



# 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](http://www.idem.IN.gov)

TO: Interested Parties / Applicant

DATE: August 22, 2008

RE: Patrick Industries, Inc. / 039-26709-00324

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

## Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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 from 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-AM.dot12/3/07



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August 22, 2008

Lynn Brandon, Sr. VP - Operations  
Patrick Industries, Inc.  
107 West Franklin Street  
Elkhart, Indiana 46515-2894

Re: 039-26709-00324  
Third Administrative Amendment to  
Part 70 No.: T039-17506-00324

Dear Lynn Brandon,

Patrick Industries, Inc. was issued a Part 70 Operating Permit (T039-17506-00324) on February 7, 2006, for a stationary wood counter top and cabinet manufacturing company. A letter requesting changes to this permit was received on July 1, 2008. Pursuant to the provisions of 326 IAC 2-7-11 an administrative amendment to this permit is hereby approved as described in the attached Technical Support Document.

The facility identified as Plant 3 and all associated emission units and permit conditions have been removed from the permit. There are no new or modified emission units included in this permit modification. Therefore, these changes are not subject to 326 IAC 2-7-10.5.

All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire Part 70 Operating Permit as modified.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Angela Taylor, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, or call at (800) 451-6027, and ask for Angela Taylor or extension 3-6867, or dial (317) 232-8253.

Sincerely,

*Original document signed by*

Chrystal A Wagner, Section Chief  
Permits Branch  
Office of Air Quality

APT

cc: File - Elkhart County  
U.S. EPA, Region V  
Elkhart County Health Department  
Northern Regional Office  
Air Compliance Section Inspector  
Compliance Data Section  
Administrative and Development

Attachments:  
Third Administrative Amendment, 039-26709-00518  
Technical Support Document (TSD)  
Calculations



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## PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Patrick Industries, Inc.  
1808 West Hively Avenue, and  
57420 Nagy Drive  
Elkhart, Indiana 46517**

(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.

**The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-17506-00324	
Issued by: Original Signed by Paul Dubenetzky Assistant Commissioner Office of Air Quality	Issuance Date: February 7, 2006 Expiration Date: February 7, 2011

First Administrative Amendment No. 039-24904-00324 was issued on August 8, 2007.  
Second Administrative Amendment: 039-26481-00324 was issued on May 28, 2008

Third Administrative Amendment No.: 039-26709-00324	Pages Affected: entire permit
Issued by: <i>Original document signed by</i> Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: August 22, 2008 Expiration Date: February 7, 2011

## TABLE OF CONTENTS

<b>SECTION A</b>	<b>SOURCE SUMMARY</b> .....	5
A.1	General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]	
A.2	Part 70 Source Definition [326 IAC 2-7-1(22)]	
A.3	Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]	
A.4	Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]	
A.5	Part 70 Permit Applicability [326 IAC 2-7-2]	
<b>SECTION B</b>	<b>GENERAL CONDITIONS</b> .....	9
B.1	Definitions [326 IAC 2-7-1]	
B.2	Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]	
B.3	Term of Conditions [326 IAC 2-1.1-9.5]	
B.4	Enforceability [326 IAC 2-7-7]	
B.5	Severability [326 IAC 2-7-5(5)]	
B.6	Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]	
B.7	Duty to Provide Information [326 IAC 2-7-5(6)(E)]	
B.8	Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]	
B.9	Annual Compliance Certification [326 IAC 2-7-6(5)]	
B.10	Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]	
B.11	Emergency Provisions [326 IAC 2-7-16]	
B.12	Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]	
B.13	Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]	
B.14	Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]	
B.15	Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]	
B.16	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]	
B.17	Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]	
B.18	Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]	
B.19	Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]	
B.20	Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]	
B.21	Source Modification Requirement [326 IAC 2-7-10.5] [326 IAC 2-3-2]	
B.22	Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]	
B.23	Transfer of Ownership or Operational Control [326 IAC 2-7-11]	
B.24	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]	
B.25	Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]	
<b>SECTION C</b>	<b>SOURCE OPERATION CONDITIONS</b> .....	19
	<b>Emission Limitations and Standards [326 IAC 2-7-5(1)]</b>	
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2	Opacity [326 IAC 5-1]	
C.3	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.4	Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.5	Fugitive Dust Emissions [326 IAC 6-4]	
C.6	Stack Height [326 IAC 1-7]	
C.7	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
	<b>Testing Requirements [326 IAC 2-7-6(1)]</b>	
C.8	Performance Testing [326 IAC 3-6]	
	<b>Compliance Requirements [326 IAC 2-1.1-11]</b>	
C.9	Compliance Requirements [326 IAC 2-1.1-11]	

**Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

- C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.11 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

- C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]
- C.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]
- C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

- C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]
- C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6][326 IAC 2-3]
- C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11][326 IAC 2-3]

**Stratospheric Ozone Protection**

- C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

**SECTION D.1 FACILITY OPERATION CONDITIONS ..... 27**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- D.1.1 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]
- D.1.2 Particulate Emissions Limitations for Manufacturing Processes [326 IAC 6-3-2]
- D.1.3 Baghouse Limitations [326 IAC 2-7-1(21)(G)(xxx)]
- D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements**

- D.1.5 Particulate Control [40 CFR 64]

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

- D.1.6 Visible Emissions Notations [40 CFR 64]
- D.1.7 Baghouse Inspections [40 CFR 64]
- D.1.8 Broken or Failed Bag Detection [40 CFR 64]
- D.1.9 Cyclone Inspections [40 CFR 64]
- D.1.10 Cyclone Failure Detection [40 CFR 64]
- D.1.11 Storage Silo Inspections [40 CFR 64]

**Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

- D.1.12 Record Keeping Requirements

**SECTION D.2 FACILITY OPERATION CONDITIONS ..... 32**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- D.2.1 General Provisions Relating to HAPs [326 IAC 20-14] [40 CFR 63, Subpart A]
- D.2.2 Wood Furniture Manufacturing Operations NESHAP [40 CFR 63, Subpart JJ] [326 IAC 20-14-1]
- D.2.3 Work Practice Standards for Wood Furniture Manufacturing Operations [40 CFR 63, Subpart JJ]
- D.2.4 PSD Minor Limit [326 IAC 2-2]
- D.2.5 Hazardous Air Pollutants (HAP) [40 CFR 63, Subpart QQQQ] [40 CFR 63, Subpart JJJJ]
- D.2.6 Particulate [326 IAC 6-3-2(d)]
- D.2.7 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]
- D.2.8 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements**

- D.2.9 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

- D.2.10 Monitoring

- D.2.11 Scrubber Inspections
- D.2.12 Scrubber Malfunction

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

- D.2.13 Record Keeping Requirements
- D.2.14 Reporting Requirements

**SECTION D.3 FACILITY OPERATION CONDITIONS ..... 39**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- D.3.1 Particulate [326 IAC 6-2-4(a)]

Certification .....	40
Emergency Occurrence Report.....	41
Quarterly Report.....	43
Semi-Annual Report.....	44
Quarterly Deviation and Compliance Monitoring Report .....	45

## 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 through A.3 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 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

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The Permittee owns and operates a stationary wood counter top and cabinet manufacturing plant.

Source Address:	Plant 1: 1808 West Hively Avenue, Elkhart, Indiana 46517 Plant 2: 57420 Nagy Drive, Elkhart, Indiana 46517
Mailing Address:	107 West Franklin Street, Elkhart, Indiana 46515-2894
Source Phone Number:	(574) 295-5223
SIC Code:	2421, 2431, 2434, 2541, 2672
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

### A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

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This wood counter top and cabinet manufacturing company consists of two (2) plants:

- (a) Plant 1 is located at 1808 West Hively Avenue, Elkhart, Indiana 46517;
- (b) Plant 2 is located at 57420 Nagy Drive, Elkhart, Indiana 46517; and

Since the two (2) plants are located in contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source, effective from the date of issuance of Part 70 permit T039-7650-00324, issued on October 6, 1998.

### A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

#### **Plant 1 (1808 West Hively Avenue)**

- (a) One (1) sawdust storage silo, identified as S-1, constructed in 1997, with a capacity of 690 cubic yards, collecting sawdust from the woodworking equipment through a cyclonic baghouse system, and exhausting to stack C1-1.
- (b) Woodworking equipment, identified as WW1a, constructed in 1995, with a maximum throughput of 25,000 pounds of wood per hour, using a cyclonic baghouse system to control particulate emissions, and exhausting to three (3) stacks, identified as C1-2, C1-3 and C1-4.
- (c) Woodworking equipment, identified as WW1b, constructed in 1995, with a maximum throughput of 25,000 pounds of wood per hour, using a cyclonic baghouse system to control particulate emissions, and exhausting to two (2) stacks, identified as C1-5 and C1-6.
- (d) Woodworking equipment, identified as WW1c, constructed in 2003, having a maximum throughput capacity of 5,000 pounds of wood per hour, using a cyclonic baghouse system to control particulate emissions, and exhausting to stack C1-7.

- (e) Two (2) denibbers for D1, identified as DN1a and DN1b, constructed in 2000, each with maximum capacities of 3,900 board feet per hour, using a cyclonic baghouse system to control particulate emissions, and exhausting to stack C1-4.
- (f) One (1) denibber for D4, identified as DN4, constructed in 2000, with a maximum capacity of 3,900 board feet per hour, using a cyclonic baghouse system to control particulate emissions, and exhausting to stack C1-4.
- (g) One (1) adhesive spray booth and one (1) wood wrapping press, identified as SA1 and WWP1, respectively, constructed in 1995, with a maximum capacity of laminating 39.143 linear feet per hour, utilizing a high volume low pressure (HVLP) application system, with particulate emissions controlled by dry filters, and exhausting to stack E1-10.
- (h) One (1) dualtech automated back sealing machine, identified as D1, constructed in 2000, with a maximum capacity of 3,900 board feet per hour, equipped with eight (8) airless/air assist spray guns, with particulate emissions controlled by a water wall and water scrubber system, identified as D2, exhausting to stack E1-2, and a hot air drying tunnel exhausting to stack E1-3.
- (i) One (1) rototech automated front staining machine, identified as D3, constructed in 2000, with a maximum capacity of 3,900 board feet per hour, equipped with twenty (20) airless/air assist spray guns, with particulate emissions controlled by dry filters, exhausting to stack E1-4, and a forced air drying tunnel exhausting to stack E1-5.
- (j) One (1) dualtech automated sealing machine, identified as D4, constructed in 2000, with a maximum capacity of 3,900 board feet per hour, equipped with eight (8) airless/air assist spray guns, with particulate emissions controlled by a water wall and water scrubber system, identified as D5, exhausting to stack E1-6, and a hot air/infrared drying tunnel exhausting to stack E1-7.
- (k) One (1) dualtech automated topcoat machine, identified as D6, constructed in 2000, with a maximum capacity of 3,900 board feet per hour, equipped with eight (8) airless/air assist spray guns, with particulate emissions controlled by a water wall and water scrubber system, identified as D7, exhausting to stack E1-8, a hot air drying tunnel exhausting to stack E1-9, and a non-heated cooling hood exhausting inside the building.
- (l) One (1) manual touch up booth, identified as TU1, constructed in 2000, with a maximum capacity of one (1) gallon of stain, two (2) gallons of sealer, and two (2) gallons of topcoat per day, consisting of one (1) airless/air assist gun, with particulate emissions controlled by dry filters, exhausting to stack TU-1.
- (m) One (1) rototech automated back staining machine, identified as D8, constructed in 2002, with a maximum capacity of 3,900 board feet per hour, equipped with twenty (20) HVLP spray guns used for coating cabinet doors and an infrared drying oven, with particulate emissions controlled by dry filters, and exhausting to stack E1-1.
- (n) One (1) vacuum coater, identified as VC-1, constructed in 1995, with a maximum capacity of 5,000 linear feet of wood per hour, applying coatings containing no VOC or HAP to wood trim, utilizing an ultraviolet (UV) curing process, with particulate emissions controlled by dry filters, and exhausting to stack E1-11.

**Plant 2 (57420 Nagy Drive)**

- (o) Woodworking equipment, identified as WW2a, constructed in 1995, with a maximum throughput of 3,000 pounds of wood per hour, using a cyclonic baghouse system, replaced in 2008, to control particulate emissions, and exhausting to stack C2-1.
- (p) Woodworking equipment, identified as WW2b, constructed in 1995, with a maximum throughput of 5,000 pounds of wood per hour, using a cyclonic baghouse system, replaced in 2008, to control particulate emissions, and exhausting to stack C2-2.

- (q) Six (6) wood wrapping machines, identified as WR2a, WR2b, WR2c, WR2d, WR2e, and WR2f, constructed in 1995, each with a maximum capacity of 280 pounds of wood styles per hour, using water-based and hot melt adhesives, using a cyclonic baghouse system, replaced in 2008, to control particulate emissions, exhausting to stack C2-1.
- (r) Three (3) wood panel laminating machines, identified as WPL2, constructed in 1995, each with a maximum capacity of 1,500 pounds of wood panels per hour, using a cyclonic baghouse system, replaced in 2008, to control particulate emissions, and exhausting to stack C2-2.

A.4 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
  - (1) One (1) natural gas-fired boiler, identified as B1, constructed in 1995, rated at 0.4 MMBtu/hr, and exhausting to stack B1. [326 IAC 6-2-4]
  - (2) Four (4) natural gas-fired hot water boilers, identified as AB1, AB2, AB3, and AB4, constructed in 2000, with each rated at 1 MMBtu per hour, exhausting to stacks AB1, AB2, AB3, and AB4, respectively. [326 IAC 6-2-4]
- (b) Insignificant woodworking equipment, meeting the definition of "insignificant woodworking operation" as specified in 326 IAC 2-7-1(21)(G)(xxx), identified as WW1c, constructed in 2005, having a maximum process weight rate of 5,000 pounds of wood per hour, using a cyclonic baghouse system to control particulate emissions, with a maximum air flow rate of 35,000 standard cubic feet of air per minute (scfm) and a maximum outlet grain loading of less than 0.003 grains per dry standard cubic foot of exhaust air, and exhausting to stack C1-7. [326 IAC 2-7-1(21)(G)(xxx)] [326 IAC 6-3-2]

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION B

## GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-7-1]

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Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

### B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

---

- (a) This permit, T039-17506-00324, 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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

### B.4 Enforceability [326 IAC 2-7-7]

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

### B.5 Severability [326 IAC 2-7-5(5)]

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

### B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

### B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

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- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). 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 [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (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 a responsible official 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) A responsible official is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 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, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report 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) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall 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 the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 Emergency Provisions [326 IAC 2-7-16]

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM Main Office  
Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,  
Compliance Section), or  
Telephone Number: 317-233-0178(ask for Compliance Section)  
Facsimile Number: 317-233-6865

Northern Regional Office  
Telephone Number: 1-800-753-5519  
Telephone Number: 574-245-4870  
Facsimile Number: 574-245-4877

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The

Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

**B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]**

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- (a) All terms and conditions of permits established prior to T039-17506-00324 and issued pursuant to permitting programs approved into the state implementation plan have been either
  - (1) incorporated as originally stated,
  - (2) revised under 326 IAC 2-7-10.5, or
  - (3) deleted under 326 IAC 2-7-10.5.

- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

**B.14 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]**

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported 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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

- (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 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

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 nine (9) months 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 2-7 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.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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 the “responsible official” as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]  
[326 IAC 2-7-12 (b)(2)]

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
  - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
  - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
and  
  
United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590  
  
in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
  - (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emissions trades that are subject to 326 IAC 2-7-20(b), (c), or (e). The Permittee shall and make such records available, upon reasonable request, for public review.  
  
Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).
- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) **Emission Trades [326 IAC 2-7-20(c)]**  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) **Alternative Operating Scenarios [326 IAC 2-7-20(d)]**  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-7-10.5] [326 IAC 2-3-2]

- (a) A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.
- (b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2-2 and 326 IAC 2-3-2.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

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 Part 70 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 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 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 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.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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 the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][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. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) 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.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][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 2-7-5(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 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.3 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. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

**C.4 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. 326 IAC 9-1-2 is not federally enforceable.

**C.5 Fugitive Dust Emissions [326 IAC 6-4]**

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

**C.6 Stack Height [326 IAC 1-7]**

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

**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 the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

## Testing Requirements [326 IAC 2-7-6(1)]

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

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- (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 the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

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

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

## Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

### C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for 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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

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

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

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

**C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on May 6, 1999.
- (b) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.  
[326 IAC 1-5-3]

**C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]**

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If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

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

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- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
  - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
  - (1) monitoring results;
  - (2) review of operation and maintenance procedures and records;
  - (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 [326 IAC 2-7-5] [326 IAC 2-7-6]**

- (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 the "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]**

- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2007 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
  - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-50 IGCN 1003  
Indianapolis, Indiana 46204-2251

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The emission statement 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.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-3]

- (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) If there is a reasonable possibility that a “project” (as defined in 326 IAC 2-3-1 (II)) at an existing emissions unit, other than projects at a Clean Unit, which is not part of a “major modification” (as defined in 326 IAC 2-2-1(z)) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-3-1 (mm)), the Permittee shall comply with following:
  - (1) Prior to commencing the construction of the “project” (as defined in 326 IAC 2-3-1 (II)) at an existing emissions unit, document and maintain the following records:
    - (A) A description of the project.
    - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
    - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
      - (i) Baseline actual emissions;
      - (ii) Projected actual emissions;
      - (iii) Amount of emissions excluded under section 326 IAC 2-3-1(mm)(2)(A)(3); and
      - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
  - (2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
  - (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-3]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, 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 the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) 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.
- (f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-3-1 (II)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
- (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and
  - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
- (1) The name, address, and telephone number of the major stationary source.
  - (2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.
  - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-3-2(c)(3).
  - (4) Any other information that the Permittee deems fit to include in this report,
- Reports required in this part shall be submitted to:

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

- (h) The Permittee shall make the information required to be documented and maintained in

accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

### **Stratospheric Ozone Protection**

#### **C.19 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

#### Plant 1 (1808 West Hively Avenue)

- (a) One (1) sawdust storage silo, identified as S-1, constructed in 1997, with a capacity of 690 cubic yards, collecting sawdust from the woodworking equipment through a cyclonic baghouse system, and exhausting to stack C1-1.
- (b) Woodworking equipment, identified as WW1a, constructed in 1995, with a maximum throughput of 25,000 pounds of wood per hour, using a cyclonic baghouse system to control particulate emissions, and exhausting to three (3) stacks, identified as C1-2, C1-3 and C1-4.
- (c) Woodworking equipment, identified as WW1b, constructed in 1995, with a maximum throughput of 25,000 pounds of wood per hour, using a cyclonic baghouse system to control particulate emissions, and exhausting to two (2) stacks, identified as C1-5 and C1-6.
- (d) Woodworking equipment, identified as WW1c, constructed in 2003, having a maximum throughput capacity of 5,000 pounds of wood per hour, using a cyclonic baghouse system to control particulate emissions, and exhausting to stack C1-7.
- (e) Two (2) denibbers for D1, identified as DN1a and DN1b, constructed in 2000, each with maximum capacities of 3,900 board feet per hour, using a cyclonic baghouse system to control particulate emissions, and exhausting to stack C1-4.
- (f) One (1) denibber for D4, identified as DN4, constructed in 2000, with a maximum capacity of 3,900 board feet per hour, using a cyclonic baghouse system to control particulate emissions, and exhausting to stack C1-4.

#### Plant 2 (57420 Nagy Drive)

- (o) Woodworking equipment, identified as WW2a, constructed in 1995, with a maximum throughput of 3,000 pounds of wood per hour, using a cyclonic baghouse system, replaced in 2008, to control particulate emissions, and exhausting to stack C2-1.
- (p) Woodworking equipment, identified as WW2b, constructed in 1995, with a maximum throughput of 5,000 pounds of wood per hour, using a cyclonic baghouse system, replaced in 2008, to control particulate emissions, and exhausting to stack C2-2.
- (q) Six (6) wood wrapping machines, identified as WR2a, WR2b, WR2c, WR2d, WR2e, and WR2f, constructed in 1995, each with a maximum capacity of 280 pounds of wood styles per hour, using water-based and hot melt adhesives, using a cyclonic baghouse system, replaced in 2008, to control particulate emissions, exhausting to stack C2-1.
- (r) Three (3) wood panel laminating machines, identified as WPL2, constructed in 1995, each with a maximum capacity of 1,500 pounds of wood panels per hour, using a cyclonic baghouse system, replaced in 2008, to control particulate emissions, and exhausting to stack C2-2.

#### Insignificant Activities: Insignificant Woodworking Plant 1 (1808 West Hively Avenue)

- (b) Insignificant woodworking equipment, meeting the definition of "insignificant woodworking operation" as specified in 326 IAC 2-7-1(21)(G)(xxx), identified as WW1c, constructed in 2005, having a maximum process weight rate of 5,000 pounds of wood per hour, using a cyclonic baghouse system to control particulate emissions, with a maximum air flow rate of 35,000 standard cubic feet of air per minute (scfm) and a maximum outlet grain loading of less than 0.003 grains per dry standard cubic foot of exhaust air, and exhausting to stack C1-7. [326 IAC 2-7-1(21)(G)(xxx)] [326 IAC 6-3-2]

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

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

**D.1.1 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]**

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), the particulate emissions from the significant and insignificant woodworking operations, denibbers, wood wrapping operations, laminating operations and sawdust storage silo are subject to PM/PM10 emission limits as shown in the following table:

Stack ID	PM/PM10 limit (lb/hr)
C1-1	3.6
C1-2	4.2
C1-3	2.9
C1-4	9.3
C1-5	3.0
C1-6	5.3
C1-7	2.9
C2-1	4.2
C2-2	1.4

These limits, combined with the total potential to emit PM/PM-10 from the other emission units at this source, will ensure that the potential to emit PM/PM-10 remains less than 250 tons per twelve (12) consecutive month period. Compliance with these limits will render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable and make this source minor for PM and PM10 under 326 IAC 2-2 (PSD).

**D.1.2 Particulate Emissions Limitations for Manufacturing Processes [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the exhaust stacks of the baghouses and cyclones controlling the significant and insignificant woodworking operations, wood wrapping operations, wood laminating operations, denibbers and sawdust storage silo shall not exceed the pounds per hour limits as shown in the following table:

Exhaust Stack ID	Particulate Emission Rate	
	Process Weight Rate (lbs)	Particulate Emission Rate (lb/hr)
C1-1	55,000	37.8
C1-2	11,000	12.8
C1-3	7,500	9.9
C1-4	6,500	9.0
C1-5	12,000	13.6
C1-6	13,000	14.4
C1-7	5,000	7.6
C2-1	4,680	7.2
C2-2	9,500	11.6

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:

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

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

#### D.1.3 Baghouse Limitations [326 IAC 2-7-1(21)(G)(xxx)]

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The insignificant woodworking operation (WW1c) controlled by a cyclonic baghouse shall be considered an insignificant activity for Title V permitting purposes provided that the baghouse operations meet the requirements of 326 IAC 2-7-1(21)(G)(xxx), including the following:

- (a) Each woodworking baghouse shall not exhaust to the atmosphere greater than forty thousand (40,000) cubic feet of air per minute and shall not emit particulate matter with a diameter less than ten (10) microns in excess of one hundredth (0.01) grain per dry standard cubic foot of outlet air.
- (b) The opacity from each baghouse shall not exceed ten percent (10%).
- (c) Visible emissions from the baghouse shall be observed daily using procedures in accordance with Method 22 and normal or abnormal emissions are recorded. In the event abnormal emissions are observed for greater than six (6) minutes in duration, the following shall occur:
  - (1) The baghouse shall be inspected.
  - (2) Corrective actions, such as replacing or reseating bags, are initiated, when necessary.

#### D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

### **Compliance Determination Requirements**

#### D.1.5 Particulate Control [40 CFR 64]

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- (a) Pursuant to CP 039-8835-00324, issued on December 29, 1997, SSM 039-18363-00324, issued on July 21, 2004, and 326 IAC 6-3-2, and in order to comply with Conditions D.1.1, D.1.2 and D.1.3, the baghouses and cyclones for particulate control shall be in operation and control emissions from the significant and insignificant woodworking operations, wood wrapping operations, wood laminating operations, denibbers and sawdust storage silo at all times that the woodworking operations, wood wrapping operations, wood laminating operations, denibbers and sawdust storage silo are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

### **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

#### D.1.6 Visible Emissions Notations [40 CFR 64]

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- (a) Daily visible emission notations of the significant and insignificant woodworking operations, wood wrapping operations, wood laminating operations, denibbers and sawdust storage silo stack exhausts (C1-1, C1-2, C1-3, C1-4, C1-5, C1-6, C1-7, C2-1, and C2-2), 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 at the significant and insignificant woodworking operations, wood wrapping operations, wood laminating operations, denibbers and sawdust storage silo stack exhausts, 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.1.7 Baghouse Inspections [40 CFR 64]

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operations, wood wrapping operations, wood laminating operations, denibbers and sawdust storage silo when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

#### D.1.8 Broken or Failed Bag Detection [40 CFR 64]

- (a) For a single compartment baghouse controlling emissions from a process operated continuously a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions 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 B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouses 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.1.9 Cyclone Inspections [40 CFR 64]

An inspection shall be performed each calendar quarter of all cyclones controlling the woodworking operations, wood wrapping operations, wood laminating operations, denibbers, and sawdust storage silo 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. Inspections are optional when venting to the indoors.

#### D.1.10 Cyclone Failure Detection [40 CFR 64]

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. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

#### D.1.11 Storage Silo Inspections [40 CFR 64]

An inspection of the sawdust outloading operation and storage silo shall be performed at least once every two weeks. The Compliance Response Plan for the woodworking operations shall contain troubleshooting contingency and response steps for the sawdust outloading operation

when abnormal emissions are observed or there is evidence of sawdust in the area surrounding the storage silo.

**Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**D.1.12 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.1.3(c) and D.1.6, the Permittee shall maintain records of daily visible emission notations of the exhaust from stacks C1-1, C1-2, C1-3, C1-4, C1-5, C1-6, C1-7, C2-1, and C2-2.
- (b) To document compliance with Conditions D.1.3(c), D.1.7, D.1.9, and D.1.11, the Permittee shall maintain records of the results of the inspections required under Conditions D.1.3(c), D.1.7, D.1.9, and D.1.11.
- (c) The Permittee shall maintain records of corrective actions to document compliance with Condition D.1.3 and 326 IAC 2-7-21(1)(G)(xxx)(GG)(dd).
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

#### Plant 1 (1808 West Hively Avenue)

- (g) One (1) adhesive spray booth and one (1) wood wrapping press, identified as SA1 and WWP1, respectively, constructed in 1995, with a maximum capacity of laminating 39.143 linear feet per hour, utilizing a high volume low pressure (HVLP) application system, with particulate emissions controlled by dry filters, and exhausting to stack E1-10.
- (h) One (1) dualtech automated back sealing machine, identified as D1, constructed in 2000, with a maximum capacity of 3,900 board feet per hour, equipped with eight (8) airless/air assist spray guns, with particulate emissions controlled by a water wall and water scrubber system, identified as D2, exhausting to stack E1-2, and a hot air drying tunnel exhausting to stack E1-3.
- (i) One (1) rototech automated front staining machine, identified as D3, constructed in 2000, with a maximum capacity of 3,900 board feet per hour, equipped with twenty (20) airless/air assist spray guns, with particulate emissions controlled by dry filters, exhausting to stack E1-4, and a forced air drying tunnel exhausting to stack E1-5.
- (j) One (1) dualtech automated sealing machine, identified as D4, constructed in 2000, with a maximum capacity of 3,900 board feet per hour, equipped with eight (8) airless/air assist spray guns, with particulate emissions controlled by a water wall and water scrubber system, identified as D5, exhausting to stack E1-6, and a hot air/infrared drying tunnel exhausting to stack E1-7.
- (k) One (1) dualtech automated topcoat machine, identified as D6, constructed in 2000, with a maximum capacity of 3,900 board feet per hour, equipped with eight (8) airless/air assist spray guns, with particulate emissions controlled by a water wall and water scrubber system, identified as D7, exhausting to stack E1-8, a hot air drying tunnel exhausting to stack E1-9, and a non-heated cooling hood exhausting inside the building.
- (l) One (1) manual touch up booth, identified as TU1, constructed in 2000, with a maximum capacity of one (1) gallon of stain, two (2) gallons of sealer, and two (2) gallons of topcoat per day, consisting of one (1) airless/air assist gun, with particulate emissions controlled by dry filters, exhausting to stack TU-1.
- (m) One (1) rototech automated back staining machine, identified as D8, constructed in 2002, with a maximum capacity of 3,900 board feet per hour, equipped with twenty (20) HVLP spray guns used for coating cabinet doors and an infrared drying oven, with particulate emissions controlled by dry filters, and exhausting to stack E1-1.
- (n) One (1) vacuum coater, identified as VC-1, constructed in 1995, with a maximum capacity of 5,000 linear feet of wood per hour, applying coatings containing no VOC or HAP to wood trim, utilizing an ultraviolet (UV) curing process, with particulate emissions controlled by dry filters, and exhausting to stack E1-11.

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

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 General Provisions Relating to HAPs [326 IAC 20-14] [40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-14, apply to the facilities described in this section except when otherwise specified in 40 CFR 63, Subpart JJ.

D.2.2 Wood Furniture Manufacturing Operations NESHAP [40 CFR 63, Subpart JJ] [326 IAC 20-14-1]

Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:

- (a) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
  - (1) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids, as applied; or
  - (2) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or
  - (3) Use any combination of (1) and (2).
- (b) Limit VHAP emissions from contact adhesives as follows:
  - (1) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pound VHAP per pound solids;
  - (2) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids;
- (c) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids, as applied.

D.2.3 Work Practice Standards for Wood Furniture Manufacturing Operations [40 CFR 63, Subpart JJ]

The Permittee shall maintain a written work practice implementation plan, as required by 40 CFR 63.803(a). The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

- (a) Operator training course.
- (b) Leak inspection and maintenance plan.
- (c) Cleaning and washoff solvent accounting system.
- (d) Chemical composition of cleaning and washoff solvents.
- (e) Spray booth cleaning.
- (f) Storage requirements.
- (g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
- (h) Line cleaning.
- (i) Gun cleaning.
- (j) Washoff operations.
- (k) Formulation assessment plan for finishing operations.

**D.2.4 PSD Minor Limit [326 IAC 2-2]**

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- (a) The total VOC input to all the surface coating operations and laminating operations combined shall not exceed 249 tons per twelve (12) consecutive month period, with compliance determined on a monthly basis. This limit, in conjunction with the uncontrolled potential to emit of the boilers, heaters and laminating operations is equivalent to VOC emissions of less than 250 tons per year for the entire source. Compliance with the VOC usage limit makes the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to the modifications done under CP 039-8835-00324, MSM 039-11334-00324, AA 039-15653-00324, MSM 039-15677-00324 and SSM 039-18363-00324.
- (b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), the particulate emissions from the surface coating operations are subject to PM/PM10 emission limits as shown in the following table:

<b>PSD Minor Limit for PM / PM10, By Stack ID</b>	
Stack ID	PM/PM10 limit (lb/hr)
E1-1	0.1
E1-2	1.9
E1-3	0.1
E1-4	0.1
E1-5	0.1
E1-6	2.0
E1-7	0.1
E1-8	2.0
E1-9	0.1
E1-10	0.4
E1-11	0.1
TU1	0.1

These limits, in combination with other PM/PM10 emissions from this source, will ensure that the source-wide potential to emit PM/PM-10 remains less than 250 tons per twelve (12) consecutive month period. Compliance with these limits also makes 326 IAC 2-2 (PSD) not applicable to the construction and modifications performed under CP 039-4472-00324, issued on August 8, 1995, CP 039-8835-00324, issued on December 29, 1997, T039-7650-00324, issued on October 6, 1998, AA 039-15653-00324, issued on April 26, 2002, and SSM 039-18363-00324, issued on July 21, 2004.

**D.2.5 Hazardous Air Pollutants (HAP) [40 CFR 63, Subpart QQQQ] [40 CFR 63, Subpart JJJJ]**

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The source's potential to emit a single HAP is less than ten (10) tons per year and the source's potential to emit a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to 40 CFR 63, Subpart QQQQ and 40 CFR 63, Subpart JJJJ. Any change that would increase HAP emissions to greater than ten (10) tons per year of a single HAP or greater than twenty-five (25) tons per year of a combination of HAPs requires prior approval from IDEM, OAQ.

**D.2.6 Particulate [326 IAC 6-3-2(d)]**

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Particulate emissions from the surface coating facilities shall be controlled by a dry particulate filter and/or water wall and water scrubber system, and the Permittee shall operate the control devices in accordance with manufacturer's specifications.

**D.2.7 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]**

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Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the emission units identified as D1, D3, D4, D6, D8 and TU1 applying surface coatings 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.2.8 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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

**Compliance Determination Requirements**

**D.2.9 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]**

Compliance with the VOC content and usage limitations contained in Conditions D.2.2, D.2.4(a), and D.2.7 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.2.10 Monitoring**

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating facilities stacks while one or more of the booths are in operation. If a condition exists which should result in a response step, 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.
- (b) Daily inspections shall be performed to verify that the water level of the water wall/baffles meets the manufacturer's recommended level. To monitor the performance of the water wall/baffles, the water level shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. In addition, weekly observations shall be made of the overspray from the surface coating booth stacks while one or more of the booths are in operation. If a noticeable change in overspray emission, or evidence of overspray emission is observed at any stack exhaust, 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.
- (c) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emission, or when evidence of overspray emissions is observed at any stack exhaust, 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.2.11 Scrubber Inspections

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An inspection of the scrubbers controlling emissions from the surface coating facilities shall be performed semi-annually. Inspections required by this condition shall not be performed in consecutive months. Repairs or replacement of defective components shall be performed in accordance with the Preventive Maintenance Plan.

#### D.2.12 Scrubber Malfunction

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In the event that a scrubber malfunction has been observed:

- (a) The affected unit will be shut down immediately in accordance with safe operating procedures until the failed unit has been repaired or the appropriate components replaced”.
- (b) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### D.2.13 Record Keeping Requirements

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- (a) To document compliance with Condition D.2.2 and D.2.5, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Conditions D.2.2 and D.2.5. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
  - (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
  - (2) The VHAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
  - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable spray booth coating used.
  - (4) The VHAP content in weight percent of each thinner used.
  - (5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (b) To document compliance with Condition D.2.4(a), the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.4(a). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
  - (1) The amount and VOC content of each coating material, dilution solvent and cleaning solvent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (2) The total VOC usage for each month; and
  - (3) The weight of VOCs emitted for each compliance period.
- (c) To document compliance with Condition D.2.3, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.

- (d) To document compliance with Condition D.2.10, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.
- (e) To document compliance with Conditions D.2.11, the Permittee shall maintain records of the results of the inspections required under Condition D.2.11.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.2.14 Reporting Requirements

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- (a) A quarterly summary of the information to document compliance with Condition D.2.4(a) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.
- (b) A semi-annual Continuous Compliance Report to document compliance with Condition D.2.2 and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported. The six (6) month periods shall cover the following months:
  - (1) January 1 through June 30.
  - (2) July 1 through December 31.

This report 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

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

## SECTION D.3

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

#### Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
- (1) One (1) natural gas-fired boiler, identified as B1, constructed in 1995, rated at 0.4 MMBtu/hr, and exhausting to stack B1. [326 IAC 6-2-4]
  - (2) Four (4) natural gas-fired hot water boilers, identified as AB1, AB2, AB3, and AB4, constructed in 2000, with each rated at 1 MMBtu per hour, exhausting to stacks AB1, AB2, AB3, and AB4, respectively. [326 IAC 6-2-4]

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

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.3.1 Particulate [326 IAC 6-2-4(a)]

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Pursuant to 326 IAC 6-2-4(a), the PM emission limit for boilers B1, AB1, AB2, AB3, and AB4 shall be 0.6 lb/MMBtu.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Patrick Industries, Inc.  
Source Address: 1808 West Hively Avenue, Elkhart, Indiana 46517; and 57420 Nagy Drive,  
Elkhart, Indiana 46517.  
Mailing Address: 107 West Franklin Street, Elkhart, Indiana 46515-2894  
Part 70 Permit No.: T039-17506-00324

**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:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-0178  
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Patrick Industries, Inc.  
Source Address: 1808 West Hively Avenue, Elkhart, Indiana 46517; 57420 Nagy Drive, Elkhart, Indiana 46517 and 58038 County Road No. 3, Elkhart, Indiana 46517  
Mailing Address: 107 West Franklin Street, Elkhart, Indiana 46515-2894  
Part 70 Permit No.: T039-17506-00324

**This form consists of 2 pages**

**Page 1 of 2**

- |  |
|--|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none"><li>X The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and</li><li>X The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.</li></ul> |
|--|

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

**Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.

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

## Part 70 Quarterly Report

Source Name: Patrick Industries, Inc.  
Source Address: 1808 West Hively Avenue, Elkhart, Indiana 46517; and 57420 Nagy Drive, Elkhart, Indiana 46517.  
Mailing Address: 107 West Franklin Street, Elkhart, Indiana 46515-2894  
Part 70 Permit No.: T039-17506-00324  
Facility: All Laminating/Surface Coating Facilities  
Parameter: VOC  
Limit: Less than 249 tons per twelve consecutive month period, with compliance determined at the end of each month.

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

### PART 70 OPERATING PERMIT Semi-Annual Report

#### VOC and VHAP usage - Wood Furniture NESHAP

Source Name: Patrick Industries, Inc.  
 Source Address: 1808 West Hively Avenue, Elkhart, Indiana 46517; and 57420 Nagy Drive, Elkhart, Indiana 46517.  
 Mailing Address: 107 West Franklin Street, Elkhart, Indiana 46515-2894  
 Part 70 Permit No.: T039-17506-00324  
 Facility: All Laminating/Surface Coating Facilities  
 Parameter: VOC and VHAPs - NESHAP  
 Limit: (1) Finishing operations - 1.0 lb VHAP/lb Solids  
 (2) Thinners used for on-site formulation of washcoats, basecoats and enamels - 3% VHAP content by weight  
 (3) All other thinner mixtures - 10% VHAP content by weight  
 (4) Foam adhesives meeting the upholstered seating flammability requirements - 1.8 lb VHAP/lb Solids  
 (5) All other contact adhesives - 1.0 lb VHAP/lb Solids  
 (6) Strippable spray booth material - 0.8 pounds VOC per pound solids

YEAR: \_\_\_\_\_

Month	Finishing Operations (1lb VHAP/lb Solid)	Thinners (3% by weight)	All Other Thinner Mixtures (10% by weight)	Foam Adhesives (upholstered) (1.8lb VHAP/lb Solid)	Contact Adhesives (1.0 lb VHAP/lb Solid)	Strippable Spray Booth Material (0.8 lb VOC/ lb Solid)
1						
2						
3						
4						
5						
6						

No deviation occurred in this month.

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

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

Attach a signed certification to complete this report.

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

**PART 70 OPERATING PERMIT  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Patrick Industries, Inc.  
Source Address: 1808 West Hively Avenue, Elkhart, Indiana 46517; and 57420 Nagy Drive,  
Elkhart, Indiana 46517.  
Mailing Address: 107 West Franklin Street, Elkhart, Indiana 46515-2894  
Part 70 Permit No.: T039-17506-00324

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

# Indiana Department of Environmental Management Office of Air Quality

## Technical Support Document (TSD) for an Administrative Amendment to a Part 70 Operating Permit

### Source Background and Description

Source Name:	Patrick Industries, Inc.
Source Address:	Plant 1: 1808 West Hively Avenue, Elkhart, Indiana 46517 Plant 2: 57420 Nagy Drive, Elkhart, Indiana 46517
Mailing Address:	107 West Franklin Street, Elkhart, Indiana 46515-2894
County:	Elkhart
SIC Code:	2421
Operation Permit No.:	T039-17506-00324
Operation Permit Issuance Date:	February 7, 2006
Significant Permit Modification No.:	039-26709-00324
Permit Reviewer:	APT

The Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) has reviewed a permit modification request from Patrick Industries, Inc. relating to the operation of a stationary wood counter top and cabinet manufacturing plant.

### History and Background

Patrick Industries, Inc. was issued a Part 70 Operating Permit Renewal No. T039-17506-00324, on February 7, 2006 for the operation of a stationary wood counter top and cabinet manufacturing facility. On July 1, 2008, a modification application was received from Patrick Industries, Inc. located in Elkhart, Indiana. The purpose of the application was to notify IDEM Office of Air Quality (OAQ) of the closing of one of the permitted plants.

### County Attainment Status

The source is located in Elkhart County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Attainment effective July 19, 2007, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
<sup>1</sup> Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including Elkhart County, and is a maintenance area for the 1-hour National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM <sub>2.5</sub> .	

- (a) Ozone Standards
  - (1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
  - (2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, and St. Joseph counties as attainment for the 8-hour ozone standard.

- (3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, and Shelby counties as attainment for the 8-hour ozone standard.
- (4) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Elkhart 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) **PM<sub>2.5</sub>**  
Elkhart County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> emissions, and the effective date of these rules is July 15<sup>th</sup>, 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 PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions until 326 IAC 2-2 is revised.
- (c) **Other Criteria Pollutants**  
Elkhart County has been classified as attainment or unclassifiable in Indiana for PM, PM<sub>10</sub>, NOx, SO<sub>2</sub>, and CO. 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.

#### Explanation of Modification

The current permit, T039-17506-00324, lists three (3) manufacturing facilities/locations. The facility that will be closed is identified in the permit as Plant 3, and is located at 58038 County Road No. 3, Elkhart, Indiana, 46517. This referenced facility will cease all operations as of June 27, 2008 and all regulated equipment/processes and pollution control equipment will be removed. The other two (2) manufacturing facilities listed in the permit will remain active. This modification will incorporate the aforementioned changes as well as the clarification, removal, or restructuring of several permit conditions.

#### Justification for the Modification

There are no changes associated with the woodworking or other manufacturing processes, and no increases in throughput or production. The source is removing emission units and no replacements will be installed as a result of the facilities closure; therefore, a source modification is not necessary. This modification will be incorporated into the Part 70 Operating Permit through an administrative amendment issued pursuant to 326 IAC 2-7-11(a)(7), because the modification revises descriptive information where the revision will not trigger a new applicable requirement or violate a permit term.

#### Enforcement Issues

There are no pending enforcement actions related to this modification.

#### Emission Calculations

See Appendix A of this document for detailed emission calculations.

**Permit Level Determination – Part 70**

There are no new or modified emission units included in this permit amendment. Therefore, these changes are not subject to 326 IAC 2-7-10.5.

This modification will be incorporated into the Part 70 Operating Permit through an administrative amendment issued pursuant to 326 IAC 2-7-11(a)(7), because the modification does not qualify as a minor permit modification.

As part of this modification, the source requested to have the controls for the woodworking operations reviewed, and IDEM, OAQ has determined that the cyclonic baghouses used for PM/PM<sub>10</sub> control of the woodworking operations at this stationary wood counter top and cabinet manufacturing facility are an integral part of the woodworking operations. Therefore, the permitting level can be determined using the potential to emit after the particulate controls. The following table reflects the source-wide PTE after this determination and after controls:

<b>Pollutant</b>	<b>Emissions Generating Activity</b>			<b>(tons/year)</b>	
	<b>Surface Coating</b>	<b>Combustion</b>	<b>Woodworking</b>	<b>TOTAL PTE</b>	
<b>PM</b>	7.95	0.23	34.74	42.92	
<b>PM10</b>	7.95	0.23	34.74	42.92	
<b>SO2</b>	-----	0.02	-----	0.02	
<b>NOx</b>	-----	2.98	-----	2.98	
<b>VOC</b>	<250	0.16	-----	<250	
<b>CO</b>	-----	2.50	-----	2.50	
<b>total HAPs</b>	9.35	0.06	-----	9.41	
<b>worst case single HAP</b>	9.35	0.03	-----	9.39	Toluene

Although the potential to emit particulates has significantly decreased based on this determination, the potential to emit VOCs has not decreased below the Part 70 threshold of one hundred (100) tons per year; therefore the permit level has not been changed.

**Permit Level Determination – PSD or Emission Offset**

This permit modification to an existing minor stationary source has not changed the permit level or the existing PSD Minor limits for the woodworking and surface coating operations established in permit number T039-17506-00324, issued on February 7, 2006. This permit amendment incorporates the removal of emission units and there have been no increases in emissions as a result.

IDEM, OAQ has agreed that after control emissions for woodworking shall be used for permit level determination only and will not be used to determine 326 IAC 2-2 (PSD) applicability. Therefore, no changes to PSD minor limits for surface coating and woodworking operations will be made due to the administrative amendment (039-26709-00324), issued pursuant to 326 IAC 2-7-11(a)(7).

**Federal Rule Applicability Determination**

- (a) New Source Performance Standards (NSPS) 40 CFR Part 60  
 There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit due to this amendment.
- (b) National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63  
 There are no new National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) requirements included in this permit due to this amendment.

### State Rule Applicability Determination

State rules and compliance monitoring applicabilities shall remain unchanged as a result of this amendment.

### Proposed Changes

The changes listed below have been made to Part 70 Operating permit No.: T039-17506-00324. Deleted language is shown in ~~strikeout~~, new language appears in **bold**. The Table of Contents has been updated as necessary.

**Change No. 1:** The following changes have been made to the cover page:

PART 70 OPERATING PERMIT RENEWAL  
OFFICE OF AIR QUALITY

Patrick Industries, Inc.  
1808 West Hively Avenue, **and**  
57420 Nagy Drive, **and**  
~~58038 County Road No. 3~~  
Elkhart, Indiana 46517

**Change No. 2:** The requirements of 326 IAC 2-3 (Emission Offset) apply to major sources or major modifications constructed in an area designated as non-attainment. Elkhart County has been re-designated as attainment or unclassifiable for ozone. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements no longer apply to this source. The facility identified as Plant 3 has been closed, and therefore, all references to Plant 3 and the emission units contained therein will be removed from the permit. The following changes have been made to Condition A.1:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary wood counter top and cabinet manufacturing plant.

Source Address: **Plant 1:** 1808 West Hively Avenue, Elkhart, Indiana 46517  
**Plant 2:** 57420 Nagy Drive, Elkhart, Indiana 46517  
~~58038 County Road No. 3, Elkhart, Indiana 46517.~~  
Mailing Address: 107 West Franklin Street, Elkhart, Indiana 46515-2894  
Source Phone Number: (574) 295-5223  
SIC Code: 2421, 2431, 2434, 2541, 2672  
County Location: Elkhart  
Source Location Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Minor Source, under PSD Rules  
~~Major Source, under Emission Offset;~~  
Minor Source, Section 112 of the Clean Air Act  
Not 1 of 28 Source Categories

**Change No. 3:** The following changes have been made to Condition A.2:

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

This wood counter top and cabinet manufacturing company consists of ~~three (3)~~ **two (2)** plants:

- (a) Plant 1 is located at 1808 West Hively Avenue, Elkhart, Indiana 46517;
- (b) Plant 2 is located at 57420 Nagy Drive, Elkhart, Indiana 46517; and
- ~~(c) Plant 3 is located at 58038 County Road No. 3, Elkhart, Indiana 46517.~~

Since the ~~three (3)~~ **two (2)** plants are located in contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source, effective from the date of issuance of Part 70 permit T039-7650-00324, issued on October 6, 1998.

**Change No. 4:**

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]  
[326 IAC 2-7-5(15)]

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

\* \* \*

**Plant 3 (58038 County Rd. No.3)**

- (s) ~~Woodworking equipment, identified as WW3a, constructed in 2002, having a maximum throughput capacity of 25,000 pounds of wood per hour. Emissions of particulate matter are controlled using a cyclonic baghouse, exhausting to stack C3-1.~~
- (t) ~~Woodworking equipment, identified as WW3b, constructed in 2004, consisting of sanders, saws and woodworking tools with a maximum throughput rate of 500 pounds of wood per hour and 25 pounds of plastic per hour, with particulate matter emissions controlled by a cyclonic baghouse and exhausting at stack C3-1.~~
- (u) ~~One (1) MDF board laminating machine, identified as BL3, constructed in 1997, utilizing a roll coat adhesive application system, with a maximum capacity of 1,000 pounds of wood panels per hour, with particulate matter emissions controlled by a cyclonic baghouse and exhausting to stack C3-1.~~
- (v) ~~One (1) adhesive coating facility, identified as S3-1, constructed in 2004, equipped with an airless/air assisted spray gun and roll coater, with a maximum usage rate of 0.8 gallons of adhesives per day, with particulate matter emissions controlled by dry filter, and exhausting at stack S3-1.~~
- (w) ~~One (1) Corian surface coating line, identified as Corian, constructed in 1998, utilizing a hand application method, with a maximum capacity of 1,000 pounds per hour, and exhausting to one (1) stack, identified as C5.~~

**Change No. 5:** The Facility Description list in Section D.1 has been changed as follows:

**SECTION D.1**

**FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)]:**

**Plant 1 (1808 West Hively Avenue)**

\* \* \*

**Plant 2 (57420 Nagy Drive)**

\* \* \*

**Plant 3 (58038 County Rd. No.3)**

- (s) ~~Woodworking equipment, identified as WW3a, constructed in 2002, having a maximum throughput capacity of 25,000 pounds of wood per hour. Emissions of particulate matter are controlled using a cyclonic baghouse, exhausting to stack C3-1.~~
- (t) ~~Woodworking equipment, identified as WW3b, constructed in 2004, consisting of sanders, saws and woodworking tools with a maximum throughput rate of 500 pounds of wood per hour~~

~~and 25 pounds of plastic per hour, with particulate matter emissions controlled by a cyclonic baghouse and exhausting at stack C3-1.~~

(u) ~~One (1) MDF board laminating machine, identified as BL3, constructed in 1997, utilizing a roll coat adhesive application system, with a maximum capacity of 1,000 pounds of wood panels per hour, with particulate matter emissions controlled by a cyclonic baghouse and exhausting to stack C3-1.~~

\* \* \*

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

**Change No. 6:** The following changes have been made to Condition D.1.1:

**D.1.1 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]**

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), the particulate emissions from the significant and insignificant woodworking operations, denibbers, wood wrapping operations, laminating operations and sawdust storage silo are subject to PM/PM10 emission limits as shown in the following table:

Stack ID	PM/PM10 limit (lb/hr)
C1-1	3.6
C1-2	4.2
C1-3	2.9
C1-4	9.3
C1-5	3.0
C1-6	5.3
C1-7	2.9
C2-1	4.2
C2-2	1.4
<del>C3-1</del>	<del>2.6</del>

These limits, combined with the total potential to emit PM/PM-10 from the other emission units at this source, will ensure that the potential to emit PM/PM-10 remains less than 250 tons per twelve (12) consecutive month period. Compliance with these limits will render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable and make this source minor for PM and PM10 under 326 IAC 2-2 (PSD).

**Change No. 7:** The following changes have been made to Condition D.1.2:

**D.1.2 Particulate Emissions Limitations for Manufacturing Processes [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the exhaust stacks of the baghouses and cyclones controlling the significant and insignificant woodworking operations, wood wrapping operations, wood laminating operations, denibbers and sawdust storage silo shall not exceed the pounds per hour limits as shown in the following table:

Exhaust Stack ID	Particulate Emission Rate	
	Process Weight Rate (lbs)	Particulate Emission Rate (lb/hr)
C1-1	55,000	37.8
C1-2	11,000	12.8
C1-3	7,500	9.9
C1-4	6,500	9.0
C1-5	12,000	13.6
C1-6	13,000	14.4
C1-7	5,000	7.6
C2-1	4,680	7.2
C2-2	9,500	11.6
<del>C3-1</del>	<del>26,525</del>	<del>23.2</del>

\* \* \*

**Change No. 8:** The following changes have been made to Condition D.1.6:

D.1.6 Visible Emissions Notations [40 CFR 64]

- (a) Daily visible emission notations of the significant and insignificant woodworking operations, wood wrapping operations, wood laminating operations, denibbers and sawdust storage silo stack exhausts (C1-1, C1-2, C1-3, C1-4, C1-5, C1-6, C1-7, C2-1, **and C2-2, and C3-4**) shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

\* \* \*

**Change No. 9:** The following changes have been made to Condition D.1.12:

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.1.12 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.3(c) and D.1.6, the Permittee shall maintain records of daily visible emission notations of the exhaust from stacks C1-1, C1-2, C1-3, C1-4, C1-5, C1-6, C1-7, C2-1, **and C2-2, and C3-4**.
- (b) To document compliance with Conditions D.1.3(c), D.1.7, D.1.9, and D.1.11, the Permittee shall maintain records of the results of the inspections required under Conditions D.1.3(c), D.1.7, D.1.9, and D.1.11.
- (c) The Permittee shall maintain records of corrective actions to document compliance with Condition D.1.3 and 326 IAC 2-7-21(1) (G) (xxx) (GG) (dd).
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**Change No. 10:** The following changes have been made to Section D.2, Facility Description:

**SECTION D.2**

**FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)]:**

\* \* \*

**~~Plant 3 (58038 County Rd. No.3)~~**

- (v) ~~One (1) adhesive coating facility, identified as S3-1, constructed in 2004, equipped with an airless/air assisted spray gun and roll coater, with a maximum usage rate of 0.8 gallons of adhesives per day, with particulate matter emissions controlled by dry filter, and exhausting at stack S3-1.~~
- (w) ~~One (1) Corian surface coating line, identified as Corian, constructed in 1998, utilizing a hand application method, with a maximum capacity of 1,000 pounds per hour, and exhausting to one (1) stack, identified as C5.~~

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

**Change No. 11:** The following changes to Condition D.2.4 have been made to reflect the removal of the emission unit identified as Corian surface coating line, exhausting to stack C5:

D.2.4 PSD Minor Limit [326 IAC 2-2]

\* \* \*

- (b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), the particulate emissions from the surface coating operations are subject to PM/PM10 emission limits as shown in the following table:

PSD Minor Limit for PM / PM10, By Stack ID	
Stack ID	PM/PM10 limit (lb/hr)
E1-1	0.1
E1-2	1.9
E1-3	0.1
E1-4	0.1
E1-5	0.1
E1-6	2.0
E1-7	0.1
E1-8	2.0
E1-9	0.1
E1-10	0.4
E1-11	0.1
TU1	0.1
G5	0.1

\* \* \*

- Change No. 12:** The following changes to Condition D.2.7 have been made to reflect the removal of the emission unit identified as Corian surface coating line:

D.2.7 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

\* \* \*

~~Any change that would increase actual VOC emissions from the Corian surface coating line, or the adhesive coating facility (S3-1) to greater than fifteen (15) pounds per day requires prior approval from IDEM, OAQ.~~

\* \* \*

- Change No. 13:** The following changes have been made to the Part 70 Operating Permit Certification:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
PART 70 OPERATING PERMIT  
CERTIFICATION

Source Name: Patrick Industries, Inc.  
Source Address: 1808 West Hively Avenue, Elkhart, Indiana 46517; ~~and 57420 Nagy Drive, Elkhart, Indiana 46517. and 58038 County Road No. 3, Elkhart, Indiana 46517~~  
Mailing Address: 107 West Franklin Street, Elkhart, Indiana 46515-2894  
Part 70 Permit No.: T039-17506-00324

\* \* \*

- Change No. 14:** The following change has been made to the Part 70 Operating Permit Emergency Occurrence Report:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
MC 61-53 IGCN 1003

Indianapolis, Indiana 46204-2251  
Phone: 317-233-0178  
Fax: 317-233-6865

PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT

Source Name: Patrick Industries, Inc.  
Source Address: 1808 West Hively Avenue, Elkhart, Indiana 46517; **and** 57420 Nagy Drive,  
Elkhart, Indiana 46517. ~~and 58038 County Road No. 3, Elkhart, Indiana 46517~~  
Mailing Address: 107 West Franklin Street, Elkhart, Indiana 46515-2894  
Part 70 Permit No.: T039-17506-00324

\* \* \*

**Change No. 15:** The following changes have been made to the Part 70 Operating Permit Quarterly Report:

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

Part 70 Quarterly Report

Source Name: Patrick Industries, Inc.  
Source Address: 1808 West Hively Avenue, Elkhart, Indiana 46517; **and** 57420 Nagy Drive,  
Elkhart, Indiana 46517. ~~and 58038 County Road No. 3, Elkhart, Indiana 46517~~  
Mailing Address: 107 West Franklin Street, Elkhart, Indiana 46515-2894  
Part 70 Permit No.: T039-17506-00324  
Facility: All Laminating/Surface Coating Facilities  
Parameter: VOC  
Limit: Less than 249 tons per twelve consecutive month period, with compliance determined at the end of each month.

\* \* \*

**Change No. 16:** The following changes have been made to the Part 70 Operating Permit Semi-Annual Report:

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

PART 70 OPERATING PERMIT  
Semi-Annual Report  
VOC and VHAP usage - Wood Furniture NESHAP

Source Name: Patrick Industries, Inc.  
Source Address: 1808 West Hively Avenue, Elkhart, Indiana 46517; **and** 57420 Nagy Drive,  
Elkhart, Indiana 46517. ~~and 58038 County Road No. 3, Elkhart, Indiana 46517~~  
Mailing Address: 107 West Franklin Street, Elkhart, Indiana 46515-2894  
Part 70 Permit No.: T039-17506-00324

\* \* \*

**Change No. 17:** The following changes have been made to the Part 70 Operating Permit Quarterly Deviation and Compliance Monitoring Report:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY

COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Patrick Industries, Inc.  
Source Address: 1808 West Hively Avenue, Elkhart, Indiana 46517; ~~and 58038 County Road No. 3, Elkhart, Indiana 46517~~ **and** 57420 Nagy Drive,  
Elkhart, Indiana 46517.  
Mailing Address: 107 West Franklin Street, Elkhart, Indiana 46515-2894  
Part 70 Permit No.: T039-17506-00324

\* \* \*

<b>Conclusion and Recommendation</b>
--------------------------------------

This administrative amendment shall be subject to the conditions of the attached Part 70 permit No. 039-17506-00324. The staff recommends to the Commissioner that this Administrative Amendment, AA 039-26709-00324, be approved.

**Appendix A: Potential Emissions Calculations Summary**

**Source Name:** Patrick Industries, Inc.  
**Source Address:** **Plant 1:** 1808 West Hively Avenue, Elkhart, Indiana 46517  
**Plant 2:** 57420 Nagy Drive, Elkhart, Indiana 46517  
**Mailing Address:** 107 West Franklin Street, Elkhart, Indiana 46515-2894  
**County:** Elkhart  
**SIC Code:** 2421  
**Operation Permit No.:** T039-17506-00324  
**Operation Permit Issuance Date:** 2/7/2006  
**Third Administrative Amendment No.:** 039-26709-00324  
**Permit Reviewer:** APT

<u>Pollutant</u>	Surface Coating	<u>Emissions Generating Activity</u>		Uncontrolled (tons/year)	
		Combustion	Woodworking	TOTAL	
PM	241.12	0.23	34.74	42.92	
PM10	241.12	0.23	34.74	42.92	
SO2	-----	0.02	-----	0.02	
NOx	-----	2.98	-----	2.98	
VOC	740.34	0.16	-----	740.50	
CO	-----	2.50	-----	2.50	
total HAPs	9.35	0.06	-----	9.41	
worst case single HAP	9.35	0.03	-----	9.35 Toluene	

<u>Pollutant</u>	Surface Coating	<u>Emissions Generating Activity</u>		Controlled (tons/year)	
		Combustion	Woodworking	TOTAL	
PM	7.95	0.23	34.74	42.92	
PM10	7.95	0.23	34.74	42.92	
SO2	-----	0.02	-----	0.02	
NOx	-----	2.98	-----	2.98	
VOC	< 249.0	0.16	-----	< 250	
CO	-----	2.50	-----	2.50	
total HAPs	9.35	0.06	-----	9.41	
worst case single HAP	9.35	0.03	-----	9.39 Toluene	

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

**Source Name:** Patrick Industries, Inc.  
**Source Address:** **Plant 1:** 1808 West Hively Avenue, Elkhart, Indiana 46517  
**Plant 2:** 57420 Nagy Drive, Elkhart, Indiana 46517  
107 West Franklin Street, Elkhart, Indiana 46515-2894  
**Mailing Address:**  
**County:** Elkhart  
**SIC Code:** 2421  
**Operation Permit No.:** T039-17506-00324  
**Operation Permit Issuance Date:** 2/7/2006  
**Third Administrative Amendment No.:** 039-26709-00324  
**Permit Reviewer:** APT

**Date:** 2/15/2005

Facility	Stack ID	Material	Density (lb/gal)	Weight % Volatile (H <sub>2</sub> O & Organics)	Weight % Water	Weight % Organics	Weight % Solids	Max. Usage (gal/unit)	Maximum Throughput (unit/hour)	PTE of VOC (ton/yr)	Transfer Efficiency	PTE of PM/PM10 Uncontrolled (ton/yr)	Control Efficiency	PTE of PM/PM10 Controlled (ton/yr)
<b>Plant 1</b>														
D1	E1-2	Back Seal	7.32	81.8%	63.1%	18.7%	11.4%	0.0081	1424	69.4	80.0%	8.47	80.0%	1.69
D3, D8	E1-4, E1-1	Stain	6.66	98.7%	44.0%	54.7%	0.6%	0.0187	1424	425	80.0%	0.93	80.0%	0.19
D4	E1-6	Sealer	7.39	78.5%	40.1%	38.3%	13.6%	0.007	1424	123	80.0%	8.72	80.0%	1.74
D6	E1-8	Topcoat	7.39	78.5%	40.1%	38.3%	13.6%	0.007	1424	123	80.0%	8.72	80.0%	1.74
TU1	TU-1	Stain, Sealer and Topcoat												
SA1, WWP1	E1-10	Helmibond 859 adhesive	8.92	54.0%	54.0%	0.00%	45.0%	0.005	100	0.00	80.0%	1.76	80.0%	0.35
VC-1	E1-11	UV Coating	9.89	2.0%	2.0%	0.00%	98.0%	0.001	500	0.00	95.0%	0.53	80.0%	0.11
<b>Plant 2</b>														
WR2, WPL2	C2-1, C2-2	40-003A adhesive	8.80	43.0%	43.0%	0.00%	55.0%	0.050	1000	0.00	80.0%	212	99.0%	2.1

TOTAL 740.335 241.122 7.946

All stains and coatings are applied with airless/HVLP equipment and controlled by dry particulate filters.

Particulate emissions from adhesive application at WR2, WPL2 and BL3 are controlled by cyclonic baghouses with a control efficiency of 99%.

**Methodology**

PTE of VOC (tons/yr) = Density (lb/gal) x Weight % Organics x Max. Usage (gal/unit) x Max. Throughput (units/hr) x 8760 (hr/yr) x 1 ton/2000 lbs

PTE of PM/PM10 Uncontrolled (tons/yr) = Density (lb/gal) x Weight % Solids x Max. Usage (gal/unit) x Max. Throughput (units/hr) x (1- Transfer Eff. (%)) x 8760 (hr/yr) x 1 ton/2000 lbs

PTE of PM/PM10 Controlled (tons/yr) = Density (lb/gal) x Weight % Solids x Max. Usage (gal/unit) x Max. Throughput (units/hr) x (1- Transfer Eff. (%)) x (1-Control Eff. (%)) x 8760 (hr/yr) x 1 ton/2000 lbs

**Appendix A: Emissions Calculations  
HAP Emissions from Surface Coating Operations**

**Source Name:** Patrick Industries, Inc.  
**Source Address:** **Plant 1:** 1808 West Hively Avenue, Elkhart, Indiana 46517  
**Plant 2:** 57420 Nagy Drive, Elkhart, Indiana 46517  
**Mailing Address:** 107 West Franklin Street, Elkhart, Indiana 46515-2894  
**County:** Elkhart  
**SIC Code:** 2421  
**Operation Permit No.:** T039-17506-00324  
**Operation Permit Issuance Date:** 2/7/2006  
**Third Administrative Amendment No.:** 039-26709-00324  
**Permit Reviewer:** APT

	Material	Density (lb/gal)	Max. Usage (gal/unit)	Maximum Throughput (unit/hour)	Weight % Toluene	Toluene Emissions (ton/yr)
<b>Plant 1</b>						
D1	Back Seal	7.32	0.0081	1424	0.00%	0.00
D3, D8	Stain	6.66	0.0187	1424	0.00%	0.00
D4	Sealer	7.39	0.0070	1424	1.46%	4.68
D6	Topcoat	7.39	0.0070	1424	1.46%	4.68
SA1	Helmibond 859 adhesive	8.92	0.0050	100	0.00%	0.00
<b>Plant 2</b>						
WPL2, GSL2	40-003A adhesive	8.80	0.05	1000	0.00%	0.00
<b>Plant 3</b>						

The coatings used by the source contain toluene only.

**TOTAL**

**9.35**

**METHODOLOGY**

PTE HAPs (tons/yr) = Density (lb/gal) x Max. Usage (gal/unit) x Maximum Throughput (unit/hr) x Weight % HAP x 8760 hrs/yr x 1 ton/2000 lbs

**Appendix A: Emissions Calculations  
Natural Gas Fired Heaters and Boilers**

**Source Name:** Patrick Industries, Inc.  
**Source Address:** **Plant 1:** 1808 West Hively Avenue, Elkhart, Indiana 46517  
**Plant 2:** 57420 Nagy Drive, Elkhart, Indiana 46517  
**Mailing Address:** 107 West Franklin Street, Elkhart, Indiana 46515-2894  
**County:** Elkhart  
**SIC Code:** 2421  
**Operation Permit No.:** T039-17506-00324  
**Operation Permit Issuance Date:** 2/7/2006  
**Third Administrative Amendment No.:** 039-26709-00324  
**Permit Reviewer:** APT

# of Emission Units	Emission Unit ID	Total Heat Input Capacity (MMBtu/hr)	Total Maximum Potential Throughput (MMCF/yr)
1	B1	0.40	3.50
4	AB1 - AB4	4.00	35.0
15	H1 - H15	2.40	21.0

Emission Factors (lbs/MMCF)						
PM*	PM10*	SO <sub>2</sub>	NO <sub>x</sub> **	CO	VOC	HAPs
7.6	7.6	0.6	100	84.0	5.5	1.89

Potential To Emit (tons/yr)							
Emission Unit ID	PM	PM10	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOC	HAPs
B1	0.01	0.01	0.00	0.18	0.15	0.01	3.3E-03
AB1 - AB4	0.13	0.13	0.01	1.75	1.47	0.10	3.3E-02
H1 - H15	0.08	0.08	0.01	1.05	0.88	0.06	2.0E-02
<b>TOTALS</b>	<b>0.23</b>	<b>0.23</b>	<b>0.02</b>	<b>2.98</b>	<b>2.50</b>	<b>0.16</b>	<b>0.056</b>

\* PM and PM10 emission factor are for condensable and filterable PM and PM10 combined.

\*\*Emission factors for NO<sub>x</sub>: Uncontrolled = 100 lb/MMCF

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

1 MMBtu = 1,000,000 Btu

1 MMCF = 1,000,000 cubic feet of gas

All Emission factors are based on normal firing.

**Methodology**

Max. Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

PTE (tons/yr) = Max. Potential Throughput (MMCF/yr) x Emission Factor (lb/MMCF) x 1 ton/2,000 lbs

**TSD Addendum: Appendix A**

Appendix A: Emission Calculations  
Particulate Emissions From Woodworking Operations

**Source Name:** Patrick Industries, Inc.  
**Source Address:** **Plant 1:** 1808 West Hively Avenue, Elkhart, Indiana 46517  
**Plant 2:** 57420 Nagy Drive, Elkhart, Indiana 46517  
**Mailing Address:** 107 West Franklin Street, Elkhart, Indiana 46515-2894  
**County:** Elkhart  
**SIC Code:** 2421  
**Operation Permit No.:** T039-17506-00324  
**Operation Permit Issuance Date:** 2/7/2006  
**Third Administrative Amendment No.:** 039-26709-00324  
**Permit Reviewer:** APT

Plant #	Emissions Unit/Baghouse ID	Stack ID	Air Flow Rate (acfm)	Outlet Grain Loading (grain/dscf)	Control Efficiency (%)	PTE of PM/PM10 (ton/yr) (Uncontrolled <sup>1</sup> )	PTE of PM/PM10 (ton/yr) (Controlled <sup>2</sup> )	Maximum Throughput Capacity (lbs/hr)	326 IAC 6-3-2 Allowable PM Emission Rate (lbs/hr)	Actual PM Emissions (lbs/hr)
Plant 1	232RF8 Storage Silo (S-1)	C1-1	23,090	0.003	99.0%	260	2.60	55,000	37.8	0.59
	276RF8 Mill Room	C1-2	27,470	0.003	99.0%	309	3.09	11,000	12.8	0.71
	72RF8 Mill Room	C1-3	19,000	0.003	99.0%	214	2.14	7,500	9.9	0.49
	484RF10 HWD	C1-4	60,190	0.003	99.0%	678	6.78	6,500	9.0	1.55
	156RF10 KC	C1-5	19,400	0.003	99.0%	218	2.18	12,000	13.6	0.50
	276RF10 Grinder	C1-6	34,330	0.003	99.0%	387	3.87	13,000	14.4	0.88
	Woodworking 1c	C1-8	36,000	0.003	99.0%	405	4.05	5,000	7.6	0.93
	Plant 2	276RF8 Mill Room	C2-1	60,000	0.003	99.0%	676	6.76	3,000	7.2
WR2a - WR2f		1,680								
WPL2		C2-2	29,000	0.003	99.0%	327	3.27	4,500	11.6	0.75
81PJD10 Laminators								5,000		
<b>TOTAL</b>						<b>3,474</b>	<b>34.7</b>			

Assume all PM is equal to PM10.

**Methodology**

PTE of PM/PM10 Controlled (tons/yr) = Flow Rate (acfm) x Outlet Grain Loading (gr/ascf) x 60 (min/hr) x 8760 (hr/yr) x 1/7000 (lb/gr) x 1 ton/2000 lbs

PTE of PM/PM10 Uncontrolled (tons/yr) = Flow Rate (acfm) x Outlet Grain Loading (gr/ascf) x 60 (min/hr) x 8760 (hr/yr) x 1/7000 (lb/gr) x 1 ton/2000 lbs x 1/(1-Control Eff. (%))

Allowable PM Emission Rate (lb/hr) = 4.1 x (Throughput (lbs/hr)/2000)<sup>0.67</sup>

Actual PM Emission Rate (lb/hr) = Flow Rate (acfm) x Outlet Grain Loading (gr/ascf) x 60 (min/hr) x 1/7000 (lb/gr)

Uncontrolled<sup>1</sup> = The uncontrolled particulate emissions are calculated without consideration of the integral control devices for the purpose of determining 326 IAC 2-2 (PSD) applicability only.

Controlled<sup>2</sup> = The controlled particulate emissions are calculated with the consideration that the woodworking controls are integral to the processes and are used for Part 70 applicability.