



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: May 19, 2008

RE: Lambright Woodworking / 087-25620-00020

FROM: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot12/03/07



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

Minor Source Operating Permit OFFICE OF AIR QUALITY

**Lambright Woodworking, LLC
7785 W. 300 South
Topeka, Indiana 46571**

(herein known as the Permittee) is hereby authorized to 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 2-6.1 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.: M087-25620-00020	
Original signed by:	Issuance Date: May 19, 2008
Matthew Stuckey, Branch Chief Permits Branch Office of Air Quality	Expiration Date: May 19, 2013

TABLE OF CONTENTS

A. SOURCE SUMMARY.....	4
A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]	
A.2 Emission Units and Pollution Control Equipment Summary	
B. GENERAL CONDITIONS	6
B.1 Definitions [326 IAC 2-1.1-1]	
B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.3 Term of Conditions [326 IAC 2-1.1-9.5]	
B.4 Enforceability	
B.5 Severability	
B.6 Property Rights or Exclusive Privilege	
B.7 Duty to Provide Information	
B.8 Certification	
B.9 Annual Notification [326 IAC 2-6.1-5(a)(5)]	
B.10 Preventive Maintenance Plan [326 IAC 1-6-3]	
B.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]	
B.13 Permit Renewal [326 IAC 2-6.1-7]	
B.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]	
B.15 Source Modification Requirement	
B.16 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2] [IC 13-17-3-2][IC 13-30-3-1]	
B.17 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]	
B.18 Annual Fee Payment [326 IAC 2-1.1-7]	
B.19 Credible Evidence [326 IAC 1-1-6]	
C. SOURCE OPERATION CONDITIONS	11
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]	
C.2 Permit Revocation [326 IAC 2-1.1-9]	
C.3 Opacity [326 IAC 5-1]	
C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.6 Fugitive Dust Emissions [326 IAC 6-4]	
C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
Testing Requirements [326 IAC 2-6.1-5(a)(2)]	
C.8 Performance Testing [326 IAC 3-6]	
Compliance Requirements [326 IAC 2-1.1-11]	
C.9 Compliance Requirements [326 IAC 2-1.1-11]	
Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]	
C.10 Compliance Monitoring [326 IAC 2-1.1-11]	
C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]	
C.12 Instrument Specifications [326 IAC 2-1.1-11]	
Corrective Actions and Response Steps	
C.13 Actions Related to Noncompliance Demonstrated by a Stack Test	
C.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]	

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]
C.15 Malfunctions Report [326 IAC 1-6-2]
C.16 General Record Keeping Requirements [326 IAC 2-6.1-5]
C.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2]
[IC 13-14-1-13]

D.1. EMISSIONS UNIT OPERATION CONDITIONS..... 17

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]
D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]
D.1.2 Hazardous Air Pollutants [326 IAC 2-4.1-1] [327 IAC 2-7]
D.1.3 Particulate Matter [326 IAC 6-3]
D.1.4 Preventive Maintenance Plan

D.2. EMISSIONS UNIT OPERATION CONDITIONS..... 18

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]
D.2.1 Particulate Matter [326 IAC 6-3]

D.3. EMISSIONS UNIT OPERATION CONDITIONS..... 19

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]
D.3.1 Particulate Matter [326 IAC 6-2]

Annual Notification 20
Malfunction Report 21

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 wood furniture and cabinets manufacturing plant.

Source Address:	7785 W. 300 South, Topeka, Indiana 46571
Mailing Address:	7785 W. 300 South, Topeka, Indiana 46571
General Source Phone Number:	(260) 593-2721
SIC Code:	2434
County Location:	LaGrange
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) Two (2) paint booths, identified as SB1 and SB2, with a maximum capacity at each spray booth of one (1) unit per hour, each equipped with one (1) air-assisted airless paint spray application system for wood furniture and cabinet coating, using dry filters for overspray control, constructed in 1995 and 2000, respectively, and exhausting to stacks identified as S1 and S2, respectively.
- (b) One (1) woodworking operation, identified as WW, with an average particulate matter (PM) generation rate of 8.2 pounds per hour, controlled by one (1) return-air pulse-jet baghouse dust collector, identified as WWDC1, constructed in 1995.
- (c) One (1) diesel-fired air compressor, identified as DC1, rated at 0.382 million British thermal units per hour (mmBtu/hour), constructed in 2007, and exhausting through stack identified as SVDC 1.
- (d) Two (2) propane-fired space heaters, identified as H1 and H2, rated at 0.015 mmBtu/hr and 0.026 mmBtu/hr, respectively, and exhausting through stacks SVH1 and SVH2.
- (e) One (1) propane-fired Weil McLain boiler, identified as H3, rated at 0.15 mmBtu/hr, installed in 1995, and exhausting through stack SVH3.
- (f) One (1) self-made wood stove, identified as WF1, rated at 0.60 mmBtu/hr and exhausting through stack SVH4.
- (g) One (1) diesel-fired generator, identified as DC2, rated at 0.889 mmBtu/hr, constructed in 2006, and exhausting through SVDC2.
- (h) One (1) back-up diesel-fired generator, identified as DC3, rated at 0.750 mmBtu/hr, serving as back-up for DC2, and exhausting through SVDC3.

- (i) One (1) propane-fired air makeup unit, identified as AM1, rated at 1.30 mmBtu/hr, constructed in 2007, and exhausting through stack SVAM1.

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, M087-25620-00020, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

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

B.8 Certification

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

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

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

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall 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.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M087-25620-00020 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least ninety (90) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the

document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

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

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

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

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

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

B.15 Source Modification Requirement

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

**B.16 Inspection and Entry
[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]**

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

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

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

The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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

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

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

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

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

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

C.12 Instrument Specifications [326 IAC 2-1.1-11]

- (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 Actions Related to Noncompliance Demonstrated by a Stack Test

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

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

C.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation
 - (2) recording that operations returned to normal without operator action (such as

- through response by a computerized distribution control system); or
- (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
- (1) monitoring results;
 - (2) review of operation and maintenance procedures and records;
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
- (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

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

C.15 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.16 General Record Keeping Requirements [326 IAC 2-6.1-5]

-
- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring

sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

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

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

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

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) 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) Two (2) paint booths, identified as SB1 and SB2, with a maximum capacity at each spray booth of one (1) unit per hour, each equipped with one (1) air-assisted airless paint spray application system for wood furniture and cabinet coating, using dry filters for overspray control, constructed in 1995 and 2000, respectively, and exhausting to stacks identified as S1 and S2, respectively.

(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, the surface coating applied to wood furniture and cabinets shall utilize one or more of the following application methods:

- (1) Airless spray application system
- (2) Air-assisted airless spray application system
- (3) Electrostatic spray application system
- (4) Electrostatic bell or disc application system
- (5) Heated airless spray application system
- (6) Roller coat
- (7) Brush or wipe application system
- (8) Dip-and-drain application system

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 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1] [326 IAC 2-7]

Any change or modification that would increase the potential to emit of a single HAP to 10 tons per year or more, or the combination of HAPs to 25 tons per year or more, shall require prior approval from the Office of Air Quality (OAQ), as required by 326 IAC 2-1.1, before such change can occur.

D.1.3 Particulate Matter (PM) [326 IAC 6-3]

- (a) Particulate from the surface coating operation shall be controlled by a dry particulate filter, waterwash or an equivalent control device, and the Permittee shall operate the 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.1.4 Preventive Maintenance Plan

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

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) woodworking operation, identified as WW, with an average particulate matter (PM) generation rate of 8.2 pounds per hour, controlled by one (1) return-air pulse-jet baghouse dust collector, identified as WWDC1, constructed in 1995.

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

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

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

Pursuant to 326 IAC 6-3-2(e)(2), the particulate from the woodworking operation shall not exceed 0.551 pounds per hour when the process weight rate is less than 100 pounds per hour.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) propane-fired Weil McLain boiler, identified as H3, rated at 0.15 mmBtu/hr, installed in 1995, and exhausting through stack SVH3.

(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.3.1 Particulate Matter (PM) [326 IAC 6-2]

Pursuant to 326 IAC 6-2-4, the particulate emissions from the Weil McLain propane-fired boiler constructed after September 21, 1983, shall not exceed 0.6 lb/mmBtu.

**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:	Lambright Woodworking, LLC
Address:	7785 W. 300 South
City:	Topeka, Indiana 46571
Phone #:	(260) 593-2721
MSOP #:	M087-25620-00020

I hereby certify that Lambright Woodworking, LLC is :

still in operation.

no longer in operation.

I hereby certify that Lambright Woodworking, LLC is :

in compliance with the requirements of MSOP M087-25620-00020.

not in compliance with the requirements of MSOP M087-25620-00020.

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 ?____, 100 TONS/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 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**

Addendum to the Technical Support Document (ATSD) for a
Minor Source Operating Permit (MSOP)

Source Background and Description
--

Source Name:	Lambright Woodworking, LLC
Source Location:	7785 W. 300 South, Topeka, Indiana 46571
County:	LaGrange
SIC Code:	2434
Operation Permit No.:	M087-25620-00020
Permit Reviewer:	Anne-Marie C. Hart

On April 11, 2008, the Office of Air Quality (OAQ) had a notice published in the LaGrange Standard, LaGrange, Indiana, stating that Lambright Woodworking, LLC had applied for a Minor Source Operating Permit to operate a stationary wood furniture and cabinets manufacturing plant. The notice also stated that the OAQ proposed to issue a Minor Source Operating Permit 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.

Comments and Responses

On April 23, 2008, Doug Elliot, on behalf of Lambright Woodworking, LLC, submitted comments to IDEM, OAQ on the draft Minor Source Operating Permit.

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. The comments and revised permit language are provided below with deleted language as ~~strikeouts~~ and new language **bolded**.

Comment 1:

The dust collector serving the woodworking operation is a return air system controlling a calculated average of 8.2 pounds of dust per hour. Please revise this language as follows:

- (b) One (1) woodworking operation, identified as WW, with an average particulate matter (PM) generation rate of 8.2 pounds per hour, controlled by one (1) return-air pulse-jet baghouse dust collector, identified as WWDC1, constructed in 1995.

Response to Comment 1:

IDEM agrees with the recommended changes. The permit has been revised as follows in sections A.2 and D.2:

A.2 Emission Units and Pollution Control Equipment Summary

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

. . .

- (b) One (1) woodworking operation, identified as WW, with ~~a maximum process throughput weight~~ **an average particulate matter (PM) generation rate** of 8.2 pounds per hour, ~~using one (1) pulse-jet baghouse dust collector for particulate control~~ **controlled by one (1) return-air pulse-jet baghouse dust collector, identified as WWDC1**, constructed in 1995, ~~and exhausting through one stack identified as S3.~~
- . . .

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) woodworking operation, identified as WW, with ~~a maximum process throughput weight~~ **an average particulate matter (PM) generation rate** of 8.2 pounds per hour, ~~using one (1) pulse-jet baghouse dust collector for particulate control~~ **controlled by one (1) return-air pulse-jet baghouse dust collector, identified as WWDC1**, constructed in 1995, ~~and exhausting through one stack identified as S3.~~

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

IDEM Contact

- (a) Questions regarding this proposed Minor Source Operating Permit can be directed to Anne-Marie C. Hart at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5401 or toll free at 1-800-451-6027 extension 4-5401.
- (b) A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	Lambright Woodworking, LLC
Source Location:	7785 W. 300 South, Topeka, Indiana 46571
County:	LaGrange
SIC Code:	2434
Permit Renewal No.:	M087-25620-00020
Permit Reviewer:	Anne-Marie C. Hart

The Office of Air Quality (OAQ) has reviewed the operating permit application from Lambright Woodworking, LLC relating to the operation of a stationary wood furniture and cabinets manufacturing plant.

History

On December 5, 2007, Lambright Woodworking, LLC submitted an application to the OAQ requesting to transition its operating permit from a Part 70 Operating Permit to a Minor Source Operating Permit. Lambright Woodworking, LLC was issued a Part 70 Operating Permit (T087-21455-00020) on June 21, 2006. Operational and process changes at Lambright Woodworking, LLC allow for a significant reduction in the potential to emit criteria pollutants and hazardous air pollutants resulting in potential emissions less than major levels. Specifically, Lambright Woodworking, LLC has eliminated the use of a cleaning solvent containing high amounts of hazardous air pollutants and changed their surface coating materials to those with low VOC content. These changes allow for Lambright Woodworking, LLC to obtain a Minor Source Operating Permit.

Permitted Emission Units and Pollution Control Equipment

- (a) Two (2) paint booths, identified as SB1 and SB2, with a maximum capacity at each spray booth of one (1) unit per hour, each equipped with one (1) air-assisted airless paint spray application system for wood furniture and cabinet coating, using dry filters for overspray control, constructed in 1995 and 2000, respectively, and exhausting to stacks identified as S1 and S2, respectively.
- (b) One (1) woodworking operation, identified as WW, with a maximum process throughput weight of 8.2 pounds per hour, using one (1) pulse-jet baghouse dust collector for particulate control, constructed in 1995, and exhausting through one stack identified as S3.
- (c) One (1) diesel-fired air compressor, identified as DC1, rated at 0.382 million British thermal units per hour (mmBtu/hour), constructed in 2007, and exhausting through stack identified as SVDC 1.
- (d) Two (2) propane-fired space heaters, identified as H1 and H2, rated at 0.015 mmBtu/hr and 0.026 mmBtu/hr, respectively, and exhausting through stacks SVH1 and SVH2.
- (e) One (1) propane-fired Weil McLain boiler, identified as H3, rated at 0.15 mmBtu/hr, installed in 1995, and exhausting through stack SVH3.
- (f) One (1) self-made wood stove, identified as WF1, rated at 0.60 mmBtu/hr and exhausting through stack SVH4.

- (g) One (1) diesel-fired generator, identified as DC2, rated at 0.889 mmBtu/hr, constructed in 2006, and exhausting through SVDC2.
- (h) One (1) back-up diesel-fired generator, identified as DC3, rated at 0.750 mmBtu/hr, serving as back-up for DC2, and exhausting through SVDC3.
- (i) One (1) propane-fired air makeup unit, identified as AM1, rated at 1.30 mmBtu/hr, constructed in 2007, and exhausting through stack SVAM1.

Existing Approvals

Since the issuance of the Part 70 Operating Permit T087-21455-00020 on June 21, 2006, the source has constructed or has been operating under the following approvals as well:

- (a) Minor Source Modification No. 067-24132-00020 issued on June 22, 2007.

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

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, were not incorporated into this Minor Source Operating Permit:

- (a) All construction conditions from all previously issued permits.

Reason not incorporated: All facilities previously permitted have already been constructed; therefore, the construction conditions are no longer necessary as part of the operating permit. Any facilities that were previously permitted but have not yet been constructed would need new pre-construction approval before beginning construction.

- (b) 40 CFR 63, Subpart JJ, National Emission Standard for Hazardous Air Pollutants for Wood Furniture Manufacturing

Reason not incorporated: This source has replaced their previous cleaning solvent to one with no hazardous air pollutants. This change in operation has reduced the source-wide HAP emissions to less than major levels. Therefore, the requirements of this NESHAP no longer apply to the source and thus not included in the permit.

Emission Calculations

See Appendix A (pages 1 through 7) of this document for detailed emission calculations.

County Attainment Status

The source is located in LaGrange County

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM _{2.5} .	

- (a) Ozone Standards
 - (1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
 - (2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, St. Joseph as attainment for the 8-hour ozone standard.
 - (3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.
 - (4) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. LaGrange County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) LaGrange County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions.
- (c) Other Criteria Pollutants
LaGrange County has been classified as attainment or unclassifiable in Indiana for CO, PM₁₀, SO₂, NO₂. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) Fugitive Emissions
 - (1) The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.
 - (2) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Unrestricted Potential Emissions

Page 1 of 7 Appendix A of this TSD lists a summary of the unrestricted potential emissions of the source.

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of all criteria pollutants is less than 100 tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP

- (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/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.

Potential to Emit After Issuance

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

Process/ Emission Unit	Potential To Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Booth 1	1.85	1.85	0.00	15.88	0.00	0.00	10.85 combined HAPs 4.35 "Worst Case" Individual HAP (Xylene)
Booth 2	1.85	1.85	0.00	15.88	0.00	0.00	10.85 combined HAPs 4.35 "Worst Case" Individual HAP (Xylene)
Woodworking Operations	0.23	0.23	0.00	0.00	0.00	0.00	0.00
Propane Combustion	Negligible	Negligible	Negligible	Negligible	0.14	1.00	0.00
Wood Combustion	1.05	0.99	Negligible	Negligible	1.58	1.29	Negligible
Diesel Combustion	1.73	1.73	1.61	2.00	5.29	24.55	0.00
Total Emissions	6.74	6.68	1.63	33.83	7.01	26.84	21.79 Total Combined HAPs 8.71 "Worst Case" Individual HAP (Xylene)

This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

- (b) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc, are not included in the permit for the Weil-McLain propane-fired boiler. The maximum heat capacity is less than ten (10) million British thermal units per hour (mmBtu/hr).
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Wood Furniture Manufacturing Operations, 40 CFR 63, Subpart JJ, are not included in the permit for the wood furniture manufacturing process. The source is not a major source of hazardous air pollutants.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Plywood and Composite Wood Products, 40 CFR 63, Subpart DDDD are not included in the permit for the wood furniture manufacturing process. The source is not a plywood and composite wood products manufacturing facility.

State Rule Applicability - Entire Source

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

The potential to emit of all criteria pollutants is less than two hundred fifty (250) tons per year and it is not one of the twenty-eight (28) source categories. Therefore, the source is not subject to the provisions of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)).

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

This source has discontinued the use of a cleaning solvent containing high amounts of hazardous air pollutants and changed to a HAP-free cleaning solvent. This change has reduced the source-wide potential to emit HAP from major to minor levels. Therefore, this source is no longer a major source of hazardous air pollutants (HAPs). The potential to emit a single HAP is less than ten (10) tons per year from the entire source and the potential to emit any combination of HAPs is less than twenty-five (25) tons per year from the entire source. Therefore, the provisions of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAPs)) are no longer applicable to this source.

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

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.

State Rule Applicability – Individual Facilities

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

Pursuant to 326 IAC 6-3-2(e)(2), the particulate from the woodworking operation shall not exceed 0.551 pounds per hour when the process weight rate is less than 100 pounds per hour. The potential to emit particulate from the woodworking operation is 0.05 pounds per hour with the use of the baghouse. Therefore, the woodworking operation will be able to comply with this limit.

The baghouse shall be in operation at all times the woodworking operation is in use, in order to comply with this limit.

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

Pursuant to 326 IAC 6-2-4, the particulate emissions from the Weil McLain propane-fired boiler constructed after September 21, 1983, shall be limited by the following equation:

$$Pt = 1.09/Q^{0.26} \quad \text{where } Pt = \text{Pounds of particulate matter emitted per million Btu (lb/mmBtu) heat input}$$

$Q = \text{Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input}$

The Weil McLain propane-fired boiler has a maximum operating capacity rating of 0.15 mmBtu/hr. Pursuant to 326 IAC 6-2-4, if the maximum operating capacity rating in million Btu per hour is less than 10 mmBtu/hr, Pt shall not exceed 0.6 lb/mmBtu. The potential to emit particulate from the Weil McLain propane-fired boiler is 0.003 tons per year. Therefore, the Weil McLain propane-fired boiler shall comply with this limit.

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

- (a) Pursuant to 326 IAC 6-3-2(d) (Particulate Emission Limitations for Manufacturing Processes), surface coating processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device.
- (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.

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

This source coats wood furniture and cabinets as described in 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating) in Booth 1 and Booth 2. Pursuant to 326 IAC 8-2-12, the surface coating applied to wood furniture and cabinets shall utilize one or more of the following application methods:

- (1) Airless spray application system
- (2) Air-assisted airless spray application system
- (3) Electrostatic spray application system

- (4) Electrostatic bell or disc application system
- (5) Heated airless spray application system
- (6) Roller coat
- (7) Brush or wipe application system
- (8) Dip-and-drain application system

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 Lambright Woodworking uses air assisted airless spray application, they are in compliance with 326 IAC 8-2-12.

Recommendation

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

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

An application for the purposes of this review was received on December 5, 2007.

Conclusion

The operation of this stationary wood furniture and cabinets manufacturing plant shall be subject to the conditions of the attached Minor Source Operating Permit No. M087-25620-00020.

**Appendix A: Emissions Calculations
Emissions Summary**

Company Name: Lambright Woodworking, LLC
Address City IN Zip: 7785 West 300 South, Topeka, Indiana 46751
Permit Number: M087-25620-00020
Plt ID: 087-00020
Reviewer: Anne-Marie C. Hart
Date: February 13, 2008

Process	tons/year						
	PM	PM ₁₀	VOC	NOx	CO	SO ₂	HAPs
Booth 1	1.85	1.85	15.88	0.00	0.00	0.00	10.85
Booth 2	1.85	1.85	15.88	0.00	0.00	0.00	10.85
Wood Working Operation							
Uncontrolled	45.67	45.37	0.00	0.00	0.00	0.00	0.00
Controlled	0.23	0.23	0.00	0.00	0.00	0.00	0.00
Propane Combustion	0.03	0.03	0.04	1.00	0.14	0.01	0.00
Wood Combustion	1.05	0.99	0.03	1.29	1.58	0.01	0.09
Diesel Combustion	1.73	1.73	2.00	24.55	5.29	1.61	0.00
Total Uncontrolled Emissions	52.18	51.82	33.83	26.84	7.01	1.63	21.79
Total Controlled Emissions	6.74	6.68	33.83	26.84	7.01	1.63	21.79

Individual HAP Emissions

tons/year							
Xylene	Toluene	Formaldehyde	Benzene	Methanol	Acrolein	Hydrogen Chloride	Styrene
8.71	4.33	0.06	4.34	4.33	0.01	0.05	0.01

"Worst Case" Individual HAP is Xylene

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

**Company Name: Lambright Woodworking, LLC
Address City IN Zip: 7785 West 300 South, Topeka, Indiana 46751
Permit Number: M087-25620-00020
Plt ID: 087-00020
Reviewer: Anne-Marie C. Hart
Date: February 13, 2008**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Booth 1																
Vinyl Primer	8.5	58.17%	0.0%	58.2%	0.0%	26.95%	0.07800	1.000	4.95	4.95	0.39	9.27	1.69	0.30	18.37	75%
Aristocoat Paint	9.5	32.48%	0.0%	32.5%	0.0%	58.25%	0.01900	1.000	3.07	3.07	0.06	1.40	0.26	0.13	5.27	75%
866 Stain	7.7	66.13%	0.0%	66.1%	0.0%	21.80%	0.12500	1.000	5.09	5.09	0.64	15.26	2.78	0.36	23.33	75%
Precatalyzed Lacquer	7.6	66.13%	0.0%	66.1%	0.0%	21.80%	0.65900	1.000	5.01	5.01	3.30	79.28	14.47	1.85	22.99	75%
3090 HAP Free Cleaner*	6.4	100.00%	0.0%	100.0%	0.0%	0.00%	0.05000	1.000	6.43	6.43	0.32	7.72	1.41	0.00	0.00	100%
Booth 2																
Vinyl Primer	8.5	58.17%	0.0%	58.2%	0.0%	26.95%	0.07800	1.000	4.95	4.95	0.39	9.27	1.69	0.30	18.37	75%
Aristocoat Paint	9.5	32.48%	0.0%	32.5%	0.0%	58.25%	0.01900	1.000	3.07	3.07	0.06	1.40	0.26	0.13	5.27	75%
866 Stain	7.7	66.13%	0.0%	66.1%	0.0%	21.80%	0.12500	1.000	5.09	5.09	0.64	15.26	2.78	0.36	23.33	75%
Precatalyzed Lacquer	7.6	66.13%	0.0%	66.1%	0.0%	21.80%	0.65900	1.000	5.01	5.01	3.30	79.28	14.47	1.85	22.99	75%
3090 HAP Free Cleaner*	6.4	100.00%	0.0%	100.0%	0.0%	0.00%	0.05000	1.000	6.43	6.43	0.32	7.72	1.41	0.00	0.00	100%

State Potential Emissions

Add worst case coating to all solvents

7.25 173.99 31.75 3.71

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

*HAP Free Cleaner = solvent

Appendix A: Emission Calculations

HAP Emission Calculations

Company Name: Lambright Woodworking, LLC
Address City IN Zip: 7785 West 300 South, Topeka, Indiana 46751
Permit Number: M087-25620-00020
Pit ID: 087-00020
Permit Reviewer: Anne-Marie C. Hart
Date: February 13, 2008

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Ethyl Benzene	Weight % Methanol	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Benzene Emissions (ton/yr)	Methanol Emissions (ton/yr)			
Booth 1																
Vinyl Primer	8.51	0.07800	1.000	0.00%	3.69%	0.00%	0.00%	0.00%	0.00	0.11	0.00	0.00	0.00	0.11		
Aristocoat Paint	9.45	0.01900	1.000	1.64%	0.00%	3.28%	0.00%	0.00%	0.01	0.00	0.03	0.00	0.00	0.04		
866 Stain	7.69	0.12500	1.000	0.00%	0.00%	0.00%	0.00%	2.00%	0.00	0.00	0.00	0.00	0.08	0.08		
Precatalyzed Lacquer	7.58	0.65900	1.000	19.90%	9.90%	0.00%	9.90%	9.90%	4.35	2.17	0.00	2.17	2.17	10.85		
Booth 2																
Vinyl Primer	8.51	0.07800	1.000	0.00%	3.69%	0.00%	0.00%	0.00%	0.00	0.11	0.00	0.00	0.00	0.11		
Aristocoat Paint	9.45	0.01900	1.000	1.64%	0.00%	3.28%	0.00%	0.00%	0.01	0.00	0.03	0.00	0.00	0.04		
866 Stain	7.69	0.12500	1.000	0.00%	0.00%	0.00%	0.00%	2.00%	0.00	0.00	0.00	0.00	0.08	0.08		
Precatalyzed Lacquer	7.58	0.65900	1.000	19.90%	9.90%	0.00%	9.90%	9.90%	4.35	2.17	0.00	2.17	2.17	10.85		
									"Worst Case" Individual HAP		8.71	4.33	0.05	4.33	4.33	
									"Worst Case" Total HAPs		21.7					

Methodology

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

"Worst Case" Individual HAP (ton/yr) = Worst Case coating for Booth 1 (tons/year) + Worst Case Coating for Booth 2 (tons/year)

**Appendix A: Emission Calculations
Woodworking Operation**

Company Name: Lambright Woodworking, LLC
Address City IN Zip: 7785 West 300 South, Topeka, Indiana 46751
Permit Number: M087-25620-00020
Pit ID: 087-00020
Permit Reviewer: Anne-Marie C. Hart
Date: February 13, 2008

Process Throughput Weight (tons/hr)	Design Maximum Air Flow Rate (acfm)	Overall Control Efficiency Rating	Design Outlet Grain Loading (gr/acf)
0.0041	7400	99.50%	0.000822

Potential to Emit Particulate

After Controls (lb/hr)	After Controls (tons/year)	Before Controls (lb/hour)	Before Controls (tons/year)
0.05	0.23	10.43	45.67

Methodology

Potential Particulate After Controls (lb/hr) = Air Flow Rate (acfm) x Grain Loading (gr/acf) x 60 (minutes/hour) x (1 lb/7000 grains)
 Potential Particulate After Controls (tons/year) = Potential Particulate After Controls (lb/hr) x 8760 (hr/year) x (1 ton/2000 lbs)
 Potential Particulate Before Controls (lb/hr) = Potential Particulate After Controls (lb/hr) x (1 - control efficiency)
 Potential Particulate Before Controls (tons/year) = Potential Particulate Before Controls (lb/hr) x 8760 (hr/year) x (1 ton/2000 lbs)

Appendix A: Emission Calculations
LPG-Propane - Industrial Boilers
(Heat input capacity: <10 MMBtu/hr)

Company Name: Lambright Woodworking, LLC
Address City IN Zip: 7785 West 300 South, Topeka, Indiana 46751
Permit Number: M087-25620-00020
Pit ID: 087-00020
Reviewer: Anne-Marie C. Hart
Date: February 13, 2008

Heat Input Capacity Potential Throughput SO₂ Emission factor = 0.10 x S
MMBtu/hr kgals/year S = Sulfur Content = 100.00 grains/100ft³

1.491

142.74

Emission Factor in lb/kgal	Pollutant					
	PM*	PM10*	SO ₂	NO _x	VOC	CO
	0.4	0.4	0.1 (0.10S)	14.0	0.5 **TOC value	1.9
Potential Emission in tons/yr	0.03	0.03	0.01	1.00	0.04	0.14

*PM emission factor is filterable PM only. PM10 emission factor is assumed to be the same as PM based on a footnote in Table 1.5-1, therefore PM10 is filterable only as well.

**The VOC value given is TOC. The methane emission factor is 0.2 lb/kgal.

Methodology

1 gallon of LPG has a heating value of 94,000 Btu

1 gallon of propane has a heating value of 91,500 Btu (use this to convert emission factors to an energy basis for propane
(Source - AP-42 (Supplement B 10/96) page 1.5-1)

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.0915 MMBtu

Emission Factors are from AP42 (Supplement B 10/96), Table 1.5-1 (SCC #1-02-010-02)

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

**Appendix A: Emissions Calculations
External Combustion Boiler
Wood Waste Combustion (uncontrolled)
Dry Wood**

Company Name: Lambright Woodworking, LLC
Address City IN Zip: 7785 West 300 South, Topeka, Indiana 46751
CP: M087-25620-00020
Pit ID: 087-00020
Reviewer: Anne-Marie C. Hart
Date: February 13, 2008

Capacity (MMBtu/hr) 0.6

	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO**
Emission Factor in lb/MMBtu	0.4	0.377	0.327	0.025	0.49	0.013	0.6
Potential Emissions in tons/yr	1.0512	0.9908	0.8594	0.0657	1.2877	0.0342	1.5768

Wet wood is considered to be greater than or equal to 20% moisture content. Dry wood is considered to be less than 20% moisture content.

*The PM10 and PM2.5 emission factors include the condensible PM emission factor of 0.017 lb/MMBtu, measured by EPA Method 202 (or equivalent) and the appropriate filterable PM emission factor, measured by EPA Method 5 (or equivalent). The PM emission factor is filterable PM measured by EPA Method 5 (or equivalent).

**The CO emission factor is for stokers and dutch ovens/fuel cells. Change the emission factor to 0.17 lb/MMBtu if the calculations are for a fluidized bed combustor.

Methodology

To convert from tons/hr capacity to MMBtu/hr capacity:

Heat Input Capacity (MMBtu/hr) = Capacity (tons/hr) x Higher Heating Value of wood fuel (Btu/lb) x (1 MMBtu/106 Btu) x 2000 lbs/1 ton

Emission Factors are from AP-42 Chapter 1.6 (revised 3/02), SCCs #1-0X-009-YY where X = 1 for utilities, 2 for industrial, and 3 for commercial/institutional; Y = 01 for bark-fired boilers, 02 for bark and wet wood-fired boilers, 03 for wet wood-fired boilers, and 08 for dry wood-fired boilers

Emissions (tons/yr) = Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8760hrs/yr x 1ton/2000lbs

HAPs Emissions Calculations

Capacity (MMBtu/hr) 0.6

	Selected Hazardous Air Pollutants				
	Acrolein	Benzene	Formaldehyde	Hydrogen Chloride	Styrene
Emission Factor in lb/MMBtu	4.0E-03	4.2E-03	4.4E-03	1.9E-02	1.9E-03
Potential Emissions in tons/yr	1.1E-02	1.1E-02	1.2E-02	5.0E-02	5.0E-03

Total HAPs 8.8E-02

Methodology

To convert from tons/hr capacity to MMBtu/hr capacity:

Heat Input Capacity (MMBtu/hr) = Capacity (tons/hr) x Higher Heating Value of wood fuel (Btu/lb) x (1 MMBtu/10⁶ Btu) x 2000 lbs/1 t

Emission Factors are from AP-42 Chapter 1.6 (revised 3/02), SCCs #1-0X-009-YY where X = 1 for utilities, 2 for industrial, and 3 for commercial/institutional; Y = 01 for bark-fired boilers, 02 for bark and wet wood-fired boilers, 03 for wet wood-fired boilers, and 08 for dry wood-fired boilers

Emissions (tons/yr) = Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8760hrs/yr x 1ton/2000lbs

These factors include the five HAPs with the highest AP-42 emission factors.

Appendix A: Emission Calculations
Internal Combustion Engines - Diesel Fuel
Turbine (>250 and <600 HP)
Reciprocating

Company Name: Lambright Woodworking, LLC
Address City IN Zip: 7785 West 300 South, Topeka, Indiana 46751
Permit Number: M087-25620-00020
Plt ID: 087-00020
Reviewer: Anne-Marie C. Hart
Date: February 13, 2008

A. Emissions calculated based on heat input capacity (MMBtu/hr)

Heat Input Capacity
MM Btu/hr

1.271

Emission Factor in lb/MMBtu	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Potential Emission in tons/yr	1.73	1.73	1.61	24.55	2.00	5.29

Methodology

Potential Throughput (hp-hr/yr) = hp * 8760 hr/yr

Use a conversion factor of 7,000 Btu per hp-hr to convert from horsepower to Btu/hr, unless the source gives you a source-specific brake-specific fuel consumption. (AP-42, Footnote a, Table 3.3-1)

Emission Factors are from AP42 (Supplement B 10/96), Table 3.3-2

Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 8760 hr/yr / (2,000 lb/ton)

Emission (tons/yr) = [Potential Throughput (hp-hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton)

*PM emission factors are assumed to be equivalent to PM10 emission factors. No information was given regarding which method was used to determine the factor or the fraction of PM10 which is condensable.