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: March 31, 2009

RE: William Hermann And Son / 097 - 26528 - 00293

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

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Minor Source Operating Permit Renewal
OFFICE OF AIR QUALITY

William Hermann & Son, Inc.
1135 South Pennsylvania Street
Indianapolis, Indiana 46225

(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.: M097-26528-00293	
Issued by: Alfred C. Dumaual, Section Chief Permits Branch Office of Air Quality	Issuance Date: March 31, 2009 Expiration Date: March 31, 2019

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary wood cabinet manufacturing facility.

Source Address:	1135 South Pennsylvania Street Indianapolis, Indiana 46225
Mailing Address:	1135 South Pennsylvania Street Indianapolis, Indiana 46225
General Source Phone Number:	(317) 637-6122
SIC Code:	2531
County Location:	Marion
Source Location Status:	Nonattainment for PM2.5 standard Attainment for all other 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) One (1) mill room (identified as emission unit ID 2), with a maximum process rate of 600 pounds of wood per hour, using a cyclone and dust collector (connected in series) as control and exhausting at stack ID 2. This facility was constructed in 1993.

(b) One (1) sanding room (identified as emission unit ID 3), with a maximum process rate of 70 pounds of wood per hour, using a cyclone as control and exhausting at stack ID 3. This facility was constructed in 1984.

(c) One (1) spray booth (identified as emission unit ID 4), with a maximum capacity of 7.97 gallons of coating per hour, and one (1) electric CCI thermal drying oven, exhausting at stack ID 4 and controlled by dry filters. This unit was installed in 1964.

(d) One (1) natural gas fired Weil-McLain boiler (identified as emission unit ID 1), with a maximum heat input capacity of 3.392 MMBtu/per hour, exhausting at stack ID 1. This unit was installed in 1996.

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, M097-26528-00293, is issued for a fixed term of ten (10) 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 and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, IN 46204-2251

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

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

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

(a) All terms and conditions of permits established prior to M097-26528-00293 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 one hundred twenty (120) 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 Administration and Support Section, 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 one hundred twenty (120) 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 Administration and Support Section, 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 Administration and Support Section, 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 due within thirty (30) calendar days of receipt of a bill from IDEM, OAQ.

(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 thirty percent (30%) 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 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on. The plan is included as Attachment A.

C.8 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
Compliance and Enforcement Branch, 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 Licensed 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 Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

C.9 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 and Enforcement Branch, 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.10 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.11 Compliance Monitoring [326 IAC 2-1.1-11]

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

C.12 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.13 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.14 Response to Excursions or Exceedances

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

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

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

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

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.17 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 or ninety (90) days of initial start-up, whichever is later.

C.18 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 and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) mill room (identified as emission unit ID 2), with a maximum process rate of 600 pounds of wood per hour, using a cyclone and dust collector (connected in series) as control and exhausting at stack ID 2. This facility was constructed in 1993.

(b) One (1) sanding room (identified as emission unit ID 3), with a maximum process rate of 70 pounds of wood per hour, using a cyclone as control and exhausting at stack ID 3. This facility was constructed in 1984.

(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 Particulate Emission Limitation [326 IAC 6-3-2]

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

(a) The allowable particulate emission rate from the mill room shall not exceed 1.83 pounds per hour when operating at a process weight rate of 600 pounds per hour.

The pounds per hour limitations were calculated with the following equation:

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

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

(b) 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 of 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. Therefore, the particulate emissions from the sanding room shall not exceed 0.551 pounds per hour.

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.1.3 Particulate Control

In order to comply with condition D.1.1, the dust collector and cyclones for particulate control shall be in operation and control emissions from the mill room and sanding room, respectively, at all times that the facilities are in operation.

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

D.1.4 Visible Emissions Notations

(a) Daily visible emission notations of the mill room and sanding room stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.5 Baghouse Inspections

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

D.1.6 Broken or Failed Bag Detection

(a) For a single compartment dust collectors controlling emissions from a process operated continuously, failed units and the associated process shall be shut down immediately until the failed unit have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section C - Response to Excursions or Exceedances).

(b) For a single compartment dust collectors controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emission unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section C - Response to Excursions or Exceedances).

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

D.1.7 Cyclone Inspections

An inspection shall be performed each calendar quarter of all cyclones controlling the woodworking operations, when exhausting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

D.1.8 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

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

D.1. Record Keeping Requirements

(a) To document compliance with Condition D.1.4, the Permittee shall maintain records of daily visible emission notations of the mill room and sanding room stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(b) To document compliance with Conditions D.1.5 and D.1.7, the Permittee shall maintain records of the results of the inspections required under Conditions D.1.5 and D.1.7.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(c) One (1) spray booth (identified as emission unit ID 4), with a maximum capacity of 7.97 gallons of coating per hour, exhausting at stack ID 4 and controlled by dry filters. This unit was installed in 1964.

(d) One (1) natural gas fired Weil-McLain boiler (identified as emission unit ID 1), with a maximum heat input capacity of 3.392 MMBtu/per hour, exhausting at stack ID 1. This unit was installed in 1996.

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

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

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

High Volume Low Pressure (HVLP) 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.2.2 Particulate [326 IAC 6-3-2(d)]

(a) Particulate from the spray booth (ID 4) shall be controlled by a dry particulate filter, 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.2.3 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating: Emission limitations for facilities specified in 326 IAC 6-2-1(d)), the PM emissions from the natural gas-fired boiler shall not exceed 0.82 pound per million Btu heat input (lb/MMBtu). This limitation was calculated using the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$ Where Q = total source capacity (MMBtu/hr)

For this unit, Q = 3.0 (MMBtu/hr).

D.2.4 Preventive Maintenance Plan [326 IAC 1-6-3]

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

MINOR SOURCE OPERATING PERMIT (MSOP) CERTIFICATION

Source Name: William Hermann & Son, Inc.
Source Address: 1135 South Pennsylvania Street, Indianapolis, Indiana 46225
Mailing Address: 1135 South Pennsylvania Street, Indianapolis, Indiana 46225
MSOP No.: M097-26528-00293

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)_____

☐ Report (specify)_____

☐ Notification (specify)_____

☐ Affidavit (specify)_____

☐ Other (specify)_____

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

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT 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:	William Hermann & Son, Inc.
Address:	1135 South Pennsylvania Street
City:	Indianapolis, Indiana 46225
Phone #:	(317) 637-6122
MSOP #:	M097-26528-00293

I hereby certify that William Hermann & Son, Inc. is :
□ still in operation.
□ no longer in operation.

I hereby certify that William Hermann & Son, Inc. is :
□ in compliance with the requirements of MSOP M097-26528-00293.
□ not in compliance with the requirements of MSOP M097-26528-00293.

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
for a Minor Source Operating Permit Renewal

Source Name:	William Hermann & Son, Inc.
Source Location:	1135 South Pennsylvania Street, Indianapolis, IN 46225
County:	Marion
SIC Code:	2531
Operating Permit No.:	M097-13572-00293
Permit Renewal No.:	M097-26528-00293
Permit Reviewer:	ERG/TDP

On February 27, 2009, the Office of Air Quality (OAQ) had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that William Hermann & Son, Inc. had proposed to renew a Minor Source Operating Permit (MSOP) to operate a stationary wood cabinet manufacturing plant. The notice also stated that OAQ proposed to issue a 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.

Upon further review, OAQ has decided to make the following changes to the MSOP Renewal. The TSD will remain as it originally appeared when published. Changes to the permit or technical support material that occur after the permit has published for public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. **Bolded** language has been added and the language with ~~strikeout~~ has been deleted.

The changes to the MSOP Renewal are as follows:

Change 1

Several of IDEM's Branches and sections have been renamed. Therefore, IDEM has updated the addresses listed in the permit. References to Permit Administration and Development Section and the Permits Branch have been changed to Permit Administration and Support Section. References to Asbestos Section, Compliance Data Section, Air Compliance Section, and Compliance Branch have been changed to Compliance and Enforcement Branch.

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

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

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	William Hermann & Son, Inc.
Source Location:	1135 South Pennsylvania Street, Indianapolis, IN 46225
County:	Marion
SIC Code:	2531
Operating Permit No.:	M097-13572-00293
Permit Renewal No.:	M097-26528-00293
Permit Reviewer:	ERG/TDP

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from William Hermann & Son, Inc. relating to the operation of a stationary wood cabinet manufacturing plant.

History

On May 13, 2008, William Hermann & Son, Inc. submitted an application to the OAQ requesting to renew its operating permit. William Hermann & Son, Inc. was issued a MSOP M097-13572-00293 on August 18, 2003.

Permitted Emission Units and Pollution Control Equipment

(a) One (1) mill room (identified as emission unit ID 2), with a maximum process rate of 600 pounds of wood per hour, using a cyclone and dust collector (connected in series) as control and exhausting at stack ID 2. This facility was constructed in 1993.

(b) One (1) sanding room (identified as emission unit ID 3), with a maximum process rate of 70 pounds of wood per hour, using a cyclone as control and exhausting at stack ID 3. This facility was constructed in 1984.

(c) One (1) spray booth (identified as emission unit ID 4), with a maximum capacity of 7.97 gallons of coating per hour, and one (1) electric CCI thermal drying oven, exhausting at stack ID 4 and controlled by dry filters. This unit was installed in 1964.

Emission Units and Pollution Control Equipment Removed From the Source

(a) One (1) natural gas fired building furnace (identified as emission unit ID 1), with a maximum heat input capacity of 3.0 MMBtu/per hour, exhausting at stack ID 1. This unit was installed in 1964.

New Emission Units and Pollution Control Equipment Added to the Source

The source has requested that the following existing emission units which were not included in the previous MSOP, with potential emissions at exempt levels (see Appendix A for emission calculations), be added to the permit:

(a) One (1) natural gas fired Weil-McLain boiler (identified as emission unit ID 1), with a maximum heat input capacity of 3.392 MMBtu/per hour, exhausting at stack ID 1. This unit was installed in 1996.

Existing Approvals

Since the issuance of the MSOP (097-13572-00293) on August 18, 2003, the source has constructed or has been operating under the following approvals as well:

(a) Notice-only Change No. 097-19940-00293 issued on November 8, 2004.

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 revised in this MSOP Renewal:

(a) D.2.1 Hazardous Air Pollutants (HAPs)
This source is not subject to the requirements of 326 IAC 2-7 (Part 70 Permit Program) because the potential to emit of a single HAP and any combination of HAPs from the entire source is less than ten (10) and twenty-five (25) tons per year, respectively. Any change or modification, which increases the potential to emit of single HAP to greater than ten (10) tons per year or any combination of HAPs to greater than twenty-five (25) tons per year, respectively, shall receive prior approval from IDEM, OAQ and OES.

Reason for removal: This condition is redundant. The requirements of this condition are covered under Condition B.20, Source Modification Requirement.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 6).

"Integral Part of the Process" Determination

In October 1993 a Final Order Granting Summary Judgment was signed by Administrative Law Judge ("ALJ") Garrettson resolving an appeal filed by Kimball Hospitality Furniture Inc. (Cause Nos. 92-A-J-730 and 92-A-J-833) related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls were necessary for the facility to produce its normal product and are integral to the normal operation of the facility, and therefore, potential emissions should be calculated after controls. Based on this ruling, potential emissions for particulate matter were calculated after consideration of the controls.

Particulate from the mill room identified as ID 2 shall be controlled by the cyclone and dust collector at all times that the woodworking operation is in operation, and the Permittee shall operate the cyclone and dust collector in accordance with manufacturer's specifications.

County Attainment Status

The source is located in Marion County.

Pollutant	Designation
SO_2	Better than national standards.

Pollutant	Designation
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
O_3	Attainment effective November 8, 2007, 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	Attainment effective July 10, 2000, for the part of Franklin Township bounded by Thompson Road on the south; Emerson Avenue on the west; Five Points Road on the east; and Troy Avenue on the north. Attainment effective July 10, 2000, for the part of Wayne Township bounded by Rockville Road on the north; Girls School Road on the east; Washington Street on the south; and Bridgeport Road on the west. The remainder of the county is not designated.

[1]Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005.
Basic Nonattainment effective April 5, 2005 for PM2.5.

(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 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.

(3) 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. Marion 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) PM2.5
Marion County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. On May 8, 2008, U.S. EPA promulgated specific New Source Review rules for PM2.5 emissions, and the effective date of these rules was July 15, 2008. Therefore, direct PM2.5 and SO_2 emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.

(c) Other Criteria Pollutants
Marion County has been classified as attainment or unclassifiable in Indiana for SO_2, CO, PM_{10}, NO_2, and Pb. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(d) Fugitive Emissions
Since this type of operation is not 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

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants is less than 100 tons per year. The source is not subject to the provisions of 326 IAC 2-7. The potential to emit of PM, PM10, and VOC exceeds 25 tons per year. Therefore, the source will be issued an MSOP.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

Actual Emissions

No previous emission data has been received from the source.

Potential to Emit 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.

	Potential To Emit (tons/year)						
Process/ Emission Unit	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_x**	**HAPs**
Mill Room	0.26	0.26	-	-	-	-	-
Sanding Room	2.44	2.44	-	-	-	-	-
Spray booth	3.26	3.26	-	< 25.0	-	-	Single HAP (Xylene) = 6.58 Total HAP = 9.74
Natural Gas Boiler	0.03	0.11	0.01	0.08	1.22	1.46	0.03
Total Emissions	5.98	6.07	0.01	< 25.1	1.22	1.46	Single HAP (Xylene) = 6.61 Total HAP = 9.77

Note: "-" emissions are negligible.

(a) 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.

(b) This existing stationary source is not major for Emission Offset because the emissions of the nonattainment pollutant, PM2.5, are less than one hundred (<100) tons per year.

(c) 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, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Federal Rule Applicability

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

(b) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60.40c, Subpart Dc, are not included in the permit for the natural gas-fired Weil-McLain boiler . This unit has a maximum heat input capacity of less than 10 MMBtu per hour.

(c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20, 40 CFR Part 61, and 40 CFR Part 63) included in this renewal permit.

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, Subpart HHHHHH are not included in the permit for the spray booths. This subpart applies to paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl), autobody refinishing operations that encompass motor vehicle and mobile equipment spray-applied surface coating operations, and spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd). This facility spray paints wood cabinets, and does not use coatings containing the identified HAPs.

(d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 326 IAC 20 (40 CFR 63, Subpart JJ) are not included in this permit because this source is not a major source of HAPs as defined in Section 112 of the Clean Air Act.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-3 (Emission Offset)
William Hermann & Son, Inc. was constructed in 1964 and is not in 1 of the 28 source categories. At construction the source had a potential to emit for all criteria pollutants that was less than 100 tons per year. Although the source was modified in 1984, 1993, and 1996 to add a sanding room facility, mill room facility, and natural gas-fired boiler, respectively, the potential to emit of each criteria pollutant from the entire source remained less than 100 tons per year. Therefore, the source remains a minor source under both PSD and Emission Offset.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The operation of the spray booth (emission unit ID 4) will emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)
This source is located in Marion County, is not required to operate under a Part 70 permit, and does not have the potential to emit greater than 5 tons per year of lead. Therefore, this source is subject only to the additional information requests in 326 IAC 2-6-5.

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

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

326 IAC 6.5-1-1 (Particulate Matter Limitations Except Lake County)
William Hermann & Son, Inc., is not subject to the requirements of 326 IAC 6.5-1-1 because this source does not have either a potential to emit particulate matter (PM) greater than one hundred (100) tons per year or actual emissions of particulate matter (PM) greater than ten (10) tons per year.

326 IAC 6.5-6-1 (Marion County Particulate Limitations)
William Hermann & Son, Inc. is not subject to the requirements of 326 IAC 6.5-6-1 because it is not one of the listed sources.

326 IAC 6-5 (Fugitive Emissions)
The requirements of 326 IAC 6-5 (Fugitive Emissions) are not included in this permit. Emissions of fugitive PM from this facility are negligible.

State Rule Applicability – Woodworking Operations

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

(a) The particulate from the milling room (emission unit ID 2) shall be limited to less than 1.83 lb/hr when operating at a process weight rate of 600 pounds per hour.

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

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

(b) 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 of 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. Therefore, the particulate emissions from the sanding room shall not exceed 0.551 pounds per hour.

The cyclone and dust collector shall each be in operation at all times the milling room is in operation, and the cyclone shall be in operation at all time the sanding room is in operation, in order to comply with these limits.

State Rule Applicability – Surface Coating Operations

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

Particulate from the spray booth room (emission unit ID 4) shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

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

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

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

326 IAC 8-1-6 (New Facilities - General Reduction Requirement)
The spray booth is not subject to the requirements of 326 IAC 8-1-6 even though the source has potential emissions of volatile organic compound (VOC) greater than 25 tons per year because it was constructed before January 1, 1980 and is subject to 326 IAC 8-2-12.

326 IAC 8-6 (Organic Solvent Emission Limitations)
This source is not subject to the requirements of 326 IAC 8-6 because the potential to emit of VOC is less than one hundred (100) tons per year.

326 IAC 8-2-12 (Wood furniture and cabinet coating)
The spray booth (identified as EU 4) is subject to 326 IAC 8-2-12 (Wood furniture and cabinet coating) because the plant is located in Marion County and the surface coating facility was constructed prior to 1990, has actual emissions greater than 15 pounds per day, and is used to apply coatings to wood furniture. Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coatings that are applied to wood furniture and cabinets shall utilize one of the following application methods:

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

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

The surface coatings for the assembly operation that are applied to wood cabinets utilizing High Volume Low Pressure Spray.

State Rule Applicability – Natural Gas Fired Boiler

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)
The natural gas-fired boiler, identified as ID 4, is subject to 326 IAC 6-2-4 (Emission limitations for facilities specified in 326 IAC 6-2-1(d)), because the boiler was constructed after September 21, 1983 and is a source of indirect heating. Pursuant to 326 IAC 6-2-4, the PM emissions from ID 4 shall not exceed 0.82 pound per million Btu heat input (lb/MMBtu). This limitation was calculated using the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$ Where Q = total source capacity (MMBtu/hr)

For these units, Q = 3.0 MMBtu/hr. Therefore,

$$Pt = \frac{1.09}{(3.0)^{0.26}} = 0.82 \text{ lb/MMBtu}$$

Based on emission calculations, the natural gas-fired boiler can meet this limit without control.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The natural gas-fired boiler is not subject to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), because this facility has potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

Compliance Determination and Monitoring Requirements

Compliance Determination Requirements
The Compliance Determination Requirements applicable to the sanding and milling rooms are as follows:

(a) Emission Controls Operation
The cyclone and dust collector associated with emission unit ID 2 for particulate emissions control shall be in operation and control particulate emissions whenever the milling room is in operation.

(b) Emission Controls Operation
The cyclone associated with emission unit ID 3 for particulate emissions control shall be in operation and control particulate emissions whenever the sanding room is in operation.

These requirements ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).

Compliance Monitoring Requirements
The compliance monitoring requirements applicable to the milling room (emission unit ID 2) are as follows:

(a) Visible Emissions Notations
The Permittee shall perform daily visible emission notations of the mill room and sanding room stack exhausts.

(b) Dust Collector Inspections
An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A dust collector inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter.

(c) Broken or Failed Bag Detection
The Permittee shall maintain the baghouse and replace broken or failed bags as needed.

(d) An inspection shall be performed each calendar quarter of all cyclones controlling the woodworking operation when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter.

(e) Cyclone Failure Detection
The Permittee shall maintain the cyclone. Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.

These monitoring conditions are necessary because the cyclones and dust collectors at this facility must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).

Recommendation

The staff recommends to the Commissioner that the MSOP Renewal No. M097-26528-00293 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 May 13, 2008.

Conclusion

The operation of this wood cabinet manufacturing facility shall be subject to the conditions of the attached MSOP Renewal No. M097-26528-00293.

Appendix A: Emission Calculations
Combustion Emissions for Natural Gas Fired Boiler and Furnaces < 100 MMBtu

Company Name: William Hermann & Son, Inc.
Address: 1135 South Pennsylvania Street, Indianapolis, IN 46225
MSOP Renewal: M097-26528-00293
Reviewer: ERG/TDP
Date: December 5, 2008

1. Process Description

Emission Unit ID	Heat Input Capacity (MMBtu/hr)	Maximum Potential Throughput (MMCF/yr)
Boiler	3.39	29.1
Total	**3.39**	**29.1**

2. Combustion Emissions - Criteria Pollutants

	Emission Factor (lbs/MMCF)					
NOx Burner Type	**PM***	**PM10***	**SO2**	**NOx****	**VOC**	**CO**
Ordinary Burners	1.9	7.6	0.6	100	5.5	84.0

	Potential To Emit (tons/yr)					
Emission Unit ID	**PM**	**PM10**	**SO2**	**NOx**	**VOC**	**CO**
Boiler	0.03	0.11	0.01	1.46	0.08	1.22
Total	**0.03**	**0.11**	**0.01**	**1.46**	**0.08**	**1.22**

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

** Emission factors for NOx: Uncontrolled = 100 lbs/MMCF, Low NOx Burners = 50 lbs/MMCF

Emission factors are from AP 42, Chapter 1.4, Tables 1.4-1, and 1.4-2, SCC 1-01-006-02, 1-02-006-02, 1-03-006-02, 1-03-006-03. (7/98)

Methodology

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

Potential To Emit (tons/year) = Maximum Potential Throughput (MMCF/yr) x Emission Factor (lbs/MMCF) x 1 ton/2,000 lbs

3. Combustion Emissions - HAP Pollutants

	Emission Factor (lbs/MMCF)				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
	Cadmium	Chromium	Manganese	Mercury	Nickel
	1.1E-03	1.4E-03	3.8E-04	2.6E-04	2.1E-03

	Potential To Emit (tons/yr)				
Emission Unit ID	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Boiler	3.1E-05	1.7E-05	1.1E-03	2.6E-02	5.0E-05
Total	3.1E-05	1.7E-05	1.1E-03	2.6E-02	5.0E-05
	Cadmium	Chromium	Manganese	Mercury	Nickel
Boiler	1.6E-05	2.0E-05	5.5E-06	3.8E-06	3.1E-05
Total	1.6E-05	2.0E-05	5.5E-06	3.8E-06	3.1E-05
HAP emission factors are from AP 42, Chapter 1.4, Tables 1.4-3 and 1.4-4. (7/98)				**TOTAL HAP**	**0.03**

Methodology

Potential To Emit (tons/yr) = Maximum Potential Throughput (MMCF/yr) x Emission Factor (lbs/MMCF) x 1 ton/2,000 lbs

Appendix A: Emission Calculations
PM/PM10
From Mill Room (Emission Unit ID 2)

Company Name: William Hermann & Son, Inc.
Address: 1135 South Pennsylvania Street, Indianapolis, IN 46225
MSOP Renewal: M097-26528-00293
Reviewer: ERG/TDP
Date: December 5, 2008

*PM Control Equipment = Cyclone and Dust Collector (connnected in series)
Grain Loading in grains/acf = 0.001
Air Flow Rate in acf/m = 7000
Control Efficiency in % = 99%

Unit ID	Potential To Emit of PM/PM10	
	After Control (ton/yr)	Before Control (ton/yr)
Mill Room (Unit ID 2)**	0.26	26.3

* Assume all PM emission are equal to PM10.

**The cyclone and dust collector controlling particulate emissions from the mill room are considered integral to the process.

Potential To Emit PM/PM10 After Control (ton/year) = Grain loading (grains/acf) * Air flow rate (acf/minute) * 60 minutes/hour * 1 lb/7000grains * 8760 hour/year * 1ton /2000 lbs
Potential To Emit PM/PM10 Before Control (ton/year) = Potential To Emit PM/PM10 After Control (ton/year) x 1/(1-Control Efficiency %)

Appendix A: Emission Calculations
PM/PM10 Emissions
From Sanding Room (Emission Unit ID 3)

Company Name: William Hermann & Son, Inc.
Address: 1135 South Pennsylvania Street, Indianapolis, IN 46225
MSOP Renewal: M097-26528-00293
Reviewer: ERG/TDP
Date: December 5, 2008

POTENTIAL TO EMIT IN TONS PER YEAR USING AMOUNT OF SAWDUST COLLECTED

*Pollutant	Hours of Operation	**Amount of Sawdust Collected		Potential To Emit	
	(hrs/week)	(lbs/week)	(lbs/hour)	(lbs/hour)	(tons/year)
PM/PM10	45	16.7	0.37	0.56	2.44

* Assume all PM emissions are equal to PM10
** Source collects 868 pounds of sawdust per year during 52 weeks per year of operation. It runs a 45 hour work week. Assuming that only 2/3 is captured, the lbs/hr emission rate is 0.56 lbs/hr.
Note: Outlet grain loading was not used to calculate the PTE in tons per year because the outlet grain loading result showed a loss of 61 percent of the total wood processed.

Methodology
Potential to Emit PM/PM10 (tons/year) = Dust collected (lbs/week) * 1week/45 hours * 1/(2/3) * 8760 hours/ year * 1 ton/2000 lbs

Appendix A: Emissions Calculations
VOC and PM/PM10 Emissions
From Spray Booth (Emission Unit ID 4)

Company Name: William Hermann & Son, Inc
Address: 1135 South Pennsylvania Street, Indianapolis, IN 46225
MSOP: 097-13572
Plt ID: 097-00293
Reviewer: ERG/TDP
Date: December 5, 2008

Material	Density (Lb/Gal)	Weight % Volatile (H20 & 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	PTE VOC (lbs/hour)	PTE VOC (lbs/day)	PTE VOC (ton/year)	PTE PM/PM10 (ton/year)	* Transfer Efficiency
Wood Stain	7.1	78.6%	0.0%	78.6%	0.0%	17.0%	0.20	0.63	5.58	5.58	0.70	16.7	3.06	0.42	50%
Wood Stain	7.2	84.0%	0.0%	84.0%	0.0%	13.0%	0.20	0.63	6.05	6.05	0.76	18.1	3.31	0.32	50%
Lacquer	7.6	76.0%	0.0%	76.0%	0.0%	17.0%	0.67	0.63	5.75	5.75	2.41	57.7	10.5	1.66	50%
Sealer	7.5	81.0%	0.0%	81.0%	0.0%	14.0%	0.44	0.63	6.10	6.10	1.68	40.3	7.35	0.86	50%
Solvent	6.9	100%	0.0%	100%	0.0%	0.0%	0.04	0.63	6.93	6.93	0.17	4.16	0.76	0.00	NA
								State Potential Emissions =			**5.71**	**137**	**25.0**	**3.26**	

* Coating applied using air atomization guns

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)
PTE VOC (pounds/hour) = Pounds of VOC / Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hour)
PTE VOC (pounds/day) = Pounds of VOC / Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hour) * (24 hours/day)

Appendix A: Emission Calculations
HAP Emission
From Spray Booth (Emission Unit ID 4)

Company Name: William Hermann & Son, Inc
Address: 1135 South Pennsylvania Street, Indianapolis, IN 46225
MSOP: 097-13572
Plt ID: 097-00293
Reviewer: ERG/TDP
Date: December 5, 2008

Material	Density (lb/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % *MIBK	Weight % Xylene	Weight % Toluene	Weight % Methanol	PTE MIBK	PTE Xylene	PTE Toluene	PTE Methanol
Wood Stain	7.1	0.20000	0.625	0%	0%	0%	0%	0.00	0.00	0.000	0.000
Wood Stain	7.2	0.20000	0.625	0%	0%	0%	0%	0.00	0.00	0.000	0.00
Lacquer	7.6	0.67000	0.625	7.460%	15.830%	9.940%	0%	1.0344	2.1950	1.3783	0.00
Sealer	7.5	0.44000	0.625	3.360%	48.360%	3.980%	0%	0.3047	4.3862	0.3610	0.00
Solvent	6.9	0.04000	0.625	0.500%	0.500%	4.500%	0.50%	0.0038	0.0038	0.0341	0.0038
State Potential Emissions								**1.34**	**6.58**	**1.77**	**0.0038**

Combined Total HAPs = **9.71**
Individual HAP (Xylene) = **6.58**

* MIBK = Methyl Isobutylketone

Methodology

Potential To Emit HAPs (tons/year) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hour) * Weight % HAP * 8760 hour/year * 1 ton/2000 lbs

Appendix A: Emission Calculations
Summary

Company Name: William Hermann & Son, Inc
Address: 1135 South Pennsylvania Street, Indianapolis, IN 46225
MSOP: 097-13572
Plt ID: 097-00293
Reviewer: ERG/TDP
Date: December 5, 2008

POTENTIAL TO EMIT BEFORE CONTROL (tons/yr)

Emission Units	PM	PM10	SO_2	NOx	VOC	CO	HAP	
							Single	Combined
Boiler	0.03	0.11	0.01	1.46	0.08	1.22	0.026	0.027
Mills Room	0.26	0.26						
Sanding Room	2.44	2.44						
Spray Booth	3.26	3.26			25.0		6.58	9.71
TOTAL	5.98	`	0.009	1.46	25.1	1.22	6.61	9.73

POTENTIAL TO EMIT AFTER CONTROL

Emission Units	PM	PM10	SO_2	NOx	VOC	CO	HAP	
							Single	Combined
Boiler	0.03	0.11	0.01	1.46	0.08	1.22	0.026	0.027
Mills Room	0.26	0.26						
Sanding Room	2.44	2.44						
Spray Booth	3.26	3.26			25.01		6.58	9.71
TOTAL	5.98	6.07	0.01	1.46	25.1	1.22	6.61	9.73