



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: December 22, 2008

RE: Woodenware USA / 085-26619-00117

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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New Source Review and Minor Source Operating Permit OFFICE OF AIR QUALITY

**Woodenware USA
9151 W 750 N
Etna Green, Indiana 46524**

(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.: M085-26619-00117	
Issued by:  Alfred C. Dumauval, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: December 22, 2008 Expiration Date: December 22, 2013

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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 door assembly and finishing facility.

Source Address:	9151 W 750 N, Etna Green, Indiana 46524
Mailing Address:	9151 W 750 N, Etna Green, IN 46524
General Source Phone Number:	(574) 646-2181
SIC Code:	2431
County Location:	Kosciusko
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) surface coating booth, identified as EU-01, constructed in 2004, with a maximum capacity of 800 square feet per hour, using dry filters for particulate control, utilizing an air-assisted airless application method, and exhausting to stack S1.
- (b) One (1) woodworking operation, identified as EU-02, with a maximum process weight rate of 4500 pounds per hour, constructed in 1985, using a baghouse identified as DC1 for particulate control, exhausting to stack DC1. The woodworking operation consists of:
 - (1) One (1) Lobo Shape & Sander
 - (2) One (1) Edge Sander
 - (3) One (1) Weaver single end cope machine
 - (4) One (1) Onsrud Inverted Router
 - (5) One (1) TI-14 Invicta shaper
 - (6) One (1) Powermatic table saw
 - (7) One (1) Baker A-Resaw
 - (8) One (1) Dowel sanding machine
 - (9) One (1) Komo CNC Router
 - (10) One (1) Delta Drill Press
 - (11) One (1) Rockweld Bandsaw
 - (12) One (1) Dewalt Miter Saw
 - (13) One (1) 3 Head Duramac wide belt sander
 - (14) One (1) Grutter up cut chop saw
 - (15) One (1) Castle Machine
- (c) One (1) diesel-fired reciprocating internal combustion generator, identified as G1, constructed in 1996, with a heat input rate of 0.7 MMBtu per hour, exhausting to stack S-2.

- (d) One (1) propane-fired breakroom heater, identified as H1, constructed in 1997 with a heat input rate of 0.033 MMBtu per hour, exhausting to stack S-4.
- (e) One (1) propane-fired air makeup unit, identified as H2, constructed in 2005, with a heat input rate of 2.4 MMBtu per hour, exhausting to stack S-5.
- (f) One (1) kerosene-fired Jungers Oil Stove, identified as H3, constructed in 1996, with a heat input rate of 0.066 MMBtu per hour, exhausting to stack S-3.

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, M085-26619-00117, 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 M085-26619-00117 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 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 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 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 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.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 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.14 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.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) One (1) surface coating booth, identified as EU-01, constructed in 2004, with a maximum capacity of 800 square feet per hour, using dry filters for particulate control, utilizing an air-assisted airless application method, and exhausting to stack S1.

(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 [326 IAC 6-3-2(d)]

- (a) Particulate from the surface coating booth EU-01 shall be controlled by dry particulate filters, and the Permittee shall operate the control devices 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.1.2 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-12]

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

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

D.1.3 Preventative Maintenance Plan [326 IAC 1-6-3]

A Preventative Maintenance Plan, in accordance with Section C - Preventative Maintenance Plan, of this permit, is required for this facility and its control devices.

Compliance Determination Requirements

D.1.4 Particulate Control [326 IAC 6-3-2]

In order to comply with Condition D.1.1, the dry filters for particulate control shall be in operation and control emissions from the surface coating booth, identified as EU-01, at all times that the

surface coating booth is in operation. The Permittee shall operate the control devices in accordance with manufacturer's specifications.

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

D.1.5 Record Keeping Requirements

To document compliance with Condition D.1.1(b) and (c), the Permittee shall maintain a record of any actions taken if overspray is visibly detected.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(b) One (1) woodworking operation, identified as EU-02, with a maximum process weight rate of 4500 pounds per hour, constructed in 1985, using a baghouse identified as DC1 for particulate control, exhausting to stack DC1. The woodworking operation consists of:

- (1) One (1) Lobo Shape & Sander
- (2) One (1) Edge Sander
- (3) One (1) Weaver single end cope machine
- (4) One (1) Onsrud Inverted Router
- (5) One (1) TI-14 Invicta shaper
- (6) One (1) Powermatic table saw
- (7) One (1) Baker A-Resaw
- (8) One (1) Dowel sanding machine
- (9) One (1) Komo CNC Router
- (10) One (1) Delta Drill Press
- (11) One (1) Rockweld Bandsaw
- (12) One (1) Dewalt Miter Saw
- (13) One (1) 3 Head Duramac wide belt sander
- (14) One (1) Grutter up cut chop saw
- (15) One (1) Castle Machine

(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) Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e), the particulate from the woodworking operation, identified as EU-02, equipped with baghouse DC1 for particulate control, shall be limited by the following:

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

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

$$E = 4.10 * (2.25)^{0.67} = 7.10 \text{ lbs PM/hour}$$

Based on the above equation, particulate emissions from the woodworking operation shall be limited to 7.10 pounds per hour. The baghouse DC1 shall be in operation at all times that the woodworking operation is in operation, in order to comply with this limit.

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

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and Northern Regional Office

MINOR SOURCE OPERATING PERMIT (MSOP)
CERTIFICATION

Source Name: Woodenware USA
Source Address: 9151 W 750 N, Etna Green, Indiana 46524
Mailing Address: 9151 W 750 N, Etna Green, IN 46524
MSOP Permit No.: M085-26619-00117

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 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:	Woodenware USA
Address:	9151 W 750 N
City:	Etna Green, Indiana 46524
Phone #:	(574) 646-2181
MSOP #:	M085-26619-00117

I hereby certify that Woodenware USA is :

still in operation.

no longer in operation.

I hereby certify that Woodenware USA is :

in compliance with the requirements of MSOP M085-26619-00117.

not in compliance with the requirements of MSOP M085-26619-00117.

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
and IDEM Northern Regional Office**

Addendum to the Technical Support Document (ATSD) for a
New Source Review and Minor Source Operating Permit

Source Background and Description
--

Source Name:	Woodenware USA
Source Location:	9151 W 750 N, Etna Green, IN 46524
County:	Kosciusko
SIC Code:	26619
Permit No.:	M085-26619-00117
Permit Reviewer:	Summer Keown

On November 12, 2008, the Office of Air Quality (OAQ) had a notice published in the Times Union, Warsaw, Indiana, stating that Woodenware USA had applied for an initial MSOP to operate their wood door assembly and finishing facility. The notice also stated that the OAQ proposed to issue a MSOP for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments and Responses

Pursuant to the TSD for this permit, M085-26619-00117 it is stated that this is an initial permit for the Source to be issued by IDEM OAQ. The permit and TSD should have indicated that this initial permit was issued as a New Source Review and 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**.

The following changes have been made:

(see next page)



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

New Source Review and Minor Source Operating Permit OFFICE OF AIR QUALITY

Woodenware USA
9151 W 750 N
Etna Green, Indiana 46524

(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.: M085-26619-00117	
Issued by: Alfred C. Dumauval, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:

IDEM Contact

- (a) Questions regarding this proposed MSOP can be directed to Summer Keown 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) 232-8427 or toll free at 1-800-451-6027 extension 2-8427.

- (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
and IDEM Northern Regional Office**

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

Source Description and Location

Source Name: Woodenware USA
Source Location: 9151 W 750 N, Etna Green, IN 46524
County: Kosciusko
SIC Code: 2431
Operation Permit No.: M 085-26619-00117
Permit Reviewer: Summer Keown

On June 2, 2008, the Office of Air Quality (OAQ) received an application from Woodenware USA related to the operation of an existing wood door assembly and finishing facility.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Kosciusko County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment as of 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 PM2.5.	

(a) Ozone Standards

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. Kosciusko 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

Kosciusko County has been classified as attainment for PM2.5. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 emissions, and the effective date of these rules was July 15th, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM10 emissions as a surrogate for PM2.5 emissions until 326 IAC 2-2 is revised.

(c) Other Criteria Pollutants

Kosciusko County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

- (a) 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.
- (b) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Background and Description of Permitted Emission Units

The Office of Air Quality (OAQ) has reviewed an application, submitted by Woodenware USA on June 2, 2008, for a Minor Source Operating Permit (MSOP).

The source consists of the following permitted emission units:

- (a) One (1) surface coating booth, identified as EU-01, constructed in 2004, with a maximum capacity of 800 square feet per hour, using dry filters for particulate control, utilizing an air-assisted airless application method, and exhausting to stack S1.
- (b) One (1) woodworking operation, identified as EU-02, with a maximum process weight rate of 4500 pounds per hour, constructed in 1985, using a baghouse identified as DC1 for particulate control, exhausting to stack DC1. The woodworking operation consists of:
 - (1) One (1) Lobo Shape & Sander
 - (2) One (1) Edge Sander
 - (3) One (1) Weaver single end cope machine
 - (4) One (1) Onsrud Inverted Router
 - (5) One (1) TI-14 Invicta shaper
 - (6) One (1) Powermatic table saw
 - (7) One (1) Baker A-Resaw
 - (8) One (1) Dowel sanding machine
 - (9) One (1) Komo CNC Router
 - (10) One (1) Delta Drill Press
 - (11) One (1) Rockweld Bandsaw
 - (12) One (1) Dewalt Miter Saw
 - (13) One (1) 3 Head Duramac wide belt sander
 - (14) One (1) Grutter up cut chop saw
 - (15) One (1) Castle Machine
- (c) One (1) diesel-fired reciprocating internal combustion generator, identified as G1, constructed in 1996, with a heat input rate of 0.7 MMBtu per hour, exhausting to stack S-2.
- (d) One (1) propane-fired breakroom heater, identified as H1, constructed in 1997 with a heat input rate of 0.033 MMBtu per hour, exhausting to stack S-4.
- (e) One (1) propane-fired air makeup unit, identified as H2, constructed in 2005, with a heat input rate of 2.4 MMBtu per hour, exhausting to stack S-5.

- (f) One (1) kerosene-fired Jungers Oil Stove, identified as H3, constructed in 1996, with a heat input rate of 0.066 MMBtu per hour, exhausting to stack S-3.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

- (a) 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 are 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.
- (b) Pursuant to 326 IAC 2-1.1-1(16) and based on the definition of "potential to emit" therein, the Source has operational limitations that reduces its capacity to emit air pollutants. Therefore, due to this limitation, the potential to emit for this Source is calculated at 4992 hours per year.

See Appendix A of this TSD, pages 1 through 8, for detailed emission calculations.

Permit Level Determination – MSOP

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

Pollutant	Potential To Emit (tons/year)
PM	30.96
PM10 ⁽¹⁾	31.00
PM2.5	31.00
SO ₂	0.87
NO _x	8.59
VOC	97.70
CO	2.17

- (1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

HAPs	Potential To Emit (tons/year)
xylene	2.79
toluene	0.51
ethyl benzene	0.88
formaldehyde	0.05
TOTAL HAPs	4.23

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of VOC and PM10 are each less than one hundred (100) tons per year, but greater than or equal to twenty-five (25) tons per year. The PTE of all other regulated criteria pollutants are less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) will be issued.

- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standards (NSPS) for Stationary Compression Ignition Internal Combustion Engines, 40 CFR 60, Subpart IIII (326 IAC 12), are not included in the permit, because the diesel-fired reciprocating internal combustion generator, identified as G1, was constructed prior to July 11, 2005.
- (b) There are no New Source Performance Standards (NSPS)(40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Wood Building Products, 40 CFR 63, Subpart QQQQ (326 IAC 20-79), are not included in the permit, since the surface coating booth is not a major source and is not located at a major source of hazardous air pollutants (HAPs).
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Stationary Reciprocating Internal Combustion Engines, 40 CFR 63, Subpart ZZZZ (326 IAC 20-82), are not included in the permit, since the diesel-fired reciprocating internal combustion generator, identified as G1, has a site rating of less than 250 brake HP and was constructed prior to June 12, 2006.
- (e) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

- (d) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all attainment regulated pollutants are less than 250 tons per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (c) 326 IAC 2-3 (Emission Offset)
This existing source is not a major stationary source, under Emission Offset (326 IAC 2-3), because the potential to emit all nonattainment regulated pollutants are less than 100 tons per year. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

- (d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (e) 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.
- (f) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (1) 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.
 - (2) 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.
- (g) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.

Woodworking Operation

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

Pursuant to 326 IAC 6-3-2(e), the particulate from the woodworking operation, equipped with baghouse DC1 for particulate control, shall be limited by the following:

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

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

$$E = 4.10 * (2.25)^{0.67} = 7.10 \text{ lbs PM/hour}$$

Based on the above equation, particulate emissions from the woodworking operation shall be limited to 7.10 pounds per hour. The baghouse DC1 shall be in operation at all times the woodworking operation is in operation, in order to comply with this limit.

Surface Coating Booth

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

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating booth EU-01 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. This source has opted to use dry filters for particulate control. Therefore, they will be in compliance with 326 IAC 6-3-2.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

326 IAC 8-1-6 (New Facilities; General Reduction Requirements) is not applicable to the surface coating operations even though they were constructed after January 1, 1980 and have the potential to emit greater than twenty-five (25) tons per year because other article 8 rules apply to this source.

326 IAC 8-2-10 (Flat Wood Panels; Manufacturing Operations)

326 IAC 8-2-10 (Flat Wood Panels; Manufacturing Operations) is not applicable to this source because this rule applies to sources manufacturing and applying coating to flat wood panels. This source constructs and applies coating to wood doors.

326 IAC 8-11 (Wood Furniture Coating)

326 IAC 8-11 (Wood Furniture Coating) does not apply to this source because this source is not located in Lake, Porter, Clark, or Floyd Counties. This source is located in Kosciusko County.

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

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating) applies to this source because it was constructed after July 1, 1990 and has potential VOC emissions greater than fifteen (15) pounds of VOC per day before add-on controls. Pursuant to this rule, 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

The spray booth at this source utilizes Air Assisted Airless Spray Application technology and is therefore in compliance with this rule.

Generator

326 IAC 9-1 (Carbon Monoxide Emission Limits)

This generator is not of a source type that has an established emission limit in 326 IAC 9-1-2. Therefore, 326 IAC 9-1 is not applicable to the generator.

326 IAC 10-1 (Nitrogen Oxides Control in Clark and Floyd Counties)

This source is located in Kosciusko County. 326 IAC 10-1 only applies to sources located in Clark and Floyd Counties. Therefore, the generator is not subject to 326 IAC 10-1.

326 IAC 10-4 (Nitrogen Oxides Budget Trading Program)

The diesel-fired reciprocating internal combustion generator, identified as G1, with a heat input rate of 0.7 MMBtu per hour, is not an electricity generating unit (EGU) as defined under section 2(16) and it is not a large affected unit as defined in section 2(27) of this rule. Therefore, 326 IAC 10-4 is not applicable to this generator.

Compliance Determination, Monitoring and Testing Requirements
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The following compliance monitoring requirements are applicable to the surface coating booth, identified as EU-01:

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

- (a) 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.
- (b) 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.

These monitoring conditions are necessary because the dry filters for surface coating booth EU-01 must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-6.1 (Minor Source Operating Permit Program).

Conclusion and Recommendation

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 June 2, 2008.

The operation of this source shall be subject to the conditions of the attached proposed MSOP No. M085-26619-00117. The staff recommends to the Commissioner that this be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Summer Keown 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) 232-8427 or toll free at 1-800-451-6027 extension 2-8427.
- (b) A copy of the findings 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

**Appendix A: Emissions Calculations
Potential to Emit
Summary**

Company Name: Woodenware USA
Address City IN Zip: 9151 W 750 N, Etna Green IN 46524
Permit Number: 085-26619-00117
Reviewer: Summer Keown
Date: September 17, 2008

Uncontrolled Emissions

Emissions Unit	PM	PM10 / PM2.5	VOC	SO2	NOx	CO	Highest Single HAP	Total HAPs
Surface Coating	21.59	21.59	97.00	0.00	0.00	0.00	2.79 (xylene)	4.23
Woodworking*	8.82	8.82	0.00	0.00	0.00	0.00	0.00	0.00
Diesel Generator	0.54	0.54	0.63	0.51	7.71	1.66	negl.	negl.
Propane Combustion	0.01	0.05	0.07	0.07	0.86	0.5	negl.	negl.
Oil Stove	0.00	0.00	0.00	0.29	0.02	0.01	0.00	0.00
Total	30.96	31.00	97.7	0.87	8.59	2.17	2.79 (xylene)	4.23

Controlled Emissions

Emissions Unit	PM	PM10 / PM2.5	VOC	SO2	NOx	CO	Highest Single HAP	Total HAPs
Surface Coating	1.08	1.08	97.00	0.00	0.00	0.00	2.79 (xylene)	4.23
Woodworking*	8.82	8.82	0.00	0.00	0.00	0.00	0.00	0.00
Diesel Generator	0.54	0.54	0.63	0.51	7.71	1.66	negl.	negl.
Propane Combustion	0.01	0.05	0.07	0.07	0.86	0.5	negl.	negl.
Oil Stove	0.00	0.00	0.00	0.29	0.02	0.01	0.00	0.00
Total	10.45	10.49	97.7	0.87	8.59	2.17	2.79 (xylene)	4.23

*Pursuant to the October 1993 order for Kimball Hospitality Furniture, Inc., the particulate control equipment is considered to be integral to the process. Therefore, only the controlled potential emissions are used in calculating potential PM, PM10 and PM2.5 for the woodworking operation.

**Appendix A: Emissions Calculations
VOC and Particulate
Surface Coating Booth EU-01**

**Company Name: Woodenware USA
Address City IN Zip: 9151 W 750 N, Etna Green IN 46524
Permit Number: 085-26619-00117
Reviewer: Summer Keown
Date: September 17, 2008**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Square gallons per foot (gal/ft2)	Square feet per hour (ft2/hr)	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
Precat	7.4	40.96%	0.0%	41.0%	0.0%	23.00%	0.00313	800	3.04	3.04	7.60	182.35	18.96	9.57	13.21	65%
Optiseal 900	7.6	58.76%	0.0%	58.8%	0.0%	14.78%	0.00313	800	4.46	4.46	11.15	267.59	27.83	6.84	30.18	65%
Formica Dye Stain	6.8	97.60%	0.0%	97.6%	0.0%	unknown	0.00375	800	6.60	6.60	19.79	475.04	49.40	0.43	unknown	65%
Pilgrim on Beech Spray Stain	6.5	96.00%	0.0%	96.0%	0.0%	unknown	0.00375	800	6.24	6.24	18.72	449.28	46.73	0.68	unknown	65%
Tobacco Ash 2	6.8	98.45%	0.0%	98.5%	0.0%	0.77%	0.00375	800	6.70	6.70	20.11	482.72	50.20	0.28	870.71	65%
Heartland Big Horn Spray Stain	6.5	93.85%	0.0%	93.9%	0.0%	unknown	0.00375	800	6.10	6.10	18.30	439.22	45.68	1.05	unknown	65%
Beech Keystone Spray Stain	6.5	93.99%	0.0%	94.0%	0.0%	unknown	0.00375	800	6.10	6.10	18.30	439.20	45.68	1.02	unknown	65%
311 Flair Spray Stain	6.6	70.38%	0.0%	70.4%	0.0%	unknown	0.00375	800	4.61	4.61	13.83	331.91	34.52	5.08	unknown	65%
Flair K Spray Stain	6.6	70.47%	0.0%	70.5%	0.0%	unknown	0.00375	800	4.63	4.63	13.89	333.35	34.67	5.08	unknown	65%
K22 Flair Spray Stain	6.5	70.46%	0.0%	70.5%	0.0%	unknown	0.00375	800	4.58	4.58	13.74	329.75	34.29	5.03	unknown	65%
Grace Maple Spray Stain	6.5	70.46%	0.0%	70.5%	0.0%	unknown	0.00375	800	4.58	4.58	13.74	329.75	34.29	5.03	unknown	65%
Vision Cherry Spray Stain	6.7	70.23%	0.0%	70.2%	0.0%	3.00%	0.00375	800	4.67	4.67	14.01	336.26	34.97	5.19	155.68	65%
Adorn Old Landmark Spray Stain	6.5	70.49%	0.0%	70.5%	0.0%	unknown	0.00375	800	4.61	4.61	13.83	331.92	34.52	5.06	unknown	65%

State Potential Emissions

Before Dry Filters: 38.86 932.67 97.00 21.59
After Dry Filters: 1.08

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) * (4992 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(4992 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
Dry Filters are assumed to have an efficiency of 95%.
PM is assumed to be equal to PM10 and PM2.5.

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

**Company Name: Woodenware USA
Address City IN Zip: 9151 W 750 N, Etna Green IN 46524
Permit Number: 085-26619-00117
Permit Reviewer: Summer Keown
Date: September 17, 2008**

Material	Density (Lb/Gal)	Square gallons per foot (gal/ft2)	Square feet per hour (Ft2/hr)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Ethyl Benzene	Weight % Hexane	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)
Precat	7.42	0.00313	800	0.00%	0.00%	0.03%	0.00%	0.00%	0.00	0.00	0.01	0.00	0.00
Optiseal 900	7.59	0.00313	800	4.81%	0.00%	0.07%	0.79%	0.00%	2.28	0.00	0.03	0.37	0.00
Formica Dye Stain	6.76	0.00375	800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Pilgrim on Beech Spray Stain	6.50	0.00375	800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Tobacco Ash 2	6.81	0.00375	800	1.00%	1.00%	0.00%	1.00%	0.00%	0.51	0.51	0.00	0.51	0.00
Heartland Big Horn Spray Stain	6.50	0.00375	800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Beech Keystone Spray Stain	6.49	0.00375	800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
311 Flair Spray Stain	6.55	0.00375	800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Flair K Spray Stain	6.57	0.00375	800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
K22 Flair Spray Stain	6.50	0.00375	800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Grace Maple Spray Stain	6.50	0.00375	800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Vision Cherry Spray Stain	6.65	0.00375	800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Adorn Old Landmark Spray St	6.54	0.00375	800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00

Total State Potential Emissions

2.79 0.51 0.05 0.88 0.00

METHODOLOGY

Total HAPs: 4.23

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 4992 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations

Woodworking Operation EU-02

Company Name: Woodenware USA
Address, City IN Zip: 9151 W 750 N, Etna Green IN 46524
Permit Number: 085-26619-00117
Reviewer: Summer Keown
Date: September 17, 2008

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Outlet grain loading: 0.045 ascf
Airflow: 9,165 acfm
Efficiency: 95.50%

Controlled Emissions

PM/PM10/PM2.5 = 3.54 lbs/hr
8.82 tons/yr

Methodology

Controlled PM/PM10/PM2.5 lbs/hr = (outlet grain loading in ascf) * (airflow in 9,165 acfm) * (60 hours/day) / (700 grains/lb)
Controlled PM/PM10/PM2.5 tons/yr = (PM/PM10/PM2.5 lbs/hr) * (4992 hrs/yr) * (1 ton/2000 lbs)

The particulate control equipment is considered to be integral to the process. Therefore, only the controlled potential emissions are used in calculating potential PM, PM10 and PM2.5 for the woodworking operation.

Appendix A: Emission Calculations
Internal Combustion Engines - Diesel Fuel
Diesel-fired Reciprocating Internal Combustion Generator G1

Company Name: Woodenware USA
Address City IN Zip: 9151 W 750 N, Etna Green IN 46524
Permit Number: 085-26619-00117
Reviewer: Summer Keown
Date: September 17, 2008

Heat Input Capacity
MM Btu/hr

0.7

Emission Factor in lb/MMBtu	Pollutant					
	PM*	PM10 / PM2.5*	SO2	NOx	VOC	CO
Potential Emission in tons/yr	0.31	0.31	0.29	4.41	0.4	0.95
	0.54	0.54	0.51	7.71	0.63	1.66

Methodology

Potential Throughput (hp-hr/yr) = hp * 4992 hr/yr

Use a conversion factor of 7,000 Btu per hp-hr to convert from horsepower to Btu/hr, (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)] * 4992 hr/yr / (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.

Appendix A: Emission Calculations
Propane-fired Combustion: Insignificant Activities
Breakroom Heater and Air Makeup Unit

Company Name: Woodenware USA
Address City IN Zip: 9151 W 750 N, Etna Green IN 46524
Permit Number: 085-26619-00117
Reviewer: Summer Keown
Date: September 17, 2008

Heat Input Capacity
MMBtu/hr

Potential Throughput
kgals/year

SO2 Emission factor = 0.10 x S

S = Sulfur Content = 10.00 grains/100ft³

2.43

132.74

	Pollutant					
	PM*	PM10 / PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	0.2	0.7	1.0 (0.10S)	13.0	1.0 **TOC value	7.5
Potential Emission in tons/yr	0.01	0.05	0.07	0.86	0.07	0.50

*PM emission factor is filterable PM only. PM10 is assumed to be equal to PM2.5.

**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 4992 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.0915 MMBtu

Emission Factors are from AP42 (Supplement B 07/08), Table 1.5-1 (SCC #1-03-010-02)

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

Appendix A: Emissions Calculations
Insignificant Activity: Jungers Oil Stove
Fuel Oil Combustion

Company Name: Woodenware USA
Address, City IN Zip: 9151 W 750 N, Etna Green IN 46524
Permit Number: 085-26619-00117
Reviewer: Summer Keown
Date: September 17, 2008

Heat Input Capacity
MMBtu/hr

0.066

Potential Throughput
kgals/year

2.353371429

S = Weight % Sulfur

1.0

Emission Factor in lb/kgal	Pollutant				
	PM / PM10 / PM2.5 *	SO2	NOx	VOC	CO
	2.0	142 (142.0S)	20.0	0.34	5.0
Potential Emission in tons/yr	0.002	0.17	0.02	0.000	0.01

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 4992 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)

*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.

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

See page 8 for HAPs emission calculations.

Appendix A: Emissions Calculations
Insignificant Activity: Jungers Oil Stove
Fuel Oil Combustion
HAPs Emissions

Company Name: Woodenware USA
Address, City IN Zip: 9151 W 750 N, Etna Green IN 46524
Permit Number: 085-26619-00117
Reviewer: Summer Keown
Date: September 17, 2008

HAPs - Metals					
Emission Factor in lb/mmBtu	Arsenic 4.0E-06	Beryllium 3.0E-06	Cadmium 3.0E-06	Chromium 3.0E-06	Lead 9.0E-06
Potential Emission in tons/yr	1.16E-06	8.67E-07	8.67E-07	8.67E-07	2.60E-06

HAPs - Metals (continued)				
Emission Factor in lb/mmBtu	Mercury 3.0E-06	Manganese 6.0E-06	Nickel 3.0E-06	Selenium 1.5E-05
Potential Emission in tons/yr	8.67E-07	1.73E-06	8.67E-07	4.34E-06

Methodology

Total HAPs: 0.00001

No data was available in AP-42 for organic HAPs.

Potential Emissions (tons/year) = Throughput (mmBtu/hr)*Emission Factor (lb/mmBtu)*4992 hrs/yr / 2,000 lb/ton