



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: May 12, 2009

RE: Maple City Woodworking Corp. /039-26959-00390

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

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot12/03/07



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Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**Maple City Woodworking Corporation
2957 Firethorn Drive
Goshen, Indiana 46526**

(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. 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 2-8 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.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

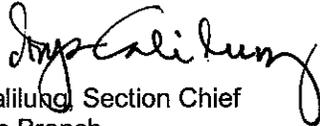
Operation Permit No.: F039-26959-00390	
Issued by:  Iryn Calitung, Section Chief Permits Branch Office of Air Quality	Issuance Date: May 12, 2009 Expiration Date: May 12, 2019

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 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 2-8-3(b)]

The Permittee owns and operates a stationary wood cabinet door manufacturing source.

Source Address:	2957 Firethorn Drive, Goshen, Indiana 46526
Mailing Address:	2957 Firethorn Drive, Goshen, IN 46526
General Source Phone Number:	(574) 642-3342
SIC Code:	3553, 2431
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) Four (4) surface coating booths used to coat wood door panel components, having maximum capacities of two hundred ninety-three (293) board feet of wood per hour, each, equipped with HVLP spray applicators and dry filters for particulate control, including the following:
 - (1) One (1) surface coating booth, identified as PB1, constructed in 1995, exhausting to stacks PBS01A and PBS01B, which then exhaust to the outside; and
 - (2) Three (3) surface coating booths, identified as PB2 through PB4, each constructed in 2004, exhausting to stacks PBS02A and PBS02B, PBS03A and PBS03B, and PBS04A and PBS04B, respectively, which then each exhaust to the outside.
- (b) One (1) woodworking area, identified as EU-01, constructed in 1995, having a maximum capacity of 2,525 pounds of wood per hour, equipped with three (3) baghouses for particulate control, identified as B1, B2 and B3, and exhausting inside the building.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities:

- (a) One (1) Glue Up area, identified as GUA, constructed in 1995, having a maximum capacity of three and fifty hundredths (3.50) pounds of VOC and HAP free glue per hour, applied using roll coating, uncontrolled and exhausting inside the building.
- (b) Natural gas-fired combustion sources, with maximum heat input equal to or less than ten (10) MMBtu/hr, consisting of the following:

- (1) One (1) air make-up unit, identified as MUA-1, installed in 1995, with a maximum heat input rate of one and seventy-five hundredths (1.75) million British thermal units per hour, uncontrolled and exhausting inside the building.
- (2) Three (3) air make-up units, identified as MUA-2 through MUA-4, installed in 2004, with a maximum heat input rate of one and fifty hundredths (1.50) million British thermal units per hour, each, uncontrolled and exhausting inside the building.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]

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

B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, F039-26959-00390, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]

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 2-8-4(4)]

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 2-8-4(5)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

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

B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

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

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (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 no later than April 15 of each year to:

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

- (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 2-8-4(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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Emergency Provisions [326 IAC 2-8-12]

- (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 except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or 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;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Northern Regional Office phone: (574) 245-4870; fax: (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 and Enforcement 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 2-8-4(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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 2-8-3(c)(6) 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 2-8 and any other applicable rules.
 - (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) 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.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

- (a) All terms and conditions of permits established prior to F039-26959-00390 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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 2-8-3(h) and 326 IAC 2-8-9.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

- (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 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating

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 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 2-8-8(a)]
- (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 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(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 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (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 2-8-3. 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least 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 2-8 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 Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) 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 approval required by 326 IAC 2-8-11.1 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
Permit Administration and Support 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, 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 emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall 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 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(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 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(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 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) 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.20 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][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) 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.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][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 2-8-4(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 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

C.7 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.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

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

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

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

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 or ninety (90) days of initial start-up, whichever is later. 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 and Enforcement 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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

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

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

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance or ninety (90) days of initial start-up, whichever is later.

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

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

Stratospheric Ozone Protection

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

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 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Surface Coating

- (a) Four (4) surface coating booths used to coat wood door panel components, having maximum capacities of two hundred ninety-three (293) board feet of wood per hour, each, equipped with HVLP spray applicators and dry filters for particulate control, including the following:
- (1) One (1) surface coating booth, identified as PB1, constructed in 1995, exhausting to stacks PBS01A and PBS01B, which then exhaust to the outside; and
 - (2) Three (3) surface coating booths, identified as PB2 through PB4, each constructed in 2004, exhausting to stacks PBS02A and PBS02B, PBS03A and PBS03B, and PBS04A and PBS04B, respectively, which then each exhaust to the outside.

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, the total volatile organic compounds (VOCs) delivered to the coating applicators in the four (4) surface coating booths, identified as PB1 through PB4, combined, shall not exceed ninety-nine and eight tenths (99.8) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit, combined with the potential to emit VOCs from all other emission units at this source, shall limit the source-wide total potential to emit of VOCs to less than one hundred (100) tons per twelve (12) consecutive month period and shall render 326 IAC 2-7 (Part 70 Permits), not applicable.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

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

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

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

D.1.3 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the four (4) surface coating booths, identified as PB1 through PB4, each, shall be controlled by a dry particulate filter, and the Permittee shall operate each control device in accordance with manufacturer's specifications.

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content limitation contained in Condition D.1.1 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 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.6 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack(s) PBS01A, PBS01B, PBS02A, PBS02B, PBS03A, PBS03B, PBS04A, and PBS04B 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) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.7 Record Keeping Requirements

- (a) To document compliance with condition D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in condition D.1.1.
 - (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on daily basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvent.
 - (3) The volume weighted average VOC content of the coatings used for each month;
 - (4) The daily cleanup solvent usage; and

- (5) The total VOC usage for each month.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain a log of weekly overspray observation, daily and monthly inspections. The Permittee shall include in its daily record when an inspection/observation is not performed and the reason for the lack of the inspection/observation, (i.e. the process did not operate that day).
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the addresses 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. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Woodworking

- (b) One (1) woodworking area, identified as EU-01, constructed in 1995, having a maximum capacity of 2,525 pounds of wood per hour, equipped with three (3) baghouses for particulate control, identified as B1, B2 and B3, and exhausting inside the building.

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate [326 IAC 6-3-2]

Pursuant to § 6-3-2(e), the particulate matter (PM) from the woodworking operations shall not exceed four and seventy-nine hundredths (4.79) pounds per hour when operating at a process weight rate of 2,525 pounds per hour. The pound per hour limitation was calculated with the following equation:

The pound per hour limitation was calculated using the following equation:

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

$$E = 4.10 P^{0.67}$$

Where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.2.3 Particulate Control

- (a) In order to comply with Condition D.2.1, the three (3) baghouses, identified as B1, B2 and B3, for particulate control shall be in operation and control emissions from the woodworking area at all times the woodworking area is 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 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.4 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation. All defective bags shall be replaced.

D.2.5 Broken or Failed Bag Detection

- (a) For a single compartment baghouses 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 line. 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 baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces, or triboflows.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.6 Record Keeping Requirements

- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of the results of the inspections required under Condition D.2.4.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Maple City Woodworking Corporation
Source Address: 2957 Firethorn Drive, Goshen, Indiana 46526
Mailing Address: 2957 Firethorn Drive, Goshen, IN 46526
FESOP Permit No.: F039-26959-00390

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

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)_____
- Report (specify)_____
- Notification (specify)_____
- Affidavit (specify)_____
- Other (specify)_____

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

Signature:

Printed Name:

Title/Position:

Date:

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Maple City Woodworking Corporation
Source Address: 2957 Firethorn Drive, Goshen, Indiana 46526
Mailing Address: 2957 Firethorn Drive, Goshen, IN 46526
FESOP Permit No.: F039-26959-00390

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">• 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• 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 |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

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 Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , 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 AND ENFORCEMENT BRANCH**

FESOP Quarterly Report

Source Name: Maple City Woodworking Corporation
 Source Address: 2957 Firethorn Drive, Goshen, Indiana 46526
 Mailing Address: 2957 Firethorn Drive, Goshen, IN 46526
 FESOP Permit No.: F039-26959-00390
 Facility: The four (4) Paint Booths (PB1 through PB4)
 Parameter: VOC Content; as delivered to the applicators.
 Limit: Less than ninety-nine and eight tenths (99.8) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: _____ 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 QUALITY
 COMPLIANCE AND ENFORCEMENT BRANCH
 FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Maple City Woodworking Corporation
 Source Address: 2957 Firethorn Drive, Goshen, Indiana 46526
 Mailing Address: 2957 Firethorn Drive, Goshen, IN 46526
 FESOP Permit No.: F039-26959-00390

Months: _____ **to** _____ **Year:** _____

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

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

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 a Federally Enforceable State Operating Permit Renewal

Source Background and Description

Source Name:	Maple City Woodworking Corporation
Source Location:	2957 Firethorn Drive, Goshen, IN 46526
County:	Elkhart
SIC Code:	3553, 2431
Permit Renewal No.:	F039-26959-00390
Permit Reviewer:	Hannah L. Desrosiers

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Maple City Woodworking relating to the operation of their existing stationary wood cabinet door manufacturing source.

History

On September 08, 2008, Maple City Woodworking submitted an application to the OAQ requesting to renew its operating permit. On February 7, 2005, Maple City Woodworking submitted a request to change their mailing address. Additionally, the attainment status for the 8-hour ozone standard in Elkhart County was changed to nonattainment as a result of a change in designation, conducted by U.S. EPA, effective June 15, 2004. Maple City Woodworking was issued a FESOP on June 25, 2004.

Permitted Emission Units and Pollution Control Equipment

- (a) Four (4) surface coating booths used to coat wood door panel components, having maximum capacities of two hundred ninety-three (293) board feet of wood per hour, each, equipped with HVLP spray applicators and dry filters for particulate control, including the following:
 - (1) One (1) surface coating booth, identified as PB1, constructed in 1995, exhausting to stacks PBS01A and PBS01B, which then exhaust to the outside; and
 - (2) Three (3) surface coating booths, identified as PB2 through PB4, each constructed in 2004, exhausting to stacks PBS02A and PBS02B, PBS03A and PBS03B, and PBS04A and PBS04B, respectively, which then each exhaust to the outside.
- (b) One (1) woodworking area, identified as EU-01, constructed in 1995, having a maximum capacity of 2,525 pounds of wood per hour, equipped with three (3) baghouses for particulate control, identified as B1, B2 and B3, and exhausting inside the building.

Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit

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

Emission Units and Pollution Control Equipment Removed From the Source

No emission units have been removed from this existing source during this review process.

Insignificant Activities

- (a) One (1) Glue Up area, identified as GUA, constructed in 1995, having a maximum capacity of three and fifty hundredths (3.50) pounds of VOC and HAP free glue per hour, applied using roll coating, uncontrolled and exhausting inside the building.
- (b) Natural gas-fired combustion sources, with maximum heat input equal to or less than ten (10) MMBtu/hr, consisting of the following:
 - (1) One (1) air make-up unit, identified as MUA-1, installed in 1995, with a maximum heat input rate of one and seventy-five hundredths (1.75) million British thermal units per hour, uncontrolled and exhausting inside the building.
 - (2) Three (3) air make-up units, identified as MUA-2 through MUA-4, installed in 2004, with a maximum heat input rate of one and fifty hundredths (1.50) million British thermal units per hour, each, uncontrolled and exhausting inside the building.

Existing Approvals

Since the issuance of the FESOP (F039-18346-00390) on June 25, 2004, the existing source has constructed or has been operating under the following approvals as well:

- (a) Administrative Amendment No. F039-18346-00390, issued on March 15, 2005.

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

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

- (1) In October 1993 a Final Order Granting Summary Judgment was signed by Administrative Law Judge ("ALJ") Garrettson resolving an appeal filed by Kimball Hospitality Furniture Inc. (Cause Nos. 92-A-J-730 and 92-A-J-833) related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls are necessary for the facility to produce its normal product and are integral to the normal operation of the facility, and therefore, potential emissions should be calculated after controls. Based on this ruling, potential emissions for particulate matter were calculated after consideration of the controls.
- (2) Methyl Ethyl Ketone (MEK) was delisted as a Hazardous Air Pollutant by both the US EPA, on December 19, 2005, and the Indiana Department of Environmental Management, on November 23, 2006. Therefore, MEK has been removed from consideration when calculating and evaluating the existing source's Hazardous Air Pollutants (HAPs) unlimited potential to emit (PTE).
- (3) The adhesive (glue) in the one (1) Glue Up area, identified as GUA, is applied using roll coating, and based on an MSDS submitted by the source, contains no VOCs or HAPs. Therefore, negligible emissions of criteria pollutants and HAPS are anticipated from this unit.

County Attainment Status

The existing source is located in Elkhart County. Pursuant to 326 IAC 21, the following attainment status designations are applicable to Elkhart County:

Pollutant	Designation
PM10	Unclassifiable effective November 15, 1990.
PM2.5	Unclassifiable or attainment effective April 5, 2005.
SO2	Better than national standards.
NOx	Cannot be classified or better than national standards.
O3	Attainment effective July 19, 2007, for the 8-hour ozone standard. ⁽¹⁾
CO	Unclassifiable or attainment effective November 15, 1990.
Pb	Not designated.
(1)	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.

(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 as attainment for the 8-hour ozone standard.
- (3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.
- (4) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. 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) PM2.5

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

(c) Other Criteria Pollutants

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

Fugitive Emissions

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

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the existing source.

Pollutant	tons/year
PM	62.74
PM ₁₀	62.90
PM _{2.5}	62.84
SO ₂	0.016
NO _x	2.74
VOC	160.20
CO	2.30

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

- (1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.
- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of Volatile Organic Compounds (VOCs) is still equal to or greater than 100 tons per year. The existing source is subject to the provisions of 326 IAC 2-7. However, the source has agreed to continue to limit their VOC emissions to less than Title V levels, therefore the source will be issued a FESOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are still less than 100 tons per year.

HAPs	tons/year
Cumene	3.47
Ethylbenzene	4.93
Formaldehyde	1.58
Glycol Ethers	1.54
Hexane	0.05

HAPs	tons/year
Methanol	0.04
Toluene	0.25
Xylenes	4.14
All Other HAPs	negl.
Total	16.27

negl. = negligible

- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is still less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is still less than twenty-five (25) tons per year.
- (d) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

Potential to Emit After Issuance

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of FESOP (tons/year)								
	PM	PM10	PM2.5	SO2	NOx	VOC ⁽²⁾	CO	Total HAPs	Worst Single HAP
Surface Coating Booths (PB1-PB4) ⁽¹⁾	2.85	2.85	2.85	-	-	< 99.8	0	16.22	4.41 (Xylenes)
Wood Working Area (EU-01) ⁽¹⁾	3.20	3.20	3.20	-	-	-	-	-	-
Natural Gas Combustion (MUA-1 thru MUA-4)	0.05	0.21	0.16	0.02	2.74	0.15	2.30	0.05	0.05
Total PTE of Entire Source	6.11	6.26	6.21	0.016	2.74	< 100	2.30	16.27	4.93
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
NA = Non-applicable negl. = negligible * Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". Additionally, US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. ⁽¹⁾ Potential to emit after controls. ⁽²⁾ Potential to emit after FESOP limits.									

(a) FESOP Status

This existing source is not a Title V major stationary source, because the potential to emit Volatile Organic Compounds (VOCs) from the entire source will still be limited to less than the Title V major source threshold level of one hundred (100) tons per year, and because the potential to emit of all other criteria pollutants from the entire source are less than the Title V major source threshold levels. In addition, this existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs is still less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year of total HAPs. Therefore, this existing source is still an area source under Section 112 of the Clean Air Act and is subject to the provisions of 326 IAC 2-8 (FESOP).

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the existing source shall comply with the following:

- (1) The total volatile organic compound (VOC) delivered to the coating applicators in the four (4) surface coating booths, identified as PB1 - PB4, combined, shall not exceed ninety-nine and eight tenths (99.8) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit, combined with the potential to emit VOCs from all other emission units at this existing source, shall continue to limit the source-wide total potential to emit of VOCs to less than one hundred (100) tons per twelve (12) consecutive month period and shall render 326 IAC 2-7

(Part 70 Permits), not applicable.

(b) PSD Minor Status

This existing source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all attainment regulated pollutants are still less than two hundred fifty (250) tons per year, and this existing source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements still do not apply.

Federal Rule Applicability

New Source Performance Standards (NSPS)

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

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Halogenated Solvent Cleaning, 40 CFR 63, Subpart T (326 IAC 20-6), are not included in this renewal, because this operation still does not use a degreasing solvent that contains any of the halogenated compounds listed in 40 CFR 63.460(a).
- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Wood Furniture Manufacturing Operations, 40 CFR 63 Subpart JJ and 326 IAC 20-14 are not included in this renewal, because this existing source is still not a major source of HAP emissions.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Wood Preserving Area Sources, 40 CFR 63, Subpart DDDD, are not included in this renewal, because this existing source is still not a major source of HAP emissions.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) Surface Coating of Wood Building Products, 40 CFR 63, Subpart QQQQ, are not included in this renewal, because this existing source is still not a major source of HAP emissions.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Wood Preserving Area Sources, 40 CFR 63, Subpart QQQQQQ, are not included in this renewal, because this existing source does not own or operate a wood preserving operation, as defined in §63.11433.
- (f) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this renewal.

Compliance Assurance Monitoring (CAM)

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

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State Rule Applicability - Entire Source

The following state rules are applicable to the existing source:

- (a) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
PSD applicability is discussed under the "PTE of the Entire Source after Issuance of the FESOP" section above.
- (b) 326 IAC 2-3 (Emission Offset)
Elkhart County has been re-classified as attainment or unclassifiable in Indiana for all criteria pollutants. Therefore, the requirements of 326 IAC 2-3 (Emission Offset) do not apply to this existing source, and the requirements are not included in this renewal.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
This existing source is still not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from each of the emission units at this existing source is still less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (d) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this existing source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than five (5) tons per year. Therefore, 326 IAC 2-6 still does not apply.
- (e) 326 IAC 2-8-4 (FESOP)
FESOP applicability is discussed under the "PTE of the Entire Source after Issuance of the FESOP" section above.
- (f) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall continue to meet the following, unless otherwise stated in this permit:
 - (1) Opacity shall still not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall still not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (g) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the existing source shall still not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the existing source is located, in a manner that would violate 326 IAC 6-4.
- (h) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (i) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Surface Coating Operation

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

- (1) Pursuant to 326 IAC 6-3-2(d) (Particulate emission limitations, work practices, and control technologies), the particulate matter (PM) from the four (4) surface coating booths, identified as PB1 through PB4, shall still be controlled by dry particulate filters, waterwash, or an equivalent control device, and the control device shall still be operated in accordance with manufacturer's specifications.

The four (4) surface coating booths, identified as PB1 through PB4, continue to use dry filters to control particulate overspray; therefore, they are in compliance with 326 IAC 6-3-2.

- (2) Pursuant to 326 IAC 6-3-1(b)(6), surface coating operations using roll coating are specifically exempted from the rule. This existing source continues to apply adhesive (glue) in the one (1) Glue Up area, identified as GUA, using roll coating. Therefore, the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) still do not apply to the gluing operations at this existing source, and are not included in this renewal.

(b) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

- (1) The four (4) surface coating booths, identified as PB1 through PB4, are each not subject to this rule because this existing source is otherwise subject to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating). Therefore, the requirements of 326 IAC 8-1-6 are not included in this renewal for the four (4) surface coating booths.

- (2) The one (1) Glue Up area, identified as GUA, is not subject to this rule because the adhesives used do not contain VOCs; therefore, the requirements of 326 IAC 8-1-6 are not included in this renewal for the Glue Up area.

(c) 326 IAC 8-2-10 (Flat Wood Panels; manufacturing operations)

This existing source is still not subject to the requirements of 326 IAC 8-2-10, since the products produced (i.e., wood cabinet doors) do not meet the definition of panels as defined in the rule.

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

- (1) This rule applies to surface coating of wood furnishings, including cabinets (kitchen, bath, and vanity), tables, beds, chairs, sofas (non-upholstered), art objects, and any other coated furnishings made of solid wood, wood composition, or simulated wood material. The four (4) surface coating booths, identified as PB1 through PB4, each, are of the type described in 326 IAC 8-2-12, were constructed after July 1, 1990, and will continue to have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls. Therefore, pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the owner/ operator of a wood furniture or cabinet coating operation shall apply all coating material, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repairs, using one (1) or more of the following application systems:

Airless Spray Application	Air-Assisted Airless Spray Application
Electrostatic Spray Application	Electrostatic Bell or Disc Application
Heated Airless Spray Application	Roller Coating
Brush or Wipe Application	Dip-and-Drain Application
High-Volume Low-Pressure (HVLP)	Aerosol Spray Cans

High-volume low-pressure spray is an acceptable alternative application of air-assisted airless spray. High-volume low-pressure (HVLP) spray means technology used to apply coating to a substrate by means of coating application equipment which operates

between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

The four (4) surface coating booths identified as PB1 through PB4 continue to use High-volume low-pressure (HVLP) spray applicators, therefore the four (4) surface coating booths will still comply with this rule.

- (2) The one (1) Glue Up area, identified as GUA, is not subject to this rule because the adhesives used do not contain VOCs; therefore, the requirements of 326 IAC 8-2-12 are not included in this renewal for the Glue Up area.
- (d) 326 IAC 8-3 (Organic Solvent Degreasing Operations)
The Pure Grade Lacquer cleaner usage, in the four (4) surface coating booths identified as PB1 through PB4, is not of a type described in subdivisions 8-3-1(b)(1)(A) through 8-3-1(b)(1)(C). Therefore, 326 IAC 8-3 still does not apply to the Pure Grade Lacquer cleaner usage at this existing source, and the requirements are not included in this renewal.
- (e) 326 IAC 8-11-3 (Volatile Organic Compounds, Wood Furniture Coatings)
The requirements of 326 IAC 8-11-3 are still not applicable to any of the emission units at this existing source, because this existing source is not located in Lake, Porter, Clark, or Floyd County.
- (f) There are no other 326 IAC 8 Rules applicable to the four (4) surface coating booths, identified as PB1 through PB4, and the one (1) Glue Up area, identified as GUA.

Woodworking Operation

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to § 6-3-2(e), the particulate matter (PM) from the woodworking operations shall still not exceed four and seventy-nine hundredths (4.79) pounds per hour when operating at a process weight rate of 2,525 pounds per hour. The pound per hour limitation was calculated with the following equation:

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:

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

Based on Appendix A, the potential PM emission rate for the woodworking operations, after controls, is:

$$3.20 \text{ ton/yr} \times (2000 \text{ lbs/ton} / 8760 \text{ hrs/yr}) = \mathbf{0.73 \text{ lb/hr}}$$

The controlled PM emissions from the woodworking operations are seventy-three hundredths (0.73) pounds of PM per hour, which is less than the allowable of four and seventy-nine hundredths (4.79) pounds of PM per hour. Therefore, the woodworking operations are still in compliance with this rule.

The three (3) baghouses, identified as B1, B2 and B3, shall continue to be in operation and control emissions at all times the woodworking area is in operation, in order to comply with this limit.

Natural Gas Combustion

- (a) 326 IAC 4-2-2 (Incinerators)
 Pursuant to 326 IAC 6-3-1(a), affected facilities include incinerators which emit regulated pollutants located anywhere in the state. The four (4) natural gas-fired air make-up units, are each not incinerators, as defined by 326 IAC 1-2-34, since they do not burn waste substances. Therefore, 326 IAC 4-2-2 still does not apply to the four (4) natural gas-fired air make-up units, and the requirements are not included in this renewal.
- (b) 326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)
 The four (4) natural gas-fired air make-up units, each, do not meet the definition of an indirect heating unit, as defined in 236 IAC 1-2-19. Therefore, 326 IAC 6-2 still does not apply to any of the four (4) natural gas-fired air make-up units, and the requirements are not included in this renewal.
- (c) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
 Pursuant to 326 IAC 6-3-1(a), activities that do not meet the definition of a "manufacturing process", as defined in 326 IAC 6-3-1.5(2), are exempted from 326 IAC 6-3. The four (4) natural gas-fired air make-up units, each, do not meet the definition of a "manufacturing process", and are therefore exempt from the requirements of 326 IAC 6-3. Consequently, the requirements are not included in this renewal.
- (d) 326 IAC 7-1.1 (Sulfur Dioxide Emissions Limitations)
 Pursuant to 326 IAC 7-1.1, this rule applies to all emissions units with a potential to emit twenty-five (25) tons per year or ten (10) pounds per hour of sulfur dioxide. The potential emissions from each of the four (4) natural gas-fired air make-up units are less than twenty-five (25) tons per year and ten (10) pounds per hour respectively. Therefore, 326 IAC 7-1.1-2 still does not apply to the four (4) natural gas-fired air make-up units, and the requirements are not included in this renewal.

Compliance Determination, Monitoring, Testing, Recordkeeping, and Reporting Requirements

Compliance Determination

- (a) The spray coating operations, paint booths PB1 through PB4, continue to have applicable compliance determination conditions as specified below:

Emission Unit/Control	Operating Parameters	Method
Spray coating operations (Booths PB1 through PB4)	VOC content	Preparing or obtaining the "as supplied" and "as applied" VOC data sheets
		Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4 as required by IDEM.

- (1) Confirmation of the VOC content of the coatings used in the spray coating operations is still required to determine compliance with the provisions of 326 IAC 2-8-4 (FESOP).
- (b) The baghouses (B1 - B3), controlling particulate emissions in the woodworking area, shall be in operation and control emissions from the woodworking equipment at all times that the woodworking equipment is in operation.

Compliance Monitoring Requirements

- (a) The spray coating operations, paint booths PB1 through PB4, and the baghouses (B1 - B3) controlling the woodworking area, have applicable compliance monitoring conditions as specified below:

Control	Parameter	Frequency	Range	Excursions & Exceedances
Paint booth dry filters (PB1 - PB4)	Inspections	Daily	Normal-Abnormal	Response Steps
Paint booth coating emissions and presence of overspray on the rooftops and the nearby ground	Inspections	Weekly and Monthly	Normal-Abnormal	Response Steps
Baghouses for the woodworking area (B1 - B3)	Inspections	Once per quarter	Normal-Abnormal	Response Steps

These monitoring conditions are necessary because the dry filters for the four (4) paint booths, and the three (3) baghouses used in conjunction with the woodworking area, must operate properly to ensure continued compliance with 326 IAC 6-3-2(d) (Particulate emission limitations, work practices, and control technologies), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), and 326 IAC 2-8-4 (FESOP).

- (b) There continue to be no specific compliance monitoring requirements for the four (4) natural gas-fired air make-up units.

Testing requirements

- (a) There continue to be no specific testing requirements associated with any of the emission units at this existing source.

Recordkeeping and Reporting Requirements

- (a) The Permittee shall maintain records of material and solvent usage, and VOC content, usage and emissions in order demonstrate compliance with the VOC emission limits established for the spray coating operations;
- (b) The Permittee shall submit a quarterly summary of the VOC emissions.
- (c) The Permittee shall continue to maintain records of the once per day dry particulate filter inspections, and the once per week and once per month coating emissions and overspray inspections established for the spray coating operations;
- (d) The Permittee shall continue to maintain records of the quarterly inspections for the three (3) baghouses used in conjunction with the woodworking area; and
- (e) The Permittee shall continue to maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan as required for the surface coating and woodworking area.

Air Quality Impacts from Minor Sources

Pursuant to 326 IAC 2-1.1-5, IDEM, OAQ, has determined that a modeling analysis of the Unlimited Potential to Emit (PTE) criteria pollutants from this existing source is unnecessary to estimate whether the Limited PTE for any of the criteria pollutants will cause or contribute to a

violation of any National Ambient Air Quality Standard (NAAQS), since they each do not exceed the PSD Significant Emission Rate thresholds.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this permit renewal was received on September 08, 2008.

The construction and operation of this existing source shall be subject to the conditions of the attached FESOP Renewal No. F039-26959-00390. The staff recommends to the Commissioner that this FESOP Renewal be approved.

IDEM Contact

Questions regarding this proposed permit can be directed to Ms. Hannah Desrosiers at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5374 or toll free at 1-800-451-6027 extension 4-5374.

A copy of the findings is available on the Internet at: www.in.gov/idem/permits/air/pending.html.

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.in.gov/idem/permits/guide/.

Appendix A: Emissions Calculations
Emission Summary

Company Name: Maple City Woodworking Corporation
Address: 65339 Firehorn Drive, Goshen, IN 46526
FESOP Renewal No.: 039-26959-00390
Reviewer: Hannah L. Desrosiers
Date Submitted: September 8, 2008

Unlimited and Uncontrolled Potential Emissions (tons/year)					
Category	Pollutant	Emissions Generating Activity			TOTAL
		Surface Coating Booths (PB1-PB4)	Wood Working Area (EU-01)	Natural Gas Combustion (MUA-1 thru MUA-4)	
Criteria Pollutants	PM	59.48	3.20	0.05	62.74
	PM10	59.48	3.20	0.21	62.90
	PM2.5	59.48	3.20	0.16	62.84
	SO2	0	0	0.02	0.016
	NOx	0	0	2.74	2.74
	VOC	160.05	0	0.15	160.20
	CO	0	0	2.30	2.30
Hazardous Air Pollutants	Benzene	0	0	5.75E-05	5.75E-05
	Cumene	3.47	0	0	3.47
	Dichlorobenzene	0	0	3.29E-05	3.29E-05
	Ethylbenzene	4.93	0	0	4.93
	Formaldehyde	1.58	0	2.05E-03	1.58
	Glycol Ethers	1.54	0	0	1.54
	Hexane	0	0	0.05	0.05
	Methanol	0.04	0	0	0.04
	Toluene	0.25	0	9.31E-05	0.25
	Xylenes	4.41	0	0	4.41
	Cadmium	0	0	3.01E-05	3.01E-05
	Chromium	0	0	3.83E-05	3.83E-05
	Lead	0	0	1.37E-05	1.37E-05
	Manganese	0	0	1.04E-05	1.04E-05
	Nickel	0	0	5.75E-05	5.75E-05
	Totals	16.22	0	0.05	16.27
					Worse Case HAP

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

Limited and Uncontrolled Emissions (tons/year)					
Category	Pollutant	Emissions Generating Activity			TOTAL
		Surface Coating Booths (PB1-PB4)	Wood Working Area (EU-01)	Natural Gas Combustion (MUA-1 thru MUA-4)	
Criteria Pollutants	PM	59.48	3.20	0.05	62.74
	PM10	59.48	3.20	0.21	62.90
	PM2.5	59.48	3.20	0.16	62.84
	SO2	0	0	0.02	0.02
	NOx	0	0	2.74	2.74
	VOC	< 99.8	0	0.15	< 100
	CO	0	0	2.30	2.30
Hazardous Air Pollutants	Benzene	0	0	5.75E-05	5.75E-05
	Cumene	3.47	0	0	3.47
	Dichlorobenzene	0	0	3.29E-05	3.29E-05
	Ethylbenzene	4.93	0	0	4.93
	Formaldehyde	1.58	0	2.05E-03	1.58
	Glycol Ethers	1.54	0	0	1.54
	Hexane	0	0	0.05	0.05
	Methanol	0.04	0	0	0.04
	Toluene	0.25	0	9.31E-05	0.25
	Xylenes	4.41	0	0	4.41
	Cadmium	0	0	3.01E-05	3.01E-05
	Chromium	0	0	3.83E-05	3.83E-05
	Lead	0	0	1.37E-05	1.37E-05
	Manganese	0	0	1.04E-05	1.04E-05
	Nickel	0	0	5.75E-05	5.75E-05
	Totals	16.22	0	0.05	16.27
					Worse Case HAP

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

Limited and Controlled Emissions (tons/year)					
Category	Pollutant	Emissions Generating Activity			TOTAL
		Surface Coating Booths (PB1-PB4)	Wood Working Area (EU-01)	Natural Gas Combustion (MUA-1 thru MUA-4)	
Criteria Pollutants	PM	2.85	3.20	0.05	6.11
	PM10	2.85	3.20	0.21	6.26
	PM2.5	2.85	3.20	0.16	6.21
	SO2	0	0	0.02	0.02
	NOx	0	0	2.74	2.74
	VOC	< 99.8	0	0.15	< 100
	CO	0	0	2.30	2.30
Hazardous Air Pollutants	Benzene	0	0	5.75E-05	5.75E-05
	Cumene	3.47	0	0	3.47
	Dichlorobenzene	0	0	3.29E-05	3.29E-05
	Ethylbenzene	4.93	0	0	4.93
	Formaldehyde	1.58	0	2.05E-03	1.58
	Glycol Ethers	1.54	0	0	1.54
	Hexane	0	0	0.05	0.05
	Methanol	0.04	0	0	0.04
	Toluene	0.25	0	9.31E-05	0.25
	Xylenes	4.41	0	0	4.41
	Cadmium	0	0	3.01E-05	3.01E-05
	Chromium	0	0	3.83E-05	3.83E-05
	Lead	0	0	1.37E-05	1.37E-05
	Manganese	0	0	1.04E-05	1.04E-05
	Nickel	0	0	5.75E-05	5.75E-05
	Totals	16.22	0	0.05	16.27
					Worse Case HAP

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

**Appendix A: Emissions Calculations
Volatile Organic Compound (VOC) Emissions
From the Surface Coating Operations**

Company Name: Maple City Woodworking Corporation
Address: 65339 Firethorn Drive, Goshen, IN 46526
FESOP Renewal No.: 039-26959-00390
Reviewer: Hannah L. Desrosiers
Date Submitted: September 8, 2008

Material	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Max Usage (gal/unit)	Maximum Throughput (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (lbs/hour)	Potential VOC (lbs/day)	Potential VOC (tons/year)	* Potential PM/PM10/PM2.5 (lbs/hour)	* Potential PM/PM10/PM2.5 (ton/year)	Transfer Efficiency	
Stains																	
New Summit Maple	6.84	27.92%	0.00%	27.92%	0.00%	1.90%	0.009	586.44	1.91	1.91	10.08	241.9	44.15	6.51	28.49	75%	
Ashland Oak Stain	6.62	28.40%	0.00%	28.40%	0.00%	2.00%	0.009	586.44	1.88	1.88	9.92	238.2	43.46	6.25	27.39	75%	
New Shine	6.67	28.10%	0.00%	28.10%	0.00%	1.30%	0.009	586.44	1.87	1.87	9.89	237.41	43.33	6.33	27.72	75%	
Tara Sample B(1)	7.11	51.05%	0.00%	51.05%	0.00%	4.90%	0.009	586.44	3.63	3.63	19.16	459.77	83.91	4.59	20.11	75%	
													459.77	83.91	6.51	28.49	
Topcoat and Sealer																	
TC-40 Self Seal	7.62	54.72%	30.00%	24.72%	27.40%	23.40%	0.014	586.44	2.59	1.88	15.47	371.16	67.74	7.08	31.02	75%	
Aromatic 150	7.50	100.00%	0.00%	100.00%	0.00%	0.00%	0.0004	586.44	7.50	7.50	1.85	44.33	8.09	0.00	0.00	75%	
Topcoat "as applied"	7.62	56.02%	29.14%	26.88%	26.60%	22.70%	0.014	586.44	2.79	2.05	17.30	415.13	75.76	7.08	30.99	75%	
Cleaner																	
Pure Grade Lacquer	7.07	100.00%	0.00%	100.00%	0.00%	0.00%	0.00002	586.44	7.07	7.07	0.09	2.09	0.38	0.00	0.00	100%	
													2.09	0.38	0.00	0.00	

State Potential Emissions

Total "Worst Case" Uncontrolled Potential Emissions:				876.99	160.05	13.58	59.48
				Control Efficiency		90.00%	
				Controlled		2.85	

METHODOLOGY

"as applied" Density (lb/gal) =

"as applied" Weight % H2O + Organics = $((W_a * D_a * V_a) + (W_b * D_b * V_b)) / ((D_a * V_a) + (D_b * V_b))$

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

Pounds of VOC per Gallon Coating = $\text{Density (lb/gal)} * \text{Weight \% Organics}$

PTE of VOC (lbs/hour) = $\text{Pounds of VOC per Gallon coating (lb/gal)} * \text{Maximum Usage (gal/unit)} * \text{Maximum Throughput (units/hour)}$

PTE of VOC (lbs/day) = $\text{Pounds of VOC per Gallon coating (lb/gal)} * \text{Maximum Usage (gal/unit)} * \text{Maximum Throughput (units/hour)} * 24 \text{ hours/day}$

PTE of VOC (tons/year) = $\text{Pounds of VOC per Gallon coating (lb/gal)} * \text{Maximum Usage (gal/unit)} * \text{Maximum Throughput (units/hour)} * 8760 \text{ hours/year} * 1 \text{ ton/2000 lbs}$

PTE of PM/PM10/PM2.5 (tons/year) = $\text{Maximum Throughput (units/hour)} * \text{Maximum Usage (gal/unit)} * \text{Density (lbs/gal)} * (1 - \text{Weight \% Volatiles}) * (1 - \text{Transfer Efficiency \%}) * 8760 \text{ hours/year} * 1 \text{ ton/2000 lbs}$

PTE of PM/PM10/PM2.5 (lbs/hour) = $\text{Maximum Throughput (units/hour)} * \text{Maximum Usage (gal/unit)} * \text{Density (lbs/gal)} * (1 - \text{Weight \% Volatiles}) * (1 - \text{Transfer Efficiency \%})$

NOTES

Add worst case coating to all solvents

* PM, PM10, and PM 2.5 emissions are assumed equal.

**Appendix A: Emissions Calculations
 Hazardous Air Pollutant (HAP) Emissions
 From the Surface Coating Operations**

Company Name: Maple City Woodworking Corporation
Address: 65339 Firethorn Drive, Goshen, IN 46526
FESOP Renewal No.: 039-26959-00390
Reviewer: Hannah L. Desrosiers
Date Submitted: September 8, 2008

Material	Density (lb/gal)	Max Usage (gal/unit)	Max. Throughput (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % EthylBenzene	Weight % Cumene	Weight % Glycol Ethers	Weight % Methanol	POTENTIAL EMISSIONS (TONS/YEAR)							
											Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	EthylBenzene Emissions (ton/yr)	Cumene Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Methanol Emissions (ton/yr)	
Stains																		
New Summit Maple	6.8	0.009	586.44	1.00%	0%	1.00%	1.00%	0%	0%	0%	1.58	0	1.58	1.58	0	0	0	
Ashland Oak Stain	6.62	0.009	586.44	1.00%	0%	1.00%	1.00%	0%	0%	0%	1.53	0	1.53	1.53	0	0	0	
New Shine	6.67	0.009	586.44	1.00%	0%	1.00%	1.00%	0%	1.00%	0%	1.54	0	1.54	1.54	0	1.54	0	
Tara Sample B(1)	7.11	0.009	586.44	1.00%	0%	0%	1.00%	2.11%	0%	0%	1.64	0	0	1.64	3.47	0	0.00	
											1.64	0	1.58	1.64	3.47	1.54	0	
Topcoat and Sealer																		
TC-40 Self Seal	7.62	0.014	586.44	1.00%	0%	0%	1.20%	0%	0%	0%	2.74	0	0	3.29	0	0	0	
Aromatic 150	7.50	0.004	586.44	0%	0%	0%	0%	0%	0%	0%	0	0	0	0	0	0	0	
											2.74	0	0	3.29	0	0	0	
Cleaner																		
Pure Grade Lacquer	7.1	0.00002	586.44	5.59%	66.28%	0%	0%	0%	0%	9.38%	0.02	0.25	0	0	0	0	0.04	
											0.02	0.25	0	0	0	0	0.04	
Total "Worst Case" Uncontrolled Potential Emissions (Single HAP):											4.41	0.25	1.58	4.93	3.47	1.54	0.04	
METHODOLOGY											Total "Worst Case" Uncontrolled Potential Emissions (Combined HAPs): 16.22							
PTE of HAP (tons/year) = Density (lb/gal) * Maximum Throughput (units/hour) * Maximum Usage (gal/unit) * Weight % HAP * 8760 hours/year * 1 ton/2000 lbs																		

Appendix A: Emission Calculations Woodworking Area

Company Name: Maple City Woodworking Corporation
Address City IN Zip: 65339 Firethorn Drive, Goshen, IN 46526
FESOP Renewal No.: 039-26959-00390
Reviewer: Hannah L. Desrosiers
Date Submitted: September 8, 2008

Particulate Emissions

Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	Particulate (PM) Emissions * (lb/hr)	Particulate (PM) Emissions * (tons/yr)
B1	95.0%	0.0019	20000	0.3326	1.457
B2	95.0%	0.0019	12000	0.1995	0.874
B3	95.0%	0.0019	12000	0.1995	0.874
Total				0.732	3.20

Methodology

Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (cub. ft./min.) (60 min/hr) (lb/7000 grains)
 Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

NOTES

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

* PM, PM10, and PM 2.5 emissions are assumed equal.

326 IAC 6-3-2(e) Allowable Rate of Emissions

Unit ID	Process Rate (lbs/hr)	Process Weight Rate (tons/hr)	Allowable Emissions (lbs/hr)
Wood Working Area	2,525	1.26	4.79

Methodology

***Process weight; weight rate: Total weight of all materials introduced into any source operation (326 IAC 1-2-59(a)).

Allowable Emissions (lb/hr) = $4.10(\text{Process Weight Rate (lb/hr)}^{0.67})$

Allowable Emissions (tons/yr) = (Allowable Emissions (lb/hr)*8760)/2000

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

Company Name: Maple City Woodworking Corporation
Address City IN Zip: 65339 Firethorn Drive, Goshen, IN 46526
FESOP Renewal No.: 039-26959-00390
Reviewer: Hannah L. Desrosiers
Date Submitted: September 8, 2008

Heat Input Capacity
MMBtu/hr
6.25

Potential Throughput
MMCF/yr
54.75

Emission Factor in lb/MMCF	Criteria Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	5.7	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.052	0.208	0.156	0.016	2.74	0.15	2.30

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined. PM2.5 emission factor is condensable PM2.5 only.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

HAPs Emissions

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.10E-03	1.20E-03	0.08	1.80	3.40E-03
Potential Emission in tons/yr	5.75E-05	3.29E-05	2.05E-03	0.049	9.31E-05

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	5.00E-04	1.10E-03	1.40E-03	3.80E-04	2.10E-03
Potential Emission in tons/yr	1.37E-05	3.01E-05	3.83E-05	1.04E-05	5.75E-05

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Total HAPs	0.052	tons/yr
Worst Single HAP	0.049	tons/yr

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98).

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

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