



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: August 17, 2007
RE: Superior Wood Products / 085-24816-00072
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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Mr. Joe Krizman
Superior Wood Products
1058 West CR 400 North
Warsaw, Indiana 46582

August 17, 2007

Re: 085-24816-00072
First Minor Permit Revision to
MSOP 085-14805-00072

Dear Mr. Krizman:

Superior Wood Products was issued Minor Source Operating Permit (MSOP) No. 085-14805-00072 on March 28, 2002 for a stationary custom made wood kitchen cabinet manufacturing operation. A letter requesting a revision to this permit was received on May 22, 2007. Pursuant to the provisions of 326 IAC 2-6.1-6 a minor permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the addition of a new spray booth (EU-5) and the modification of the coatings used in the existing spray booths EU-1 through EU-4.

The new emission units are as follows:

- (a) One (1) spray booth, identified as EU-5, approved for construction in 2007, utilizing HVLP spray application methods, with a maximum capacity of 3.23 units per hour, with particulate emissions controlled by dry filters, and exhausting to stack S8.
- (b) One (1) natural gas - fired combustion unit, consisting of an air make-up unit, identified as AM-B5, with a maximum heat input of 0.125 MMBtu/hr.

The existing emission units to be modified are as follows:

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

The following construction conditions are applicable to the proposed project:

1. The data and information supplied with the application shall be considered part of this permit revision approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Pursuant to IC 13-15-5-3, this approval to construct becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-6.1-6, the minor source operating permit shall be revised by incorporating the minor permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please find attached a copy of the revised permit.

Pursuant to Contract No. A305-5-65, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Mr. Stephen Treimel, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7902 to speak directly to Mr. Treimel. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, or call (800) 451-6027 and ask for Duane Van Laningham or extension 3-6878, or dial (317) 233-6878.

Sincerely/Original Signed By:

Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

Attachments
ERG/ST

cc: File - Kosciusko County
U.S. EPA, Region V
Kosciusko County Health Department
Northern Regional Office
Air Compliance Section Inspector - Doyle Houser
Compliance Data Section
Administrative and Development
Technical Support and Modeling - Michele Boner
Billing, Licensing and Training Section - Dan Stamatkin



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Minor Source Operating Permit OFFICE OF AIR QUALITY

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

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

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

Operation Permit No.: MSOP 085-14805-00072	
Original signed by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: March 28, 2002 Expiration Date: March 28, 2007

Minor Permit Revision No.: 085-24816-00072	
Issued by/Original Signed By: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: August 17, 2007

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SECTION A

SOURCE SUMMARY

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

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

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

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

A.2 Emissions units and Pollution Control Equipment Summary

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

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

A.3 Previous Permit

The operation of this custom made wood cabinet manufacturing operation shall be subject to the conditions of this proposed Minor Source Operating Permit 085-14805-00072 which supersedes Part 70 Operating Permit 085-7425-00072 issued on February 25, 1999.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

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

B.2 Definitions

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

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

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

B.4 Modification to Permit [326 IAC 2]

All requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.5 Permit Term [326 IAC 2-6.1-7]

This permit is issued for a fixed term of five (5) years from the original date, 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.

B.6 Minor Source Operating Permit [326 IAC 2-6.1]

- (a) This document shall also become a minor source operating permit pursuant to 326 IAC 2 6.1.
- (b) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2 1.1-7(Fees).
- (c) Pursuant to 326 IAC 2-6.1-7, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in the validation letter. If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied. The operation permit issued shall contain as a minimum the conditions in Section C and Section D of this permit.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential to emit of PM is limited to less than 250 tons per year. Therefore the requirements of 326 IAC 2- (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential to emit to 250 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAQ prior to making the change.
- (c) Any change or modification which may increase potential to emit to ten (10) tons per year of any single hazardous air pollutant, twenty-five (25) tons per year of any combination of hazardous air pollutants, or 100 tons per year of any other regulated pollutant from this source, shall cause this source to be considered a major source under Part 70 Permit Program, 326 IAC 2-7, and shall require approval from IDEM, OAQ prior to making the change.

C.2 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) after issuance of this permit, including the following information on each emissions unit:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMPs shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ,. IDEM, OAQ, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to 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, IN 46204-2251

Any such application should be certified by the 'authorized individual' as defined by 326 IAC 2-1.1-1.

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

C.4 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

C.5 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

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

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, shall issue a revised permit.

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

C.6 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to

reduce emissions during an air pollution episode.

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

C.7 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.8 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.9 Stack Height [326 IAC 1-7]

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

Testing Requirements

C.10 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, IN 46204-2251

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the 'authorized individual' as defined by 326 IAC 2-1.1-1.

Compliance Monitoring Requirements

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

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

C.12 Maintenance of Monitoring Equipment [IC 13-14-1-13]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3]

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, or other approved methods as specified in this permit.

C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and

implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

- (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C.10 Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected emissions unit while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.

- (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. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected emissions unit.

The documents submitted pursuant to this condition do not require the certification by the 'authorized individual' as defined by 326 IAC 2-1.1-1.

Record Keeping and Reporting Requirements

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

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

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

C.17 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) With the exception of performance tests conducted in accordance with Section C.10 Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is

documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.18 General Record Keeping Requirements [326 IAC 2-6.1-2]

- (a) Records of all required monitoring data and support information 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 kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. 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 written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
- (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
- (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator=s standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.19 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The

Compliance Monitoring Report shall include the certification by the authorized individual as defined by 326 IAC 2-1.1-1(1).

- (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, IN 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, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The report shall include the certification by the 'authorized individual' as defined by 326 IAC 2-1.1-1(1).

- (e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
- (2) A malfunction as described in 326 IAC 1-6-2; or
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) 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.

C.20 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification

must be signed by an authorized individual.

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

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Surface Coating Booths

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

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

Emission Limitations and Standards

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

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

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

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

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

- (a) Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating processes identified as EU-4 shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with the manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.1.3 Minor Source HAP Limit [326 IAC 2-6.1-6]

Pursuant to 326 IAC 2-6.1-6, this source shall use less than 10 tons per year of any single HAP or 25 tons per year of any combination of HAPs, including coatings, dilution solvents and cleaning solvents per 12 consecutive month period, thus 326 IAC 2-7 does not apply.

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section C.2 - Preventive Maintenance Plan, of this permit, is required for emission unit EU-4 and any control devices.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.2 shall be determined by a performance test conducted in accordance with Section C.10 - Performance Testing.

D.1.6 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2(d), the dry filters for PM control shall be in operation at all times when the paint booth identified as EU-4 is in operation.

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

D.1.7 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits established in Condition D.1.3.
- (1) The amount and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (5) The total HAP and individual HAP usage for each month; and
 - (6) The weight of HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.2, the Permittee shall maintain a record of any actions taken if overspray is visibly detected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.8 Reporting Requirements

A semi-annual summary of the information to document compliance with Condition D.1.3 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 six (6) month period being reported.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

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

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

Emission Limitations and Standards

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the rough mill and finish mill woodworking facilities shall not exceed 2.58 pounds per hour when operating at a process weight rate of 1000 pounds per hour.

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

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

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

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

A Preventive Maintenance Plan, in accordance with Section C.2 - Preventive Maintenance Plan, of this permit, is required for this emissions unit and its control device.

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

D.2.3 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C.10 - Performance Testing.

D.2.4 Particulate Matter (PM)

Pursuant to CP-085-7425-00072, issued on February 25, 1999, the control equipment for PM control shall be in operation at all times when the woodworking equipment is in operation.

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

D.2.5 Visible Emissions Notations

- (a) Daily visible emission notations of the woodworking operation stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.2.6 Baghouse Inspections

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

D.2.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. 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 single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have 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).

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

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the woodworking operations stack exhaust.
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C.18 - General Record Keeping Requirements, of this permit.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (d) One (1) natural gas - fired combustion unit with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (e) One (1) natural gas - fired combustion unit, consisting of an air make-up unit, identified as AM-B5, with a maximum heat input of 0.125 MMBtu/hr.
- (f) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.

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

Emission Limitations and Standards

D.3.1 Particulate Matter (PM)

Pursuant to 326 IAC 6-2-4(a) (Particulate Matter Emission Limitations for Sources of Indirect Heating, the PM emissions from the ten (10) MMBtu per hour heat input boiler shall be limited to 0.6 pounds per MMBtu heat input.

This limitation is based on the following equation: $Pt = 1.09 / Q^{(0.26)}$

Where: Pt = Lb of particulate matter emitted / MMBtu heat input.

Q = Total maximum operating capacity rating in MMBtu/hr heat input.

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

D.3.2 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the (PM) limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C.10 - Performance Testing.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	Superior Wood Products
Address:	1058 West CR 400 North
City:	Warsaw, Indiana 46580
Phone #:	(574) 267-5879
MSOP #:	M085-24816-00072

I hereby certify that Superior Wood Products is :

still in operation.

no longer in operation.

I hereby certify that Superior Wood Products is :

in compliance with the requirements of MSOP M085-24816-00072.

not in compliance with the requirements of MSOP M085-24816-00072.

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

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

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

Semi-Annual Report

Source Name: Superior Wood Products
Source Address: 1058 W CR400 North, Warsaw, Indiana 46580
Permit No.: T085-14805-00072
Pollutant: HAPs usage

QUARTER :

YEAR:

Month	HAP Usage (tons)	HAP Usage (tons)	HAP Usage (tons)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			
Month 4			
Month 5			
Month 6			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on:

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

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

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

Source Description and Location

Source Name:	Superior Wood Products
Source Location:	1058 West CR 400 North, Warsaw, IN 46580
County:	Kosciusko
SIC Code:	2434
Operation Permit No.:	085-14805-00072
Operation Permit Issuance Date:	March 28, 2002
Minor Permit Revision No.:	085-24816-00072
Permit Reviewer:	ERG/ST

Existing Approvals

The source was issued Minor Source Operating Permit 085-14805-00072 on March 28, 2002.

County Attainment Status

The source is located in Kosciusko County.

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

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Kosciusko County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Kosciusko County has been classified as 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.
- (c) Kosciusko County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

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

Source Status

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

Pollutant	Emissions (tons/year)
PM	55.04
PM10	55.04
SO ₂	0.0
VOC	25.85
CO	3.70
NO _x	4.40
Xylene	2.64
Toluene	6.94
Methanol	1.15
All Other HAPs	1.47
Total HAPs	12.2 *

These emissions are based upon the TSD for MSOP 085-14805-00072, issued on March 28, 2002.

* Methyl Ethyl Ketone (MEK) is no longer considered a HAP and is not included in these totals.

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because HAPs emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Actual Emissions

No previous emission data has been received from the source.

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Superior Wood Products on May 22, 2007, relating to the addition of a new spray booth (EU-5) and the modification of the coatings used in the existing spray booths EU-1 through EU-4. The following is a list of the proposed emission units and pollution control devices:

- (a) One (1) spray booth, identified as EU-5, approved for construction in 2007, utilizing HVLP spray application methods, with a maximum capacity of 3.23 units per hour, with particulate emissions controlled by dry filters, and exhausting to stack S8.
- (b) One (1) natural gas - fired combustion unit, consisting of an air make-up unit, identified as AM-B5, with a maximum heat input of 0.125 MMBtu/hr.

The following is a list of the existing emission units that are proposed to be modified. The modification consists of changing the coatings and solvents used in these existing surface coating

operations.

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

Enforcement Issue

There are no pending enforcement actions related to this modification.

Stack Summary

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

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations Pages 1 through 4).

Permit Level Determination – Part 70

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

The following tables are used to determine the appropriate permit level under 326 IAC 2-6.1-6. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

The following table shows the potential to emit before controls of the proposed new surface coating booth EU-5 and air make-up unit AM-B5:

Pollutant	Potential To Emit EU-5 (tons/year)	Potential To Emit AM-B5 (tons/year)
PM	2.25	0.001
PM10	2.25	0.004
SO ₂	0	negligible
VOC	8.77	0.003
CO	0	0.045
NO _x	0	0.054
Single HAP (xylene)	1.16	negligible
Total HAPs	1.68	negligible

The following table shows the potential to emit before controls of the existing surface coating booths (EU-1 through EU-4) before and after the proposed modification:

Pollutant	Potential To Emit EU-1 through EU-4 Before Modification (tons/year) *	Potential To Emit EU-1 through EU-4 After Modification (tons/year)	Net Difference (tons/year)
PM	6.04	4.10	- 1.94
PM10	6.04	4.10	- 1.94
SO ₂	0	0	0
VOC	25.7	30.7	+ 5.0
CO	0	0	0
NO _x	0	0	0
Toluene	6.94	1.72	- 5.22
Xylene	2.64	0.64	- 2.00
Total HAPs	13.8	4.52	- 9.28

These emissions are based upon the TSD for MSOP 085-14805-00072, issued on March 28, 2002.

The following table shows the potential to emit before controls of the modification:

Pollutant	PTE New Emission Units (tons/year)	Net Increase to PTE of Modified Emission Units (tons/year)	Total Increase in PTE for New and Modified Units (tons/year)
PM	2.25	--	2.25
PM10	2.25	--	2.25
SO ₂	negligible	--	negligible
VOC	8.77	5.00	13.77
CO	0.045	--	0.045
NO _x	0.054	--	0.054
HAPs	1.68	--	1.68

This source modification is subject to 326 IAC 2-6.1-6(g)(4) because the modification has a potential to emit less than twenty-five (25) tons per year and equal to or greater than ten (10) tons per year of volatile organic compounds. The modification will be incorporated into the Minor Source Operating Permit through a minor permit revision issued pursuant to 326 IAC 2-6.1-6.

Permit Level Determination – Prevention of Significant Deterioration (PSD)

The table below summarizes the increase in potential to emit due to the new and modified emission units. Any control equipment is considered enforceable by IDEM, OAQ only after issuance of this Minor Permit Revision to a Minor Source Operating Permit, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/Emission Unit	Increase in Potential to Emit (tons/year)					
	PM	PM10	SO ₂	VOC	CO	NO _x
EU-1 through EU-4	0	0	0	5.00	0	0
EU-5	2.25	2.25	0	8.77	0	0
AM-B5	0.001	0.004	0.0003	0.003	0.045	0.054
Total for Modification	2.25	2.25	0.0003	13.77	0.045	0.054

	Increase in Potential to Emit (tons/year)					
Significant Level or Major Source Threshold	250	250	250	250	250	250

This modification to an existing minor stationary source is not major because the emissions increase is less than the PSD major source thresholds (two hundred fifty (250) tons per year), and it is not in one of the twenty-eight (28) listed source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

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

State Rule Applicability Determination

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

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

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

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

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

326 IAC 2-6 (Emission Reporting)

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

326 IAC 5-1 (Opacity Limitations)

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

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

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

The source is located in Kosciusko County.

- (a) This source is not located in any of the areas listed in 326 IAC 6-5-1(a). Therefore, this

source is not subject to the requirements of 326 IAC 6-5.

- (b) This source did not receive all of the necessary preconstruction approvals prior to December 13, 1985. However, the fugitive particulate emissions from the source are negligible. Pursuant to 326 IAC 6-5-7(d), this source is not subject to the requirements of 326 IAC 6-5.

State Rule Applicability – Surface Coating

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

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

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

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

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

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

- (a) The surface coating booths identified as EU-1, EU-2, EU-3, and EU-5 have potential to emit of particulate less than 0.551 pounds per hour. Pursuant to 326 IAC 6-3-1(b)(14), these booths are exempt from the requirements of 326 IAC 6-3-2.
- (b) The surface coating booth identified as EU-4 uses more than five (5) gallons of coating per day and has a potential to emit greater than 0.551 pounds per hour. Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating processes shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with the manufacturer's specifications.

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

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

If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so

that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

Testing Requirements

There are no testing requirements applicable to this modification.

Compliance Determination and Monitoring Requirements

There are no new Compliance Monitoring Requirements or Compliance Determination Requirements applicable to this modification.

Proposed Changes

The changes listed below have been made to Minor Source Operating Permit No. 085-14805-00072. Deleted language appears as ~~strike throughs~~ and new language appears in **bold**:

1. The following changes have been made to the permit due this modification. The listing of emissions units has been updated in Conditions A.2 and Section D.1. The emission standards and compliance determination requirements for surface coating booths EU-1, EU-2, EU-3 have been removed from Conditions D.1.2 and D.1.6. Condition D.1.7 has been removed because this requirement only applies to FESOP and Title V sources. Other conditions have been re-numbered accordingly. Compliance Monitoring conditions for surface coating booth EU-4 at an MSOP source have been added in Condition D.1.2, and recordkeeping requirements have been added to Condition D.1.7 (formerly D.1.8).

A.2 Emissions units and Pollution Control Equipment Summary

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

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

...

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-6.1-5] **Surface Coating Booths**

- (a) Four (4) spray booths, identified as EU-1, EU-2, EU-3 and EU-4, **constructed in 1999, approved for modification in 2007**, utilizing HVLP spray **application methods** guns, each booth with a maximum capacity of 3.23 units per hour, **with particulate emissions** - ~~Emissions shall be controlled by dry filters, and exhausting to for overspray control and exhausted at stacks S1, S2, S3 and S4, respectively.~~
- (b) **One (1) spray booth, identified as EU-5, approved for construction in 2007, utilizing HVLP spray application methods, with a maximum capacity of 3.23 units per hour, with particulate emissions controlled by dry filters, and exhausting to stack S8.**

...

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(e)]

~~Pursuant to [326 IAC 6-3-2(e)], the PM from the four (4) paint booths EU-1, EU-2, EU-3 and EU-4 shall not exceed 2.58 pound per hour when operating at a process weight rate of 1000 pounds per hour.~~

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

~~Interpolation and extrapolation 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:~~

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

- (a) Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating processes identified as EU-4 shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with the manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

...

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section C.2 - Preventive Maintenance Plan,

of this permit, is required for this emissions unit **EU-4** and any control devices.

...

D.1.6 Particulate Matter (PM)

Pursuant to ~~326 IAC 6-3-2(e)~~, **326 IAC 6-3-2(d)**, the dry filters for PM control shall be in operation at all times when the ~~three (3)~~ paint booths EU-1, EU-2 and EU-3 are **identified as EU-4** is in operation.

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

~~D.1.7~~ 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 (S1, S2 and S3) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records and Reports [~~326 IAC 2-8-4~~] [~~326 IAC 2-8-5~~] shall be considered a violation of this permit.~~
- (b) ~~Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records and Reports [~~326 IAC 2-8-4~~] [~~326 IAC 2-8-5~~] shall be considered a violation of this permit.~~
- (c) ~~Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

...

~~D.1.8~~ **D.1.7** Record Keeping Requirements

...

- (b) ~~To document compliance with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations, weekly observations of the water level in the pans, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.~~ **To document compliance with Condition D.1.2, the Permittee shall maintain a record of any actions taken if overspray is visibly detected.**

...

~~D.1.12~~ **D.1.8** Reporting Requirements

2. IDEM, OAQ has updated the phone numbers, address and added the specific mail codes (MC) for each of the IDEM branches to improve mail delivery, as follows:

Telephone No.: 317-233-~~5674~~ **0178** (ask for Compliance Section)
Facsimile No.: 317-233-~~5967~~ **6865**

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, ~~P.O. Box 6015~~
MC 61-53 IGCN 1003
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**

Permits Branch: **MC 61-53 IGCN 1003**
Compliance Branch: **MC 61-53 IGCN 1003**
Air Compliance Section: **MC 61-53 IGCN 1003**
Compliance Data Section: **MC 61-53 IGCN 1003**
Asbestos Section: **MC 61-52 IGCN 1003**
Technical Support and Modeling: **MC 61-50 IGCN 1003**

2. In order to reduce the number of administrative amendments, IDEM, OAQ has removed the identification of the Responsible Official in Condition A.1. IDEM will continue to maintain records of the name, title, and contact information for the responsible official.

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

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

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

Conclusion and Recommendation

The construction of this proposed modification shall be subject to the conditions of the attached proposed Minor Permit Revision No. 085-24816-00072. The staff recommend to the Commissioner that this Minor Permit Revision to a Minor Source Operating Permit be approved.

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

Company Name: Superior Wood Products
 Address: 1058 West CR 400 North, Warsaw, Indiana 46580
 MPR: 085-24816-00072
 Reviewer: ERG/ST
 Date: June 6, 2007

Emission Unit ID	Material	Density (lbs/gal)	Weight % Water	Weight % VOC	Weight % Solids	Usage (gal/unit)	Throughput (unit/hr)	VOC (lb/gal)	PTE of VOC (lb/hr)	PTE of VOC (ton/yr)	PTE of PM/PM10 Before Controls (ton/yr)	PTE of PM/PM10 After Controls (ton/yr)
EU-1	Stain	7.07	0.10%	87.59%	12.31%	0.065	3.23	6.19	1.30	5.69	0.20	0.04
	Cleanup Solvent	6.44	9.24%	90.76%	0.00%	0.014	3.23	5.84	0.26	1.16	0.00	0.00
EU-2	Stain	7.07	0.10%	87.59%	12.31%	0.065	3.23	6.19	1.30	5.69	0.20	0.04
	Cleanup Solvent	6.44	9.24%	90.76%	0.00%	0.014	3.23	5.84	0.26	1.16	0.00	0.00
EU-3	Topcoat	7.58	1.90%	66.04%	32.06%	0.100	3.23	5.01	1.62	7.08	0.86	0.17
	Cleanup Solvent	6.44	9.24%	90.76%	0.00%	0.014	3.23	5.84	0.26	1.16	0.00	0.00
EU-4	Sealer	7.58	1.90%	66.04%	32.06%	0.100	3.23	5.01	1.62	7.08	0.86	0.17
	Primer	10.29	0.00%	39.94%	60.06%	0.130	3.23	4.11	1.73	7.56	2.84	0.57
	Cleanup Solvent	6.44	9.24%	90.76%	0.00%	0.014	3.23	5.84	0.26	1.16	0.00	0.00
EU-5	Paint Coat	9.03	0.00%	45.85%	54.15%	0.130	3.23	4.14	1.74	7.61	2.25	0.45
	Cleanup Solvent	6.44	9.24%	90.76%	0.00%	0.014	3.23	5.84	0.26	1.16	0.00	0.00
								Totals		39.43	6.35	1.27

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

METHODOLOGY

VOC (lb/gal) = Density (lb/gal) x Weight % VOC (%)

PTE of VOC (lb/hr) = Density (lb/gal) x Weight % VOC x Usage (gal/unit) x Throughput (unit/hr)

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

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

PTE of PM/PM10 After Controls (ton/yr) = PTE PM/PM10 Before Controls (ton/yr) x (1 - Control Efficiency %)

Appendix A: Emission Calculations
HAP Emissions From Surface Coating Operations

Company Name: Superior Wood Products
Address: 1058 West CR 400 North, Warsaw, Indiana 46580
MPR: 085-24816-00072
Reviewer: ERG/ST
Date: June 6, 2007

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

Emission Unit ID	Material	Density (lb/gal)	Usage (gal/unit)	Throughput (unit/hr)	PTE of Ethylbenzene (ton/yr)	PTE of Formaldehyde (ton/yr)	PTE of Methanol (ton/yr)	PTE of MIBK (ton/yr)	PTE of Toluene (ton/yr)	PTE of Xylene (ton/yr)	
EU-1	Stain	same as above			0.00	0.00	0.00	0.00	0.00	0.00	
	Cleanup Solvent				0.00	0.00	0.00	0.00	0.00	0.00	
EU-2	Stain				0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Cleanup Solvent				0.00	0.00	0.00	0.00	0.00	0.00	0.00
EU-3	Topcoat				0.05	0.01	0.00	0.00	0.00	0.86	0.32
	Cleanup Solvent				0.00	0.00	0.00	0.00	0.00	0.00	0.00
EU-4	Sealer				0.05	0.01	0.00	0.00	0.00	0.86	0.32
	Primer				0.04	0.02	0.57	2.46	0.19	0.00	
	Cleanup Solvent				0.00	0.00	0.00	0.00	0.00	0.00	
EU-5	Paint Coat				0.17	0.02	0.33	0.00	0.00	1.16	
	Cleanup Solvent				0.00	0.00	0.00	0.00	0.00	0.00	
Totals					0.27	0.05	0.90	2.46	1.72	1.81	

Sealer and Primer coatings applied at EU-4 are mutually exclusive. Only the worst case material for VOC and particulate are included in totals.

Methodology

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

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

Company Name: Superior Wood Products
Address: 1058 West CR 400 North, Warsaw, Indiana 46580
MPR: 085-24816-00072
Reviewer: ERG/ST
Date: June 6, 2007

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

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

Potential To Emit (ton/yr)							
Emission Unit ID	PM	PM10	SO ₂	NO _x	CO	VOC	HAPs
Air Make-up Unit AM-B5	0.001	0.004	0.0003	0.054	0.045	0.003	0.001

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

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

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

All emission factors are based on normal firing.

Methodology

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

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

Appendix A: Emission Calculations
Summary

Company Name: Superior Wood Products
 Address: 1058 West CR 400 North, Warsaw, Indiana 46580
 MPR: 085-24816-00072
 Reviewer: ERG/ST
 Date: June 6, 2007

Emission Unit ID	Potential To Emit of Source Before Modification (ton/yr)								
	Uncontrolled		Controlled		SO ₂	NO _x	CO	VOC	HAPs
	PM	PM10	PM	PM10					
Spray Booths EU-1 through EU-4	6.04	6.04	1.21	1.21	0	0	0	25.7	13.8
Rough Mill	30.4	30.4	0.30	0.30	0	0	0	0.00	0.00
Finish Mill	18.5	18.5	3.70	3.70	0	0	0	0.00	0.00
Natural Gas Combustion	0.08	0.33	0.08	0.33	0.03	4.40	3.70	0.24	0.08
Totals	55.0	55.3	5.30	5.55	0.03	4.40	3.70	25.9	13.9

Emission Unit ID	Potential To Emit of Source After Modification (ton/yr)								
	Uncontrolled		Controlled		SO ₂	NO _x	CO	VOC	HAPs
	PM	PM10	PM	PM10					
Spray Booth EU-1	0.20	0.20	0.04	0.04	0	0	0	6.85	0
Spray Booth EU-2	0.20	0.20	0.04	0.04	0	0	0	6.85	0
Spray Booth EU-3	0.86	0.86	0.17	0.17	0	0	0	8.24	1.24
Spray Booth EU-4	2.84	2.84	0.57	0.57	0	0	0	8.72	3.27
Spray Booth EU-5	2.25	2.25	0.45	0.45	0	0	0	8.77	1.68
Rough Mill	30.4	30.4	0.30	0.30	0	0	0	0.00	0.00
Finish Mill	18.5	18.5	3.70	3.70	0	0	0	0.00	0.00
Natural Gas Combustion	0.08	0.34	0.08	0.34	0.03	4.46	3.74	0.25	0.08
Totals	55.3	55.6	5.36	5.61	0.03	4.46	3.74	39.7	6.28

Entire Source	Increase in Potential To Emit of Source Due to Modification (ton/yr)								
	Uncontrolled		Controlled		SO ₂	NO _x	CO	VOC	HAPs
	PM	PM10	PM	PM10					
	0.31	0.31	0.06	0.07	0.00	0.05	0.05	13.8	-7.61