



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
MC 61-53 IGCN 1003
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant
DATE: July 16, 2007
RE: Genesis Products, Inc. – Hardwoods (Plant 3) / 039-24055-00582
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, 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 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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.



Mitchell E. Daniels, Jr.

Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.in.gov/idem

New Source Review and Part 70 Operating Permit OFFICE OF AIR QUALITY

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

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

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 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. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions.

Operation Permit No.: T 039-24055-00582	
Issued by: <i>Original document signed by</i> Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: July 16, 2007 Expiration Date: July 16, 2012

TABLE OF CONTENTS

SECTION A	SOURCE SUMMARY	5
A.1	General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]	
A.3	Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]	
A.4	Part 70 Permit Applicability [326 IAC 2-7-2]	
SECTION B	GENERAL CONDITIONS	7
B.1	Definitions [326 IAC 2-7-1]	
B.2	Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]	
B.3	Term of Conditions [326 IAC 2-1.1-9.5]	
B.4	Enforceability [326 IAC 2-7-7]	
B.5	Severability [326 IAC 2-7-5(5)]	
B.6	Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]	
B.7	Duty to Provide Information [326 IAC 2-7-5(6)(E)]	
B.8	Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]	
B.9	Annual Compliance Certification [326 IAC 2-7-6(5)]	
B.10	Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]	
B.11	Emergency Provisions [326 IAC 2-7-16]	
B.12	Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]	
B.13	Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]	
B.14	Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]	
B.15	Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]	
B.16	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]	
B.17	Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]	
B.18	Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12] [40 CFR 72]	
B.19	Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]	
B.20	Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]	
B.21	Source Modification Requirement [326 IAC 2-7-10.5] [326 IAC 2-3-2]	
B.22	Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]	
B.23	Transfer of Ownership or Operational Control [326 IAC 2-7-11]	
B.24	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]	
B.25	Advanced Source Modification Approval [326 IAC 2-7-5(16)] [326 IAC 2-7-10.5]	
B.26	Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314] [326 IAC 1-1-6]	
SECTION C	SOURCE OPERATION CONDITIONS	18
	Emission Limitations and Standards [326 IAC 2-7-5(1)]	
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2	Opacity [326 IAC 5-1]	
C.3	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.4	Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.5	Fugitive Dust Emissions [326 IAC 6-4]	
C.6	Stack Height [326 IAC 1-7]	
C.7	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
	Testing Requirements [326 IAC 2-7-6(1)]	
C.8	Performance Testing [326 IAC 3-6]	

Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

C.15 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

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

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
[326 IAC 2-6]

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2]
[326 IAC 2-3]

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1 FACILITY OPERATION CONDITIONS: Woodworking Operation 27

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

D.1.1 Particulate [326 IAC 6-3-2]

D.1.2 Particulate Matter [326 IAC 2-2]

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

D.1.4 Particulate Control

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

D.1.5 Baghouse Parametric Monitoring

D.1.6 Broken or Failed Bag Detection

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

D.1.7 Record Keeping Requirements

D.2 FACILITY OPERATION CONDITIONS: Paint Booths 29

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

D.2.1 Emission Offset Minor Limit [326 IAC 2-3]

D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

D.2.3 Particulate [326 IAC 6-3-2(d)]

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

D.2.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

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

D.2.6 Monitoring

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

D.2.7 Record Keeping Requirements

D.2.8 Reporting Requirements

E.1 FACILITY OPERATION CONDITIONS: Construction Conditions, Paint Booths 32

Construction Conditions

General Construction Conditions

E.1.1 Permit No Defense

E.1.2 Effective Date of the Permit [IC 13-15-5-3]

E.1.3 Modification to Construction Conditions [326 IAC 2]

E.1.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

E.1.5 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]

Certification 34

Emergency Occurrence Report 35

Part 70 Quarterly Report 37

Quarterly Deviation and Compliance Monitoring Report 39

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)] [326 IAC 2-7-1(22)]

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

Source Address:	2515 Industrial Park Drive, Goshen, Indiana 46526
Mailing Address:	2515 Industrial Park Drive, Goshen, Indiana 46526
General Source Phone Number:	574-975-0070
SIC Code:	2434
County Location:	Elkhart
Source Location Status:	Nonattainment for 8 hour ozone Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Rules Major Source, under 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 [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:

- (a) One (1) woodworking operation, identified as WW, constructed in 2003 and approved for a modification in 2007, equipped with two (2) dust collectors, identified as DC1 and DC2, capable of exhausting inside only, capacity increasing from 500 to 1,000 pounds of wood per hour.
- (b) One (1) surface coating machine with a dryer, identified as SCLD, constructed in 2003, equipped with airless air assisted spray guns and dry filters for particulate control exhausting to Stacks SC1 and SC2, capacity: 250 wood cabinet doors per hour.
- (c) One (1) spray booth, identified as SB-1, constructed in 2006, utilizing an air assisted airless HVLP application system, equipped with dry filters for particulate control, exhausting to Vent SB-1, capacity: 25 wood cabinet doors per hour.
- (d) One (1) surface coating machine and air dryer, identified as SCLD2, approved for construction in 2007, equipped with low volume low pressure (LVLP) spray applicators to coat wood cabinet doors and dry filters for particulate control, exhausting through Stacks SC3 and SC4, capacity: 250 wood cabinet doors per hour.
- (e) One (1) aqueous adhesive application operation, identified as AA, approved for construction in 2007, using brushes and squeeze type bottles to apply materials, exhausting to the general ventilation, capacity: 500 wood cabinet doors per hour.

A.3 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 as defined in 326 IAC 2-7-1 (21):

Natural gas-fired combustion sources with heat input capacities equal to or less than ten million (10,000,000) British thermal units (Btu) per hour:

- (1) Four (4) radiant space heaters, identified as SH1 through SH4, installed in 1988, exhausting to Stacks SH1 through SH4, heat input capacity: 0.100 mmBtu/hr, each.
- (2) One (1) radiant space heater, identified as SH5, installed in 1988, exhausting to Stack SH5, heat input capacity: 0.050 mmBtu/hr.
- (3) Two (2) forced air furnaces, identified as SH6 and SH7, installed in 1988, exhausting to Stacks SH6 and SH7, heat input capacity: 0.090 mmBtu/hr, each.
- (4) One (1) water heater, identified as WH1, installed in 1988, exhausting to Stack SH7, heat input capacity: 0.053 mmBtu/hr.
- (5) One (1) natural gas-fired air makeup unit, identified as AM1, heat input capacity: 0.500 mmBtu/hr.
- (6) One (1) radiant space heater, identified as SH8, approved for construction in 2007, exhausting to Stack SH8, heat input capacity: 0.100 mmBtu/hr.
- (7) One (1) radiant space heater, identified as SH9, approved for construction in 2007, exhausting to Stack SH9, heat input capacity: 0.118 mmBtu/hr.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 Permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

- (a) This permit, T 039-24055-00582, 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, including any permit shield provided in 326 IAC 2-7-15 until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-7-7]

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

B.5 Severability [326 IAC 2-7-5(5)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U.S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (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 the "responsible official" 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) The "responsible official" is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each 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.

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

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

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 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.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a 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 and Northern Regional Office 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
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

Northern Regional Office
220 W. Colfax Avenue, Suite 200
South Bend, Indiana 46601-1634

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that

the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.

- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

- (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T 039-24055-00582 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this combined permit, all previous registrations and permits are superseded by this combined new source review and Part 70 Operating Permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(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 nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated non-compliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

- (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 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12] [40 CFR 72]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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 the "responsible official" as defined by 326 IAC 2-7-1 (34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11 (c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

- (4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b), (c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-7-10.5] [326 IAC 2-3-2]

- (a) A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.
- (b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-3-2.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

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 Part 70 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 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 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 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.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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 the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11 (c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Advanced Source Modification Approval [326 IAC 2-7-5(16)] [326 IAC 2-7-10.5]

- (a) The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

B.26 Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314] [326 IAC 1-1-6]

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(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 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.3 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. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 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.5 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). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Stack Height [326 IAC 1-7]

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

C.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 the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

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 the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification 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.

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

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

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.15 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

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

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (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 the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) Pursuant to 326 IAC 2-6-3(b)(3), starting in 2007 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
 - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The emission statement 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.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3]

- (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) If there is a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
 - (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1(mm)(2)(A)(iii); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
 - (2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
 - (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2] [326 IAC 2-3]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, 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.
- (f) If the Permittee is required to comply with the record keeping provisions of (c) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
 - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C - General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1(xx) and/or 326 IAC 2-3-1(qq), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
 - (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C - General Record Keeping Requirements.
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
 - (4) Any other information that the Permittee deems fit to include in this report.

Reports required in this part shall be submitted to:

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

- (h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C - General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) One (1) woodworking operation, identified as WW, constructed in 2003 and approved for a modification in 2007, equipped with two (2) dust collectors, identified as DC1 and DC2, capable of exhausting inside only, capacity: 1,000 pounds of wood per hour.

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

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

D.1.1 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 one (1) woodworking operation, identified as WW, shall not exceed 2.58 pounds per hour when operating at a process weight rate of 1,000 pounds per hour (0.500 tons per hour).

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

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

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

D.1.2 Particulate Matter [326 IAC 2-2]

- (a) The PM emissions from the one (1) woodworking operation, identified as WW, shall be limited to 2.58 pounds per hour.
- (b) The PM₁₀ emissions from the one (1) woodworking operation, identified as WW, shall be limited to 2.58 pounds per hour.

Compliance with these limitations shall render the requirements of 326 IAC 2-2, PSD, not applicable.

D.1.3 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 one (1) woodworking operation, identified as WW, and its two (2) baghouses, identified as DC1 and DC2.

Compliance Determination Requirements

D.1.4 Particulate Control

- (a) In order to comply with Conditions D.1.1 and D.1.2, the baghouses for particulate control shall be in operation and control emissions from the one (1) woodworking operation, identified as WW, at all times that the one (1) woodworking is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.1.5 Baghouse Parametric Monitoring

- (a) The Permittee shall record the pressure drop at least once per day across the baghouses used in conjunction with the one (1) woodworking operation, identified as WW, when it is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. 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 - Response to Excursions or Exceedances, 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.1.6 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the one (1) woodworking operation, identified as WW. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

D.1.7 Record Keeping Requirements

- (a) To document compliance with Condition D.1.5, the Permittee shall maintain a daily record of the pressure drop across the baghouse controlling the woodworking operation. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Paint Booths

- (b) One (1) surface coating machine with a dryer, identified as SCLD, constructed in 2003, equipped with airless air assisted spray guns and dry filters for particulate control, exhausting to Stacks SC1 and SC2, capacity: 250 wood cabinet doors per hour.
- (c) One (1) spray booth, identified as SB-1, constructed in 2006, utilizing an air assisted airless HVLP application system, equipped with dry filters for particulate control, exhausting to Vent SB-1, capacity: 25 wood cabinet doors per hour.
- (d) One (1) surface coating machine and air dryer, identified as SCLD2, approved for construction in 2007, equipped with low volume low pressure (LVLP) spray applicators to coat wood cabinet doors and dry filters for particulate control, exhausting through Stacks SC3 and SC4, capacity: 250 wood cabinet doors per hour.
- (e) One (1) aqueous adhesive application operation, identified as AA, approved for construction in 2007, using brushes and squeeze type bottles to apply materials, exhausting to the general ventilation, capacity: 500 wood cabinet doors per hour.

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

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

D.2.1 Emission Offset Minor Limit [326 IAC 2-3]

- (a) The use of VOC, including coatings, dilution solvents, and cleaning solvents at the one (1) surface coating machine with a dryer, identified as SCLD, and the one (1) spray booth, identified as SB-1, shall be less than a total of 99.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC from these facilities to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit renders the requirements of 326 IAC 2-3, Emission Offset, not applicable.
- (b) The use of VOC, including coatings, dilution solvents, and cleaning solvents at the one (1) surface coating machine, identified as SCLD2, shall be less than 99.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC from the addition of the one (1) surface coating machine, identified as SCLD2, to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit renders the requirements of 326 IAC 2-3, Emission Offset, not applicable.

D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

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

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

High Volume Low Pressure (HVLP) and Low Volume Low Pressure (LVLP) Spray Application are accepted alternative methods of application for Air Assisted Airless Spray Application. HVLP and LVLP spray are the technologies 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.2.3 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the one (1) surface coating machine, identified as SCLD, the one (1) surface coating machine, identified as SCLD2, and the one (1) spray booth, identified as SB-1, shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.2.4 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 one (1) surface coating machine, identified as SCLD, the one (1) surface coating machine, identified as SCLD2, and the one (1) spray booth, identified as SB-1, and their dry particulate filters.

Compliance Determination Requirements

D.2.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC usage limitations contained in Condition D.2.1 be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.2.6 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth Stacks SC1-SC4 and Vent SB-1 while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the Stacks SC1-SC4 and Vent SB-1 and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.2.7 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.2.1. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.
- (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on a monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain a log of weekly overspray observations, and monthly inspections.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION E.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Paint Booths

- (d) One (1) surface coating machine and air dryer, identified as SCLD2, approved for construction in 2007, equipped with low volume low pressure (LVLP) spray applicators to coat wood cabinet doors and dry filters for particulate control, exhausting through Stacks SC3 and SC4, capacity: 250 wood cabinet doors per hour.
- (e) One (1) aqueous adhesive application operation, identified as AA, approved for construction in 2007, using brushes and squeeze type bottles to apply materials, exhausting to the general ventilation, capacity: 500 wood cabinet doors per hour.

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

THE CONSTRUCTION CONDITIONS IN THIS SECTION OF THE PERMIT ARE BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-7-10.5, WITH CONDITIONS LISTED BELOW, FOR THE NEW EMISSION UNITS DESCRIBED IN (d) AND (e) ABOVE.

Construction Conditions

General Construction Conditions

E.1.1 Permit No Defense

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

E.1.2 Effective Date of the Permit [IC 13-15-5-3]

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

E.1.3 Modification to Construction Conditions [326 IAC 2]

All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for modifications pursuant to 326 IAC 2.

E.1.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

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

E.1.5 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.

- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Genesis Products, Inc. - Hardwoods (Plant 3)
Source Address: 2515 Industrial Park Drive, Goshen, Indiana 46526
Mailing Address: 2515 Industrial Park Drive, Goshen, Indiana 46526
Part 70 Permit No.: T 039-24055-00582

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify) _____
- Report (specify) _____
- Notification (specify) _____
- Affidavit (specify) _____
- Other (specify) _____

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Genesis Products, Inc. - Hardwoods (Plant 3)
Source Address: 2515 Industrial Park Drive, Goshen, Indiana 46526
Mailing Address: 2515 Industrial Park Drive, Goshen, Indiana 46526
Part 70 Permit No.: T 039-24055-00582

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)
X	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
X	The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

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

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Genesis Products, Inc. - Hardwoods (Plant 3)
Source Address: 2515 Industrial Park Drive, Goshen, Indiana 46526
Mailing Address: 2515 Industrial Park Drive, Goshen, Indiana 46526
Part 70 Permit No.: T 039-24055-00582
Facilities: One (1) surface coating machine with a dryer, identified as SCLD, and one (1) spray booth, identified as SB-1.
Parameter: VOC usage
Limit: Less than a total of 99.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

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

- No deviation occurred in this month.
- Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Genesis Products, Inc. - Hardwoods (Plant 3)
Source Address: 2515 Industrial Park Drive, Goshen, Indiana 46526
Mailing Address: 2515 Industrial Park Drive, Goshen, Indiana 46526
Part 70 Permit No.: T 039-24055-00582
Facility: One (1) surface coating machine, identified as SCLD2
Parameter: VOC usage
Limit: Less than 99.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

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

- No deviation occurred in this month.
- Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Genesis Products, Inc. - Hardwoods (Plant 3)
 Source Address: 2515 Industrial Park Drive, Goshen, Indiana 46526
 Mailing Address: 2515 Industrial Park Drive, Goshen, Indiana 46526
 Part 70 Permit No.: T 039-24055-00582

Months: _____ **to** _____ **Year:** _____

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the
Technical Support Document for a Part 70 Operating Permit

Source Name: Genesis Products, Inc. – Hardwoods (Plant 3)
Source Location: 2515 Industrial Park Drive, Goshen, Indiana 46526
County: Elkhart
SIC Code: 2434
Operation Permit No.: T 039-24055-00582
Permit Reviewer: Michael A. Morrone/MES

On May 24, 2007, the Office of Air Quality (OAQ) had a notice published in the Goshen News, Goshen, Indiana, stating that Genesis Products, Inc. – Hardwoods (Plant 3) had applied for a Part 70 Operating Permit to operate a wood cabinet door manufacturing source with dry filters and dust collectors. The notice also stated that OAQ proposed to issue a Part 70 Operating Permit for this operation and provided information on how the public could review the proposed Part 70 Operating Permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Operating Permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following changes to the Part 70 Operating Permit: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

Change 1:

Condition B.11(b)(5) of the permit has been updated to include the address of the Northern Regional Office as follows:

B.11 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 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 and Northern Regional Office 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
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

Northern Regional Office
220 W. Colfax Avenue, Suite 200
South Bend, Indiana 46601-1634

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Change 2:

Condition C.18(c) has been updated as follows:

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3]

- (c) If there is a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit **other than projects at a source with a Plantwide Applicability Limitation (PAL)**, which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:

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

Technical Support Document (TSD) for a New Source Review and
a Transition from a Minor Source Operating Permit (MSOP) to
a Part 70 Operating Permit

Source Background and Description

Source Name:	Genesis Products, Inc. – Hardwoods (Plant 3)
Source Location:	2515 Industrial Park Drive, Goshen, Indiana 46526
County:	Elkhart
SIC Code:	2434
MSOP No.:	039-17190-00582
MSOP Issuance Date:	September 12, 2003
Operation Permit No.:	T 039-24055-00582
Permit Reviewer:	Michael A. Morrone

History

On December 12, 2006, the Office of Air Quality (OAQ) initially received an application from Genesis Products, Inc – Hardwoods (Plant 3) to transition from an MSOP to a Federally Enforceable State Operating Permit (FESOP). On February 6, 2007, Genesis Products, Inc. – Hardwoods (Plant 3) changed their request to transition from an MSOP to a Part 70 Operating Permit. The application addressed the construction of new emission units at a wood cabinet door manufacturing source.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) woodworking operation, identified as WW, constructed in 2003 and approved for a modification in 2007, equipped with two (2) dust collectors, identified as DC1 and DC2, capable of exhausting inside only, capacity increasing from 500 to 1,000 pounds of wood per hour.
- (b) One (1) surface coating machine with a dryer, identified as SCLD, constructed in 2003, equipped with airless air assisted spray guns and dry for particulate control, exhausting to Stacks SC1 and SC2, capacity: 250 wood cabinet doors per hour.
- (c) One (1) spray booth, identified as SB-1, constructed in 2006, utilizing an air assisted airless HVLP application system, equipped with dry filters for particulate control, exhausting to Vent SB-1, capacity: 25 wood cabinet doors per hour.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted emission units operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

The application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-7-5(16):

- (d) One (1) surface coating machine and air dryer, identified as SCLD2, approved for construction in 2007, equipped with low volume low pressure (LVLP) spray applicators to coat wood cabinet doors and dry filters for particulate control, exhausting through Stacks SC3 and SC4, capacity: 250 wood cabinet doors per hour.
- (e) One (1) aqueous adhesive application operation, identified as AA, approved for construction in 2007, using brushes and squeeze type bottles to apply materials, exhausting to the general ventilation, capacity: 500 wood cabinet doors per hour.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

Natural gas-fired combustion sources with heat input capacities equal to or less than ten million (10,000,000) British thermal units (Btu) per hour:

- (a) Four (4) radiant space heaters, identified as SH1 through SH4, installed in 1988, exhausting to Stacks SH1 through SH4, heat input capacity: 0.100 mmBtu/hr each.
- (b) One (1) radiant space heater, identified as SH5, installed in 1988, exhausting to Stack SH5, heat input capacity: 0.050 mmBtu/hr.
- (c) Two (2) forced air furnaces, identified as SH6 and SH7, installed in 1988, exhausting to Stacks SH6 and SH7, heat input capacity: 0.090 mmBtu/hr, each.
- (d) One (1) water heater, identified as WH1, installed in 1988, exhausting to Stack SH7, heat input capacity: 0.053 mmBtu/hr.
- (e) One (1) natural gas-fired air makeup unit, identified as AM1, heat input capacity: 0.500 mmBtu/hr.
- (f) One (1) radiant space heater, identified as SH8, approved for construction in 2007, exhausting to Stack SH8, heat input capacity: 0.100 mmBtu/hr.
- (g) One (1) radiant space heater, identified as SH9, approved for construction in 2007, exhausting to Stack SH9, heat input capacity: 0.118 mmBtu/hr.

Existing Approvals

The source has been operating under the previous MSOP 039-17190-00582, issued on September 12, 2003, and the following amendments and revisions:

- (a) MSOP Notice Only Change (NOC) 039-19980-00582, issued on January 25, 2005,
- (b) MSOP NOC 039-22478-00582, issued on January 23, 2005, and
- (c) MSOP NOC 039-22516-00582, issued on April 26, 2006.

This source has requested to transition from an MSOP to a Part 70 Operating Permit. MSOP Revocation 039-24178-00582 will be issued after this Part 70 Operating Permit is issued. All conditions from previous approvals were incorporated into this Part 70 Operating Permit. This Part 70 Operating Permit contains provisions intended to satisfy the requirements of the construction permit rules.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the transition from an MSOP to a Part 70 Operating Permit 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 administratively complete application for the purposes of this review was received on December 12, 2006. On February 6, 2007, Genesis Products, Inc. – Hardwoods (Plant 3) changed their request to transition from an MSOP to a Part 70 Operating Permit.

Emission Calculations

See pages 1 through 8 of Appendix A of this document for detailed emissions calculations.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM _{2.5}	Attainment
PM ₁₀	Attainment
SO ₂	Attainment
NO _x	Attainment
8-Hour Ozone	Basic nonattainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements of 326 IAC 2-3, Emission Offset. See the State Rule Applicability - Entire Source section of this document.
- (b) Elkhart County has been classified as unclassifiable or attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM_{2.5} emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions. See the State Rule Applicability - Entire Source Section of this document.

- (c) Elkhart County has been classified as attainment or unclassifiable in Indiana for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section of this document.
- (d) 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.
- (e) Fugitive Emissions
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Unrestricted Potential to Emit of the Source (Existing and New Units)

This table reflects the unrestricted potential emissions of the source, excluding any emissions limitations.

Pollutant	Potential to Emit (tons/yr)
PM	265
PM ₁₀	265
SO ₂	0.004
VOC	220
CO	0.515
NO _x	0.614

HAPs	Potential to Emit (tons/yr)
Glycol Ethers	0.382
Toluene	0.058
Hexane	0.011
Lead, Benzene, Dichlorobenze, Formaldehyde, Cadmium, Chromium, Manganese, Nickel	Less than or equal to 0.001, each
Total	0.452

The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM₁₀ and VOC are equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. PM₁₀, not PM, is the pollutant considered when determining Part 70 applicability.

Source Status Before the Modification

Pollutant	PM (ton/yr)	PM ₁₀ (ton/yr)	SO ₂ (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO _x (ton/yr)
Existing Source	0.700	0.729	0.003	91.5	0.435	0.518
PSD or Offset Threshold Level	250	250	250	100	250	250

- (a) This existing source is a minor source pursuant to 326 IAC 2-2, PSD, because all attainment criteria pollutants are emitted at a rate of less than two-hundred fifty (250) tons per year.
- (b) This existing source is a minor source pursuant to 326 IAC 2-3, Emission Offset, because all nonattainment criteria pollutants are emitted at a rate of less than one-hundred (100) tons per year.

Proposed Modification

Potential to Emit from the proposed modification to increase the capacity of the one (1) wood-working operation from 500 pounds of wood per hour to 1,000 pounds of wood per hour and to add one (1) surface coating machine and air dryer, identified as SCLD2, and one (1) aqueous adhesive application operation, identified as AA (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit where applicable):

Pollutant	PM (ton/yr)	PM ₁₀ (ton/yr)	SO ₂ (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO _x (ton/yr)
Proposed Modification	11.2	11.2	0.0006	Less than 99.5	0.080	0.096
PSD or Offset Threshold Level	250	250	250	100	250	250

- (a) As a result of the increase in capacity of the one (1) woodworking operation, identified as WW, the addition of the one (1) coating machine and air dryer, identified as SCLD2, and the addition of two (2) radiant space heaters, identified as SH8 and SH9, the following increases in the potential to emit have occurred at the source:
 - (1) The PM and PM₁₀ emissions increased 11.0 tons due to the increase in capacity of the one (1) woodworking operation and also due the fact that in the previous MSOP, 039-17190-00582, the PM and PM₁₀ emissions from the one (1) woodworking operation, identified as WW, were limited to the controlled potential to emit, whereas they are now being limited to the allowable emissions pursuant to 326 IAC 6-3-2. In addition, there is an increase in PM and PM₁₀ of 0.190 tons per year due to the addition of the one (1) coating machine and air dryer, identified as SCLD2, and of 0.002 and 0.007 tons of PM and PM₁₀, respectively, due to the addition of the two (2) radiant space heaters, identified as SH8 and SH9.
 - (2) The SO₂ emissions increased 0.0006 tons per year due to the addition of the two (2) radiant space heaters, identified as SH8 and SH9.

- (3) The VOC emissions increased by a limited amount of less than 99.5 tons per year due to the addition of the one (1) coating machine and air dryer, identified as SCLD2.
- (4) The CO and NO_x emissions increased 0.080 and 0.096 tons per year, respectively, due to the addition of the two (2) radiant space heaters, identified as SH8 and SH9.
- (b) This modification to an existing minor stationary source is not major because the emission increase for attainment pollutants is less than the PSD threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (c) This modification to an existing minor stationary source is not major because the emission increase for nonattainment pollutants is less than the Emission Offset threshold levels. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.
- (d) As a result of this modification, this source is now a major source, pursuant to 326 IAC 2-3, Emission Offset.

Potential to Emit of the Source After Issuance

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

Process/emission unit	Potential To Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
One (1) surface coating machine with a dryer, identified as SCLD, constructed in 2003	0.168	0.168	0.00	Less than 99.5	0.00	0.00	0.382 single; 0.382 total
One (1) spray booth, identified as SB-1, constructed in 2006	0.004	0.004	0.00		0.00	0.00	0.058 single; 0.058 total
One (1) woodworking operation, identified as WW, constructed in 2003, modified in 2007	11.3	11.3	0.00	0.00	0.00	0.00	0.00
One (1) surface coating machine and air dryer, identified as SCLD2, approved for construction in 2007	0.109	0.109	0.00	Less than 99.5	0.00	0.00	0.00

Process/emission unit	PM	PM10	SO2	VOC	CO	NOx	HAPs
One (1) roll coating aqueous adhesive application operation, identified as AA, approved for construction in 2007	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Insignificant Activities	0.012	0.047	0.004	0.034	0.515	0.614	0.011 single; 0.012 total
Total Emissions	11.6	11.6	0.004	Less than 199	0.515	0.614	0.382 single; 0.452 total
PSD/Emission Offset Threshold	250	250	250	100	250	250	-

- (a) The above table represents the unrestricted potential to emit of all emissions units, except for the following:
- (1) PM and PM₁₀ from the one (1) woodworking area, identified as WW, is limited to 2.58 pounds per hour, which is equivalent to 11.3 tons per year. Compliance with this limitation shall satisfy the requirements of 326 IAC 6-3-2, and render the requirements of 326 IAC 2-2 not applicable.
 - (2) VOC emissions from the one (1) surface coating machine with an air dryer identified as SCLD, and the one (1) spray booth, identified as SB-1, are limited to less than 99.5 tons per year. Compliance with this limitation shall establish this source as a minor source pursuant to 326 IAC 2-3, Emission Offset.
 - (3) VOC emissions from the one (1) surface coating machine and air dryer, identified as SCLD2, are limited to less than 99.5 tons per year. Compliance with this limitation qualifies as a minor modification to an existing minor source.
 - (3) PM and PM₁₀ emissions from the one (1) surface coating machine with a dryer, identified as SCLD, the one (1) spray booth, identified as SB-1, and the one (1) surface coating machine and air dryer, identified as SCLD2, are the controlled potential to emit. The controls are required pursuant to the requirements of 326 IAC 6-3-2.
- (b) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.
- (c) Since a nonattainment criteria pollutant is now emitted at a rate of greater than one-hundred (100) tons per year, this source is now a major stationary source, pursuant to 326 IAC 2-3, Emission Offset.

Actual Emissions

No previous emission data has been received from the source.

Part 70 Operating Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 Operating Permits.
- (b) Monitoring and related record keeping requirements which assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) This source does involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 that has the potential to emit before controls equal to or greater than the major source threshold for PM₁₀, that is subject to an emission limitation or standard for PM₁₀. The woodworking operation, identified as WW, uses a control device (a baghouse) as defined in 40 CFR Part 64.1 to comply with that emission limitation or standard (326 IAC 6-3-2). However, since this is the initial Part 70 Operating Permit issued to the source, the CAM plan for the source is not required until the source applies for a renewal to this Part 70 Operating Permit.
- (b) This source does involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 that has the potential to emit before controls equal to or greater than the major source threshold for VOC, and is subject to an emission limitation or standard for that VOC. However, the emission unit does not use a control device as defined in 40 CFR Part 64.1 to comply with that emission limitation or standard.

Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable to this source for VOC.

- (c) The six (6) radiant space heaters, identified as SH1 through SH4, SH8, and SH9, the two (2) forced air furnaces, identified as SH6 and SH7, and the one (1) natural gas-fired air makeup unit, identified as AM1, are not steam generating units. Therefore, the requirements of the New Source Performance Standards, 40 CFR 60, Subpart D, Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971, Subpart Da, Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978, Subpart Db, Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units, and Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, are not included in the permit.
- (d) The one (1) natural gas-fired water heater, identified as WH1, has a heat input capacity of 0.053 mmBtu/hr, which is less than 250 mmBtu/hr. Therefore, the requirements of the New Source Performance Standard, 40 CFR 60, Subpart D, Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971, are not included in the permit.

- (e) The one (1) natural gas-fired water heater, identified as WH1, has a heat input capacity of 0.053 mmBtu/hr, which is less than 250 mmBtu/hr. Therefore, the requirements of the New Source Performance Standard, 40 CFR 60, Subpart Da, Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978, are not included in the permit.
- (f) The one (1) natural gas-fired water heater, identified as WH1, has a heat input capacity of 0.053 mmBtu/hr, which is less than 100 mmBtu/hr. Therefore, the requirements of the New Source Performance Standard, 40 CFR 60, Subpart Db, Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units, are not included in the permit.
- (g) The one (1) natural gas-fired water heater, identified as WH1, was constructed before June 9, 1989. Therefore, the requirements of the New Source Performance Standard, 40 CFR 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, are not included in the permit.
- (h) There are no other New Source Performance Standards included in the permit.
- (i) The source is an area source for HAPs. Therefore, the requirements of 40 CFR 63, Subpart JJ, National Emission Standards for Wood Furniture Manufacturing Operations, are not included in the permit.
- (j) The source is an area source for HAPs. Therefore, the requirements of 40 CFR 63, Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, are not included in the permit.
- (k) There are no other National Emission Standards for Hazardous Air Pollutants included in the permit.

State Rule Applicability – Entire Source

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

- (a) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.
- (b) The unrestricted PM and PM₁₀ emissions from the source are greater than two-hundred fifty (250) tons per year. However, the source will limit PM and PM₁₀ emissions to less than two-hundred fifty (250) tons per year, as follows:
 - (1) Pursuant to 326 IAC 6-3-2, PM emissions from the one (1) woodworking operation, identified as WW, shall be limited to 2.58 pounds per hour. This will limit the PM emissions from the one (1) woodworking operation, identified as WW, to 11.3 tons per year and less than two-hundred fifty (250) tons for the entire source.
 - (2) PM₁₀ emissions from the one (1) woodworking operation, identified as WW, shall be limited to 2.58 pounds per hour. This will limit the PM₁₀ emissions from the one (1) woodworking operation, identified as WW, to 11.3 tons per year and less than two-hundred fifty (250) tons per year, from the entire source.

- (c) The unrestricted potential to emit of all remaining attainment criteria pollutants are less than two-hundred fifty (250) tons per year. Therefore, this source, which is not one (1) of the twenty-eight (28) source categories, is a minor source pursuant to 326 IAC 2-2, PSD.

326 IAC 2-3 (Emission Offset)

- (a) The unrestricted potential to emit VOC from the addition of the one (1) spray coating machine, identified as SCLD2, is greater than one-hundred (100) tons per year. However, the source will limit VOC emissions from the one (1) spray coating machine, identified as SCLD2, to less than 99.5 tons per year.
- (b) The VOC emissions from the one (1) surface coating machine with an air dryer, identified as SCLD, and the one (1) spray booth, identified as SB-1, shall be limited to less than a total of 99.5 tons per year. Compliance with this limitation will ensure this source is a minor source pursuant to 326 IAC 2-3, Emission Offset. Therefore, the addition of the one (1) spray coating machine, identified as SCLD2, is a minor modification to an existing minor source, pursuant to 326 IAC 2-3, Emission Offset.
- (c) As a result of this minor modification, the entire source is major, pursuant to 326 IAC 2-3, Emission Offset.

326 IAC 2-4.1-1 (New source toxics control)

The operation of this source will emit less than ten (10) tons per year of a single HAP and twenty-five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit pursuant to 326 IAC 2-7, Part 70. Pursuant to 326 IAC 2-6-3(b)(3), starting in 2007 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c).

326 IAC 5-1 (Opacity Limitations)

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

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

State Rule Applicability – Individual Facilities

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

- (a) Pursuant to 326 IAC 6-3-2(d), the dry filters for particulate control shall be operation in accordance with manufacturer's specifications and control emissions from the one (1) surface coating machine, identified as SCLD, the one (1) spray booth, identified as SB-1,

and the one (1) surface coating machine, identified as SCLD2, at all times when the one (1) surface coating machine, identified as SCLD, the one (1) spray booth, identified as SB-1, and the one (1) surface coating machine, identified as SCLD2, are in operation.

- (b) The allowable particulate emission rate from the one (1) woodworking operation, identified as WW, shall not exceed 2.58 pounds per hour when operating at a process weight rate of 1,000 pounds per hour (0.500 tons per hour).

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

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

The one (1) woodworking area, identified as WW, is controlled by two (2) baghouses, identified as DC1 and DC2. The PM emissions from the one (1) woodworking area, identified as WW, after control by the two (2) baghouses, identified as DC1 and DC2, are 0.574 pounds per hour. Therefore, the one (1) woodworking area, identified as WW, controlled by two (2) baghouses, identified as DC1 and DC2, can comply with this rule.

326 IAC 8-1-6 (New facilities; general reduction requirements)

This source consists of new facilities that were constructed after January 1, 1980 and have VOC emissions of greater than twenty-five (25.0) tons per year. However, the source is limited by 326 IAC 8-2-12, Surface coating emission limitations: wood furniture and cabinet coating. Therefore, pursuant to 326 IAC 8-1-6(3)(A), the requirements of 326 IAC 8-1-6, New facilities; general reduction requirements, are not applicable.

326 IAC 8-2-12 (Surface coating emission limitations: wood furniture and cabinet coating)

The one (1) surface coating machine, identified as SCLD and constructed in 2003, the one (1) spray booth, identified as SB-1 and constructed in 2006, and the one (1) surface coating machine, identified as SCLD2 and approved for construction in 2007, each have VOC emissions of greater than fifteen (15.0) pounds per day. Therefore, pursuant to 326 IAC 8-2-1(a)(4), the requirements of 326 IAC 8-2-12, Surface coating emission limitations: wood furniture and cabinet coating are applicable. Pursuant to 326 IAC 8-2-12, the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

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

High Volume Low Pressure (HVLP) and Low Volume Low Pressure (LVLP) Spray Application are accepted alternative methods of application for Air Assisted Airless Spray Application. HVLP and LVLP spray are the technologies 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.

Therefore, the one (1) surface coating machine, identified as SCLD, the one (1) spray booth, identified as SB-1, and the one (1) surface coating machine, identified as SCLD2, operating using HVLP and LVLP applicators can comply with this rule.

326 IAC 8-6 (Organic Solvent Emissions Limitations)

This source has a potential to emit VOC of greater than one-hundred (100) tons per year, but did not commence operations between October 7, 1974 and January 1, 1980. Therefore, pursuant to 326 IAC 8-6-1(2), the requirements of 326 IAC 8-6, Organic Solvent Emissions Limitations, are not applicable.

Testing Requirements

No stack tests have been incorporated into the proposed Part 70 Operating Permit for the one (1) surface coating machine, identified as SCLD, the one (1) surface coating machine, identified as SCLD2, and the one (1) spray booth, identified as SB-1, because the emissions from surface coating operations are based upon material usage and the MSDSs and are documented by the record keeping and reporting requirements of the proposed Part 70 Operating Permit.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

The Compliance Determination Requirements applicable to the source are as follows:

- (a) The two (2) surface coating machines and air dryers, identified as SCLD and SCLD2, and the one (1) spray booth, identified as SB-1, have the following Compliance Determination Requirements:

Compliance with the VOC usage limitations shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

- (b) The one (1) woodworking operation, identified as WW, has the following Compliance Determination Requirements:

- (1) The two (2) baghouses, identified as DC1 and DC2, for particulate control shall be in operation and control emissions from the one (1) woodworking operation,

identified as WW, at all times that the one (1) woodworking operation, identified as WW, is in operation.

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

The Compliance Monitoring Requirements applicable to this source are as follows:

- (a) The one (1) surface coating machine with a dryer, identified as SCLD, the one (1) spray booth, identified as SB-1, and the one (1) surface coating machine and air dryer, identified as SCLD2, have the following Compliance Monitoring Requirements:
 - (1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth Stacks (SC1-SC4) and Vent SB-1 while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
 - (2) Monthly inspections shall be performed of the coating emissions from the Stacks SC1-SC4 and Vent SB-1 and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) The one (1) woodworking operation, identified as WW, has the following Compliance Monitoring Requirements:
 - (1) The Permittee shall record the pressure drop across the baghouses, identified as DC1 and DC2, used in conjunction with one (1) woodworking operation, identified as WW, at least once per day when the one (1) woodworking operation is in operation. When for any one reading, the pressure drop across the baghouses is outside the normal range of 1.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. 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 - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
 - (2) 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.
 - (3) For a single compartment baghouse controlling emissions from a process operated

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

- (4) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. 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).

Conclusion

The construction and operation of this wood cabinet door manufacturing source shall be subject to the conditions of the Part 70 Operating Permit T 039-24055-00582.

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

**Company Name: Genesis Products, Inc. - Hardwoods (Plant 3)
Address City IN Zip: 2515 Industrial Park Dr., Goshen, IN 46526
Part 70: T 039-24055-00582
Plt ID: 039-00582
Reviewer: Michael A. Morrone
Application Date: December 12, 2006**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency	Substrate
One (1) surface coating machine with a dryer, identified as SCLD																	
Stain	6.87	97.5%	71.1%	26.4%	68.4%	1.00%	0.005	250	5.75	1.82	2.10	50.3	9.19	0.215	182	75%	Wood
Topcoat/Sealer A.A.	7.47	73.6%	22.0%	51.6%	24.8%	19.8%	0.021	250	5.12	3.85	20.0	481	87.7	11.2	19.4	75%	Wood
Acetone	6.67	100%	100%	0.0%	100%	0.00%	0.0004	250	n/a	0.00	0.00	0.00	0.00	0.00	n/a	100%	Wood
										SUBTOTAL	20.03	481	87.7	11.2			
One (1) spray booth, identified as SB-1																	
Keystone Glaze (FS-5074)	8.37	83.4%	0.0%	83.4%	0.00%	15.8%	0.005	25.0	6.98	6.98	0.873	20.9	3.82	0.190	44.2	75%	Wood
Wash Thinner - Blender 2739	7.02	100%	0.0%	100%	0.00%	0.00%	0.00002	25.0	7.02	7.02	0.004	0.084	0.015	0.00	n/a	100%	Wood
										SUBTOTAL	0.876	21.0	3.84	0.190			
One (1) surface coating machine and air dryer, identified as SCLD2																	
BS04-220 Waterbased stain	8.37	92.0%	92.0%	0.00%	92.0%	8.00%	0.005	250	0.00	0.00	0.00	0.00	0.00	0.169	0.00	95%	Wood
OR																	
LR04038C Topcoat	7.78	75.3%	2.8%	72.5%	3.70%	24.4%	0.0208	250	5.86	5.64	29.3	703	128	2.19	23.2	95%	Wood
Acetone	6.61	100%	100.0%	0.00%	100%	0.00%	0.0004	250	n/a	0.00	0.00	0.00	0.00	0.00	n/a	100%	Wood
										SUBTOTAL	29.3	703	128	2.19			
One (1) roll coating aqueous adhesive application operation, identified as AA																	
CL-1809 Adhesive	8.84	53.0%	53.0%	0.00%	56.2%	53.5%	0.005	500	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%	Wood
Water	8.34	100%	100.0%	0.00%	100%	0.00%	0.0006	500	n/a	0.00	0.00	0.00	0.00	0.00	n/a	100%	Wood
										SUBTOTAL	0.00	0.00	0.00	0.00			

PM Control Efficiency (SCLD): 98.5%
PM Control Efficiency (SB-1): 98.0%
PM Control Efficiency (SCLD2): 95.0%

Add worst case coating to all solvents

Uncontrolled	50.2	1205	220	13.6
Controlled	50.2	1205	220	0.113

METHODOLOGY

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

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

**Company Name: Genesis Products, Inc. - Hardwoods (Plant 3)
Address City IN Zip: 2515 Industrial Park Dr., Goshen, IN 46526
Part 70: T 039-24055-00582
Plt ID: 039-00582
Permit Reviewer: Michael A. Morrone
Application Date: December 12, 2006**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Glycol Ethers	Weight % Toluene	Glycol Ether Emissions (ton/yr)	Toluene Emissions (ton/yr)	Total Emissions (ton/yr)	
One (1) surface coating machine with a dryer, identified as SCLD									
Stain	6.87	0.00462	250	1.10%	0.00%	0.382	0.00	0.382	
One (1) spray booth, identified as SB-1									
Keystone Glaze	8.37	0.005	25.0	0.00%	1.09%	0.00	0.050	0.050	
Wash Thinner - Blender 2739	7.02	0.00002	25.0	0.00%	55.0%	0.00	0.008	0.008	
						TOTALS	0.382	0.058	0.441

METHODOLOGY

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

**Appendix A: Emission Calculations
Woodworking Operations - WW**

Company Name: Genesis Products, Inc. - Hardwoods (Plant 3)
Address City IN Zip: 2515 Industrial Park Dr., Goshen, IN 46526
Part 70: T 039-24055-00582
Plt ID: 039-00582
Reviewer: Michael A. Morrone
Application Date: December 12, 2006

Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	PM Emission Rate before Controls (lb/hr)	PM Emission Rate before Controls (tons/yr)	PM Emission Rate after Controls (lb/hr)	PM Emission Rate after Controls (tons/yr)
DC1	99.0%	0.001	20000	17.1	75.1	0.171	0.751
DC2	99.0%	0.001	47000	40.3	176	0.403	1.76
TOTALS				57.4	252	0.574	2.52

Methodology

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

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

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

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

Allowable Rate of Emissions

Process Rate (lbs/hr)	Process Weight Rate (tons/hr)	Allowable Emissions (lbs/hr)
1000	0.500	2.58

Methodology

Allowable Emissions = 4.10(Process Weight Rate)^{0.67}

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

**Company Name: Genesis Products, Inc. - Hardwoods (Plant 3)
Address City IN Zip: 2515 Industrial Park Dr., Goshen, IN 46526
Part 70: T 039-24055-00582
Plt ID: 039-00582
Reviewer: Michael A. Morrone
Application Date: December 12, 2006**

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100	5.50	84.0
				**see below		

*PM emission factor is filterable PM only. PM-10 emission factor is filterable and condensable PM-10 combined.

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

Equipment	Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Potential Emission in tons/yr					
			PM*	PM10*	SO2	NOx	VOC	CO
Four (4) radiant space heaters, identified as SH1 through SH4	0.400	3.50	0.003	0.013	0.001	0.175	0.010	0.147
One (1) radiant space heater, identified as SH5	0.050	0.438	0.0004	0.002	0.0001	0.022	0.001	0.018
Two (2) forced air furnaces, identified as SH6 and SH7	0.180	1.58	0.001	0.006	0.0005	0.079	0.004	0.066
One (1) water heater, identified as WH1	0.053	0.464	0.0004	0.002	0.0001	0.023	0.001	0.019
One (1) natural gas-fired air makeup unit, identified as AM1	0.500	4.38	0.004	0.017	0.001	0.219	0.012	0.184
One (1) radiant space heater, identified as SH8	0.100	0.876	0.001	0.003	0.0003	0.044	0.002	0.037
One (1) radiant space heater, identified as SH9	0.118	1.03	0.001	0.004	0.0003	0.052	0.003	0.043
Total	1.40	12.3	0.012	0.047	0.004	0.614	0.034	0.515

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See page 5 for HAPs emissions calculations.

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

**Company Name: Genesis Products, Inc. - Hardwoods (Plant 3)
Address City IN Zip: 2515 Industrial Park Dr., Goshen, IN 46526
Part 70: T 039-24055-00582
Plt ID: 039-00582
Reviewer: Michael A. Morrone
Application Date: December 12, 2006**

HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	0.0021	0.0012	0.0750	1.800	0.003
Potential Emission in tons/yr	0.00001	0.00001	0.0005	0.011	0.00002

HAPs - Metals						
	Lead	Cadmium	Chromium	Manganese	Nickel	Total HAPs
Emission Factor in lb/MMcf	0.001	0.0011	0.0014	0.0004	0.0021	
Potential Emission in tons/yr	0.000003	0.00001	0.00001	0.000002	0.00001	0.012

Methodology is the same as page 4.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
Summary**

Company Name: Genesis Products, Inc. - Hardwoods (Plant 3)
Address City IN Zip: 2515 Industrial Park Dr., Goshen, IN 46526
Part 70: T 039-24055-00582
Plt ID: 039-00582
Reviewer: Michael A. Morrone
Application Date: December 12, 2006

Summary of Emissions

Uncontrolled Potential Emissions

Significant Emission Units	PM	PM-10	SO2	NOx	VOC	CO	Lead	Glycol Ethers	Toluene	Benzene	Hexane	Other HAPs	Total HAPs
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)						
One (1) surface coating machine with a dryer, identified as SCLD	11.2	11.2	0.00	0.00	87.7	0.00	0.00	0.382	0.00	0.00	0.00	0.00	0.382
One (1) spray booth, identified as SB-1	0.190	0.190	0.00	0.00	3.84	0.00	0.00	0.00	0.058	0.00	0.00	0.00	0.058
One (1) surface coating machine and air dryer, identified as SCLD2	2.19	2.19	0.00	0.00	128	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) roll coating aqueous adhesive application operation, identified as AA	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) woodworking operation, identified as VVW	252	252	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Subtotal Significant Emission Units	265	265	0.00	0.00	220	0.00	0.00	0.382	0.058	0.00	0.00	0.00	0.441
Insignificant Activities													
Natural gas-fired combustion sources	0.012	0.047	0.004	0.614	0.034	0.515	0.000003	0.00	0.00002	0.00001	0.011	0.0001	0.011
Subtotal Insignificant Activities	0.012	0.047	0.004	0.614	0.034	0.515	0.000003	0.00	0.00002	0.00001	0.011	0.0001	0.011
Total	265	265	0.004	0.614	220	0.515	0.000003	0.382	0.058	0.00001	0.011	0.0001	0.452

Company Name: Genesis Products, Inc. - Hardwoods (Plant 3)
Address City IN Zip: 2515 Industrial Park Dr., Goshen, IN 46526
Part 70: T 039-24055-00582
Plt ID: 039-00582
Reviewer: Michael A. Morrone
Application Date: December 12, 2006

Controlled Potential Emissions

Significant Emission Units	PM	PM-10	SO2	NOx	VOC	CO	Lead	Glycol Ethers	Toluene	Hexane	Other HAPs	Total HAPs
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)						
One (1) surface coating machine with a dryer, identified as SCLD	0.168	0.168	0.00	0.00	87.7	0.00	0.00	0.382	0.00	0.00	0.00	0.382
One (1) spray booth, identified as SB-1	0.004	0.004	0.00	0.00	3.8	0.00	0.00	0.00	0.058	0.00	0.00	0.058
One (1) surface coating machine and air dryer, identified as SCLD2	0.109	0.109	0.00	0.00	128.4	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) roll coating aqueous adhesive application operation, identified as AA	0.0	0.0	0.00	0.00	0.0	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) woodworking operation, identified as WW	2.52	2.52	0.00	0.00	0.0	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Subtotal Significant Emission Units	2.80	2.80	0.00	0.00	220	0.00	0.00	0.382	0.058	0.00	0.00	0.441
Insignificant Activities												
Natural gas-fired combustion sources	0.012	0.047	0.004	0.614	0.034	0.515	0.000003	0.00	0.00002	0.011	0.0001	0.011
Subtotal Insignificant Activities	0.012	0.047	0.004	0.614	0.034	0.515	0.000003	0.00	0.00002	0.011	0.0001	0.011
Total	2.81	2.84	0.004	0.614	220	0.515	0.000003	0.382	0.058	0.011	0.0001	0.452

Company Name: Genesis Products, Inc. - Hardwoods (Plant 3)
Address City IN Zip: 2515 Industrial Park Dr., Goshen, IN 46526
Part 70: T 039-24055-00582
Plt ID: 039-00582
Reviewer: Michael A. Morrone
Application Date: December 12, 2006

Limited & Controlled Potential Emissions

Significant Emission Units	PM	PM-10	SO2	NOx	VOC	CO	Lead	Glycol Ethers	Toluene	Hexane	Other HAPs	Total HAPs
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
One (1) surface coating machine with a dryer, identified as SCLD	0.168	0.168	0.00	0.00	Less than 99.5	0.00	0.00	0.382	0.00	0.00	0.00	0.382
One (1) spray booth, identified as SB-1	0.004	0.004	0.00	0.00	Less than 99.5	0.00	0.00	0.00	0.058	0.00	0.00	0.058
One (1) surface coating machine and air dryer, identified as SCLD2	0.109	0.109	0.00	0.00	Less than 99.5	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) roll coating aqueous adhesive application operation, identified as AA	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) woodworking operation, identified as WW	11.3	11.3	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Subtotal Significant Emission Units	11.6	11.6	0.00	0.00	Less than 199	0.00	0.00	0.382	0.058	0.00	0.00	0.441
Insignificant Activities												
Natural gas-fired combustion sources	0.012	0.047	0.004	0.614	0.034	0.515	0.000003	0.00	0.00	0.011	0.0001	0.011
Subtotal Insignificant Activities	0.012	0.047	0.004	0.614	0.034	0.515	0.000003	0.00	0.00	0.011	0.0001	0.011
Total	11.6	11.6	0.004	0.614	Less than 199	0.515	0.000003	0.382	0.058	0.011	0.0001	0.452