnaces, identified as SH6 and SH7, installed in 1988, exhausting to Stacks SH6 and SH7, capacity: 0.090 million British thermal units per hour each;

(4) One (1) water heater, identified as WH1, installed in 1988, exhausting to Stack SH7, capacity: 0.0525 million British thermal units per hour; and

(5) One (1) natural gas-fired air makeup unit, identified as AM1, capacity: 0.500 million British thermal units per hour.

(d) One (1) spray booth, identified as SB-1, utilizing an air assisted airless HVLP application system, equipped with dry filters for particulate control, exhausting to vent SB-1, capacity: 25 wood cabinet doors per hour.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description: Surface Coating Operations

(a) One (1) surface coating machine with a dryer, identified as SCLD, equipped with airless air assisted spray guns and dry filters to control particulate overspray, exhausting to Stacks SC1 and SC2, capacity: 250 wood cabinet doors per hour.

(d) One (1) spray booth, identified as SB-1, utilizing an air assisted airless HVLP application system, equipped with dry filters for particulate control, exhausting to vent SB-1, capacity: 25 wood cabinet doors per hour.

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

Change 2:

326 IAC 6-3-2 requires record keeping. Therefore, Condition D.1.4 Record Keeping Requirements has been added as follows:

D.1.4 Record Keeping Requirements

(a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with D.1.2.

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

Change 3:

The Annual Notification shall reflect the current name of the source Genesis Products Inc. – Hardwoods (Plant 3), formerly Creative Doors, Inc. The changes to the Annual Notification are as follows:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

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

Company Name:	~~Creative Doors, Inc.~~ **Genesis Products, Inc. – Hardwoods (Plant 3)**
Address:	2515 Industrial Park Drive
City:	Goshen, Indiana 46526
Phone #:	574 - 642-4887
MSOP #:	MSOP 039-17190-00582

I hereby certify that ~~Creative Doors, Inc.~~ **Genesis Products, Inc. – Hardwoods (Plant 3)** is
still in operation.
no longer in operation.

I hereby certify that ~~Creative Doors, Inc.~~ **Genesis Products, Inc. – Hardwoods (Plant 3)** is
in compliance with the requirements of
MSOP 039-17190-00582
not in compliance with the requirements of
MSOP 039-17190-00582.

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:

Conclusion

The construction and operation of this proposed Notice Only Change shall be subject to the conditions of the attached proposed MSOP Notice Only Change No 039-22516-00582.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Notice Only Change to a Minor Source Operating Permit

Source Background and Description

Source Name:	**Genesis Products Inc. – Hardwoods (Plant 3)**
Source Location:	**2515 Industrial Park Drive, Goshen, Indiana 46526**
County:	**Elkhart**
SIC Code:	**2434**
Operation Permit No.:	**M 039-17190-00582**
Operation Permit Issuance Date:	**September 12, 2003**
Notice Only Change No.:	**039-22516-00582**
Permit Reviewer:	**Brian J. Pedersen**

The Office of Air Quality (OAQ) has reviewed a Notice Only Change application from Genesis Products Inc. – Hardwoods (Plant 3) relating to the construction and operation of the following emission unit and pollution control devices:

One (1) spray booth, identified as SB-1, utilizing an air assisted airless HVLP application system, equipped with dry filters for particulate control, exhausting to vent SB-1, capacity: 25 wood doors per hour.

History

Genesis Products Inc. – Hardwoods (Plant 3) was issued an MSOP 039-17190-00582 on September 12, 2003. The surface coating emissions were based upon the stain and topcoat sealer being applied at the same time. According to this source, this was erroneous and the result was an overestimated emission total. The source can only apply one (1) coating at a time. Therefore VOC emissions from the source shall decrease from the previously calculated 96.7 tons per year to 87.7 tons per year. Therefore, the addition of the new spray booth, identified as SB-1, with the added potential to emit of 3.84 tons of VOC per year, shall keep the VOC emissions below one hundred (100) tons per year. Therefore, this source shall remain a minor source under 326 IAC 2-3 Emission Offset and shall not be subject to Part 70 rules.

Stack Summary

There are no stack emissions associated with this Notice Only Change.

Recommendation

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

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

A complete application for the purposes of this review was received on January 17, 2006.

Emission Calculations

See pages 1 and 2 of Appendix A of this document for detailed emission calculations.

Potential to Emit of the Revision Before Controls

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

Pollutant	Potential to Emit (tons/yr)
PM	0.190
PM_{10}	0.190
SO_2	-
VOC	3.84
CO	-
NO_x	-

HAPs	Potential to Emit (tons/yr)
MEK	0.058
Toluene	0.003
Total	0.061

Justification for Revision

The MSOP is being revised through an MSOP Notice Only Change. This Notice Only Change is being performed pursuant to 326 IAC 2-6.1-6(d) because the potential to emit of PM_{10} and VOC is less than five (5) tons per year. The addition of the new spray booth, identified as SB-1, with the added potential to emit of 3.84 tons of VOC per year, shall keep the VOC emissions below one hundred (100) tons per year. Also, the potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs are less than twenty-five (25) tons per year. All remaining criteria pollutants shall be less than one hundred (100) tons per year as well. Therefore, this source shall remain a minor source under 326 IAC 2-3 Emission Offset and shall not be subject to Part 70 rules.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
$PM_{2.5}$	Attainment
PM_{10}	Attainment
SO_2	Attainment
NO_2	Attainment
1-Hour Ozone	Attainment
8-Hour Ozone	Basic Nonattainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) and nitrogen oxides (NO_X) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_X emissions were reviewed pursuant to the requirements of 326 IAC 2-3, Emission Offset. See the State Rule Applicability - Entire Source section of this document.

(b) Elkhart County has been classified as unclassifiable or attainment for $PM_{2.5}$. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for $PM_{2.5}$ emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for $PM_{2.5}$ emissions, it has directed states to regulate PM_{10} emissions as a surrogate for $PM_{2.5}$ emissions. See the State Rule Applicability - Entire Source section of this document.

(c) Elkhart County has been classified as attainment or unclassifiable in Indiana for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section of this document.

(d) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit of Revision After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units.

	Potential to Emit (tons/year)						
Process/facility	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPs**
Proposed Revision (SB-1)	0.190	0.190	-	3.84	-	-	Single 0.058 Total 0.061
Existing Source	0.510	0.539	0.003	87.7	0.435	0.518	Single 0.391 Total 0.392
Total	0.700	0.729	0.003	91.5	0.435	0.518	Single Less Than 10 Total Less Than 25
MSOP Threshold Level	N/A	100	100	100	100	100	10/25

This revision to the existing MSOP will **not** change the status of the stationary source because the potential emissions from the entire source will still be less than the Part 70 major source thresholds.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this proposed Notice Only Change.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in the permit for this proposed Notice Only Change.

State Rule Applicability – Entire Source

326 IAC 2-3 (Emission Offset)

The unrestricted potential VOC emissions and the unrestricted potential NO_X emissions from the entire source, are each less than one-hundred (100) tons per year after this Notice Only Change. Therefore, this source is a minor source pursuant to 326 IAC 2-3, Emission Offset.

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

The potential to emit of all remaining criteria pollutants from the entire source, which is not one (1) of the twenty-eight (28) major source categories, after this Notice Only Change, is less than two-hundred fifty (250) tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) are not applicable.

State Rule Applicability – Individual Facilities

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

Pursuant to 326 IAC 6-3-2(d) particulate from the one (1) spray booth, identified as SB-1, shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

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

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

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

326 IAC 8-2-12 (Volatile Organic Compounds (VOC))

Pursuant to 326 IAC 8-2-12, the one (1) spray booth, identified as SB-1, will be constructed after 1990 and the actual VOC emissions from the booth are greater than fifteen (15) pounds per day. Therefore the one (1) spray booth, identified as SB-1, is subject to the requirements of 326 IAC 8-2-12. This rule requires that the Permittee of a wood furniture or cabinet coating operation apply all coating material, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repairs, using one (1) or more of the following application systems:

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

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system. Since the one (1) spray booth, identified as SB-1, will be using an HVLP application method, this facility shall comply with this rule.

Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in **bold**):

Change 1:

The one (1) spray booth, identified as SB-1 has been added to Sections A.2 and D.1 as follows:

A.2 Emissions Units and Pollution Control Equipment Summary

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

(a) One (1) surface coating machine with a dryer, identified as SCLD, equipped with airless air assisted spray guns and dry filters to control particulate overspray, exhausting to Stacks SC1 and SC2, capacity: 250 wood cabinet doors per hour.

(b) One (1) woodworking operation, identified as WW, equipped with a dust collector, identified as DC, exhausting inside, capacity: 500 pounds of wood per hour.

(c) Source-wide natural gas-fired combustion, consisting of the following:

(1) Four (4) radiant space heaters, identified as SH1 - SH4, installed in 1988, exhausting to Stacks SH1 - SH4, capacity: 0.100 million British thermal units per hour each;

(2) One (1) radiant space heater, identified as SH5, installed in 1988, exhausting to Stack SH5, capacity: 0.050 million British thermal units per hour;

(3) Two (2) forced air furnaces, identified as SH6 and SH7, installed in 1988, exhausting to Stacks SH6 and SH7, capacity: 0.090 million British thermal units per hour each;

(4) One (1) water heater, identified as WH1, installed in 1988, exhausting to Stack SH7, capacity: 0.0525 million British thermal units per hour; and

(5) One (1) natural gas-fired air makeup unit, identified as AM1, capacity: 0.500 million British thermal units per hour.

(d) One (1) spray booth, identified as SB-1, utilizing an air assisted airless HVLP application system, equipped with dry filters for particulate control, exhausting to vent SB-1, capacity: 25 wood cabinet doors per hour.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description: Surface Coating Operations

(a) One (1) surface coating machine with a dryer, identified as SCLD, equipped with airless air assisted spray guns and dry filters to control particulate overspray, exhausting to Stacks SC1 and SC2, capacity: 250 wood cabinet doors per hour.

(d) One (1) spray booth, identified as SB-1, utilizing an air assisted airless HVLP application system, equipped with dry filters for particulate control, exhausting to vent SB-1, capacity: 25 wood cabinet doors per hour.

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

Change 2:

326 IAC 6-3-2 requires record keeping. Therefore, Condition D.1.4 Record Keeping Requirements has been added as follows:

D.1.4 Record Keeping Requirements

(a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with D.1.2.

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

Change 3:

The Annual Notification shall reflect the current name of the source Genesis Products Inc. – Hardwoods (Plant 3), formerly Creative Doors, Inc. The changes to the Annual Notification are as follows:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

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

Company Name:	~~Creative Doors, Inc.~~ **Genesis Products, Inc. – Hardwoods (Plant 3)**
Address:	2515 Industrial Park Drive
City:	Goshen, Indiana 46526
Phone #:	574 - 642-4887
MSOP #:	MSOP 039-17190-00582

I hereby certify that ~~Creative Doors, Inc.~~ **Genesis Products, Inc. – Hardwoods (Plant 3)** is
still in operation.
no longer in operation.

I hereby certify that ~~Creative Doors, Inc.~~ **Genesis Products, Inc. – Hardwoods (Plant 3)** is
in compliance with the requirements of
MSOP 039-17190-00582
not in compliance with the requirements of
MSOP 039-17190-00582.

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:

Conclusion

The construction and operation of this proposed Notice Only Change shall be subject to the conditions of the attached proposed MSOP Notice Only Change No 039-22516-00582.

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

Company Name: **Genesis Products, Inc. _ Harwoods (Plant 3)**
Address City IN Zip: **2515 Industrial Park Drive, Goshen, Indiana 46526**
Notice Only Change: **039-22516**
Plt ID: **039-00582**
Reviewer: **Brian J. Pedersen**
Application Date: **January 17, 2006**

Material	Density (Lb/Gal)	Weight % Volatile (H20 & 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
Keystone Glaze (FS-5074)	8.37	83.4%	0.00%	83.4%	0.00%	15.8%	0.005	25.0	6.98	6.98	0.873	20.9	3.82	0.190	44.1	75%
Wash Thinner - Blender 2739	7.02	100%	0.00%	100.0%	0.00%	0.00%	0.00002	25.0	7.02	7.02	0.00	0.08	0.02	0.00	NA	100%
									PM Control Efficiency:	98.00%						
State Potential Emissions			**Add worst case coating to all solvents**							**Uncontrolled**	**0.876**	**21.0**	**3.84**	**0.190**		
										Controlled	**0.876**	**21.0**	**3.84**	**0.004**		

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: **Genesis Products, Inc. _ Harwoods (Plant 3)**
Address City IN Zip: **2515 Industrial Park Drive, Goshen, Indiana 46526**
Notice Only Change: **039-22516**
Plt ID: **039-00582**
Permit Reviewer: **Brian J. Pedersen**
Application Date: **January 17, 2006**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % MEK	Weight % Toluene	MEK Emissions (ton/yr)	Toluene Emissions (ton/yr)	Total Emissions (ton/yr)
Keystone Glaze (FS-5074)	8.37	0.0050	25.0	0.00%	1.09%	0.00	0.050	0.050
Wash Thinner - Blender 2739	7.02	0.00002	25.0	20.00%	55.00%	0.003	0.008	0.012
Total State Potential Emissions						**0.003**	**0.058**	**0.061**

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