



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 26, 2007
RE: Superior Wood Products / 085-24053-00072
FROM: Matthew Stuckey, Deputy Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot12/03/07



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100 North Senate Avenue
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Indianapolis, Indiana 46204-2251
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Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

**Superior Wood Products
1058 West CR 400 North
Warsaw, Indiana 46580**

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

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

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

Operation Permit No.: M085-24053-00072	
Issued by/Original Signed By: Matthew Stuckey, Deputy Branch Chief Permits Branch Office of Air Quality	Issuance Date: December 26, 2007 Expiration Date: December 26, 2012

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

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

The Permittee owns and operates a stationary custom made wood kitchen cabinet manufacturing operation.

Source Address:	1058 West CR 400 North, Warsaw, Indiana 46580
Mailing Address:	1058 West CR 400 North, Warsaw, Indiana 46580
General Source Phone Number:	(574) 267-5879
SIC Code:	2434
County Location:	Kosciusko
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) Four (4) spray booths, identified as EU-1, EU-2, EU-3, and EU-4, constructed in 1999 and modified in 2007, utilizing HVLP spray application methods, each with a maximum capacity of 3.23 units per hour, with particulate emissions controlled by dry filters, and exhausting to stacks S1, S2, S3, and S4, respectively.
- (b) One (1) spray booth, identified as EU-5, constructed in 2007, utilizing HVLP spray application methods, with a maximum capacity of 3.23 units per hour, with particulate emissions controlled by dry filters, and exhausting to stack S8.
- (c) One (1) woodworking shop with rough mill and finish mill operations, constructed in 1999, with a combined maximum throughput capacity of 1,000 pounds of wood per hour, with cyclones, baghouses, and internal portable dust collectors for particulate control. One cyclone is exhausted inside through two baghouses; additional woodworking emissions are exhausted at stacks S4, S5 and S6.
- (d) Natural gas-fired combustion units, consisting of:
 - (1) Ten (10) natural gas-fired space heaters, constructed in 1999, with a total maximum heat input capacity of 1.4 MMBtu per hour.
 - (2) One (1) air make-up unit, identified as AM-B5, with a maximum heat input of 0.125 MMBtu/hr.
- (e) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, M085-24053-00072, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

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

B.8 Certification

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

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

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, IN 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

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

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

- (a) All terms and conditions of permits established prior to M085-24053-00072 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least ninety (90) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

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

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

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

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

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

B.15 Source Modification Requirement

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

B.16 Inspection and Entry

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

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

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

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

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

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

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

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

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

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

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

C.7 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
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

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

C.8 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 than 180 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required

monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

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

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

Corrective Actions and Response Steps

C.12 Actions Related to Noncompliance Demonstrated by a Stack Test

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

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

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

C.13 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.14 General Record Keeping Requirements [326 IAC 2-6.1-5]

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

C.15 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Surface Coating Booths

- (a) Four (4) spray booths, identified as EU-1, EU-2, EU-3, and EU-4, constructed in 1999 and modified in 2007, utilizing HVLP spray application methods, each with a maximum capacity of 3.23 units per hour, with particulate emissions controlled by dry filters, and exhausting to stacks S1, S2, S3, and S4, respectively.
- (b) One (1) spray booth, identified as EU-5, constructed in 2007, utilizing HVLP spray application methods, with a maximum capacity of 3.23 units per hour, with particulate emissions controlled by dry filters, and exhausting to stack S8.

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

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

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

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets in surface coating booths EU-1 through EU-5 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]

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

- (a) Particulate from the surface coating processes identified as EU-1, EU-2, EU-3, EU-4, and EU-5 shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with the 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 these facilities and their control devices.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Woodworking

- (c) One (1) woodworking shop with rough mill and finish mill operations, constructed in 1999, with a combined maximum throughput capacity of 1,000 pounds of wood per hour, with cyclones, baghouses, and internal portable dust collectors for particulate control. One cyclone is exhausted inside through two baghouses; additional woodworking emissions are exhausted at stacks S4, S5 and S6.

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

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

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 woodworking facilities shall not exceed 2.58 pounds per hour when operating at a process weight rate of 1,000 pounds per hour.

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

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

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

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

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

Compliance Determination Requirements

D.2.3 Particulate Control

Pursuant to 326 IAC 6-3-2 and in order to comply with condition D.2.1, the cyclones, baghouses and internal portable dust collectors for particulate control shall be in operation at all times the woodworking facilities are in operation.

**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:	Superior Wood Products
Address:	1058 West CR 400 North
City:	Warsaw, Indiana 46580
Phone #:	(574) 267-5879
MSOP #:	M085-24053-00072

I hereby certify that Superior Wood Products is :

still in operation.

no longer in operation.

I hereby certify that Superior Wood Products is :

in compliance with the requirements of MSOP M085-24053-00072.

not in compliance with the requirements of MSOP M085-24053-00072.

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

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: ____/____/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

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

Source Description and Location

Source Name:	Superior Wood Products
Source Location:	1058 West CR 400 North, Warsaw, IN 46580
County:	Kosciusko
SIC Code:	2434
Operation Permit No.:	M085-14805-00072
Operation Permit Issuance Date:	March 28, 2002
MSOP Renewal No.:	M085-24053-00072
Permit Reviewer:	ERG/ST

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Superior Wood Products relating to the operation of a stationary custom made wood kitchen cabinet manufacturing operation.

History

On December 12, 2006, Superior Wood Products submitted an application to IDEM, OAQ requesting the renewal of its operating permit. Superior Wood Products was issued Minor Source Operating Permit (MSOP) 085-14805-00072 on March 28, 2002.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Four (4) spray booths, identified as EU-1, EU-2, EU-3 and EU-4, constructed in 1999 and modified in 2007, utilizing HVLP spray application methods, each with a maximum capacity of 3.23 units per hour, with particulate emissions controlled by dry filters, and exhausting to stacks S1, S2, S3 and S4, respectively.
- (b) One (1) spray booth, identified as EU-5, constructed in 2007, utilizing HVLP spray application methods, with a maximum capacity of 3.23 units per hour, with particulate emissions controlled by dry filters, and exhausting to stack S8.
- (c) One (1) woodworking shop with rough mill and finish mill operations, constructed in 1999, with a combined maximum throughput capacity of 1,000 pounds of wood per hour, with cyclones, baghouses, and internal portable dust collectors for particulate control. One cyclone is exhausted inside through two baghouses; additional woodworking emissions are exhausted at stacks S4, S5 and S6.
- (d) Natural gas-fired combustion units, consisting of:
 - (1) Ten (10) natural gas-fired space heaters, constructed in 1999, with a total maximum heat input capacity of 1.4 MMBtu per hour.
 - (2) One (1) air make-up unit, identified as AM-B5, with a maximum heat input of 0.125 MMBtu/hr.

- (e) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.

Existing Approvals

Since the issuance of the Minor Source Operating Permit 085-14805-00072 on March 28, 2002, the source has constructed or has been operating under the following approvals:

- (a) Minor Permit Revision No.: 085-24816-00072, issued on August 17, 2007.

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

The following terms and conditions from previous approvals have been revised or removed in this MSOP Renewal:

- (a) HAP Minor Limit:
Conditions D.1.3, D.1.8 and D.1.9 of M085-14805-00072, issued on March 28, 2002 have been removed. These conditions required the Permittee to limit the amount of HAP used at the source to minor source levels, and to report HAP usage semi-annually. The source-wide potential to emit is less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Further, a source cannot take any limits to become an MSOP-level source. The TSD Addendum to M085-14805-00072 indicated that the HAP reporting was necessary to comply with an Agreed Order. However, the Agreed Order for case # 2000-9744-A stated that " The Respondent has demonstrated that it is an Area Source as defined by 40 CFR 63.800(b)." Therefore, no HAP limit or reporting is necessary.
- (b) Particulate Limit:
The particulate limit and monitoring requirements for the surface coating booths in Conditions D.1.2, D.1.6, and D.1.7 of M085-14805-00072 have been revised to reflect the revisions made to 326 IAC 6-3 in October 2002.
- (c) Compliance Monitoring:
The compliance monitoring and record keeping requirements in Conditions D.2.5, D.2.6, D.2.7, and D.2.8 have been removed. IDEM has determined that these conditions are not necessary because the potential to emit of the woodworking operations is relatively small.
- (d) Section D.3 and Condition D.3.1 of M085-14805-00072 has been deleted. The source submitted information stating that there is no boiler onsite. Heating is provided by ten (10) space heaters with a total maximum heat input capacity of 1.4 MMBtu per hour.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
S1	Spray Booth #1 (EU-1)	11	3	8,200	75
S2	Spray Booth #2 (EU-2)	11	3	8,200	75
S3	Spray Booth #3 (EU-3)	15	3	8,200	75
S4	Spray Booth #4 (EU-4)	15	2.5	8,750	85
S5	Rough Mill	10	1	4,000	75
S6	Rough Mill	10	1	4,000	75
S7	Finish Mill	10	1	4,000	75
S8	Spray Booth #5 EU-5	15	2.5	8,750	85

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations Pages 1 through 5).

County Attainment Status

The source is located in Kosciusko County.

Pollutant	Status
PM10	Attainment
PM2.5	Attainment
SO ₂	Attainment
NO ₂	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Kosciusko County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Kosciusko County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions.
- (c) Kosciusko County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) Fugitive Emissions
 Since this type of operation is not in one of the twenty-eight (28) listed source categories under 326 IAC 2-2, fugitive emissions are not counted toward the determination of PSD applicability.

Unrestricted Potential Emissions

The table below summarizes the unrestricted potential to emit of the entire source:

Pollutant	Emissions (tons/year)
PM	55.3
PM10	55.3
SO ₂	0.004
VOC	42.2
CO	0.55
NO _x	0.66
Methyl Isobutyl Ketone	2.46
Xylene	1.48
All Other HAPs	2.27
Total HAPs	6.21

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants is less than 100 tons per year. The source is not subject to the provisions of 326 IAC 2-7. The potential to emit of PM, PM10, and VOC is greater than 25 tons per year. Therefore, the source will be issued an MSOP
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.
- (c) Fugitive Emissions
 Since this type of operation is not in one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

Actual Emissions

No previous emission data has been received from the source.

Potential to Emit of the Entire Source After Issuance

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

Emission Unit	Potential To Emit (tons/year)						
	PM	PM10	SO ₂	VOC	CO	NO _x	HAPs
Woodworking Rough Mill	0.30	0.30	0	0	0	0	0
Woodworking Finish Mill	3.70	3.70	0	0	0	0	0
Spray Booth EU-1	0.04	0.04	0	6.85	0	0	0
Spray Booth EU-2	0.04	0.04	0	6.85	0	0	0
Spray Booth EU-3	0.17	0.17	0	8.24	0	0	1.24
Spray Booth EU-4	0.57	0.57	0	8.72	0	0	3.27
Spray Booth EU-5	0.45	0.45	0	8.77	0	0	1.68
Adhesive Application	0	0	0	2.74	0	0	0
Combustion	0.01	0.05	0.004	0.04	0.55	0.66	0.01
Total Emissions	5.29	5.32	0.004	42.2	0.55	0.66	6.21

- (a) This existing stationary source is not major for PSD because the emissions of each regulated pollutant are less than two hundred fifty (250) tons per year, and it is not in one of the twenty-eight (28) listed source categories.
- (b) Fugitive Emissions
Since this type of operation is not in one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

Federal Rule Applicability Determination

- (a) There are no New Source Performance Standards (NSPS) (40 CFR Part 60, 326 IAC 12) included in this permit.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations (40 CFR 63, Subpart JJ, 326 IAC 20-14) are not included in this permit for this source because this source is a minor source of HAPs. The source-wide potential to emit is less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year for a combination of HAPs.

State Rule Applicability Determination - Entire Source

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

The source-wide potential to emit of all regulated pollutants (PM, PM10, SO₂, CO, NO_x, and VOC) is less than 250 tons per year and this source is located in a county that is attainment for all criteria pollutants. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) do not apply.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of the surface coating booths (EU1 through EU-5) will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is located in Kosciusko County, is not required to operate under a Part 70 permit, and does not have lead emissions greater than five tons per year. This source is only subject to the additional information requests in 326 IAC 2-6-5.

326 IAC 5-1 (Opacity Limitations)

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

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

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

The source is located in Kosciusko County.

- (a) This source is not located in any of the areas listed in 326 IAC 6-5-1(a).
- (b) This source did not receive all of the necessary preconstruction approvals prior to December 13, 1985. However, the fugitive particulate emissions from the source are negligible.

Pursuant to 326 IAC 6-5-7(d), this source is not subject to the requirements of 326 IAC 6-5.

State Rule Applicability – Surface Coating and Adhesive Application

326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)

Surface coating booths EU-1 through EU-5 are regulated by another Article 8 rule. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

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

- (a) Surface coating booths EU-1 through EU-5 apply organic coatings to wood furniture and cabinets and have actual emissions of greater than fifteen (15) pounds per day of VOC before add-on controls. Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets in surface coating booths EU-1 through EU-5 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.

The source is in compliance with this requirement because it uses HVLP spray guns in the surface coating booths.

- (b) The adhesives applied to cabinets have actual emissions of VOC less than 15 pounds per day. Therefore, the requirements of 326 IAC 8-2 do not apply.

326 IAC 6-3-2(d) (Particulate Emissions)

- (a) Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating booths (EU-1, EU-2, EU-3, EU-4, and EU-5) 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:

- (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.

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.

- (b) The water based adhesives are applied with hand application methods and do not have the potential to form airborne particulate.

State Rule Applicability – Woodworking

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 allowable particulate emission rate from the woodworking facilities shall not exceed 2.58 pounds per hour when operating at a process weight rate of 1,000 pounds per hour.

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

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

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

The cyclones, baghouses and internal portable dust collectors for particulate control shall be in operation at all times the woodworking facilities are in operation, in order to comply with this limit.

State Rule Applicability – Air Make-up Unit and Space Heaters

326 IAC 6-2-4 (Particulate Emissions for Sources of Indirect Heating)

The air make-up unit and space heaters are not subject to 326 IAC 6-2 because they are not a source of indirect heating.

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

The air make-up unit and space heaters are not subject to 326 IAC 6-3-2 because these units have a potential to emit of particulate less than 0.551 pounds per hour.

Testing Requirements

There are no testing requirements applicable to this source.

Compliance Monitoring Requirements

There are no Compliance Monitoring Requirements applicable to the emission units at this source. The potential particulate emissions from the surface coating booths and the woodworking operations are relatively small.

Recommendation

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

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

An application for the purposes of this review was received on December 12, 2006. Additional information was received on May 22, 2007 and September 11, 2007.

Conclusion

The operation of this stationary custom made wood kitchen cabinet manufacturing operation shall be subject to the conditions of the Minor Source Operating Permit Renewal No. 085-24053-00072.

Appendix A: Emission Calculations
VOC and Particulate Emissions from Surface Coating Operations

TSD Appendix

Company Name: Superior Wood Products
Address: 1058 West CR 400 North, Warsaw, Indiana 46580
MSOP Renewal: 085-24053-00072
Reviewer: ERG/ST
Date: October 22, 2007

1. Potential to Emit from Spray Booths

Emission Unit ID	Material	Density (lbs/gal)	Weight % Water	Weight % VOC	Weight % Solids	Usage (gal/unit)	Throughput (unit/hr)	VOC (lb/gal)	PTE of VOC (lb/hr)	PTE of VOC (ton/yr)	PTE of PM/PM10 Before Controls (ton/yr)
EU-1	Stain	7.07	0.10%	87.59%	12.31%	0.065	3.23	6.19	1.30	5.69	0.20
	Cleanup Solvent	6.44	9.24%	90.76%	0.00%	0.014	3.23	5.84	0.26	1.16	0.00
EU-2	Stain	7.07	0.10%	87.59%	12.31%	0.065	3.23	6.19	1.30	5.69	0.20
	Cleanup Solvent	6.44	9.24%	90.76%	0.00%	0.014	3.23	5.84	0.26	1.16	0.00
EU-3	Topcoat	7.58	1.90%	66.04%	32.06%	0.100	3.23	5.01	1.62	7.08	0.86
	Cleanup Solvent	6.44	9.24%	90.76%	0.00%	0.014	3.23	5.84	0.26	1.16	0.00
EU-4	Sealer	7.58	1.90%	66.04%	32.06%	0.100	3.23	5.01	1.62	7.08	0.86
	Primer	10.29	0.00%	39.94%	60.06%	0.130	3.23	4.11	1.73	7.56	2.84
	Cleanup Solvent	6.44	9.24%	90.76%	0.00%	0.014	3.23	5.84	0.26	1.16	0.00
EU-5	Paint Coat	9.03	0.00%	45.85%	54.15%	0.130	3.23	4.14	1.74	7.61	2.25
	Cleanup Solvent	6.44	9.24%	90.76%	0.00%	0.014	3.23	5.84	0.26	1.16	0.00
								Totals	9.00	39.4	6.35

Sealer and Primer coatings applied at EU-4 are mutually exclusive. Only the worst case material for VOC and particulate are included in totals. Coatings are applied using HVLP spray guns and manual hand wiping for cleaning. Assume transfer efficiency of 75% for HVLP guns and control efficiency of 80% for dry filter.

2. Potential to Emit from Adhesive Application

Potential to Emit (ton/yr) = Maximum Application Rate (15 lb VOC/day) x 365 days/yr x 1 ton/2,000 lb = 2.74 ton/yr
Adhesives are applied with manual methods and create no airborne particulate. Adhesives contain no HAPs.

METHODOLOGY

VOC (lb/gal) = Density (lb/gal) x Weight % VOC (%)
PTE of VOC (lb/hr) = Density (lb/gal) x Weight % VOC x Usage (gal/unit) x Throughput (unit/hr)
PTE of VOC (ton/yr) = Density (lb/gal) x Weight % VOC x Usage (gal/unit) x Throughput (unit/hr) x 8,760 hr/yr x 1 ton/2,000 lb
PTE of PM/PM10 Before Controls (ton/yr) = Density (lb/gal) x Weight % Solids x Usage (gal/unit) x Throughput (unit/hr) x 8,760 hr/yr x 1 ton/2,000 lb x (1 - Transfer Efficiency %)
PTE of PM/PM10 After Controls (ton/yr) = PTE PM/PM10 Before Controls (ton/yr) x (1 - Control Efficiency %)

PTE of PM/PM10 After Controls (ton/yr)
0.04
0.00
0.04
0.00
0.17
0.00
0.17
0.57
0.00
0.45
0.00
1.27

ers.

Appendix A: Emission Calculations
HAP Emissions From Surface Coating Operations

Company Name: Superior Wood Products
Address: 1058 West CR 400 North, Warsaw, Indiana 46580
MSOP Renewal: 085-24053-00072
Reviewer: ERG/ST
Date: October 22, 2007

Emission Unit ID	Material	Density (lbs/gal)	Usage (gal/unit)	Throughput (units/hr)	Weight % Ethylbenzene	Weight % Formaldehyde	Weight % Methanol	Weight % MIBK	Weight % Toluene	Weight % Xylene
EU-1	Stain	7.07	0.065	3.23	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	Cleanup Solvent	6.44	0.014	3.23	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
EU-2	Stain	7.07	0.065	3.23	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	Cleanup Solvent	6.44	0.014	3.23	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
EU-3	Topcoat	7.58	0.100	3.23	0.50%	0.10%	0.00%	0.00%	8.00%	3.00%
	Cleanup Solvent	6.44	0.014	3.23	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
EU-4	Sealer	7.58	0.100	3.23	0.50%	0.10%	0.00%	0.00%	8.00%	3.00%
	Primer	10.29	0.130	3.23	0.20%	0.10%	3.00%	13.00%	1.00%	0.00%
	Cleanup Solvent	6.44	0.014	3.23	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
EU-5	Paint Coat	9.03	0.130	3.23	1.00%	0.10%	2.00%	0.00%	0.00%	7.00%
	Cleanup Solvent	6.44	0.014	3.23	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Emission Unit ID	Material	Density (lb/gal)	Usage (gal/unit)	Throughput (unit/hr)	PTE of Ethylbenzene (ton/yr)	PTE of Formaldehyde (ton/yr)	PTE of Methanol (ton/yr)	PTE of MIBK (ton/yr)	PTE of Toluene (ton/yr)	PTE of Xylene (ton/yr)	
EU-1	Stain	same as above			0.00	0.00	0.00	0.00	0.00	0.00	
	Cleanup Solvent				0.00	0.00	0.00	0.00	0.00	0.00	
EU-2	Stain				0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Cleanup Solvent				0.00	0.00	0.00	0.00	0.00	0.00	0.00
EU-3	Topcoat				0.05	0.01	0.00	0.00	0.86	0.32	
	Cleanup Solvent				0.00	0.00	0.00	0.00	0.00	0.00	
EU-4	Sealer				0.05	0.01	0.00	0.00	0.86	0.32	
	Primer				0.04	0.02	0.57	2.46	0.19	0.00	
	Cleanup Solvent				0.00	0.00	0.00	0.00	0.00	0.00	
EU-5	Paint Coat				0.17	0.02	0.33	0.00	0.00	1.16	
	Cleanup Solvent	0.00	0.00	0.00	0.00	0.00	0.00				
				Totals	0.26	0.05	0.90	2.46	1.05	1.48	

Sealer and Primer coatings applied at EU-4 are mutually exclusive. Only the worst case material for HAP (primer) is included in totals.

Methodology

PTE of HAPs (ton/yr) = Density (lb/gal) x Usage (gal/unit) x Throughput (unit/hr) x Weight % HAP x 8,760 hr/yr x 1 ton/2,000 lb

Appendix A: Emission Calculations
 Particulate Emissions From Woodworking Operations

TSD Append

Company Name: Superior Wood Products
 Address: 1058 West CR 400 North, Warsaw, Indiana 46580
 MSOP Renewal: 085-24053-00072
 Reviewer: ERG/ST
 Date: October 22, 2007

Woodworking Operations

Emission Unit ID	Process Weight Rate (lbs/hr)	Sawdust Collected* (lbs/hr)	Collection/ Control Efficiency (%)	Uncontrolled PTE of PM/PM10 (tons/yr)	Uncontrolled PTE of PM/PM10 (lbs/hr)	326 IAC 6-3-2 Allowable PM Emission Rate (lbs/hr)	Controlled PTE of PM/PM10 (tons/yr)
Rough Mill	1,000	6.87	99.0%	30.4	6.94	2.58	0.30
Finish Mill	1,000	3.38	80.0%	18.5	4.22	2.58	3.70
TOTALS				48.9			4.00

*Based on reported amount of sawdust collected from 8 hours of operations per day.
 Assume all PM is equal to PM10. Assume all sawdust collected is PM / PM10.
 The dust collectors exhaust inside the building.
 The process weight rate for each of the woodworking operations is 1000 pounds per hour.

Methodology

PTE of PM/PM10 Uncontrolled (tons/yr) = Sawdust Collected (lbs/hr) / (Control Efficiency %) x 8760 (hr/yr) x 1 ton/2000 lbs
 PTE of PM/PM10 Uncontrolled (lbs/hr) = Sawdust Collected (lbs/hr) / (Control Efficiency %)
 PTE of PM/PM10 Controlled (tons/yr) = PTE of PM/PM10 Uncontrolled (tons/yr) x (1 - Control Efficiency %)
 PTE of PM/PM10 Controlled (lbs/hr) = PTE of PM/PM10 Uncontrolled (lbs/hr) x (1 - Control Efficiency %)
 326 IAC 6-3-2 Allowable PM Emission Rate (lbs/hour) = 4.1 x process weight rate (tons/hr)^{0.67}

Controlled PTE of PM/PM10 (lbs/hr)
0.069
0.845

Appendix A: Emission Calculations
Combustion Emissions from the Natural Gas-fired Space Heaters and Air Makeup Units

Company Name: Superior Wood Products
Address: 1058 West CR 400 North, Warsaw, Indiana 46580
MSOP Renewal: 085-24053-00072
Reviewer: ERG/ST
Date: October 22, 2007

Description	Heat Input Capacity (MMBtu/hr)	Potential Throughput (MMCF/yr)
Space Heaters	1.40	12.0
Air Make-up Unit AM-B5	0.125	1.07

Pollutant Emission Factors (lb/MMCF)						
PM*	PM10*	SO ₂	NO _x **	CO	VOC	HAPs
1.9	7.6	0.6	100	84.0	5.5	1.89

Potential To Emit (ton/yr)							
Emission Unit ID	PM	PM10	SO ₂	NO _x	CO	VOC	HAPs
Space Heaters	0.011	0.05	0.004	0.60	0.51	0.03	0.011
Air Make-up Unit AM-B5	0.001	0.004	0.0003	0.054	0.045	0.003	0.001
Totals	0.01	0.05	0.004	0.66	0.55	0.04	0.01

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

**Emission factor for NO_x: Uncontrolled = 100 lb/MMCF

Emission Factors are from AP-42, Chapter 1.4 - Natural Gas Combustion, Tables 1.4-1, 1.4-2, 1.4-3 and 1.4-4. SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03. (AP-42 Supplement D 7/98)

All emission factors are based on normal firing.

Methodology

Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 (hr/yr) x 1 MMCF/1,020 MMBtu

Potential to Emit (ton/yr) = Potential Throughput (MMCF/yr) x Emission Factor (lb/MMCF) x 1 ton/2,000 lb

Appendix A: Emission Calculations
Summary

Company Name: Superior Wood Products
 Address: 1058 West CR 400 North, Warsaw, Indiana 46580
 MSOP Renewal: 085-24053-00072
 Reviewer: ERG/ST
 Date: October 22, 2007

Emission Unit ID	Potential To Emit (ton/yr)								
	Uncontrolled		Controlled		SO ₂	NO _x	CO	VOC	HAPs
	PM	PM10	PM	PM10					
Spray Booth EU-1	0.20	0.20	0.04	0.04	0	0	0	6.85	0
Spray Booth EU-2	0.20	0.20	0.04	0.04	0	0	0	6.85	0
Spray Booth EU-3	0.86	0.86	0.17	0.17	0	0	0	8.24	1.24
Spray Booth EU-4	2.84	2.84	0.57	0.57	0	0	0	8.72	3.27
Spray Booth EU-5	2.25	2.25	0.45	0.45	0	0	0	8.77	1.68
Adhesive Application	0	0	0	0	0	0	0	2.74	0
Rough Mill	30.4	30.4	0.30	0.30	0	0	0	0	0
Finish Mill	18.5	18.5	3.70	3.70	0	0	0	0	0
Natural Gas Combustion	0.01	0.05	0.01	0.05	0.00	0.66	0.55	0.04	0.01
Totals	55.3	55.3	5.29	5.32	0.004	0.66	0.55	42.2	6.21