



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: December 13, 2006
RE: Therma Tru Corporation / 033-23835-00019
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 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, 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 4-21.5-3-7 and IC 13-15-7-3 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 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-MOD.dot 03/23/06



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204-2251
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December 13, 2006

Mr. Rick Goodman
Therma Tru Corporation
108 Mutzfeld Road
Butler, Indiana 46721

Re: 033-23835-00019
Second Minor Source Modification to:
Part 70 Operating Permit No.: T 033-7927-00019

Dear Mr. Goodman:

Therma Tru Corporation was issued Part 70 Operating Permit T 033-7927-00019 on November 12, 1998 for a stationary metal and fiberglass doors, sash and trim plastics products manufacturing plant located at 108 Mutzfeld Road, Butler, Indiana 46721. An application to modify the source was received on November 2, 2006. Pursuant to 326 IAC 2-7-10.5 the following emission unit is approved for construction at the source:

One (1) deflashing station, identified as DF-1, approved for installation in 2006, equipped with a cartridge dust collector for particulate control, exhausted inside the building, capacity: 720 fiberglass door skins per hour or 13,680 pounds per hour.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval 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.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval 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.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

The source may begin construction and operation when the minor source modification has been issued. Operating conditions shall be incorporated into the Part 70 Operating Permit as a minor permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12.

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 contact Edward A. Longenberger, c/o OAQ, 100 North Senate Avenue, Indianapolis, Indiana 46204-2251, at 631-691-3395, ext. 20 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

EAL/MES

Attachments

cc: File - Dekalb County
Dekalb County Health Department
Northern Regional Office
Air Compliance Section Inspector – Doyle Houser
Compliance Branch
Administrative and Development Section
Technical Support and Modeling - Michele Boner



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Indianapolis, Indiana 46204-2251
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MINOR SOURCE MODIFICATION PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Therma Tru Corporation
108 Mutzfeld Road
Butler, Indiana 46721**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 033-7927-00019	
Original signed by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date: November 12, 1998 Expiration Date: November 12, 2003

First Significant Source Modification, SSM 033-10998-00019	Issuance Date: January 21, 2000
Second Significant Source Modification SSM 033-12630-00019	Issuance Date: December 5, 2000
First Minor Source Modification MSM 033-14449-00019	Issuance Date: July 30, 2001
Third Significant Source Modification SSM 033-20516-00019	Issuance Date: April 23, 2005
Fourth Significant Source Modification SSM 033-21698-00019	Issuance Date: October 31, 2005

Second Minor Source Modification No. 033-23835-00019	Sections Affected: A.2, B.13, D.7, Emergency Occurrence Report Form
Issued by:Original signed by Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: December 13, 2006

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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.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary metal doors, sash and trim plastics products manufacturing plant.

Responsible Official: General Manager
Source Address: 108 Mutzfeld Road, Butler, IN 46721
Mailing Address: 108 Mutzfeld Road, Butler, IN 46721
SIC Code: 3442 and 3089
County Location: DeKalb
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

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

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

- (1) One door skin gluing operation, identified as EU2, with a maximum capacity of 360 doors per hour, and exhausting to stacks 1.1 and 1.2.
- (2) One (1) flowcoating operation, identified as EU3, consisting of one (1) flowcoater, equipped with filters, replaced in 2000, one (1) flash off tunnel and one (1) paint cure oven, with a maximum capacity of 360 doors per hour, and exhausting to stacks 3.1 and 3.2, 4.1 and 4.2, and 4.3 and 4.4 respectively.
- (3) One (1) machining station, identified as EU4, with a maximum capacity of 360 doors per hour, using a dust collector for particulate emission control, and exhausting to stack 5.1.
- (4) One (1) calcium carbonate storage silo, identified as EU5, with a maximum throughput of 16,500 pounds per day, and using a baghouse for particulate control.
- (5) Degreasing operations, identified as EU6, consisting of two (2) cold cleaner degreasers not using halogenated solvents, exhausting to stacks 13.1, 13.2, 13.3 and 13.4.

Door Assembly Line, capacity: 20,250 pounds of doors per hour or 450 doors per hour

- (6) One (1) electric door skin preheat oven, known as D2-OV1, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.1, capacity: 20,250 pounds per hour of fiberglass door skins per hour or 450 doors per hour.
- (7) One (1) adhesive application station, known as D2-APP1, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.2, capacity, 43 pounds of adhesive per hour or 450 doors per hour.

- (8) One (1) electric glue curing oven, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.2, known as D2-OV2, capacity: 450 doors per hour.
- (9) One (1) electric skin reheat oven, known as D2-OV3, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.3, capacity: 450 doors per hour.
- (10) One (1) door foam injection system, known as D2-F1, exhausting through Stack 19.1, capacity: 2,300 pounds of resin and foam insulation per hour or 450 doors per hour.
- (11) One (1) door machining station, known as D2-MS1, equipped with a baghouse and cyclone connected in series, known as D2-DC1, exhausting through Stack 20.1, capacity: 450 doors per hour or 20,250 pounds per hour.

New Skins Warehouse

Molding Plant Sheet Molding Compound Production Line, known as SMC2, capacity: 18,500 pounds of molding compound per hour, consisting of:

- (12) One (1) existing permitted calcium carbonate silo, equipped with a baghouse, known as SILO1, exhausting through Stacks 25.1, capacity: 150,000 pounds calcium carbonate.
- (13) Two (2) calcium carbonate silos, known as SILO2 and SILO3, each equipped with a baghouse, exhausting through Stacks 25.2 and 25.3, throughput: 8,800 pounds of calcium carbonate per hour each, capacity: 200,000 pounds calcium carbonate, each.
- (14) Two (2) resin mixers, exhausting through Stack 17.1 and/or Stack 17.2, total throughput: 8,880 pounds of calcium carbonate, 4,700 pounds of resin, 648 pounds of pigment mixture, 130 pounds of release agent, and 74 pounds of catalyst per hour.
- (15) One (1) sheet molding compound extruder, exhausting through Stack 17.1 and/or Stack 17.2, throughput 14,432 pounds of materials plus 4,070 pounds of chopped fiberglass strands per hour.
- (16) One (1) hose cleaning re-circulation station, (cold cleaner tank, known as SMC-CC2), exhausting through Stack 17.1 and/or Stack 17.2.

Door Assembly Line (additional equipment)

- (17) One (1) two-belt sander, known as EU7, with emissions controlled by D2-DC1, exhausting through Stack 20.1.

SMC Presses

- (18) Six (6) sheet molding compound (SMC) presses, identified as Presses 1 through 6, installed in 1989, exhausting inside, capacity: 1,067 pounds of SMC per hour, each.
- (19) One (1) sheet molding compound (SMC) press, identified as Press 7, installed in February 1989, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (20) One (1) sheet molding compound (SMC) press, identified as Press 8, installed in August 1989, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (21) One (1) sheet molding compound (SMC) press, identified as Press 9, installed in March 1999, exhausting inside, capacity: 862.5 pounds of SMC per hour.

- (22) Four (4) sheet molding compound (SMC) presses, identified as Presses 11 through 14, installed in 2000, exhausting inside, capacity: 1,067 pounds of SMC per hour, each.
- (23) One (1) sheet molding compound (SMC) press, identified as Press 15, installed in March 2001, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (24) One (1) sheet molding compound (SMC) press, identified as Press 16, installed in May 2001, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (25) One (1) sheet molding compound (SMC) press, identified as Press 17, installed in June 2002, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (26) One (1) sheet molding compound (SMC) press, identified as Press 18, installed in June 2002, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (27) One (1) sheet molding compound (SMC) press, identified as Press 19, installed in July 2002, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (28) One (1) sheet molding compound (SMC) press, identified as Press 20, installed in July 2002, exhausting inside, capacity: 1,067 pounds of SMC per hour.
- (29) Five (5) sheet molding compound (SMC) presses, identified as Presses 21 - 25, exhausting inside, capacity: 1,067 pounds of SMC per hour each and a combined total of 4,826 pounds of SMC per hour.
- (30) One (1) deflashing station, identified as DF-1, approved for installation in 2006, equipped with a cartridge dust collector for particulate control, exhausted inside the building, capacity: 720 fiberglass door skins per hour or 13,680 pounds per hour.

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

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

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (2) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (3) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (4) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (5) Water based adhesives that are less than or equal to 5% by volume of VOC's excluding HAPs.
- (6) Paved and unpaved roads and parking lots with public access.
- (7) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic feet and a gas flow rate less than or equal to

If due to circumstances beyond its control, the PMP 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

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ.

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

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

SECTION D.7 FACILITY OPERATION CONDITIONS

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

- (30) One (1) deflashing station, identified as DF-1, approved for installation in 2006, equipped with a cartridge dust collector for particulate control, exhausted inside the building, capacity: 720 fiberglass door skins per hour or 13,680 pounds per hour.

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.7.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the deflashing station (DF-1) shall not exceed 14.87 pounds per hour when operating at a process weight rate of 13,680 pounds per hour (6.84 tons per hour). The pound per hour limitation was calculated using 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.7.2 Minor Source Modification (PM and PM₁₀) [326 IAC 2-7-10.5(d)(4)(C)]

Pursuant to 326 IAC 2-7-10.5(d)(4)(C), the potential to emit of the deflashing station (DF-1) shall be limited to less than twenty-five (25) tons per year of PM and fifteen (15) tons per year of PM₁₀ by using a particulate air pollution control device as follows:

- (a) Achieving and maintaining ninety-nine percent (99%) efficiency.
- (b) Complying with a no visible emission standard.
- (c) The potential to emit before controls does not exceed major source thresholds for federal permitting programs.
- (d) Certifying to the commissioner that the control device supplier guarantees that a specific outlet concentration, in conjunction with design air flow, will result in actual emissions less than twenty-five (25) tons of particulate matter (PM) or fifteen (15) tons per year of particulate matter with an aerodynamic diameter less than or equal to ten (10) micrometers (PM₁₀).

D.7.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the deflashing station (DF-1) and its control device.

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

D.7.4 Particulate Control [326 IAC 2-7-6(6)]

- (a) In order to comply with Conditions D.7.1 and D.7.2, the cartridge dust collector for particulate control shall be in operation and control emissions from the deflashing station (DF-1) at all times that the deflashing station (DF-1) is in operation.

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

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

D.7.5 Visible Emissions Notations

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

D.7.6 Dust Collector Parametric Monitoring [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- (a) The Permittee shall record the pressure drop across the cartridges used in conjunction with the deflashing station (DF-1) at least once per day when the deflashing station (DF-1) is in operation and exhausting to the atmosphere. When for any one reading, the pressure drop across the cartridge is outside the normal range of 1.0 and 4.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a deviation from this permit.
- (b) The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.7.7 Broken or Failed Cartridge Detection

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

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

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

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

D.7.8 Record Keeping Requirements

- (a) To document compliance with Condition D.7.2, the Permittee shall maintain the following records:
- (1) Copies of manufacturer specifications for the control device that indicate control efficiency equal to or greater than ninety-nine percent (99%) efficiency.
 - (2) Records of visible emission notations of the deflashing station (DF-1) exhaust once per day when exhausting to the atmosphere.
 - (3) A copy of the vendor certification that guarantees that actual emissions will be less than twenty-five (25) tons of particulate matter (PM) or fifteen (15) tons per year of particulate matter with an aerodynamic diameter less than or equal to ten (10) micrometers (PM₁₀).
- (b) To document compliance with Condition D.7.5, the Permittee shall maintain records of visible emission notations of the deflashing station (DF-1) exhaust once per day when exhausting to the atmosphere.
- (c) To document compliance with Condition D.7.6, the Permittee shall maintain records once per day of the pressure drop during normal operation when exhausting to the atmosphere.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Therma Tru Corporation
Source Address: 108 Mutzfeld Road, Butler, Indiana 46721
Mailing Address: 108 Mutzfeld Road, Butler, Indiana 46721
Part 70 Permit No.: T 033-7927-00019

This form consists of 2 pages

Page 1 of 2

<input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.
--

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

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

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70
Minor Source Modification and Minor Permit Modification

Source Description and Location

Source Name:	Therma Tru Corporation
Source Location:	108 Mutzfeld Road, Butler, Indiana 46721
County:	DeKalb
SIC Code:	3442 and 3089
Operation Permit No.:	T 033-7927-00019
Operation Permit Issuance Date:	November 12, 1998
Minor Source Modification No.:	MSM 033-23835-00019
Minor Permit Modification No.:	MPM 033-23875-00019
Permit Reviewer:	Edward A. Longenberger

Existing Approvals

The source was issued a Part 70 Operating Permit T 033-7927-00019 on November 12, 1998. The source submitted an application for a Part 70 Operating Permit Renewal (T 033-17546-00019) on April 7, 2003. At this time that application is still under review. The source has since received the following approvals:

- (a) SSM 033-10998-00019, issued January 21, 2000
- (b) SPM 033-11605-00019, issued January 28, 2000
- (c) SPM 033-11940-00019, issued June 2, 2000
- (d) SSM 033-12630-00019, issued December 5, 2000
- (e) AAT 033-12746-00019, issued December 8, 2000
- (f) MSM 033-14449-00019, issued July 30, 2001
- (g) Reopening 033-13182-00019, issued December 31, 2001
- (h) AAT 033-16180-00019, issued November 14, 2002
- (i) SSM 033-20516-00019, issued April 23, 2005
- (j) SPM 033-20777-00019, issued May 2, 2005
- (k) SSM 033-21698-00019, issued October 31, 2005
- (l) SPM 033-21597-00019, issued November 15, 2005

County Attainment Status

The source is located in DeKalb County.

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

- (a) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 redesignating Delaware, Greene, Jackson, Vanderburgh, Vigo and Warrick Counties to attainment for the eight-hour ozone standard, redesignating Lake County to attainment for the sulfur dioxide standard, and revoking the one-hour ozone standard in Indiana.
- (b) Volatile organic compounds (VOC) and nitrogen oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. DeKalb County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section of this document.
- (c) DeKalb County has been classified as unclassifiable or attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM_{2.5} emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions. See the State Rule Applicability - Entire Source section of this document.
- (d) DeKalb 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.
- (e) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8,760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	Greater Than 250
PM ₁₀	Greater Than 250
SO ₂	Less Than 250
VOC	Greater Than 250
CO	Less Than 250
NO _x	Less Than 250

- (a) This existing source is a major stationary source under PSD (326 IAC 2-2) because PM, PM₁₀ and VOC are each emitted at a rate of two-hundred fifty (250) tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) These emissions are based upon the information contained within the TSD for SSM 033-21698-00019, issued October 31, 2005.

The table below summarizes the potential to emit HAPs for the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

HAPs	Emissions (tons/year)
Worst Case Single HAP	Greater than 10.0
Total HAPs	Greater than 25.0

- (a) This existing source is a major source of HAPs, as defined in 40 CFR 63.41, because HAP emissions are greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).
- (b) These emissions are based upon the information contained within the TSD for SSM 033-21698-00019, issued October 31, 2005.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2003 (2004 for HAPs) OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	Not reported
PM ₁₀	0
SO ₂	0
VOC	44
CO	1

Pollutant	Actual Emissions (tons/year)
NO _x	1
HAP (Glycol Ether)	5.13
HAP (Styrene)	112

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Therma Tru Corporation on November 2, 2006, relating to the construction of a deflashing station. This equipment will be used to trim the excess fiberglass from the edges of fiberglass door skins that are produced in the existing SMC presses. The following is the newly proposed emission unit and pollution control device:

One (1) deflashing station, identified as DF-1, approved for installation in 2006, equipped with a cartridge dust collector for particulate control, exhausted inside the building, capacity: 720 fiberglass door skins per hour or 13,680 pounds per hour.

Enforcement Issues

There are no pending enforcement actions.

Stack Summary

There are no stacks associated with the proposed deflashing station. The process exhausts inside the building.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

Permit Level Determination – Part 70

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emission 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, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	83.4
PM ₁₀	83.4
SO ₂	-
VOC	-
CO	-
NO _x	-

HAPs	Potential To Emit (tons/year)
TOTAL	-

This source modification would have been a significant source modification as specified by 326 IAC 2-7-10.5(f)(4), since the potential to emit of PM and PM₁₀ from this modification is greater than twenty five (25) tons per year, but Therma Tru Corporation has agreed to comply with the requirements of 326 IAC 2-7-10.5(d)(4)(C) which will allow the modification to be processed as a minor source modification. Conditions have been included in the permit to ensure that the requirements of 326 IAC 2-7-10.5(d)(4)(C) are met. Additionally, the modification will be incorporated into the Part 70 Operating Permit through a minor permit modification issued pursuant to 326 IAC 2-7-12(b)(1).

Permit Level Determination – PSD

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 source modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/Emission Unit	Potential to Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Deflashing station (DF-1)	0.834	0.834	-	-	-	-	-
Significant Level	25	15	40	40	100	40	NA

This modification to an existing major stationary source is not major because the emissions increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. The cartridge dust collector for particulate control shall be in operation and control emissions from the deflashing station (DF-1) at all times that the deflashing station (DF-1) is in operation

Federal Rule Applicability Determination

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60)

applicable to this proposed modification.

- (b) Although this source is already subject to the requirements of the National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production (40 CFR 63.5780, Subpart WWWW), there are no applicable requirements in Subpart WWWW for trimming or deflashing of plastic composites.
- (c) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified emission units that involve a pollutant-specific emission unit and meet the following criteria:
 - (1) has a potential to emit before or after controls equal to or greater than the major source threshold for the pollutant involved;
 - (2) is subject to an emission limitation or standard for that pollutant; and
 - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the applicability criteria, under 40 CFR 64.1, to each new or modified emission unit involved:

Emission Unit	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
DF-1 (PM and PM ₁₀)	Cartridge dust collector	Y	83.4	0.834	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to the new unit as part of this modification.

State Rule Applicability Determination

The following state rules are applicable to the source due to the modification:

326 IAC 2-2 (PSD)

PSD applicability is discussed under the Permit Level Determination - PSD section.

326 IAC 2-7-10.5 (Part 70 permits; source modifications)

Pursuant to 326 IAC 2-7-10.5(d)(4)(C), the potential to emit of the deflashing station (DF-1) is limited to less than twenty-five (25) tons per year of PM and PM₁₀ by using a particulate air pollution control device as follows:

- (a) Achieving and maintaining ninety-nine percent (99%) efficiency.
- (b) Complying with a no visible emission standard.
- (c) The potential to emit before controls does not exceed major source thresholds for federal permitting programs.
- (d) Certifying to the commissioner that the control device supplier guarantees that a specific outlet concentration, in conjunction with design air flow, will result in actual emissions less than twenty-five (25) tons of particulate matter (PM) or fifteen (15) tons per year of particulate

matter with an aerodynamic diameter less than or equal to ten (10) micrometers (PM₁₀).

The potential to emit before controls (83.4 tons per year of PM and PM₁₀) is less than the two hundred fifty (250) ton per year major source threshold under 326 IAC 2-2 (PSD). The applicant has provided manufacturer specifications and vendor certifications that show the control device can maintain at least 99% control efficiency and that actual emissions will be less than twenty-five (25) tons per year of PM and fifteen (15) tons per year of PM₁₀. The Permittee will be required to keep records of these certifications and records of daily visible emissions notations when exhausting to the atmosphere.

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the deflashing station (DF-1) shall not exceed 14.87 pounds per hour when operating at a process weight rate of 13,680 pounds per hour (6.84 tons per hour).

The pound per hour limitation was calculated using 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:

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

The cartridge dust collector shall be in operation at all times the deflashing station (DF-1) is in operation, in order to comply with this limit.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance determination requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

The compliance determination requirements applicable to this modification are as follows:

The deflashing station DF-1 has applicable compliance determination conditions as specified below:

The cartridge dust collector for particulate control shall be in operation and control emissions from the deflashing station (DF-1) at all times that the deflashing station (DF-1) is in operation.

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

The deflashing station DF-1 has applicable compliance monitoring conditions as specified below:

- (a) Visible emission notations of the deflashing station (DF-1) 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 expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps shall be considered a deviation from this permit.
- (b) The Permittee shall record the pressure drop across the cartridges used in conjunction with the deflashing station (DF-1) at least once per day when the deflashing station (DF-1) is in operation and exhausting to the atmosphere. When for any one reading, the pressure drop across the cartridge is outside the normal range of 1.0 and 4.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a deviation from this permit.
- (c) For a single compartment dust collector controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

These monitoring conditions are necessary because the cartridge dust collector for the deflashing station (DF-1) must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-7 (Part 70)).

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T 033-7927-00019. Deleted language appears as ~~strike throughs~~ and new language appears in bold:

Change 1:

The IDEM, OAQ Compliance Branch phone and fax number has been changed in Condition B.13 and the Emergency Occurrence Report Form, as shown:

B.13 Emergency Provisions [326 IAC 2-7-16]

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

Telephone Number: 317-233-~~5674~~ **0178** (ask for Compliance Section)

Facsimile Number: 317-233-~~5967~~ **6865**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
Phone: 317-233-~~5674~~ **0178**
Fax: 317-233-~~5967~~ **6865****

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Therma Tru Corporation
Source Address: 108 Mutzfeld Road, Butler, Indiana 46721
Mailing Address: 108 Mutzfeld Road, Butler, Indiana 46721
Part 70 Permit No.: T 033-7927-00019

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- C The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-~~5674~~ **0178**, ask for Compliance Section); and
 - C The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-~~5967~~ **6865**), and follow the other requirements of 326 IAC 2-7-16.

Change 2:

The proposed deflashing station (DF-1) has been added to the end of Section A.2 as item number 30, as shown:

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

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

- (30) One (1) deflashing station, identified as DF-1, approved for installation in 2006, equipped with a cartridge dust collector for particulate control, exhausted inside the building, capacity: 720 fiberglass door skins per hour or 13,680 pounds per hour.

Change 3:

The proposed deflashing station (DF-1) and the related applicable requirements have been added in their own D section (Section D.7), as follows:

SECTION D.7 FACILITY OPERATION CONDITIONS

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

- (30) One (1) deflashing station, identified as DF-1, approved for installation in 2006, equipped with a cartridge dust collector for particulate control, exhausted inside the building, capacity: 720 fiberglass door skins per hour or 13,680 pounds per hour.

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.7.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the deflashing station (DF-1) shall not exceed 14.87 pounds per hour when operating at a process weight rate of 13,680 pounds per hour (6.84 tons per hour). The pound per hour limitation was calculated using 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.7.2 Minor Source Modification (PM and PM₁₀) [326 IAC 2-7-10.5(d)(4)(C)]

Pursuant to 326 IAC 2-7-10.5(d)(4)(C), the potential to emit of the deflashing station (DF-1) shall be limited to less than twenty-five (25) tons per year of PM and fifteen (15) tons per year of PM₁₀ by using a particulate air pollution control device as follows:

- (a) Achieving and maintaining ninety-nine percent (99%) efficiency.
- (b) Complying with a no visible emission standard.
- (c) The potential to emit before controls does not exceed major source thresholds for federal permitting programs.

- (d) Certifying to the commissioner that the control device supplier guarantees that a specific outlet concentration, in conjunction with design air flow, will result in actual emissions less than twenty-five (25) tons of particulate matter (PM) or fifteen (15) tons per year of particulate matter with an aerodynamic diameter less than or equal to ten (10) micrometers (PM₁₀).

D.7.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the deflashing station (DF-1) and its control device.

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

D.7.4 Particulate Control [326 IAC 2-7-6(6)]

- (a) In order to comply with Conditions D.7.1 and D.7.2, the cartridge dust collector for particulate control shall be in operation and control emissions from the deflashing station (DF-1) at all times that the deflashing station (DF-1) is in operation.
- (b) In the event that cartridge failure is observed in a multi-compartment dust collector, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.7.5 Visible Emissions Notations

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

D.7.6 Dust Collector Parametric Monitoring [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- (a) The Permittee shall record the pressure drop across the cartridges used in conjunction with the deflashing station (DF-1) at least once per day when the deflashing station (DF-1) is in operation and exhausting to the atmosphere. When for any one reading, the pressure drop across the cartridge is outside the normal range of 1.0 and 4.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a deviation from this permit.
- (b) The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.7.7 Broken or Failed Cartridge Detection

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

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

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

D.7.8 Record Keeping Requirements

- (a) To document compliance with Condition D.7.2, the Permittee shall maintain the following records:
 - (1) Copies of manufacturer specifications for the control device that indicate control efficiency equal to or greater than ninety-nine percent (99%) efficiency.
 - (2) Records of visible emission notations of the deflashing station (DF-1) exhaust once per day when exhausting to the atmosphere.
 - (3) A copy of the vendor certification that guarantees that actual emissions will be less than twenty-five (25) tons of particulate matter (PM) or fifteen (15) tons per year of particulate matter with an aerodynamic diameter less than or equal to ten (10) micrometers (PM₁₀).
- (b) To document compliance with Condition D.7.5, the Permittee shall maintain records of

visible emission notations of the deflashing station (DF-1) exhaust once per day when exhausting to the atmosphere.

- (c) To document compliance with Condition D.7.6, the Permittee shall maintain records once per day of the pressure drop during normal operation when exhausting to the atmosphere.**
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

Conclusion and Recommendation

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 033-23835-00019 and Minor Permit Modification No. 033-23875-00019. The staff recommends to the Commissioner that this Part 70 Minor Source Modification and Minor Permit Modification be approved.

**Appendix A: Emission Calculations
Deflashing Station (DF-1)**

Company Name: Therma Tru Corporation
Address City IN Zip: 108 Mutzfield Road, Butler, Indiana 46721
MSM: 033-23835-00019
MPM: 033-23875-00019
Plt ID: 033-00019
Reviewer: Edward A. Longenberger
Date: November 2, 2006

Assume all PM = PM10

Process	Throughput (skins/hr)	Process Weight Rate (lbs/hr)	Emission Rate (lbs/unit)	Control Efficiency (%)	Potential Particulate Emissions (lbs/hour)	Potential Particulate Emissions (tons/year)	Potential Emissions after Control (lbs/hour)	Potential Emissions after Control (tons/year)
DF-1	720.00	13,680	0.026	99.0%	19.05	83.43	0.190	0.834

METHODOLOGY

Potential Emissions (lbs/hr) = Throughput (skins/hr) x Emission Rate (lbs/skin)
 Potential Emissions (tons/year) = Potential Emissions (lbs/hr) x (8760 hours/year) x (1 ton/2000 lbs)
 Potential Emissions after Control (lbs/hr) = Potential Emissions (lbs/hr) * (1 - Control Efficiency (%))
 Potential Emissions after Control (tons/year) = Potential Emissions after Control (lbs/hr) x (8760 hours/year) x (1 ton/2000 lbs)

Emission rate based on engineering data. Worst case assumed: all material lost is considered potential particulate emissions. Data taken from test where fiberglass door skins were weighed before and after deflashing. All material lost was considered to be potential particulate emissions, even though much of the material removed during the process would not be considered particulate matter due to the size of the material being larger than 100 microns.