



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: November 1, 2007  
RE: MJ Finishing / 099-24980-00104  
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 according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures  
FNPER.dot 03/23/06



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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 Construction and Minor Source Operating Permit

## OFFICE OF AIR QUALITY

**MJ Finishing**  
**5311 East County Line Rd**  
**Bremen, Indiana 46506**

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

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

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

Operation Permit No.: M099-24980-00104	
Original signed by:	Issuance Date: November 1, 2007
Nisha Sizemore, Chief Permits Branch Office of Air Quality	Expiration Date: November 1, 2012

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## SECTION A SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary wood furniture and cabinets surface coating plant.

Source Address:	5311 East County Line Rd, Bremen, Indiana 46506
Mailing Address:	5311 E County Line Rd, Bremen, IN 46506
General Source Phone Number:	574-646-2080
SIC Code:	2499
County Location:	Marshall
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) Three (3) surface coating booths, identified as Booth 1, Booth 2, and Booth 3, approved for construction in 2007, for applying stain to wood products, utilizing an air assisted airless spray system, coating a combined maximum of 70 units per hour, using dry filters for particulate matter overspray control, and exhausting to stacks S1, S2, and S3.
- (b) One (1) surface coating and sanding booth, identified as Booth 4, approved for construction in 2007, for applying sealer to wood products, utilizing an air assisted airless spray system, coating a maximum of 70 units per hour, using dry filters for particulate matter overspray control, and exhausting to stack S4.
- (c) One (1) surface coating booth, identified as Booth 5, approved for construction in 2007, for applying topcoat to wood products, utilizing an air assisted airless spray system, coating a maximum of 70 units per hour using dry filters for particulate matter overspray control, and exhausting to stack S5.
- (d) One (1) propane gas-fired air make-up unit, identified as H1, approved for construction in 2007, with a maximum heat input capacity of 6 MMBtu per hour.
- (e) One (1) diesel-fired generator, identified as G1, approved for construction in 2007, rated at 0.445 MMBtu per hour.
- (f) One (1) propane gas-fired boiler, identified as H2, approved for construction in 2007, rated at 0.6 MMBtu per hour.

## **SECTION B GENERAL CONDITIONS**

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

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

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

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

### **B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]**

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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.

### **B.4 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]**

- 
- (a) This permit, M099-24980-00104, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
  - (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

### **B.5 Term of Conditions [326 IAC 2-1.1-9.5]**

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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.6 Enforceability**

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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.7 Severability**

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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.8 Property Rights or Exclusive Privilege**

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

**B.9 Duty to Provide Information**

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

**B.10 Certification**

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

**B.11 Annual Notification [326 IAC 2-6.1-5(a)(5)]**

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- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:  
  
Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, IN 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

**B.12 Preventive Maintenance Plan [326 IAC 1-6-3]**

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- (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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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- (a) All terms and conditions of permits established prior to M099-24980-00104 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

**B.14 Termination of Right to Operate [326 IAC 2-6.1-7(a)]**

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

B.15 Permit Renewal [326 IAC 2-6.1-7]

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

Request for renewal shall be submitted to:

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

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

B.16 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

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

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

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

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

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

B.17 Source Modification Requirement

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

**B.18 Inspection and Entry**  
[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

**B.19 Transfer of Ownership or Operational Control** [326 IAC 2-6.1-6]

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

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

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

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

**B.20 Annual Fee Payment** [326 IAC 2-1.1-7]

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- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.

- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

**B.21 Credible Evidence [326 IAC 1-1-6]**

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

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

**C.3 Opacity [326 IAC 5-1]**

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

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

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

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

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

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

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

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

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
- (A) Asbestos removal or demolition start date;
- (B) Removal or demolition contractor; or
- (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-52 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

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

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

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

#### **C.8 Performance Testing [326 IAC 3-6]**

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- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

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

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

### **Compliance Requirements [326 IAC 2-1.1-11]**

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

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

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

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

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

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

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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]**

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- (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**

### **C.13 Response to Excursions or Exceedances**

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- (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; and/or

- (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.14 Actions Related to Noncompliance Demonstrated by a Stack Test**

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

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

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

**C.15 Malfunctions Report [326 IAC 1-6-2]**

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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.16 General Record Keeping Requirements [326 IAC 2-6.1-5]**

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- (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.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]**

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- (a) Reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) 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.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) Three (3) surface coating booths, identified as Booth 1, Booth 2, and Booth 3, approved for construction in 2007, for applying stain to wood products, utilizing an air assisted airless spray system, coating a combined maximum of 70 units per hour, using dry filters for particulate matter overspray control, and exhausting to stacks S1, S2, and S3.
- (b) One (1) surface coating and sanding booth, identified as Booth 4, approved for construction in 2007, for applying sealer to wood products, utilizing an air assisted airless spray system, coating a maximum of 70 units per hour, using dry filters for particulate matter overspray control, and exhausting to stack S4.
- (c) One (1) surface coating booth, identified as Booth 5, approved for construction in 2007, for applying topcoat to wood products, utilizing an air assisted airless spray system, coating a maximum of 70 units per hour using dry filters for particulate matter overspray control, and exhausting to stack S5.
- (d) One (1) propane gas-fired air make-up unit, identified as H1, approved for construction in 2007, with a maximum heat input capacity of 6 MMBtu per hour.
- (e) One (1) diesel-fired generator, identified as G1, approved for construction in 2007, rated at 0.445 MMBtu per hour.
- (f) One (1) propane gas-fired boiler, identified as H2, approved for construction in 2007, rated at 0.6 MMBtu 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 [326 IAC 2-6.1-5(a)(1)]

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

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the Permittee shall perform surface coating of wood furniture and cabinets, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) or more of the following application systems:

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

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

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

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- (a) Pursuant to 326 IAC 6-3-2(d), particulate from surface coating booths Booth1 through Booth 5, shall each be controlled by dry particulate filters, and the Permittee shall operate each control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
  - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
  - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

**D.1.3 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]**

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Pursuant to 326 IAC 6-2-4, the particulate matter emissions from the propane gas fired boiler, identified as H2, shall not exceed 0.6 lb/MMBtu.

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

**D.1.4 Record Keeping Requirement**

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- (a) To document compliance with Condition D.1.2(c) the Permittee shall maintain a record of any actions taken if overspray is visibly detected.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

**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).

<b>Company Name:</b>	MJ Finishing
<b>Address:</b>	5311 East County Line Rd
<b>City:</b>	Bremen, Indiana 46506
<b>Phone #:</b>	574-646-2080
<b>MSOP #:</b>	M099-24980-00104

I hereby certify that MJ Finishing is :

still in operation.

no longer in operation.

I hereby certify that MJ Finishing is :

in compliance with the requirements of MSOP M099-24980-00104.

not in compliance with the requirements of MSOP M099-24980-00104.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

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.

<b>Noncompliance:</b>

### MALFUNCTION REPORT

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

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

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_

INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

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

**326 IAC 1-6-1 Applicability of rule**

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

**326 IAC 1-2-39 "Malfunction" definition**

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

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

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

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Mail to: Permit Administration & Development Section  
Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

MJ Finishing  
5311 East County Line Rd  
Bremen, Indiana 46506

Affidavit of Construction

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

1. I live in \_\_\_\_\_ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of \_\_\_\_\_ for \_\_\_\_\_.  
(Title) (Company Name)
3. By virtue of my position with \_\_\_\_\_, I have personal  
(Company Name)  
knowledge of the representations contained in this affidavit and am authorized to make  
these representations on behalf of \_\_\_\_\_.  
(Company Name)
4. I hereby certify that MJ Finishing 5311 East County Line Rd, Bremen, Indiana 46506, completed construction of the furniture and cabinets surface coating facility on \_\_\_\_\_ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on July 2, 2007 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M099-24980-00104, Plant ID No. 099-00104, issued on \_\_\_\_\_.

Further Affiant said not.

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

Signature \_\_\_\_\_

Date \_\_\_\_\_

STATE OF INDIANA)  
)SS

COUNTY OF \_\_\_\_\_ )

Subscribed and sworn to me, a notary public in and for \_\_\_\_\_ County and State of  
Indiana on this \_\_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_\_.  
My Commission expires: \_\_\_\_\_.

Signature \_\_\_\_\_

\_\_\_\_\_  
Name (typed or printed)

# Indiana Department of Environmental Management Office of Air Quality

## Addendum to the Technical Support Document (TSD) for a New Source Construction and a Minor Source Operating Permit (MSOP)

### Source Background and Description

Source Name:	MJ Finishing
Source Location	5311 East County Line Road, Bremen, Indiana 46506
County:	Marshall
SIC Code:	2499
MSOP No.:	M 099-24980-00104
Permit Reviewer:	Swarna Prabha

On September 15, 2007, the Office of Air Quality (OAQ) had a notice published in Plymouth Pilot News, Bremen, Indiana, stating that MJ Finishing had applied for a New Source Construction Permit and Minor Source Operating Permit (MSOP) to operate stationary furniture surface coating plant, located at 5311 East County Line Road, Bremen, IN 46506. The notice also stated that the OAQ proposed to issue a MSOP for this operation and provided information on how the public could review the proposed 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 permit should be issued as proposed.

The following comments were submitted to IDEM, OAQ on the draft MSOP. NOTE: The Technical Support Document (TSD) is used by IDEM, OAQ for historical purposes. IDEM, OAQ does not make any changes to the original TSD, but the Permit will have the updated changes.

### Comments and Responses

On October 04, 2005, E. Click, an environmental consultant, on behalf of MJ Finishing submitted comments on the draft MSOP. The comments and revised permit language are provided below with deleted language as ~~strikeouts~~ and new language **bolded**.

**Comment 1:** The source requests that facility has decided to install 3 separate staining booths in lieu of one large booth/EU01. The Booths EU 02 and EU 03 needs to be identified as Booth 4 and Booth 5 respectively. The addition of the booths does not increase the capacity of the facility, as we have taken one large area and divided that same area into three separate booths.

**Response to Comment 1:** As requested by the Permittee, the MSOP permit, the facility description in Section A.2 and Section D.1 have been revised as follows:

- (a) ~~One-Three (4)~~ **(3)** surface coating booths, identified as ~~EU-04~~ **Booth 1, Booth 2, and Booth 3**, approved for construction in 2007, for applying stain to wood products, utilizing an air assisted airless spray system, coating a **combined** maximum of 70 units per hour, using dry filters for particulate matter overspray control, and exhausting to stacks S1, S2, and S3.
- (b) One (1) surface coating and sanding booth, identified as ~~EU-02~~ **Booth 4**, approved for construction in 2007, for applying sealer to wood products, utilizing an air assisted airless spray system, coating a maximum of 70 units per hour, using dry filters for particulate matter overspray control, and exhausting to stack S4.
- (c) One (1) surface coating booth, identified as ~~EU-03~~ **Booth 5**, approved for construction in 2007, for applying topcoat to wood products, utilizing an air assisted airless spray

system, coating a maximum of 70 units per hour, using dry filters for particulate matter overspray control, and exhausting to stack S5.

.....

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

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- (a) Pursuant to 326 IAC 6-3-2(d), particulate from surface coating booths ~~EU-01, EU-02, and EU-03~~ **Booth 1 through Booth 5**, shall each be controlled by dry particulate filters, and the Permittee shall operate each control device in accordance with manufacturer's specifications.

**Appendix A: Emissions Calculations  
Emission Summary**

**Company Name:** MJ Finishing  
**Address :** 5311 E County Line Rd, Bremen, Indiana 46506  
**MSOP No.:** M099-24980-00104  
**Reviewer:** Swarna Prabha

Category	Uncontrolled Potential Emissions (tons/year)				
	Emissions Generating Activity				
	Pollutant	Diesel-Gen G1 Diesel Fired	Boiler H2, Air Make-Up unit H1-Propane Fired	Spray Booths Wood Surface Coatings Booth 1-Booth 5	TOTAL
Criteria Pollutants	PM	0.0	0.12	12.40	12.53
	PM10	0.0	0.12	12.40	12.53
	SO2	0.0	0.01		0.01
	NOx	0.0	4.15		4.15
	VOC		0.16	67.54	67.70
	CO	0.0	0.57		0.57
Hazardous Air Pollutant	1,3-Butadiene	7.62E-05			7.62E-05
	Acetaldehyde	1.49E-03			1.5E-03
	Xylenes	5.55E-04		2.23	2.23
	Toluene	7.97E-04		9.47	9.47
	Benzene	1.82E-03			1.82E-03
	Acrolein	1.80E-04			1.80E-04
	Ethylbenzene			0.95	0.95
	Formaldehyde	2.30E-03		0.08	0.08
	<b>Totals</b>	<b>7.22E-03</b>		<b>12.73</b>	<b>12.74</b>

Total emissions based on rated capacity at 8,760 hours/year.

Category	Controlled Potential Emissions (tons/year)				
	Emissions Generating Activity				
	Pollutant	Diesel-Gen G1 Diesel Fired	Boiler H2, Air Make-Up unit H1-Propane Fired	Spray Booths Wood Surface Coatings Booth 1-Booth 5	TOTAL
Criteria Pollutants	PM	0.0	0.12	0.62	0.74
	PM10	0.0	0.12	0.62	0.74
	SO2	0.0	0.01		0.01
	NOx	0.0	4.15		4.15
	VOC		0.16	67.54	67.70
	CO	0.0	0.57		0.57
Hazardous Air Pollutants	1,3-Butadiene	7.62E-05			7.62E-05
	Acetaldehyde	1.49E-03			1.49E-03
	Xylenes	5.55E-04		2.23	2.23
	Toluene	7.97E-04		9.47	9.47
	Benzene	1.82E-03			1.82E-03
	Acrolein	1.80E-04			1.80E-04
	Ethylbenzene			0.95	0.95
	Formaldehyde	2.30E-03		0.08	0.08
	<b>Totals</b>	<b>7.22E-03</b>		<b>12.73</b>	<b>12.74</b>

**Appendix A: Emission Calculations  
VOC and Particulate Emissions from Surface Coating Operations  
Hazardous Air Pollutants (HAPs)**

**Company Name: MJ Finishing  
Address: 5311 E County Line Rd, Bremen, Indiana 46506  
MSOP No. : M099-24980-00104  
Reviewer: Swarna Prabha**

**Spray Booths (Booth 1- Booth 5)**

Material	Density (lbs/gal)	Weight % Water	Weight % VOC	Weight % Solids	Maximum Capacity (unit/hr)	Maximum Capacity (gal/unit)	Maximum Usage * (gals/hour)	VOC (lbs/gal)	PTE of VOC (lbs/hour)	PTE of VOC (lbs/day)	Actual Emissions of VOC*** (lbs/day)	PTE of VOC (tons/year)	PTE PM/PM10 (lbs/hr)	PTE of PM/PM10 Before Controls (tons/year)	PTE of PM/PM10 After Controls (tons/year)	Transfer Efficiency**
<b>Stain Booths-Booth 1-Booth 3</b>																
Stain Blend 4002(FMDS-11)	6.96	0.0%	76.58%	23.4%	70	0.0083	0.581	5.33	3.10	74.32	24.77	13.56	0.95	1.45	0.073	65%
<b>Seal &amp; Sand Booth 4</b>																
Low VOC Catalyzed sealer	7.93	0.0%	62.96%	37.04%	70	0.0167	1.169	4.99	5.84	140.08	46.69	25.56	3.43	5.26	0.263	65%
<b>Top Coat Booth 5</b>																
Aristovar HV Topcoat	7.84	0.0%	59.53%	40.5%	70	0.0167	1.169	4.67	5.46	130.94	43.65	23.90	3.71	5.69	0.284	65%
<b>Solvent Usage(Booth 1-Booth 5)</b>																
Wash Thinner -2739	<b>7.02</b>	0.0%	100.00%	0.00%	70	0.002	0.147	7.02	1.03	24.77	8.26	4.52	0.00	0.0	0.00	100%
<b>Totals</b>									<b>15.42</b>	<b>370.11</b>	<b>123.37</b>	<b>67.54</b>	<b>8.09</b>	<b>12.40</b>	<b>0.620</b>	

**Dry Filter Control Efficiency = 95.0%
Worst Case Coating PTE (After Controls) = 0.620

<b>HAPs</b>															
Material	Density (lbs/gal)	Maximum Capacity (gal/unit)	Maximum Usage * (gals/hour)	Weight % Toluene	Weight % Xylene	Weight % Ethylbenzene	Weight % Formaldehyde	Weight % MEK	PTE of Toluene (tons/yr)	PTE of MEK (tos/yr)	PTE of Ethylbenzene (tons/yr)	PTE of Formaldehyde (tons/yr)	PTE of Xylene (tons/yr)	Total PTE of HAPs	
<b>Stain Booths-Booth 1-Booth 3</b>															
Stain Blend 4002(FMDS-11)	6.96	0.0083	0.581	0.0%	0.0%	0.0%	0.0%	0%	0.0	0.0	0.0	0.0	0.0	0.00	
<b>Seal &amp; Sand Booth 4</b>															
Low VOC Catalyzed sealer	7.93	0.0167	1.169	10.19%	1.11%	0.39%	0.11%	0%	4.137	0.0	0.158	0.045	0.451	4.79	
<b>Top Coat Booth 5</b>															
Aristovar HV Topcoat	7.84	0.0167	1.169	6%	4.44%	1.97%	0.09%	0%	2.605	0.0	0.791	0.036	1.782	5.21	
<b>Solvent Usage(Booth 1-Booth 5)</b>															
Wash Thinner -2739	7.69	0.002	0.147	55.00%	0.0%	0.0%	0.0%	20%	2.723	0.990	0.0	0.0	0.0	3.71	
<b>Total PTE Of HAPs</b>									<b>9.466</b>	<b>0.990</b>	<b>0.949</b>	<b>0.081</b>	<b>2.233</b>	<b>13.72</b>	

<b>Worst Case PTE HAPs</b>	<b>9.470</b>
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\* Maximum Usage as reported by source, based on materials used during an actual production run. Operator applies stain, sealer and topcoat to the wood furniture in sequence to produce the finished product.  
 \*\*Assume transfer efficiency of 65% for air assisted airless spray guns and control efficiency of 95% for dry filters.  
 \*\*\*Anticipated actual hours of operation assumed = 2000 hrs, 8 hours per day, 5 days per week, and 50 weeks per year

**METHODOLOGY**

VOC (lbs/gal) = Density (lbs/gal) x Weight % VOC (%)  
 PTE of PM/PM10 Before Controls (tons/year) = Density (lbs/gal) x Weight % Solids x Maximum Usage (gals/hour) x 8760 (hours/year) x 1 ton/2000 lbs x (1 - Transfer Efficiency %)  
 HAPS emission rate (tons/yr) = (Maximum Usage (lb/hr)) \* [Weight % HAP] \* [8760 hours/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 of VOC per Gallon Coating = [Density (lb/gal)] \* [Weight % VOCs]  
 PTE of VOC (lbs/hr) = [Maximum Usage (lbs/hr)] \* [Weight % VOCs]  
 PTE of VOC (lbs/day) = [PTE of VOC (lbs/hr)] \* [24 hours/day]  
 PTE of VOC (tons/yr) = [PTE of VOC (lbs/day)] \* [(365 days/yr)] \* [1 ton/2000 lbs]  
 PTE of PM/PM10 (tons/yr) = [Density (lbs/gal)] \* [Maximum Usage (gal/day)] \* [(Weight % Solids)] \* [1 - Transfer efficiency]] \* [365 days/yr] \* [1 ton/2000 lbs]  
 Pounds VOC per Gallon of Solids = [Density (lbs/gal)] \* [Weight % VOCs] / [Volume % solids]  
 The Permittee coats 70 units of furniture per hour. Average unit weighs approximately 15 pounds. Average finished unit is 8 square feet

**Appendix A: Emission Calculations**  
**Combustion Emissions from the Air Make-up unit, Radiant Heat Boiler, Diesel Generator**

**Company Name: MJ Finishing**  
**Address: 5311 E County Line Rd, Bremen, Indiana 46506**  
**MSOP No.: M099-24980-00104**  
**Reviewer: Swarna Prabha**

Description	Heat Input Capacity (MMBtu/hr)	Total Max. Potential Throughput (10 <sup>3</sup> gal/yr)
Air Make-up Unit H1-Propane Fired	6.0	574.4
Boiler H2-Propane Fired	0.6	57.4
Diesel-Generator G1-Diesel Fired	0.445	

Description	Pollutant Emission Factors					
	PM	PM10*	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOC
Propane Fired -LPG Combustion (lbs/10 <sup>3</sup> gal)	0.40	0.40	0.02	14.00	1.9	0.50
Diesel Fuel (lbs / MMBtu)	0.310	0.310	0.290	4.41	0.95	
Potential To Emit (tons/yr)						
Emission Unit ID	PM*	PM10	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOC
Air Make-up Unit H1-Propane Fired	0.11	0.11	0.006	4.02	0.55	0.144
Boiler H2-Propane Fired	0.01	0.01	0.008	0.13	0.03	0.014
Diesel-Generator G1-Diesel Fired	0.00	0.00	0.00	0.00	0.00	
<b>Total PTE</b>	<b>0.12</b>	<b>0.12</b>	<b>0.014</b>	<b>4.15</b>	<b>0.57</b>	<b>0.16</b>

Hazardous Air Pollutants (HAPs)	Pollutant Emission Factors						
	Benzene	Xylenes	Formaldehyde	Acetaldehyde	Toluene	Acrolein	1,3-Butadiene
Emission Factor (lbs / MMBtu)	9.33E-04	2.85E-04	1.18E-03	7.67E-04	4.1E-04	9.25E-05	3.91E-05
Potential To Emit (tons/yr)							
Emission Unit ID	Benzene	Xylenes	Formaldehyde	Acetaldehyde	Toluene	Acrolein	1,3-Butadiene
Diesel-Generator G1-Diesel Fired	1.8E-03	5.6E-04	2.3E-03	1.5E-03	8.0E-04	1.8E-04	7.6E-05
<b>Totals</b>	<b>1.8E-03</b>	<b>5.55E-04</b>	<b>2.3E-03</b>	<b>1.5E-03</b>	<b>8.0E-04</b>	<b>1.8E-04</b>	<b>7.6E-05</b>

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

Emission Factors are from AP 42, Chapter 1.5, Table 1.5-1 SCC#1-03-010-02, and Chapter 3.3 Table 3.3-1, SCC#2-03-001-01, and Table 3.3-2

The seven highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 3.3 Table 3.3-1, SCC#

Propane sulfur content assumed = 0.2 gr / 100 ft<sup>3</sup>

91.5 MMBtu Of Propane = 10<sup>3</sup> gal

**Methodology**

Potential Throughput ( 10<sup>3</sup> gal/yr ) = Heat Input Capacity (MMBtu/hr) \* [ 8,760 hours/yr ] \* [10<sup>3</sup> gal/( 91.5 MMBtu) ]

Emission (tons/yr) =[Throughput (10<sup>3</sup> gal/yr)] \* [Emission Factor ( lbs/10<sup>3</sup> gal ) / (2,000 lbs/ton)]

HAPS emission rate (tons/yr) = [Heat Input Capacity (MMBtu/hr)] \* [8,760 hours/yr] \* [1 ton/2,000 lbs]

All emission factors are based on normal firing.

**Abbreviations**

PM = Particulate Matter

PM10 = Particulate Matter (<10 um)

SO<sub>2</sub> = Sulfur Dioxide

Nox = Nitrous Oxide

VOC = Volatile Organic Compounds

CO = Carbon Monoxide

MMBtu = 1,000,000 Btu

# Indiana Department of Environmental Management Office of Air Quality

## Technical Support Document (TSD) for a New Source Construction and a Minor Source Operating Permit (MSOP)

### Source Background and Description

Source Name:	MJ Finishing
Source Location:	5311 East County Line Road, Bremen, Indiana 46506
County:	Marshall
SIC Code:	2499
MSOP No.:	M 099-24980-00104
Permit Reviewer:	Swarna Prabha

The Office of Air Quality (OAQ) has reviewed an application from MJ Finishing relating to the operation of a stationary wood furniture and cabinets surface coating plant.

### Permitted Emission Units and Pollution Control Equipment

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

### Unpermitted Emission Units and Pollution Control Equipment

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

### New Emission Units and Pollution Control Equipment

The following is a list of the new emission units and pollution control devices proposed at this source during this review process:

- (a) One (1) surface coating booth, identified as EU-01, approved for construction in 2007, for applying stain to wood products, utilizing an air assisted airless spray system, coating a maximum of 70 units per hour, using dry filters for particulate matter overspray control, and exhausting to stacks S1, S2, and S3.
- (b) One (1) surface coating and sanding booth, identified as EU-02, approved for construction in 2007, for applying sealer to wood products, utilizing an air assisted airless spray system, coating a maximum of 70 units per hour, using dry filters for particulate matter overspray control, and exhausting to stack S4.
- (c) One (1) surface coating booth, identified as EU-03, approved for construction in 2007, for applying topcoat to wood products, utilizing an air assisted airless spray system, coating a maximum of 70 units per hour, using dry filters for particulate matter overspray control, and exhausting to stack S5.
- (d) One (1) propane gas-fired air make-up unit, identified as H1, approved for construction in 2007, with a maximum heat input capacity of 6 MMBtu per hour.
- (e) One (1) diesel-fired generator, identified as G1, approved for construction in 2007, rated at 0.445 MMBtu per hour.
- (f) One (1) propane gas-fired boiler, identified as H2, approved for construction in 2007, rated at 0.6 MMBtu per hour.

### Existing Approvals

There are no previous approvals issued to this source.

### Enforcement Issue

There are no enforcement issues pending.

### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
S1	Paint Booth	n/a	n/a	20,000	70
S2	Paint Booth	n/a	n/a	20,000	70
S3	Paint Booth	n/a	n/a	20,000	70
S3	Paint Booth	n/a	n/a	20,000	70
S4	Paint Booth	n/a	n/a	20,000	70

### Emission Calculations

See Appendix A of this document for detailed emission calculations (Appendix A, pages 1 through 3).

### Potential to Emit of the Source Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, 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.”

The following table reflects the PTE of the entire source potential before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit:

Pollutant	Potential to Emit (tons/year)
PM	12.53
PM10	12.53
SO <sub>2</sub>	0.01
VOC	67.70
CO	0.57
NO <sub>x</sub>	4.15

HAPs	Potential to Emit (tons/year)
1,3 Butadiene	7.62E-05
Xylene	2.23
Acetaldehyde	1.49E-03
Acrolein	1.80E-04
Benzene	1.82E-03
Ethylbenzene	0.95
Formaldehyde	.08
Toluene	9.47
Total	12.74

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of all criteria pollutants are less than 100 tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) will be issued.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is not subject to the requirements of 326 IAC 2-7.
- (c) **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 applicability.

### County Attainment Status

The source is located in Marshall County.

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

- (a) Marshall County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) emissions and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Marshall County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) Marshall County has been classified as attainment or unclassifiable in Indiana for all other 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.
- (d) **Fugitive Emissions**  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD or Emission Offset applicability.

## Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	0.74
PM10	0.74
SO <sub>2</sub>	0.01
VOC	67.70
CO	0.57
NO <sub>x</sub>	4.15
Single HAP	<10
Combination HAPs	<25

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2) because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (b) These emissions were based on the application submitted by the Permittee on July 2, 2007, and additional information submitted on August 7, 2007 and August 20, 2007, and the potential to emit calculations for the source (see Appendix A).
- (c) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward the determination of Part 70 applicability.

## Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons per year.

This is the first air approval issued to this source.

## Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR 60) included in this permit for this source.
- (b) The National Emission Standards for Hazardous Air Pollutants for Wood Surface Coatings operations (40 CFR 63, Subpart JJ, 326 IAC 20-14-1) are not included in this permit, because this source is not a major source of HAPs as defined in 40 CFR 63.2
- (c) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this permit for this source.

### **State Rule Applicability – Entire Source**

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

This existing source is not a major stationary source, under PSD (326 IAC 2-2) because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

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

The operation of MJ finishing facility 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, it is not subject to the provisions of 326 IAC 2-4.1.

#### **326 IAC 2-6 (Emission Reporting)**

This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit under 326 IAC 2-7 (Part 70 Program), it is not located in Lake or Porter County, and it does not emit lead at levels equal to or greater than five (5) tons per year.

#### **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.

#### **326 IAC 6-4 (Fugitive Dust Emissions)**

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.

### **State Rule Applicability - Spray Booths EU-01,EU-02, EU-03**

#### **326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)**

This rule applies to surface coating of wood furnishings, including cabinets (kitchen, bath, and vanity), tables, beds, chairs, sofas (nonupholstered), art objects, and any other coated furnishings made of solid wood, wood composition, or simulated wood material. The surface coating booths EU-01, EU-02, EU-03 are each subject to 326 IAC 8-2-12, since they each are a facility of the type described in 326 IAC 8-2-12, the source to be constructed after July 1, 1990, and emission units EU-02, and EU-03 will have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls. Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the Permittee shall perform surface coating of wood furniture and cabinets, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) or more of the following application systems:

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

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system. Since each of the surface coating booths uses air assisted airless spray, it is in compliance with 326 IAC 8-2-12.

**326 IAC 8-11-3 (Volatile Organic Compounds, Wood Furniture and Cabinet Coatings)**

The requirements of 326 IAC 8-11-3 are not applicable to this source, since this source is not located in Lake, Porter, Clark, or Floyd County.

**326 IAC 8**

There are no other 326 IAC 8 Rules that are applicable to surface coating booths EU-01, EU-02, and EU-03.

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

Pursuant to 326 IAC 6-3-2(d), particulate from surface coating booths EU01, EU02, and EU03, shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

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

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

**State Rule Applicability – Propane Gas-Fired Units**

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

Pursuant to 326 IAC 6-3-1(b)(14), the propane gas-fired air make-up unit, identified as H1, and boiler, identified as H2, are each not subject to the requirements of 326 IAC 6-3-2, because pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight. In addition, the propane gas-fired air make-up unit and boiler are each not subject to the requirements of 326 IAC 6-3-2 because the particulate emissions from these units are less than 0.551 pounds per hour.

**326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)**

- (a) The propane gas-fired air make-up unit, identified as H1, is not subject to the provisions of 326 IAC 6-2-4 (Emission Limitations for Sources of Indirect Heating) because it is not a source of indirect heating.
- (b) The propane gas-fired boiler, identified as H2, is subject to the requirements of 326 IAC 6-2-4, because it is a source of indirect heating. Pursuant to 326 IAC 6-2-4, the particulate matter emissions shall not exceed 0.6 lb/MMBtu, since it has a maximum operating capacity rating of less than 10 MMBtu/hr and began construction after September 21, 1983.

### **State Rule Applicability – Diesel Fired Generator**

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

The diesel-fired generator, identified as G1, is not subject to the requirements of 326 IAC 6-3-2, because pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight. In addition, pursuant to 326 IAC 6-3-1(b)(14), the diesel fired generator is not subject to the requirements of 326 IAC 6-3-2 because the particulate emissions from the unit is less than 0.551 pounds per hour.

#### **326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)**

The diesel-fired generator, identified as G1, is not subject to the provisions of 326 IAC 6-2-4 (Emission Limitations for Sources of Indirect Heating) because this unit is not a source of indirect heating.

### **Compliance Monitoring Requirements**

There are no Compliance Monitoring Requirements.

### **Recommendation**

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

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

An application for the purposes of this review was received on July 2, 2007, with additional information received on August 17, 2007, and August 20, 2007.

### **Conclusion**

The operation of this stationary wood furniture and cabinets surface coating plant shall be subject to the conditions of the New Source Construction and Minor Source Operating Permit No. 099-24980-00104.

**Appendix A: Emissions Calculations  
Emission Summary**

**Company Name: MJ Finishing  
Address : 5311 E County Line Rd, Bremen, Indiana 46506  
MSOP No.: M099-24980-00104  
Reviewer: Swarna Prabha**

Category	Uncontrolled Potential Emissions (tons/year)				
	Emissions Generating Activity				
	Pollutant	Diesel-Gen G1 Diesel Fired	Boiler H2, Air Make-Up unit H1-Propane Fired	Spray Booths Wood Surface Coatings EU-01,EU-02,EU-03	TOTAL
Criteria Pollutants	PM	0.0	0.12	12.40	12.53
	PM10	0.0	0.12	12.40	12.53
	SO2	0.0	0.01		0.01
	NOx	0.0	4.15		4.15
	VOC		0.16	67.54	67.70
	CO	0.0	0.57		0.57
Hazardous Air Pollutant	1,3-Butadiene	7.62E-05			7.62E-05
	Acetaldehyde	1.49E-03			1.5E-03
	Xylenes	5.55E-04		2.23	2.23
	Toluene	7.97E-04		9.47	9.47
	Benzene	1.82E-03			1.82E-03
	Acrolein	1.80E-04			1.80E-04
	Ethylbenzene			0.95	0.95
	Formaldehyde	2.30E-03		0.08	0.08
	<b>Totals</b>	<b>7.22E-03</b>		<b>12.73</b>	<b>12.74</b>

Total emissions based on rated capacity at 8,760 hours/year.

Category	Controlled Potential Emissions (tons/year)				
	Emissions Generating Activity				
	Pollutant	Diesel-Gen G1 Diesel Fired	Boiler H2, Air Make-Up unit H1-Propane Fired	Spray Booths Wood Surface Coatings EU-01,EU-02,EU-03	TOTAL
Criteria Pollutants	PM	0.0	0.12	0.62	0.74
	PM10	0.0	0.12	0.62	0.74
	SO2	0.0	0.01		0.01
	NOx	0.0	4.15		4.15
	VOC		0.16	67.54	67.70
	CO	0.0	0.57		0.57
Hazardous Air Pollutants	1,3-Butadiene	7.62E-05			7.62E-05
	Acetaldehyde	1.49E-03			1.49E-03
	Xylenes	5.55E-04		2.23	2.23
	Toluene	7.97E-04		9.47	9.47
	Benzene	1.82E-03			1.82E-03
	Acrolein	1.80E-04			1.80E-04
	Ethylbenzene			0.95	0.95
	Formaldehyde	2.30E-03		0.08	0.08
	<b>Totals</b>	<b>7.22E-03</b>		<b>12.73</b>	<b>12.74</b>

**Appendix A: Emission Calculations**  
**VOC and Particulate Emissions from Surface Coating Operations**  
**Hazardous Air Pollutants (HAPs)**

**Company Name: MJ Finishing**  
**Address: 5311 E County Line Rd, Bremen, Indiana 46506**  
**MSOP No. : M099-24980-00104**  
**Reviewer: Swarna Prabha**

**Spray Booths (EU-01, EU-02, EU-03)**

Material	Density (lbs/gal)	Weight % Water	Weight % VOC	Weight % Solids	Maximum Capacity (unit/hr)	Maximum Capacity (gal/unit)	Maximum Usage * (gals/hour)	VOC (lbs/gal)	PTE of VOC (lbs/hour)	PTE of VOC (lbs/day)	Actual Emissions of VOC*** (lbs/day)	PTE of VOC (tons/year)	PTE PM/PM10 (lbs/hr)	PTE of PM/PM10 Before Controls (tons/year)	PTE of PM/PM10 After Controls (tons/year)	Transfer Efficiency**
<b>Stain Booth 1 (EU-01)</b>																
Stain Blend 4002(FMDS-11)	6.96	0.0%	76.58%	23.4%	70	0.0083	0.581	5.33	3.10	74.32	24.77	13.56	0.95	1.45	0.073	65%
<b>Seal &amp; Sand Booth 2 (EU-02)</b>																
Low VOC Catalyzed sealer	7.93	0.0%	62.96%	37.04%	70	0.0167	1.169	4.99	5.84	140.08	46.69	25.56	3.43	5.26	0.263	65%
<b>Top Coat Booth 3 (EU-03)</b>																
Aristovar HV Topcoat	7.84	0.0%	59.53%	40.5%	70	0.0167	1.169	4.67	5.46	130.94	43.65	23.90	3.71	5.69	0.284	65%
<b>Solvent Usage(EU-01,EU-02,EU-03)</b>																
Wash Thinner -2739	<b>7.02</b>	0.0%	100.00%	0.00%	70	0.002	0.147	7.02	1.03	24.77	8.26	4.52	0.00	0.0	0.00	100%
<b>Totals</b>									<b>15.42</b>	<b>370.11</b>	<b>123.37</b>	<b>67.54</b>	<b>8.09</b>	<b>12.40</b>	<b>0.620</b>	

**Dry Filter Control Efficiency =	95.0%
Worst Case Coating PTE (After Controls) =	0.620

<b>HAPs</b>															
Material	Density (lbs/gal)	Maximum Capacity (gal/unit)	Maximum Usage * (gals/hour)	Weight % Toluene	Weight % Xylene	Weight % Ethylbenzene	Weight % Formaldehyde	Weight % MEK	PTE of Toluene (tons/yr)	PTE of MEK (tos/yr)	PTE of Ethylbenzene (tons/yr)	PTE of Formaldehyde (tons/yr)	PTE of Xylene (tons/yr)	Total PTE of HAPs	
<b>Stain Booth 1 (EU-01)</b>															
Stain Blend 4002(FMDS-11)	6.96	0.0083	0.581	0.0%	0.0%	0.0%	0.0%	0%	0.0	0.0	0.0	0.0	0.0	0.00	
<b>Seal &amp; Sand Booth 2 (EU-02)</b>															
Low VOC Catalyzed sealer	7.93	0.0167	1.169	10.19%	1.11%	0.39%	0.11%	0%	4.137	0.0	0.158	0.045	0.451	4.79	
<b>Top Coat Booth 3 (EU-03)</b>															
Aristovar HV Topcoat	7.84	0.0167	1.169	6%	4.44%	1.97%	0.09%	0%	2.605	0.0	0.791	0.036	1.782	5.21	
<b>Solvent Usage(EU-01,EU-02,EU-03)</b>															
Wash Thinner -2739	7.69	0.002	0.147	55.00%	0.0%	0.0%	0.0%	20%	2.723	0.990	0.0	0.0	0.0	3.71	
<b>Total PTE Of HAPs</b>									<b>9.466</b>	<b>0.990</b>	<b>0.949</b>	<b>0.081</b>	<b>2.233</b>	<b>13.72</b>	

<b>Worst Case PTE HAPs</b>	<b>9.470</b>
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\* Maximum Usage as reported by source, based on materials used during an actual production run. Operator applies stain, sealer and topcoat to the wood furniture in sequence to produce the finished product.  
 \*\*Assume transfer efficiency of 65% for air assisted airless spray guns and control efficiency of 95% for dry filters.  
 \*\*\*Anticipated actual hours of operation assumed = 2000 hrs, 8 hours per day, 5 days per week, and 50 weeks per year

**METHODOLOGY**

VOC (lbs/gal) = Density (lbs/gal) x Weight % VOC (%)  
 PTE of PM/PM10 Before Controls (tons/year) = Density (lbs/gal) x Weight % Solids x Maximum Usage (gals/hour) x 8760 (hours/year) x 1 ton/2000 lbs x (1 - Transfer Efficiency %)  
 HAPS emission rate (tons/yr) = [Maximum Usage (lb/hr)] \* [Weight % HAP] \* [8760 hours/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 of VOC per Gallon Coating = [Density (lb/gal)] \* [Weight % VOCs]  
 PTE of VOC (lbs/hr) = [Maximum Usage (lbs/hr)] \* [Weight % VOCs]  
 PTE of VOC (lbs/day) = [PTE of VOC (lbs/hr)] \* [24 hours/day]  
 PTE of VOC (tons/yr) = [PTE of VOC (lbs/day)] \* [(365 days/yr)] \* [1 ton/2000 lbs]  
 PTE of PM/PM10 (tons/yr) = [Density (lbs/gal)] \* [Maximum Usage (gal/day)] \* [(Weight % Solids)] \* [1 - Transfer efficiency]] \* [365 days/yr] \* [1 ton/2000 lbs]  
 Pounds VOC per Gallon of Solids = [Density (lbs/gal)] \* [Weight % VOCs] / [Volume % solids]  
 The Permittee coats 70 units of furniture per hour. Average unit weighs approximately 15 pounds. Average finished unit is 8 square feet

**Appendix A: Emission Calculations**  
**Combustion Emissions from the Air Make-up unit, Radiant Heat Boiler, Diesel Generator**

**Company Name: MJ Finishing**  
**Address: 5311 E County Line Rd, Bremen, Indiana 46506**  
**MSOP No.: M099-24980-00104**  
**Reviewer: Swarna Prabha**

Description	Heat Input Capacity (MMBtu/hr)	Total Max. Potential Throughput (10 <sup>3</sup> gal/yr)
Air Make-up Unit H1-Propane Fired	6.0	574.4
Boiler H2-Propane Fired	0.6	57.4
Diesel-Generator G1-Diesel Fired	0.445	

Description	Pollutant Emission Factors					
	PM	PM10*	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOC
Propane Fired -LPG Combustion (lbs/10 <sup>3</sup> gal)	0.40	0.40	0.02	14.00	1.9	0.50
Diesel Fuel (lbs / MMBtu)	0.310	0.310	0.290	4.41	0.95	
Potential To Emit (tons/yr)						
Emission Unit ID	PM*	PM10	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOC
Air Make-up Unit H1-Propane Fired	0.11	0.11	0.006	4.02	0.55	0.144
Boiler H2-Propane Fired	0.01	0.01	0.008	0.13	0.03	0.014
Diesel-Generator G1-Diesel Fired	0.00	0.00	0.00	0.00	0.00	
<b>Total PTE</b>	<b>0.12</b>	<b>0.12</b>	<b>0.014</b>	<b>4.15</b>	<b>0.57</b>	<b>0.16</b>

Hazardous Air Pollutants (HAPs)	Pollutant Emission Factors						
	Benzene	Xylenes	Formaldehyde	Acetaldehyde	Toluene	Acrolein	1,3-Butadiene
Emission Factor (lbs / MMBtu)	9.33E-04	2.85E-04	1.18E-03	7.67E-04	4.1E-04	9.25E-05	3.91E-05
Potential To Emit (tons/yr)							
Emission Unit ID	Benzene	Xylenes	Formaldehyde	Acetaldehyde	Toluene	Acrolein	1,3-Butadiene
Diesel-Generator G1-Diesel Fired	1.8E-03	5.6E-04	2.3E-03	1.5E-03	8.0E-04	1.8E-04	7.6E-05
<b>Totals</b>	<b>1.8E-03</b>	<b>5.5E-04</b>	<b>2.3E-03</b>	<b>1.5E-03</b>	<b>8.0E-04</b>	<b>1.8E-04</b>	<b>7.6E-05</b>

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

Emission Factors are from AP 42, Chapter 1.5, Table 1.5-1 SCC#1-03-010-02, and Chapter 3.3 Table 3.3-1, SCC#2-03-001-01, and Table 3.3-2

The seven highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 3.3 Table 3.3-1, SCC#

Propane sulfur content assumed = 0.2 gr / 100 ft<sup>3</sup>

91.5 MMBtu Of Propane = 10<sup>3</sup> gal

**Methodology**

Potential Throughput ( 10<sup>3</sup> gal/yr ) = Heat Input Capacity (MMBtu/hr) \* [ 8,760 hours/yr ] \* [10<sup>3</sup> gal/ ( 91.5 MMBtu) ]

Emission (tons/yr) =[Throughput (10<sup>3</sup> gal/yr)] \* [Emission Factor ( lbs/10<sup>3</sup> gal ) / (2,000 lbs/ton)]

HAPS emission rate (tons/yr) = [Heat Input Capacity (MMBtu/hr)] \* [8,760 hours/yr] \* [1 ton/2,000 lbs]

All emission factors are based on normal firing.

**Abbreviations**

PM = Particulate Matter

PM10 = Particulate Matter (<10 um)

SO<sub>2</sub> = Sulfur Dioxide

Nox = Nitrous Oxide

VOC = Volatile Organic Compounds

CO = Carbon Monoxide

MMBtu = 1,000,000 Btu