



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

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a **Significant Revision** to a **Minor Source Operating Permit (MSOP)**

for Nu-Wood Company, LLC in Elkhart County

Significant Permit Revision No.: M039-28310-00586

The Indiana Department of Environmental Management (IDEM) has received an application from Nu-Wood Company, LLC located at 1722 Eisenhower Drive North, Goshen, Indiana for a significant revision of their MSOP issued on December 23, 2008. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow Nu-Wood Company, LLC to make certain changes at their existing source. Nu-Wood Company, LLC has applied to construct a new custom hardwood stair production line, a new pre-fabricated hardwood cabinet door front coating operation, and replacement of the control device serving their existing urethane sanding and finishing operations.

The applicant intends to construct and operate new equipment that will emit air pollutants, therefore the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed or removed. The potential to emit criteria pollutants and hazardous air pollutants will continue to be limited to less than the TV and/or PSD major threshold levels, respectively. IDEM has reviewed this application, and has developed preliminary findings, consisting of a draft permit and several supporting documents, that would allow the applicant to make this change.

A copy of the permit application and IDEM's preliminary findings are available at:

Goshen Public Library
601 South 5th Street
Goshen, IN 46526

AND

IDEM Northern Regional Office
300 N. Michigan Street, Suite 450
South Bend, IN 46601-1295

A copy of the preliminary findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

How can you participate in this process?

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number **M039-28310-00586** in all correspondence.

Comments should be sent to:

Hannah L. Desrosiers
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 4-5374
Or dial directly: (317) 234-5374
E-mail: hdesrosi@idem.in.gov

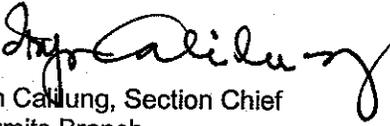
All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor or noise. For such issues, please contact your local officials.

For additional information about air permits and how you can participate, please see IDEM's **Guide for Citizen Participation and Permit Guide** on the Internet at: www.idem.in.gov.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251 and IDEM Northern Regional Office, 300 N. Michigan Street, Suite 450, South Bend, IN 46601-1295.

If you have any questions, please contact Ms. Hannah Desrosiers of my staff at the above address.


Iryn Callung, Section Chief
Permits Branch
Office of Air Quality

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John Olafson
Nu-Wood Company, LLC
1722 Eisenhower Drive North,
Goshen, IN 46526

Re: M039-28310-00586
First Significant Revision to
M039-26567-00586

Dear Mr. Olafson:

Nu-Wood Company, LLC was issued a Minor Source Operating Permit (MSOP) No.: M039-26567-00586 on December 23, 2008, for a stationary stationary urethane decorative moldings and millwork manufacturing operation, located at 1722 Eisenhower Drive North, Goshen, Indiana. On September 3, 2009, the Office of Air Quality (OAQ) received an application from the source requesting the addition of a new custom hardwood stair production line, the addition of a pre-fabricated hardwood cabinet door front coating operation, and replacement of the control device serving their existing urethane sanding and finishing operations. The attached Technical Support Documents (TSD) provides additional explanation of the changes to the source/permit. Pursuant to the provisions of 326 IAC 2-6.1-6, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-6.1-6(i). Pursuant to the provisions of 326 IAC 2-6.1-6, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-6.1-6, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Ms. Hannah Desrosiers, of my staff, at 317-234-5374 or 1-800-451-6027, and ask for extension 4-5374.

Sincerely,

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Technical support documents and revised permit

IC/hd

cc: File - Elkhart County
Elkhart County Health Department
U.S. EPA, Region V
Compliance and Enforcement Branch
Billing, Licensing, and Training Section



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Minor Source Operating Permit OFFICE OF AIR QUALITY

Nu-Wood Company, LLC
1722 Eisenhower Drive North
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.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No.: M039-26567-00586	
Issued by/Original Signed By: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: October 23, 2008 Expiration Date: October 23, 2013

First Significant Permit Revision No.: M039-28310-00586	Pages affected: 4 - 6 and 18-23
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date: October 23, 2013

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SECTION A

SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary, urethane, decorative molding and millwork manufacturing operation, a custom hardwood stair production line, and pre-fabricated, hardwood, cabinet door front coating operation.

Source Address:	1722 Eisenhower Drive North, Goshen, Indiana 46526
Mailing Address:	1722 Eisenhower Drive North, Goshen, 46526
General Source Phone Number:	574-534-1192
SIC Code:	3086, 2499, 2434
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) stationary, urethane, decorative molding and millwork manufacturing operation, including the following:
- (1) Spray Booth # 1, constructed in 2004 and exhausting to stack identified as 001, with a maximum hourly capacity of coating 30 silicone rubber molds per hour; dry filters as control devices for overspray; and one (1) 15 pound per square inch (psi) spray coating gun and using high volume low pressure application;
 - (2) Spray Booth # 2, constructed in 2004 and exhausting to stack identified as 002, with a maximum hourly capacity of coating 20 silicone rubber molds per hour; dry filters as control devices for overspray; and one (1) 15 pound per square inch (psi) spray coating gun and using high volume low pressure application;
 - (3) Spray Booth # 3, constructed in 2004 and exhausting to stack identified as 003, with a maximum hourly capacity of coating 50 polyurethane millwork parts per hour; dry filters as control devices for overspray; and one (1) 15 pound per square inch (psi) spray coating gun and using high volume low pressure application;
 - (4) Aerosol Spray Can Painting #019, constructed in 2004, with a maximum gallon per hour (gph) application rate of 0.09; the twelve (12) ounce aerosol spray cans are used for surface coating touch up;
 - (5) Urethane Machine # 1, constructed in 2004 and exhausting to stack identified as stack 002, with a maximum hourly capacity of filling urethane at 20 silicone rubber molds per hour; makes polyurethane millwork parts by applying two-part mixture of urethane and isocyanate to a rubber mold;

- (6) Urethane Machine #2, constructed in 2004 and exhausting to stack identified as stack 005, with a maximum hourly capacity of filling urethane at 20 silicone rubber molds per hour; makes polyurethane millwork parts by applying two-part mixture of urethane and isocyanate to a rubber mold;
 - (7) Urethane Sanding and Finishing operations, consisting of a table saw, miter saws, a band saw, table routers, and a sander (# 2), constructed in 2004, with a maximum hourly capacity of processing 50 polyurethane millwork parts per hour, using one (1) Grizzly Model G0637 industrial dust collector, identified as DC2, for particulate matter control, and exhausting to the indoors; and
 - (8) Equipment Cleaning and Maintenance #020; consisting of SP741 solvent, mineral spirits and acetone; SP741 solvent is used to flush out the urethane line and contains Naphthalene as a HAP, mineral spirits are used to clean silicone-covered parts, and acetone is not defined as a VOC.
- (b) One (1) custom hardwood stair production line, approved for construction in 2009, and including the following:
- (1) Spray Booth # 4, identified as SB4, constructed in 2004 and reconstructed in 2009, coating a maximum of one (1) custom hardwood stair unit per hour, having one (1) fifteen (15) pound per square inch (psi) spray coating gun for high volume low pressure application, using dry filters to control overspray, and exhausting to one (1) stack identified as SB4;
 - (2) One (1) woodworking line, identified as WW, approved for construction in 2009, with a maximum material throughput of six hundred (600) pounds of wood per hour, using one (1) external, high efficiency return-air bagfilter system, identified as WWDC1, to control particulate emissions, exhausting to the indoors, and consisting of the following equipment:

Note: The maximum material throughput of this line corresponds to the revised throughput of Spray Booth #4, of one (1) custom hardwood stair unit per hour. The coating operations act as an operational bottleneck, limiting the throughput of the woodworking line.

 - (A) two (2) Drill Presses (DP1 & DP2);
 - (B) one (1) Stroke Sander (SS1);
 - (C) one (1) 8" Edge Sander (ES1);
 - (D) one (1) 24" Belt Sander (BS1);
 - (E) four (4) Manual Sanding Tables (ST1 - ST4);
 - (F) one (1) CNC Router (R1);
 - (G) one (1) CNC Lathe (L1);
 - (H) five (5) Shapers (SH1 - SH5);
 - (I) two (2) Molding Machines (MM1 & MM2);
 - (J) one (1) Basket Jointer (J1);
 - (K) two (2) Gang Rip Saws (GRS1 & GRS2);
 - (L) two (2) Strate Line Saws (SLS1 & SLS2);
 - (M) two (2) Table Saws (S1 & S2); and
 - (N) ten (10) Chop Saws (CS1 - CS10);
 - (3) Two (2) natural gas fired space heaters, identified as H1 and H2, approved for construction in 2009, with a maximum rated heat input capacity of three hundred fifty thousandths (0.350) MMBtu/hr, each, uncontrolled and exhausting inside the building.

- (c) One (1) hardwood door front coating operation, approved for construction in 2009, and including the following:
 - (1) Spray Booth #5, identified as SB5, approved for construction in 2009, coating a maximum of forty (40) pre-fabricated hardwood cabinet door fronts per hour, having three (3) fifteen (15) pound per square inch (psi) spray coating guns for high volume low pressure application, using dry filters to control overspray, and exhausting to two (2) external exhausts identified as SVSB5a and SVSB5b;

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, M039-26567-00586, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

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

B.8 Certification

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

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

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

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) All terms and conditions of permits established prior to M039-26567-00586 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
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 ninety (90) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

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

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

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

Indiana Department of Environmental Management
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 shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.15 Source Modification Requirement

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

B.16 Inspection and Entry

[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

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

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

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

Indiana Department of Environmental Management
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 notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
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. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

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

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

Indiana Department of Environmental Management
Compliance 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.9 Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.13 Response to Excursions or Exceedances

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

- (2) monitor performance data, if applicable; and
- (3) corrective actions taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test

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

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

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

C.15 Malfunctions Report [326 IAC 1-6-2]

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

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

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are

available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

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

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

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

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

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) stationary, urethane, decorative molding and millwork manufacturing operation, including the following:
 - (1) Spray Booth # 1, constructed in 2004 and exhausting to stack identified as 001, with a maximum hourly capacity of coating 30 silicone rubber molds per hour; dry filters as control devices for overspray; and one (1) 15 pound per square inch (psi) spray coating gun and using high volume low pressure application;
 - (2) Spray Booth # 2, constructed in 2004 and exhausting to stack identified as 002, with a maximum hourly capacity of coating 20 silicone rubber molds per hour; dry filters as control devices for overspray; and one (1) 15 pound per square inch (psi) spray coating gun and using high volume low pressure application;
 - (3) Spray Booth # 3, constructed in 2004 and exhausting to stack identified as 003, with a maximum hourly capacity of coating 50 polyurethane millwork parts per hour; dry filters as control devices for overspray; and one (1) 15 pound per square inch (psi) spray coating gun and using high volume low pressure application;
 - (4) Aerosol Spray Can Painting #019, constructed in 2004, with a maximum gallon per hour (gph) application rate of 0.09; the twelve (12) ounce aerosol spray cans are used for surface coating touch up;
- (b) One (1) custom hardwood stair production line, approved for construction in 2009, and including the following:
 - (1) Spray Booth # 4, identified as SB4, constructed in 2004 and reconstructed in 2009, coating a maximum of one (1) custom hardwood stair unit per hour, having one (1) fifteen (15) pound per square inch (psi) spray coating gun for high volume low pressure application, using dry filters to control overspray, and exhausting to one (1) stack identified as SB4;
- (c) One (1) hardwood door front coating operation, approved for construction in 2009, and including the following:
 - (1) Spray Booth #5, identified as SB5, approved for construction in 2009, coating a maximum of forty (40) pre-fabricated hardwood cabinet door fronts per hour, having three (3) fifteen (15) pound per square inch (psi) spray coating guns for high volume low pressure application, using dry filters to control overspray, and exhausting to two (2) external exhausts identified as SVSB5a and SVSB5b;

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating(s) applied in Spray Booth #5, to wood furniture and cabinets, with the exception of applying no more than ten (10) gallons of coating per day used for touch-up and repair operations, 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.1.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), Spray Booths 1, 2, 3, 4, and 5, shall each be controlled by a dry particulate filter, waterwash, or an equivalent control device, subject to the following:

- (a) The source shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust, or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the source shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

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

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

Compliance Determination Requirements

There are no compliance determination requirements for these facilities.

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

There are no compliance monitoring requirements for these facilities.

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

There are no record keeping and reporting requirements for these facilities.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) stationary, urethane, decorative molding and millwork manufacturing operation, including the following:
- (5) Urethane Machine # 1, constructed in 2004 and exhausting to stack identified as stack 002, with a maximum hourly capacity of filling urethane at 20 silicone rubber molds per hour; makes polyurethane millwork parts by applying two-part mixture of urethane and isocyanate to a rubber mold;
 - (6) Urethane Machine #2, constructed in 2004 and exhausting to stack identified as stack 005, with a maximum hourly capacity of filling urethane at 20 silicone rubber molds per hour; makes polyurethane millwork parts by applying two-part mixture of urethane and isocyanate to a rubber mold;

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

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

D.2.1 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

There are no compliance determination requirements for these facilities.

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

There are no compliance monitoring requirements for these facilities.

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

There are no record keeping and reporting requirements for these facilities.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) stationary, urethane, decorative molding and millwork manufacturing operation, including the following:
- (7) Urethane Sanding and Finishing operations, consisting of a table saw, miter saws, a band saw, table routers, and a sander (# 2), constructed in 2004, with a maximum hourly capacity of processing 50 polyurethane millwork parts per hour, using one (1) Grizzly Model G0637 industrial dust collector, identified as DC2, for particulate matter control, and exhausting to the indoors; and
- (8) Equipment Cleaning and Maintenance #020; consisting of SP741 solvent, mineral spirits and acetone; SP741 solvent is used to flush out the urethane line and contains Naphthalene as a HAP, mineral spirits are used to clean silicone-covered parts, and acetone is not defined as a VOC.
- (b) One (1) custom hardwood stair production line, approved for construction in 2009, and including the following:

- (2) One (1) woodworking line, identified as WW, approved for construction in 2009, with a maximum material throughput of six hundred (600) pounds of wood per hour, using one (1) external, high efficiency return-air bagfilter system, identified as WWDC1, to control particulate emissions, exhausting to the indoors, and consisting of the following equipment:

Note: The maximum material throughput of this line corresponds to the revised throughput of Spray Booth #4, of one (1) custom hardwood stair unit per hour. The coating operations act as an operational bottleneck, limiting the throughput of the woodworking line.

- (A) two (2) Drill Presses (DP1 & DP2);
(B) one (1) Stroke Sander (SS1);
(C) one (1) 8" Edge Sander (ES1);
(D) one (1) 24" Belt Sander (BS1);
(E) four (4) Manual Sanding Tables (ST1 - ST4);
(F) one (1) CNC Router (R1);
(G) one (1) CNC Lathe (L1);
(H) five (5) Shapers (SH1 - SH5);
(I) two (2) Molding Machines (MM1 & MM2);
(J) one (1) Basket Jointer (J1);
(K) two (2) Gang Rip Saws (GRS1 & GRS2);
(L) two (2) Strate Line Saws (SLS1 & SLS2);
(M) two (2) Table Saws (S1 & S2); and
(N) ten (10) Chop Saws (CS1 - CS10);

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

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

D.3.1 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the urethane sanding and

finishing operations shall not exceed 1.342 pounds per hour when operating at a process weight rate of 378 pounds per hour.

- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking line (WW) shall not exceed 1.83 pounds per hour when operating at a process weight rate of 600 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 60,000 pounds per hour shall be accomplished by use of the equation:

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

D.3.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.3.3 Particulate Control

- (a) In order to comply with Condition D.3.1(a), the industrial dust collector (DC2) for particulate control shall be in operation and control emissions from the urethane sanding and finishing operations at all times that the urethane sanding and finishing operations are in operation.
- (b) In order to comply with Condition D.3.1(b), the external, high efficiency return-air bagfilter system (WWDC1) for particulate control shall be in operation and control emissions from the woodworking line at all times that the woodworking line, is in operation.
- (c) 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 2-6.1-5(a)(2)]

D.3.4 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 C- Response to Excursions or Exceedances).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section C- Response to Excursions or Exceedances).

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, or dust traces or triboflows.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Nu-Wood Company, LLC
Address:	1722 Eisenhower Drive North
City:	Goshen, Indiana 46526
Phone #:	574-534-1192
MSOP #:	M039-26567-00586

I hereby certify that Nu-Wood Company, LLC is :

still in operation.

no longer in operation.

I hereby certify that Nu-Wood Company, LLC is :

in compliance with the requirements of MSOP M039-26567-00586.

not in compliance with the requirements of MSOP M039-26567-00586.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY FAX NUMBER - 317 233-6865

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100 TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF "MALFUNCTION" AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

Indiana Department of Environmental Management Office of Air Quality

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

Source Description and Location

Source Name:	Nu-Wood Company, LLC
Source Location:	1722 Eisenhower Drive North, Goshen, Indiana, 46526
County:	Elkhart County
SIC Code:	3086, 2499
Operation Permit No.:	M039-26567-00586
Operation Permit Issuance Date:	December 23, 2008
Significant Permit Revision No.:	039-28310-00586
Permit Reviewer:	Hannah L. Desrosiers

On September 3, 2009, the Office of Air Quality (OAQ) received an application from Nu-Wood Company, LLC related to the addition of a new custom hardwood stair production line, the addition of a new pre-fabricated hardwood cabinet door front coating operation, and replacement of the control device serving their existing urethane sanding and finishing operations.

Existing Approvals

The source was issued MSOP No.: M039-26567-00586, on December 23, 2008.

County Attainment Status

The source is located in Elkhart County. 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.
NO2	Cannot be classified or better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O3	Attainment effective July 19, 2007, for the 8-hour ozone standard. ¹
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
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

- (a) The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.
- (b) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Status of the Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed revision, after consideration of all enforceable limits established in the effective permits:

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)								
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Spray Booth 1	4.57	4.57	4.57	-	-	2.44	-	-	-
Spray Booth 2	3.05	3.05	3.05	-	-	1.63	-	-	-
Spray Booth 3	11.67	11.67	11.67	-	-	1.39	-	-	-
Spray Booth #4	5.70	5.70	5.70	-	-	2.01	-	1.05	1.05 Ethylene Glycol
Aerosol Paint Cans	0.114	0.114	0.114	-	-	0.18	-	-	-
Urethane Molding	-	-	-	-	-	0.04	-	0.04	0.04 MDI
Solvent Cleaning	-	-	-	-	-	1.90	-	0.05	0.05 Napthalene
Sanding and Finishing Operation	74.04	74.04	74.04	-	-	-	-	-	-
Total PTE of Entire Source	99.15	99.15	99.15	-	-	9.60	-	1.14	1.05 Ethylene Glycol
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

Note: The emissions contained in this table are based upon MSOP No.: M039-26567-00586, issued on December 23, 2008.

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Nu-Wood Company, LLC on September 3, 2009, relating to the addition of a new custom hardwood stair production line, the addition of a pre-fabricated hardwood cabinet door front coating operation, and replacement of the control device serving their existing urethane sanding and finishing operations. This includes the conversion of one of the existing surface coating booths (Spray Booth #4) to accommodate a solvent based hardwood stair coating line, and the addition of a new paint room, new woodworking equipment, an external, portable, low air flow, high efficiency, return-air bagfilter system, and two (2), new, natural gas fired, space heaters. Additionally, the existing control device for the urethane sanding and finishing operations will be replaced with a new, external, high efficiency, return-air bagfilter system.

(a) The following is a list of the affected existing emission unit(s) and pollution control device(s), as currently described in MSOP No.: M039-26567-00586. The revised descriptions can be found in the "Proposed Changes" section below:

- (1) Spray Booth #4, constructed in 2004, and exhausting to stack identified as 006, with a maximum hourly capacity of coating 35 polyurethane millwork parts per hour; dry filters as control devices for overspray; and one (1) 15 pound per square inch (psi) spray coating gun and using high volume low pressure application.
- (2) Sanding and Finishing operations, exhausting to stack identified as stack 004, consisting of, a table saw, miter saws, a band saw and table routers constructed in 2004 and sander # 2 constructed in 2004, with a maximum hourly capacity of processing 50 polyurethane millwork parts per hour; and baghouse as a control device for particulate matter.

(b) The following is a list of the new emission unit(s) and pollution control device(s):

- (1) Spray Booth #5, identified as SB5, approved for construction in 2009, coating a maximum of forty (40) pre-fabricated hardwood cabinet door fronts per hour, having three (3) fifteen (15) pound per square inch (psi) spray coating guns for high volume low pressure application, using dry filters to control overspray, and exhausting to two (2) external exhausts identified as SVSB5a and SVSB5b;
- (2) One (1) woodworking line, identified as WW, approved for construction in 2009, with a maximum material throughput of six hundred (600) pounds of wood per hour, using one (1) external, high efficiency return-air bagfilter system, identified as WWDC1, to control particulate emissions, exhausting to the indoors, and consisting of the following equipment:

Note: The maximum material throughput of this line corresponds to the revised throughput of Spray Booth #4, of one (1) custom hardwood stair unit per hour. The coating operations act as an operational bottleneck, limiting the throughput of the woodworking line.

- (A) two (2) Drill Presses (DP1 & DP2);
- (B) one (1) Stroke Sander (SS1);
- (C) one (1) 8" Edge Sander (ES1);
- (D) one (1) 24" Belt Sander (BS1);
- (E) four (4) Manual Sanding Tables (ST1 - ST4);
- (F) one (1) CNC Router (R1);

- (G) one (1) CNC Lathe (L1);
 - (H) five (5) Shapers (SH1 - SH5);
 - (I) two (2) Molding Machines (MM1 & MM2);
 - (J) one (1) Basket Jointer (J1);
 - (K) two (2) Gang Rip Saws (GRS1 & GRS2);
 - (L) two (2) Strate Line Saws (SLS1 & SLS2);
 - (M) two (2) Table Saws (S1 & S2); and
 - (N) ten (10) Chop Saws (CS1 - CS10);
- (3) Two (2) natural gas fired space heaters, identified as H1 and H2, approved for construction in 2009, with a maximum rated heat input capacity of three hundred fifty thousandths (0.350) MMBtu/hr, each, uncontrolled and exhausting inside the building.

Enforcement Issues

There are no pending enforcement actions related to this revision.

Emission Calculations

See Appendix A of this TSD 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.

Permit Level Determination – MSOP Revision

The following table is used to determine the appropriate permit level under 326 IAC 2-6.1-6. This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

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Process/ Emission Unit	Potential to Emit (PTE) of the Proposed Revision (tons/year)								
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Revised Units									
Spray Booth #4	1.95 5.70	1.95 5.70	1.95 5.70	-	-	13.35 2.04	-	3.02 4.05	2.23 4.05 Toluene Ethylene Glycol
Urethane Sanding and Finishing Operations	39.06 74.04	39.06 74.04	39.06 74.04	-	-	-	-	-	-
PTE of the Revised Units	41.01	41.01	41.01	-	-	13.35	-	3.02	2.23 Toluene
New Units									
Spray Booth #5	7.09	7.09	7.09	-	-	36.13	-	12.14	5.80 Xylenes
Woodworking Operations ^α	2.39	2.39	2.39	-	-	-	-	-	-
Natural Gas Combustion	0.01	0.02	0.02	0.002	0.31	0.02	0.26	5.79E-03	0.006 Hexane
PTE of New Units	9.49	9.51	9.50	0.002	0.31	36.15	0.26	12.14	5.80 Xylenes
Total PTE of Proposed Revision	50.51	50.52	50.52	0.002	0.31	49.50	0.26	15.16	6.39 Xylenes
Minor Permit Revision Thresholds	≥ 5 < 25	≥ 5 < 25	≥ 5 < 25	≥ 10 < 25	≥ 10 < 25	≥ 10 < 25	≥ 25 < 100	< 10	< 25
Significant Permit Revision Thresholds	> 25 ≤ 250	> 25 ≤ 100	> 25 ≤ 100	> 25 ≤ 100	> 25 ≤ 100	> 25 ≤ 100	< 100	< 10	< 25
N/A = non-applicable * Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". α The particulate emissions from the woodworking were calculated after consideration of controls as noted in the "Emission Calculations" Section of this TSD. <u>Methodology</u> PTE of the (new/revised) units (tons/yr) = the sum of the emissions from the listed units. Net Change in PTE for the Revised Units (tons/yr) = the sum of the net change in emissions from each of the revised units. Total PTE of the Proposed Revision (tons/yr) = PTE of the revised units (tons/yr) + PTE of the new units (tons/yr).									

This MSOP is being revised through a MSOP Significant Permit Revision pursuant to 326 IAC 2-6.1-6(i)(1)(E)(iv), because the revision involves the construction of emission units with a combined potential to emit (PTE) VOCs of greater than twenty-five (25) tons per year. Additionally, the replacement of the existing urethane sanding and finishing operations air pollution device, with a new and more efficient unit, is necessary for the source to maintain its MSOP status, because the PTE of the urethane sanding and finishing operations is calculated based on the control device's [baghouse] specifications.

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PTE of the Entire Source After Issuance of the MSOP Revision

The table below summarizes the potential to emit of the entire source, with updated emissions shown as **bold** values and previous emissions shown as ~~strikethrough~~ values.

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)								
	PM	PM10*	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Spray Booth #1	4.57	4.57	4.57	-	-	2.44	-	-	-
Spray Booth #2	3.05	3.05	3.05	-	-	1.63	-	-	-
Spray Booth #3	11.67	11.67	11.67	-	-	1.39	-	-	-
Spray Booth #4	1.95 5.70	1.95 5.70	1.95 5.70	-	-	13.35 2.04	-	3.02 4.05	2.23 1.05 Toluene Ethylene Glycol
Spray Booth #5	7.09	7.09	7.09	-	-	36.13	-	12.14	5.80 Xylenes
Aerosol Paint Cans	0.11	0.11	0.11	-	-	0.18	-	-	-
Urethane Molding	-	-	-	-	-	0.04	-	0.04	0.04 MDI
Urethane Solvent Cleaning	-	-	-	-	-	1.90	-	0.05	0.05 Naphthalene
Urethane Sanding and Finishing Operations	39.06 74.04	39.06 74.04	39.06 74.04	-	-	-	-	-	-
Woodworking Operations ^α	2.39	2.39	2.39	-	-	-	-	-	-
Natural Gas Combustion	0.01	0.02	0.02	0.002	0.31	0.02	0.26	5.79E-03	0.006 Hexane
Total PTE of Entire Source	69.91 99.15	69.93 99.15	69.92 99.15	0.002	0.31	57.09 9.60	0.26	15.25 4.14	6.93 1.05 Xylenes Ethylene Glycol
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
negl. = negligible * Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". ^α The particulate emissions from the woodworking were calculated after consideration of controls as noted in the "Emission Calculations" Section of this TSD.									

The table below summarizes the potential to emit of the entire source after issuance of this revision, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this MSOP permit revision, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. (Note: the table below was generated from the above table, with bold text un-bolded and strikethrough text deleted).

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Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Revision (tons/year)								
	PM	PM10*	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Spray Booth #1	4.57	4.57	4.57	-	-	2.44	-	-	-
Spray Booth #2	3.05	3.05	3.05	-	-	1.63	-	-	-
Spray Booth #3	11.67	11.67	11.67	-	-	1.39	-	-	-
Spray Booth #4	1.95	1.95	1.95	-	-	13.35	-	3.02	2.23 Toluene
Spray Booth #5	5.66	5.66	5.66	-	-	20.71	-	11.37	5.24 Xylenes
Aerosol Paint Cans	0.11	0.11	0.11	-	-	0.18	-	-	-
Urethane Molding	-	-	-	-	-	0.04	-	0.04	0.04 MDI
Urethane Solvent Cleaning	-	-	-	-	-	1.90	-	0.05	0.05 Naphthalene
Urethane Sanding and Finishing Operations	39.06	39.06	39.06	-	-	-	-	-	-
Woodworking Operations ^α	2.39	2.39	2.39	-	-	-	-	-	-
Natural Gas Combustion	0.01	0.02	0.02	0.002	0.31	0.02	0.26	5.79E-03	0.006 Hexane
Total PTE of Entire Source	69.91	69.93	69.92	0.002	0.31	57.09	0.26	15.25	6.39 Xylenes
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

negl. = negligible

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

^α The particulate emissions from the woodworking were calculated after consideration of controls as noted in the "Emission Calculations" Section of this TSD.

MSOP Status

This revision to an existing Title V minor stationary source will not change the minor status, because the unlimited potential to emit criteria pollutants from the entire source will still be less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-6.1 (MSOP).

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

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

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) 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 for this proposed revision because this source will not be using a cold solvent cleaning machine or any degreasing solvent that contains any of the halogenated compounds listed in 40 CFR 63.460(a), in the new custom hardwood stair production line, or the new pre-fabricated hardwood cabinet door front coating operation.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Wood Furniture Manufacturing Operations, 40 CFR 63 Subpart JJ (326 IAC 20-14) are not included for this proposed revision because this source is not a major source of HAP emissions.

- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Wood Building Products, 40 CFR 63, Subpart QQQQ (326 IAC 20), are not included for this proposed revision because this source this source is not a major source of HAP emissions.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH (326 IAC 20), are not included for this proposed revision because while this source plans to use spray application methods, it will not be coating metal or plastic parts, will not be using coatings containing any of the metal HAPs (cadmium (Cd), chromium (Cr), lead (Pb), manganese (Mn), or nickel (Ni)), and will not be performing paint stripping using Methylene Chloride.
- (f) 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 for this proposed revision because this source is not planning to purchase, or operate, a wood preserving operation, as defined in §63.11433.
- (g) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included for this proposed revision.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

The following state rules are applicable to the proposed revision:

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than two hundred fifty (250) tons per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the MSOP Revision Section above.
- (c) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (d) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
 - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

- (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (e) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (f) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (g) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Surface Coating:

- (a) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new custom hardwood stair coating line and the new pre-fabricated hardwood cabinet door front coating operation, combined, are 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.
- (b) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2(d), Spray Booth #4 and Spray Booth #5 shall each control particulate emissions using a dry filter, waterwash, or equivalent control device, and are subject to the following:
 - (1) The source shall operate the control device in accordance with manufacturer's specifications.
 - (2) If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (A) Repair the control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (B) Operate the equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (3) If overspray is visibly detected, the source shall continue to maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must still be maintained for five (5) years.
- (c) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
 - (1) The requirements of 326 IAC 8-1-6 do not apply to Spray Booth #4, because the unlimited potential VOC emissions from this proposed revision will be less than twenty-five (25) tons per year.
 - (2) The requirements of 326 IAC 8-1-6 do not apply to Spray Booth #5, because it is otherwise regulated by the provisions of 326 IAC 8-2-12, Wood Furniture and Cabinet Coating.
- (d) 326 IAC 8-2-10 (Volatile Organic Compounds; Flat Wood Panels Manufacturing Operations)
The requirements of 326 IAC 8-2-10 do not apply to this proposed revision because the source does not manufacture flat wood panels.

- (e) 326 IAC 8-2-12 (Volatile Organic Compounds: Wood Furniture and Cabinet Coating)
- (1) The requirements of 326 IAC 8-2-12 do not apply to Spray Booth #4, now used to coat custom hardwood stair units, because hardwood stairs do not meet the definition of wood furniture or cabinets, as defined in § 8-2-12(a).
- (2) Spray Booth #5, identified as SB5, approved for construction in 2009, after the rule applicability date of July 1, 1990, having potential and actual VOC emissions greater than fifteen (15) lbs/day, will be used to apply surface coatings to pre-fabricated, hardwood, cabinet door fronts. Therefore, pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), all surface coating materials, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, shall be applied 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) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.
- Since the source intends to use HVLP spray application, Spray Booth #5 will comply with 326 IAC 8-2-12.
- (f) 326 IAC 8-3 (Organic Solvent Degreasing Operations)
The requirements of 326 IAC 8-3 do not apply to this proposed revision because the solvent usage in Spray Booth #4 and Spray Booth #5, each, is not of a type described in subdivisions in 326 IAC 8-3-1(b)(1)(A) through 326 IAC 8-3-1(b)(1)(C).
- (g) 326 IAC 8-11-3 (Volatile Organic Compounds: Wood Furniture Coatings)
The requirements of 326 IAC 8-11-3 not apply to this proposed revision, because this existing source is not located in Lake, Porter, Clark, or Floyd County, and does not manufacture wood furniture.
- (h) There are no other 326 IAC 8 Rules applicable to Spray Booth #4, and/or Spray Booth #5.

Woodworking:

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2(e), the particulate matter (PM) from the woodworking operation shall not exceed one and eighty-three hundredths (1.83) pounds per hour when operating at a process weight rate of three hundredths (0.30) tons 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:

$$2.39 \text{ ton/yr} \times (2000 \text{ lbs/ton} / 8760 \text{ hrs/yr}) = 0.55 \text{ lb/hr}$$

Note: The process rate for the woodworking operation is inherently limited by the maximum throughput of the corresponding surface coating booth (Spray Booth #4), and is based on a throughput rate of one hundred fifty (150) board ft/hr of red oak, at four (4.0) lbs/board ft, or an equivalent of six hundred (600) pounds of wood per hour (lbs/hr).

The controlled PM emissions from the woodworking operations are fifty-five hundredths (0.55) pounds of PM per hour, which are less than the allowable emissions of one and eighty-three hundredths (1.83) pounds of PM per hour. Therefore, the woodworking operations will comply with this rule.

The external, high efficiency, return-air bagfilter system shall be in operation at all times the woodworking operation 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 two (2) natural gas-fired space heaters, each, are not incinerators, as defined by 326 IAC 1-2-34, since they do not burn waste substances. Therefore, 326 IAC 4-2-2 does not apply to the two (2) natural gas-fired space heaters, and the requirements are not included for this proposed revision.
- (b) 326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)
The two (2) natural gas-fired space heaters, each, do not meet the definition of an indirect heating unit, as defined in 236 IAC 1-2-19. Therefore, 326 IAC 6-2 does not apply to any of the two (2) natural gas-fired space heaters, and the requirements are not included for this proposed revision.
- (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 two (2) natural gas-fired space heaters, 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 for this proposed revision.
- (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 the two (2) natural gas-fired space heaters, each, are less than twenty-five (25) tons per year and ten (10) pounds per hour respectively. Therefore, 326 IAC 7-1.1-2 does not apply to the two (2) natural gas-fired space heaters, and the requirements are not included for this proposed revision.

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

Compliance Determination

- (a) There are no compliance determination requirements applicable to the modification of Spray Booth #4, or for new Spray Booth #5.
- (b) The new industrial dust collector (DC2), used to control particulate in the existing urethane sanding and finishing operations, shall be in operation and control emissions at all times that the urethane sanding and finishing operations are in operation.
- (c) The external, high efficiency return-air bagfilter system (WWDC1), used to control particulate in the woodworking line, shall be in operation and control emissions at all times that the woodworking line is

in operation.

Compliance Monitoring Requirements

- (a) The compliance monitoring requirements applicable to the modification of Spray Booth #4, and to the new Spray Booth #5, are as follows:

Control	Parameter	Frequency	Range	Excursions and Exceedances
Spray Booth #4 & Spray Booth #5 dry filters	Inspections	Daily	Normal-Abnormal	Response Steps
The coating emissions from stacks SB4, SVSBa & SVSBb, and the presence of overspray on the rooftops and the nearby ground	Inspections	Weekly and Monthly	Normal-Abnormal	Response Steps

These monitoring conditions for the dry filters for Spray Booth #4, and Spray Booth #5, are necessary to ensure compliance with 326 IAC 6-3-2(d) (Particulate emission limitations, work practices, and control technologies) and 326 IAC 2-6.1 (MSOP).

- (b) The compliance monitoring requirements for the control device serving the existing urethane sanding and finishing operations have been removed from the permit as a result of this revision. The new, control device will exhaust to the inside of the building. Additionally, the controlled PTE from this more efficient unit has resulted in a net decrease in potential particulate emissions (see TSD App A, pages 1, 2 & 10 of 10), therefore monitoring and recordkeeping is no longer needed. However, the source is still required to maintain the device according to the manufacturer's specifications.
- (c) There are no specific compliance monitoring requirements for the new woodworking line and the natural gas-fired space heaters.

Testing requirements

- (a) There are no specific testing requirements associated with Spray Booth #4, Spray Booth #5, the new woodworking line with corresponding control device, the new control device for the urethane sanding and finishing operations, or the natural gas-fired space heaters.

Recordkeeping and Reporting Requirements

- (a) The recordkeeping and/or reporting requirements for the control device serving the existing urethane sanding and finishing operations have been removed from the permit as a result of this revision, since there are no specific compliance monitoring requirements for the new control device.
- (b) There are no specific recordkeeping or reporting requirements for the new Spray Booth #5, the new woodworking line, or the new natural gas-fired space heaters.

All existing compliance determination, monitoring, testing recordkeeping and reporting requirements, not associated with this revision, remain unchanged. The source shall continue to comply with the applicable requirements and permit conditions as contained in MSOP No: M039-26567-00586, issued on December 23, 2008.

Proposed Changes

The following changes listed below are due to the proposed revision. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

1. The source description, found in section A.1, page 4 of 26 of the permit, has been updated to

reflect the addition of the new production line, and the new door front coating operation. Additionally, new SIC Codes for the hardwood stair manufacturing operation and the new door front coating operation have been added.

2. The emission unit descriptions, found in sections A.2, D.1, D.2, and D.3, pages 4 - 6, and 18 - 23 of 26 of the permit, have been revised to reflect the proposed changes to the source.
3. New condition D.1.1, pages 18 and 19 of 26 of the permit, has been added to incorporate the requirements of 326 IAC 8-2-12 for the new pre-fabricated hardwood cabinet door front coating operation.
4. Existing conditions D.1.1 and D.1.2, renumbered as D.1.2 and D.1.3, page 19 of 26 of the permit, have been revised to reflect the addition of the new pre-fabricated hardwood cabinet door front coating operation.
5. Existing condition D.3.1, pages 21 and 22 of 26 of the permit, has been revised to reflect the addition of the new woodworking line and corresponding control device.
6. Existing condition D.3.3, page 22 of 26 of the permit, has been revised to reflect the replacement of the urethane sanding and finishing control device, and to include the requirement to operate the control device for the new woodworking line to ensure compliance with 326 IAC 6-3.
7. Existing conditions D.3.4, D.3.5, and D.3.7, pages 21 & 22 of 25 of the existing permit, have been removed because the new, external, high efficiency return-air bagfilter system serving the new woodworking operations, and new industrial dust collector serving the existing urethane sanding and finishing operations, will each exhaust to the inside of the building. Additionally, the controlled PTE from these more efficient control devices has resulted in a net decrease in potential particulate emissions (see TSD App A, pages 1, 2 & 10 of 10), therefore monitoring and recordkeeping is no longer needed.
8. Existing condition D.3.6, renumbered as D.3.4, pages 22 & 23 of 26 of the permit, has been updated to include a requirement requiring the Permittee to notify IDEM if a broken bag is detected and the control device will not be repaired for more than ten (10) days. This notification allows IDEM to take any appropriate actions if the emission unit will continue to operate for a long period of time while the control device is not operating in optimum condition.

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

The Permittee owns and operates a stationary, urethane, decorative moldings and millwork manufacturing operation, **a custom hardwood stair production line and a pre-fabricated hardwood cabinet door front coating operation.**

SIC Codes: 3086, **2499, 2434**

A.2 Emission Units and Pollution Control Equipment Summary

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

(a) One (1) stationary, urethane, decorative molding and millwork manufacturing operation, including the following:

- (1a) Spray Booth # 1, constructed in 2004 and exhausting to stack identified as 001, with a maximum hourly capacity of coating 30 silicone rubber molds per hour; dry filters as control devices for overspray; and one (1) 15 pound per square inch (psi) spray coating gun and using high volume low pressure application;-

- (2b) Spray Booth # 2, constructed in 2004 and exhausting to stack identified as 002, with a maximum hourly capacity of coating 20 silicone rubber molds per hour; dry filters as control devices for overspray; and one (1) 15 pound per square inch (psi) spray coating gun and using high volume low pressure application;-
 - (3e) Spray Booth # 3, constructed in 2004 and exhausting to stack identified as 003, with a maximum hourly capacity of coating 50 polyurethane millwork parts per hour; dry filters as control devices for overspray; and one (1) 15 pound per square inch (psi) spray coating gun and using high volume low pressure application;-
 - ~~(d) Spray Booth # 4, constructed in 2004 and exhausting to stack identified as 006, with a maximum hourly capacity of coating 35 polyurethane millwork parts per hour; dry filters as control devices for overspray; and one (1) 15 pound per square inch (psi) spray coating gun and using high volume low pressure application.~~
 - (4e) Aerosol Spray Can Painting #019, constructed in 2004, with a maximum gallon per hour (gph) application rate of 0.09; the twelve (12) ounce aerosol spray cans are used for surface coating touch up;-
 - (5f) Urethane Machine # 1, constructed in 2004 and exhausting to stack identified as stack 002, with a maximum hourly capacity of filling urethane at 20 silicone rubber molds per hour; makes polyurethane millwork parts by applying two-part mixture of urethane and isocyanate to a rubber mold;-
 - (6g) Urethane Machine #2, constructed in 2004 and exhausting to stack identified as stack 005, with a maximum hourly capacity of filling urethane at 20 silicone rubber molds per hour; makes polyurethane millwork parts by applying two-part mixture of urethane and isocyanate to a rubber mold;-
 - (7h) ~~Urethane Sanding and Finishing operations, exhausting to stack identified as stack 004, consisting of, a table saw, miter saws, a band saw, and table routers, constructed in 2004 and a sander (# 2), constructed in 2004, with a maximum hourly capacity of processing 50 polyurethane millwork parts per hour,; and using one (1) Grizzly Model G0637 industrial dust collector, identified as DC2, baghouse as a control device for particulate matter control, and exhausting to the indoors; and~~
 - (8i) Equipment Cleaning and Maintenance #020; consisting of SP741 solvent, mineral spirits and acetone; SP741 solvent is used to flush out the urethane line and contains Naphthalene as a HAP, mineral spirits are used to clean silicone-covered parts, and acetone is not defined as a VOC.
- (b) **One (1) custom hardwood stair production line, approved for construction in 2009, and including the following:**
- (1e) Spray Booth #4, **identified as SB4**, constructed in 2004 **and reconstructed in 2009**, with **coating** a maximum hourly capacity of coating 35 polyurethane millwork parts **one (1) custom hardwood stair unit** per hour,; **having** and one (1) **fifteen** (15) pound per square inch (psi) spray coating gun **for** ~~and using~~ high volume low pressure application, using dry filters to ~~as control devices for overspray,; and exhausting to~~ **one (1)** stack identified as **SB4 006**;-
 - (2) **One (1) woodworking line, identified as WW, approved for construction in 2009, with a maximum material throughput of six hundred (600) pounds of wood per hour, using one (1) external, high efficiency return-air bagfilter system, identified as WWDC1, to control particulate emissions, exhausting to**

the indoors, and consisting of the following equipment:

Note: The maximum material throughput of this line corresponds to the revised throughput of Spray Booth #4, of one (1) custom hardwood stair unit per hour. The coating operations act as an operational bottleneck, limiting the throughput of the woodworking line.

- (A) two (2) Drill Presses (DP1 & DP2);
- (B) one (1) Stroke Sander (SS1);
- (C) one (1) 8" Edge Sander (ES1);
- (D) one (1) 24" Belt Sander (BS1);
- (E) four (4) Manual Sanding Tables (ST1 - ST4);
- (F) one (1) CNC Router (R1);
- (G) one (1) CNC Lathe (L1);
- (H) five (5) Shapers (SH1 - SH5);
- (I) two (2) Molding Machines (MM1 & MM2);
- (J) one (1) Basket Jointer (J1);
- (K) two (2) Gang Rip Saws (GRS1 & GRS2);
- (L) two (2) Strate Line Saws (SLS1 & SLS2);
- (M) two (2) Table Saws (S1 & S2); and
- (N) ten (10) Chop Saws (CS1 - CS10);

- (3) Two (2) natural gas fired space heaters, identified as H1 and H2, approved for construction in 2009, with a maximum rated heat input capacity of three hundred fifty thousandths (0.350) MMBtu/hr, each, uncontrolled and exhausting inside the building.

- (c) One (1) hardwood door front coating operation, approved for construction in 2009, and including the following:

- (1) Spray Booth #5, identified as SB5, coating a maximum of forty (40) pre-fabricated hardwood cabinet door fronts per hour, having three (3) fifteen (15) pound per square inch (psi) spray coating guns for high volume low pressure application, using dry filters to control overspray, and exhausting to two (2) external exhausts identified as SVSB5a and SVSB5b;

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) **One (1) stationary, urethane, decorative molding and millwork manufacturing operation, including the following:**
 - (1a) Spray Booth # 1, constructed in 2004 and exhausting to stack identified as 001, with a maximum hourly capacity of coating 30 silicone rubber molds per hour; dry filters as control devices for overspray; and one (1) 15 pound per square inch (psi) spray coating gun and using high volume low pressure application;-
 - (2b) Spray Booth # 2, constructed in 2004 and exhausting to stack identified as 002, with a maximum hourly capacity of coating 20 silicone rubber molds per hour; dry filters as control devices for overspray; and one (1) 15 pound per square inch (psi) spray coating gun and using high volume low pressure application;-
 - (3e) Spray Booth # 3, constructed in 2004 and exhausting to stack identified as 003, with a maximum hourly capacity of coating 50 polyurethane millwork parts per hour; dry filters as control devices for overspray; and one (1) 15 pound per square inch (psi) spray coating

- gun and using high volume low pressure application;-
- (d) ~~Spray Booth # 4, constructed in 2004 and exhausting to stack identified as 006, with a maximum hourly capacity of coating 35 polyurethane millwork parts per hour; dry filters as control devices for overspray; and one (1) 15 pound per square inch (psi) spray coating gun and using high volume low pressure application.~~
- (4e) Aerosol Spray Can Painting #019, constructed in 2004, with a maximum gallon per hour (gph) application rate of 0.09; the twelve (12) ounce aerosol spray cans are used for surface coating touch up;-
- ***
- (b) **One (1) custom hardwood stair production line, approved for construction in 2009, and including the following:**
- (1d) **Spray Booth # 4, identified as SB4, constructed in 2004 and reconstructed in 2009, with coating a maximum hourly capacity of coating 35 polyurethane millwork parts one (1) custom hardwood stair unit per hour,; having and one (1) fifteen (15) pound per square inch (psi) spray coating gun for and using high volume low pressure application, using dry filters to as control devices for overspray,; and exhausting to one (1) stack identified as SB4 006.;**
- ***
- (c) **One (1) hardwood door front coating operation, approved for construction in 2009, and including the following:**
- (1) **Spray Booth #5, identified as SB5, coating a maximum of forty (40) pre-fabricated hardwood cabinet door fronts per hour, having three (3) fifteen (15) pound per square inch (psi) spray coating guns for high volume low pressure application, using dry filters to control overspray, and exhausting to two (2) external exhausts identified as SVSB5a and SVSB5b;**
- ***

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating(s) applied in Spray Booth #5, to wood furniture and cabinets, with the exception of applying no more than ten (10) gallons of coating per day used for touch-up and repair operations, 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.1.2 4 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), Spray Booths 1, 2, 3, and 4, and 5, shall **each** be controlled by a dry particulate filter, waterwash, or an equivalent control device, subject to the following:

D.1.3 2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan of this permit, is required for **these facilities** ~~the facility~~ and any **corresponding** control devices.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) stationary, urethane, decorative molding and millwork manufacturing operation, including the following:

(5f) Urethane Machine # 1, constructed in 2004 and exhausting to stack identified as stack 002, with a maximum hourly capacity of filling urethane at 20 silicone rubber molds per hour; makes polyurethane millwork parts by applying two-part mixture of urethane and isocyanate to a rubber mold;-

(6g) Urethane Machine #2, constructed in 2004 and exhausting to stack identified as stack 005, with a maximum hourly capacity of filling urethane at 20 silicone rubber molds per hour; makes polyurethane millwork parts by applying two-part mixture of urethane and isocyanate to a rubber mold;-

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) stationary, urethane, decorative molding and millwork manufacturing operation, including the following:

(7h) ~~Urethane Sanding and Finishing operations, exhausting to stack identified as stack 004, consisting of, a table saw, miter saws, a band saw, and table routers, constructed in 2004 and a sander (# 2), constructed in 2004, with a maximum hourly capacity of processing 50 polyurethane millwork parts per hour; and~~ **using one (1) Grizzly Model G0637 industrial dust collector, identified as DC2, baghouse as a control device for particulate matter control, and exhausting to the indoors; and**

(8i) Equipment Cleaning and Maintenance #020; consisting of SP741 solvent, mineral spirits and acetone; SP741 solvent is used to flush out the urethane line and contains Naphthalene as a HAP, mineral spirits are used to clean silicone-covered parts, and acetone is not defined as a VOC.

(b) One (1) custom hardwood stair production line, approved for construction in 2009, and including the following:

(2) One (1) woodworking line, identified as WW, approved for construction in 2009, with a maximum material throughput of six hundred (600) pounds of wood per hour, using one (1) external, high efficiency return-air bagfilter system, identified as

WWDC1, to control particulate emissions, exhausting to the indoors, and consisting of the following equipment:

Note: The maximum material throughput of this line corresponds to the revised throughput of Spray Booth #4, of one (1) custom hardwood stair unit per hour. The coating operations act as an operational bottleneck, limiting the throughput of the woodworking line.

- (A) two (2) Drill Presses (DP1 & DP2);
- (B) one (1) Stroke Sander (SS1);
- (C) one (1) 8" Edge Sander (ES1);
- (D) one (1) 24" Belt Sander (BS1);
- (E) four (4) Manual Sanding Tables (ST1 - ST4);
- (F) one (1) CNC Router (R1);
- (G) one (1) CNC Lathe (L1);
- (H) five (5) Shapers (SH1 - SH5);
- (I) two (2) Molding Machines (MM1 & MM2);
- (J) one (1) Basket Jointer (J1);
- (K) two (2) Gang Rip Saws (GRS1 & GRS2);
- (L) two (2) Strate Line Saws (SLS1 & SLS2);
- (M) two (2) Table Saws (S1 & S2); and
- (N) ten (10) Chop Saws (CS1 - CS10);

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

D.3.1 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the **urethane** sanding and finishing operations shall not exceed 1.342 pounds per hour when operating at a process weight rate of 378 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the **woodworking line (WW)** shall not exceed one and eighty-three hundredths (1.83) pounds per hour when operating at a process weight rate of six hundred (600) pounds per hour.

D.3.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

D.3.3 Particulate Control

- (a) In order to comply with Condition D.3.1(a), the **industrial dust collector (DC2)** ~~baghouse~~ for particulate control shall be in operation and control emissions from the **urethane** sanding and finishing operations at all times that the **urethane** sanding and finishing operations are in operation.
- (b) In order to comply with Condition D.3.1(b), the **external, high efficiency return-air bagfilter system (WWDC1)** for particulate control shall be in operation and control emissions from the **woodworking line** at all times that the **woodworking line**, are in operation.

~~D.3.4 Visible Emissions Notations~~

- ~~(a) Visible emission notations of Stack 004 shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.~~
- ~~(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.~~
- ~~(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~
- ~~(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~
- ~~(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.~~

~~D.3.5 Baghouse Parametric Monitoring~~

- ~~(a) The Permittee shall record the pressure drop across the baghouse used in conjunction with the sanding and finishing operation at least once per day when the sanding and finishing is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of three (3.0) and six (6.0) inches of water, or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.~~
- ~~(b) The instrument(s) used for determining the pressure and temperature shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.~~

~~D.3.46 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 C- Response to Excursions or Exceedances).**~~
- ~~(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. **Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section C- Response to Excursions or Exceedances).**~~

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, or dust traces **or triboflows**.

~~D.3.7 Record Keeping Requirements~~

- ~~(a) To document compliance with Condition D.3.4, the Permittee shall maintain daily records of the visible emission notations from Stack 004. The Permittee shall include, in its daily record, when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the plant did not operate that day).~~
- ~~(b) To document compliance with Condition D.3.5, the Permittee shall maintain daily records of the pressure drop across the baghouse controlling the sanding and finishing operations. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (e.g., sanding and finishing of product was not conducted that day).~~

Additionally, upon further review, IDEM, OAQ has decided to make the following changes to the permit. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

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

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

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

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on September 3, 2009.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed MSOP Significant Revision No.: 039-28310-00586. The staff recommends to the Commissioner that this MSOP Significant Revision be approved.

IDEM Contact

- Questions regarding this proposed permit can be directed to 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: <http://www.in.gov/ai/appfiles/idem-caats/>
- For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Appendix A: Emissions Calculations
PTE of the Entire Source After Issuance of the MSOP Revision

Company Name: Nu-Wood Company, LLC
Address City IN Zip: 1722 Eisenhower Drive North, Goshen, Indiana
Permit No.: M039-26567-00586
Permit Revision No.: M039-28310-00586
Reviewer: Hannah L. Desrosiers
Date Received: 9/3/2009

Uncontrolled Potential Emissions (tons/year)													
Category	Emissions Generating Activity												TOTAL
	Pollutant	Spray Booth 1	Spray Booth 2	Spray Booth 3	Spray Booth 4	Spray Booth 5	Aerosol Cans	Urethane Molding	Urethane Solvent Cleaning	Urethane Sanding/ Grinding	Woodworking	Natural Gas Combustion	
Criteria Pollutants	PM	4.57	3.05	11.67	1.95	7.09	0.11	0	0	39.06	2.39	0.01	69.91
	PM10	4.57	3.05	11.67	1.95	7.09	0.11	0	0	39.06	2.39	0.02	69.93
	PM2.5	4.57	3.05	11.67	1.95	7.09	0.11	0	0	39.06	2.39	0.02	69.92
	SO2	0	0	0	0	0	0	0	0	0	0	0.002	0.002
	NOx	0	0	0	0	0	0	0	0	0	0	0.31	0.31
	VOC	2.44	1.63	1.39	13.35	36.13	0.18	0.04	1.90	0	0	0.02	57.09
	CO	0	0	0	0	0	0	0	0	0	0	0.26	0.26
Hazardous Air Pollutants	Benzene	0	0	0	0	0	0	0	0	0	0	6.44E-06	6.44E-06
	Dichlorobenzene	0	0	0	0	0	0	0	0	0	0	3.68E-06	3.68E-06
	Ethylbenzene	0	0	0	0.10	2.65	0	0	0	0	0	0	2.74
	Ethylene Glycol	0	0	0	0	0	0	0	0	0	0	0	0
	Formaldehyde	0	0	0	0.11	0.05	0	0	0	0	0	2.30E-04	0.16
	Hexane	0	0	0	0	0	0	0	0	0	0	0.01	0.01
	MDI	0	0	0	0	0	0	0.04	0	0	0	0	0.04
	Methanol	0	0	0	0	0.14	0	0	0	0	0	0	0.14
	Napthalene	0	0	0	0	0	0	0	0.05	0	0	0	0.05
	Toluene	0	0	0	2.23	3.49	0	0	0	0	0	1.04E-05	5.72
	Xylenes	0	0	0	0.58	5.80	0	0	0	0	0	0	6.39
	Cadmium	0	0	0	0	0	0	0	0	0	0	3.37E-06	3.37E-06
	Chromium	0	0	0	0	0	0	0	0	0	0	4.29E-06	4.29E-06
	Lead	0	0	0	0	0	0	0	0	0	0	1.53E-06	1.53E-06
	Manganese	0	0	0	0	0	0	0	0	0	0	1.17E-06	1.17E-06
	Nickel	0	0	0	0	0	0	0	0	0	0	6.44E-06	6.44E-06
Totals	0	0	0	3.02	12.14	0	0.04	0.05	0	0	5.79E-03	15.25	
												6.39	

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

Appendix A: Emissions Calculations
PTE of Proposed Revision (tons/year)

Company Name: Nu-Wood Company, LLC
Address City IN Zip: 1722 Eisenhower Drive North,
 Goshen, Indiana
Permit No.: M039-26567-00586
Permit Revision No.: M039-28310-00586
Reviewer: Hannah L. Desrosiers
Date Received: 9/3/2009

Uncontrolled Potential Emissions (tons/year)									
Category	Emissions Generating Activity								TOTAL
	Pollutant	Existing Affected Unit	Revised Unit ⁽¹⁾	Existing Affected Unit	Revised Unit ⁽¹⁾	New Unit(s)			
		Spray Booth 4 ^a	Spray Booth 4	Urethane Sanding/Grinding ^a	Urethane Sanding/Grinding	Spray Booth 5	Woodworking	Natural Gas Combustion	
Criteria Pollutants	PM	5.70	1.95	74.04	39.06	7.09	2.39	0.01	50.51
	PM10	5.70	1.95	74.04	39.06	7.09	2.39	0.02	50.52
	PM2.5	5.70	1.95	74.04	39.06	7.09	2.39	0.02	50.52
	SO2	0	0	0	0	0	0	0.002	0.002
	NOx	0	0	0	0	0	0	0.31	0.31
	VOC	2.01	13.35	0	0	36.13	0	0.02	49.50
Hazardous Air Pollutants	CO	0	0	0	0	0	0	0.26	0.26
	Benzene	0	0	0	0	0	0	6.44E-06	6.44E-06
	Dichlorobenzene	0	0	0	0	0	0	3.68E-06	3.68E-06
	Ethylbenzene	0	0.10	0	0	2.65	0	0	2.74
	Ethylene Glycol	1.05	0	0	0	0	0	0	0
	Formaldehyde	0	0.11	0	0	0.05	0	2.30E-04	0.16
	Hexane	0	0	0	0	0	0	0.01	0.01
	MDI	0	0	0	0	0	0	0	0
	Methanol	0	0	0	0	0.14	0	0	0.14
	Napthalene	0	0	0	0	0	0	0	0
	Toluene	0	2.23	0	0	3.49	0	1.04E-05	5.72
	Xylenes	0	0.58	0	0	5.80	0	0	6.39
	Cadmium	0	0	0	0	0	0	3.37E-06	3.37E-06
	Chromium	0	0	0	0	0	0	4.29E-06	4.29E-06
	Lead	0	0	0	0	0	0	1.53E-06	1.53E-06
Manganese	0	0	0	0	0	0	1.17E-06	1.17E-06	
Nickel	0	0	0	0	0	0	6.44E-06	6.44E-06	
Totals		1.05	3.02	0	0	12.14	0	5.79E-03	15.16
									6.39

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

⁽¹⁾ The corresponding emissions are the result of a revision to existing operations^a. The revised values supercede and replace the original values, which are no longer counted in the TOTAL emissions

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

Company Name: Nu-Wood Company, LLC
Address City IN Zip: 1722 Eisenhower Drive North, Goshen, Indiana
Permit No.: M039-26567-00586
Permit Revision No.: M039-28310-00586
Reviewer: Hannah L. Desrosiers
Date Received: 9/3/2009

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Weight % Non-Volatiles (solids)	Material Usage Rate (gal/unit)*	Maximum Throughput (unit/hour)	Pounds VOC per gallon of coating	Pounds VOC per gallon of coating less water	Potential Hourly VOC Emissions (lbs/hr)	Potential Daily VOC Emissions (lb/day)	*Actual Daily VOC Emissions (lb/day)	Potential Annual VOC Emissions (ton/yr)	*Actual Annual VOC Emissions (ton/yr)	Potential Annual Particulate Emissions (ton/yr)	lb VOC/gal solids	Transfer Efficiency	
Booth 4 - Hardwood Stair Coating Line																			
HC White Vinyl Primer	8.9	59.90%	0%	59.9%	0%	40.10%	0.49990	1.000	5.33	5.33	2.67	63.96	21.32	11.67	2.67	1.95	13.29	75%	
9912-FC Stain	7.8	65.19%	0%	65.2%	0%	34.81%	0.24900	1.000	5.09	5.09	1.27	30.43	10.14	5.55	1.27	0.741	14.63	75%	
Aristovar HV 35-532B	7.8	59.98%	0%	60.0%	0%	40.02%	0.49990	1.000	4.69	4.69	2.34	56.27	18.76	10.27	2.34	1.71	11.72	75%	
HC Aristocoat Catalyst	7.2	80.48%	0%	80.5%	0%	19.52%	0.00190	1.000	5.80	5.80	0.011	0.265	0.088	0.048	0.011	0.003	29.73	75%	
Worst case coating emissions											2.665	63.960	21.320	11.673	2.665	1.954			
Framwood Wood Filler	12.9	13.70%	0%	13.7%	0%	86.30%	0.00125	1.000	1.77	1.77	0.002	0.053	0.018	0.010	0.002	0.000	0.000	100%	
5542A Assembly Adhesive	9.2	3.00%	0%	3.0%	0%	97.00%	0.04990	1.000	0.275	0.275	0.014	0.330	0.110	0.060	0.014	0.000	0.000	100%	
Mineral Spirits-Cleaner	6.5	100.00%	0%	100.0%	0%	0.00%	0.04990	1.000	6.51	6.51	0.325	7.80	2.60	1.42	0.325	0.000	0.000	100%	
Acrastrip-Cleaner	8.6	63.00%	53.0%	10.0%	0%	37.00%	0.04990	1.000	0.860	0.860	0.043	1.03	0.343	0.188	0.043	0.000	0.000	100%	
Sum of all solvents, adhesives and fillers											0.384	9.209	3.070	1.681	0.384	0.000			

State Potential Emissions	3.05	73.17	24.39	13.35	3.05	1.95
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METHODOLOGY

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Potential Hourly VOC Emissions (lbs/hr) = Material Usage Rate (gal/unit) * Maximum Throughput (units/hr) * Pounds of VOC per Gallon coating (lb/gal)
Potential Daily VOC Emissions (lbs/day) = Material Usage Rate (gal/unit) * Maximum Throughput (units/hr) * Pounds of VOC per Gallon coating (lb/gal) * (24 hr/day)
Actual Daily VOC Emissions (lbs/day) = Material Usage Rate (gal/unit) * Maximum Throughput (units/hr) * Pounds of VOC per Gallon coating (lb/gal) * Anticipated Actual Hours of Operation (hr/day)
Potential Annual VOC Emissions (tons/yr) = Material Usage Rate (gal/unit) * Maximum Throughput (units/hr) * Pounds of VOC per Gallon coating (lb/gal) * (8760 hr/yr) * (1 ton/2000 lbs)
Actual Annual VOC Emissions (tons/yr) = Material Usage Rate (gal/unit) * Maximum Throughput (units/hr) * Pounds of VOC per Gallon coating (lb/gal) * Anticipated Actual Hours of Operation (hr/yr) * (1 ton/2000 lbs)
Potential Annual Particulate Emissions (tons/yr) = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
State Potential Emissions (tons/yr) = Worst Case Coating + Sum of all solvents, adhesives, and fillers

NOTES

*1 Unit= 20 Stair Treads

Actual hours of operation anticipated by the source = 8.0 hrs/day * 5 days/wk * 50 weeks/yr = 2000 hrs/yr

**Appendix A: Emission Calculations
HAP Emission Calculations
From the Modified Surface Coating Operations**

Company Name: Nu-Wood Company, LLC
Address City IN Zip: 1722 Eisenhower Drive North, Goshen, Indiana
Permit No.: M039-26567-00586
Permit Revision No.: M039-28310-00586
Reviewer: Hannah L. Desrosiers
Date Received: 9/3/2009

Material	Density (Lb/Gal)	Material Usage Rate (gal/unit)	Maximum Throughput (unit/hour)	Weight % Ethyl Benzene	E-Benzene Emissions (ton/yr)	Weight % Formaldehyde	Formaldehyde Emissions (ton/yr)	Weight % Toluene	Toluene Emissions (ton/yr)	Weight % Xylene	Xylene Emissions (ton/yr)
Booth 4 - Hardwood Stair Coating Line											
HC White Vinyl Primer	8.90	0.49990	1.000	0.38%	0.074	0%	0	8.12%	1.58	2.34%	0.456
HC Aristocoat Catalyst	7.21	0.00190	1.000	0%	0	0%	0	0%	0	0%	0
9912-FC Stain	7.81	0.24900	1.000	0%	0	0%	0	0.10%	0.009	0.09%	0.007
Aristovar HV 35-532B	7.82	0.49990	1.000	0.39%	0.067	0.11%	0.021	10.48%	1.79	1.50%	0.256
Worst case coating emissions					0.074		0.021		1.794		0.456
Framwood Wood Filler	12.93	0.00125	1.000	0.39%	0.0003	0.11%	0.021	8.12%	0.006	2.34%	0.002
5542A Assembly Adhesive	9.18	0.04990	1.000	0.39%	0.008	0.11%	0.021	8.12%	0.163	2.34%	0.047
Mineral Spirits-Cleaner	6.51	0.04990	1.000	0.39%	0.006	0.11%	0.021	8.12%	0.116	2.34%	0.033
Acrastrip-Cleaner	8.60	0.04990	1.000	0.39%	0.007	0.11%	0.021	8.12%	0.153	2.34%	0.044
Sum of all solvents, adhesives and fillers					0.021		0.086		0.437		0.126

State Potential Emissions	Total Single HAPs	0.10	0.11	2.23	0.58
	Total Combined HAPs	3.02			

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
 State Potential Emissions (Total Single HAPs (tons/yr)) = Worst Case Coating + Sum of all solvents, adhesives, and fillers used
 State Potential Emissions (Total Combined HAPs (tons/yr)) = Sum of all Single HAPs totals

NOTES

*1 Unit= 20 Stair Treads

**Appendix A: Emission Calculations
NEW Baghouse for the Urethane Gringing and Sanding Operations**

Company Name: Nu-Wood Company, LLC
Address City IN Zip: 1722 Eisenhower Drive North, Goshen, Indiana
Permit No.: M039-26567-00586
Permit Revision No.: M039-28310-00586
Reviewer: Hannah L. Desrosiers
Date Received: 9/3/2009

Particulate Emissions

Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	Uncontrolled Particulate (PM) Emissions (lb/hr)	Controlled Particulate (PM) Emissions (lb/hr)	Uncontrolled Particulate (PM) Emissions (tons/yr)	Controlled Particulate (PM) Emissions (tons/yr)
DC2	99.0%	0.0030	3,468.0	8.92	0.089	39.06	0.391
Total				8.92	0.09	39.06	0.39

METHODOLOGY

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

NOTES

* 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)
DC2	8.45	0.004226	0.11

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(Process Weight Rate (lb/hr)^{0.67}
 Allowable Emissions (tons/yr) = (Allowable Emissions (lb/hr)*8760)/2000

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

Company Name: Nu-Wood Company, LLC
Address City IN Zip: 1722 Eisenhower Drive North, Goshen, Indiana
Permit No.: M039-26567-00586
Permit Revision No.: M039-28310-00586
Reviewer: Hannah L. Desrosiers
Date Received: 9/3/2009

Material	Density (Lb/Gal)	Weight % Volatiles (H2O & Organics)	Weight % Water & Exempt	Weight % Organics	Volume % Water	Weight % Non-Volatiles (solids)	Material Usage Rate (gal/unit)*	Maximum Throughput (unit/hour)	Pounds VOC per gallon of coating	Pounds VOC per gallon of coating less water	Potential Hourly VOC Emissions (lbs/hr)	Potential Daily VOC Emissions (lb/day)	*Actual Daily VOC Emissions (lb/day)	Potential Annual VOC Emissions (ton/yr)	*Actual Annual VOC Emissions (ton/yr)	Potential Annual Particulate Emissions (ton/yr)	lb VOC/gal solids	Transfer Efficiency	
Booth 5 - Hardwood Cabinet Door Front Coating Operation																			
3090 Stain Base	6.42	100.00%	25.0%	75.00%	0%	0%	0.2490	1.000	4.82	4.82	1.20	28.77	9.59	5.25	1.20	0.0	0.0	75%	
HC Precatalyzed Lacquer	7.58	76.97%	0%	76.97%	0%	23.03%	0.7499	1.000	5.83	5.83	4.38	105.00	35.00	19.16	4.38	1.43	25.33	75%	
HC Aristocoat Sealer	9.99	31.00%	0%	31.00%	0%	68.99%	0.7499	1.000	3.10	3.10	2.32	55.74	18.58	10.17	2.32	5.66	4.49	75%	
4-PLT Thinner-Cleaner	7.07	100.00%	0%	100.00%	0%	0%	0.0499	1.000	7.07	7.07	0.35	8.47	2.82	1.55	0.35	0.0	0.0	100%	
											8.249	197.982	65.994	36.132	8.249	7.094			

State Potential Emissions	Add worst case coating to all solvents											8.25	197.98	65.99	36.13	8.25	7.09			
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METHODOLOGY

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

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

Potential Hourly VOC Emissions (lbs/hr) = Material Usage Rate (gal/unit) * Maximum Throughput (units/hr) * Pounds of VOC per Gallon coating (lb/gal)

Potential Daily VOC Emissions (lbs/day) = Material Usage Rate (gal/unit) * Maximum Throughput (units/hr) * Pounds of VOC per Gallon coating (lb/gal) * (24 hr/day)

Actual Daily VOC Emissions (lbs/day) = Material Usage Rate (gal/unit) * Maximum Throughput (units/hr) * Pounds of VOC per Gallon coating (lb/gal) * Anticipated Actual Hours of Operation (hr/day)

Potential Annual VOC Emissions (tons/yr) = Material Usage Rate (gal/unit) * Maximum Throughput (units/hr) * Pounds of VOC per Gallon coating (lb/gal) * (8760 hr/yr) * (1 ton/2000 lbs)

Actual Annual VOC Emissions (tons/yr) = Material Usage Rate (gal/unit) * Maximum Throughput (units/hr) * Pounds of VOC per Gallon coating (lb/gal) * Anticipated Actual Hours of Operation (hr/yr) * (1 ton/2000 lbs)

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

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

State Potential Emissions (tons/yr) = Worst Case Coating + Sum of all solvents, adhesives, and fillers

NOTES

*1 Unit= 40 Door Fronts

Actual hours of operation anticipated by the source = 8.0 hrs/day * 5 days/wk * 50 weeks/yr = 2000 hrs/yr

**Appendix A: Emission Calculations
HAP Emission Calculations
From the New Surface Coating Operations**

Company Name: Nu-Wood Company, LLC
Address City IN Zip: 1722 Eisenhower Drive North, Goshen, Indiana
Permit No.: M039-26567-00586
Permit Revision No.: M039-28310-00586
Reviewer: Hannah L. Desrosiers
Date Received: 9/3/2009

Material	Density (Lb/Gal)	Material Usage Rate (gal/unit)	Maximum Throughput (unit/hour)	Weight % Ethyl Benzene	E-Benzene Emissions (ton/yr)	Weight % Formaldehyde	Formaldehyde Emissions (ton/yr)	Weight % Methanol	Methanol Emissions (ton/yr)	Weight % Toluene	Toluene Emissions (ton/yr)	Weight % Xylene	Xylene Emissions (ton/yr)		
Booth 5 - Hardwood Cabinet Door Front Coating Operation															
3090 Stain Base	6.42	0.2490	1.000	0%	0	0%	0	0%	0	0%	0	0%	0		
HC Precatalyzed Lacquer	7.58	0.7499	1.000	9.90%	2.46	0.09%	0.02	0%	0	9.90%	2.46	20.70%	5.15		
HC Aristocoat Sealer	9.99	0.7499	1.000	0.55%	0.18	0.09%	0.03	0%	0	0%	0	1.72%	0.56		
4-PLT Thinner-Cleaner	7.07	0.0499	1.000	0%	0	0%	0	9.38%	0.14	66.28%	1.02	5.59%	0.09		
					2.645			0.052			0.145			3.489	5.804

State Potential Emissions	Total Single HAPs	2.65	0.05	0.14	3.49	5.80
	Total Combined HAPs	12.14				

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
 State Potential Emissions (Total Single HAPs (tons/yr)) = Worst Case Coating + Sum of all solvents, adhesives, and fillers used
 State Potential Emissions (Total Combined HAPs (tons/yr)) = Sum of all Single HAPs totals

NOTES

*1 Unit= 40 Door Fronts

Appendix A: Emission Calculations
NEW Baghouse for the Woodworking Operations

Company Name: Nu-Wood Company, LLC
Address City IN Zip: 1722 Eisenhower Drive North, Goshen, Indiana
Permit No.: M039-26567-00586
Permit Revision No.: M039-28310-00586
Reviewer: Hannah L. Desrosiers
Date Received: 9/3/2009

Particulate Emissions

Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	Controlled Particulate (PM) Emissions (lb/hr)	Controlled Particulate (PM) Emissions (tons/yr)
WWDC1	99.9%	0.0030	21,252.0	0.546	2.394
Total				0.55	2.39

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

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

Potential emissions for particulate matter (PTE) for the woodworking operations were calculated after consideration of the controls. In October 1993 a Final Order Granting Summary Judgment was signed by Administrative Law Judge ("ALJ") Garretson 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.

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)
WWDC1	600	0.30	1.83

METHODOLOGY

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

The process rate for the woodworking operation is inherently limited by the maximum throughput of the corresponding surface coating booth, and is based on a throughput rate of one hundred fifty (150) board ft/hr of red oak at four (4.0) lbs/board ft.

Allowable Emissions (lb/hr) = 4.10(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
Two (2) Natural Gas Fired Space Heaters
MM BTU/HR <100**

Company Name: Nu-Wood Company, LLC
Address City IN Zip: 1722 Eisenhower Drive North, Goshen, Indiana
Permit No.: M039-26567-00586
Permit Revision No.: M039-28310-00586
Reviewer: Hannah L. Desrosiers
Date Received: 9/3/2009

Heat Input Capacity Potential Throughput
MMBtu/hr MMCF/yr
0.70 6.13
= 2 @ 0.35 MMBtu/hr each

Particulate Emissions

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	0.006	0.023	0.017	0.002	0.307	0.017	0.258

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable fractions combined. PM2.5 emission factor is condensable fraction 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	6.44E-06	3.68E-06	2.30E-04	0.006	1.04E-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	1.53E-06	3.37E-06	4.29E-06	1.17E-06	6.44E-06

METHODOLOGY

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Total HAPs =	5.79E-03	tons/yr
Worst Single HAP =	5.52E-03	tons/yr

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

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).

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

**Appendix A: Emissions Calculations
Potential To Emit of the Entire Source Prior to Revision (tons/year)**

Company Name: Nu-Wood Company, LLC
Address City IN Zip: 1722 Eisenhower Drive North, Goshen, Indiana
Permit No.: M039-26567-00586
Permit Revision No.: M039-28310-00586
Reviewer: Hannah L. Desrosiers
Date: 9/3/2009

Uncontrolled Potential Emissions (tons/year)										
Category	Emissions Generating Activity									
	Pollutant	Spray Booth 1	Spray Booth 2	Spray Booth 3	Spray Booth 4	Aerosol Cans	Urethane Molding	Urethane Solvent Cleaning	Urethane Sanding/Grinding	TOTAL
Criteria Pollutants	PM	4.57	3.05	11.67	5.70	0.114	0	0	74.04	99.15
	PM10	4.57	3.05	11.67	5.70	0.114	0	0	74.04	99.15
	PM2.5	4.57	3.05	11.67	5.70	0.114	0	0	74.04	99.15
	SO2	0	0	0	0	0	0	0	0	0
	NOx	0	0	0	0	0	0	0	0	0
	VOC	2.44	1.63	1.39	2.01	0.182	0.044	1.90	0	9.60
Hazardous Air Pollutants	CO	0	0	0	0	0	0	0	0	0
	Benzene	0	0	0	0	0	0	0	0	0
	Dichlorobenzene	0	0	0	0	0	0	0	0	0
	Ethylene Glycol	0	0	0	1.051	0	0	0	0	1.051
	Formaldehyde	0	0	0	0	0	0	0	0	0
	Hexane	0	0	0	0	0	0	0	0	0
	MDI	0	0	0	0	0	0.044	0	0	0.044
	Napthalene	0	0	0	0	0	0	0.050	0	0.050
	Toluene	0	0	0	0	0	0	0	0	0
	Xylenes	0	0	0	0	0	0	0	0	0
	Cadmium	0	0	0	0	0	0	0	0	0
	Chromium	0	0	0	0	0	0	0	0	0
	Lead	0	0	0	0	0	0	0	0	0
	Manganese	0	0	0	0	0	0	0	0	0
	Nickel	0	0	0	0	0	0	0	0	0
Totals	0	0	0	1.051	0	0.044	0.050	0	1.14	
								Worse Case HAP	1.05	

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



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

December 2, 2009

Mr. John Olafson
Nu-Wood Company, LLC
1722 Eisenhower Drive North
Goshen, Indiana 46526

Re: Public Notice
Nu-Wood Company, LLC
Permit Level: MSOP
Permit Number: 039-28310-00586

Dear Mr. Olafson:

Enclosed is a copy of your draft MSOP, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has submitted the draft permit package to the Goshen Public Library, 601 South Street in Goshen, Indiana. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper. The OAQ has requested that the The Elkhart Truth in Elkhart, Indiana publish this notice no later than Monday, December 7, 2009.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Hannah Desrosiers, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-5374 or dial (317) 234-5374.

Sincerely,
Catherine Denny
Catherine Denny
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter. dot 3/27/08



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

December 2, 2009

The Elkhart Truth
Attn: Terri
421 South 2nd Street
POB 487
Elkhart, IN 46515

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Nu-Wood Company, LLC, Elkhart County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than Monday, December 7, 2009.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Catherine Denny at 800-451-6027 and ask for extension 3-9488 or dial 317-233-9488.

Sincerely,
Catherine Denny
Catherine Denny
Permit Branch
Office of Air Quality

Permit Level: MSOP
Permit Number: 039-28310-00586

Enclosure
PN Newspaper.dot 3/27/08



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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www.idem.IN.gov

December 2, 2009

To: Goshen Public Library

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

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

Applicant Name: Nu-Wood Company, LLC
Permit Number: 039-28310-00586

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

If you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library.dot 03/27/08



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Notice of Public Comment

December 2, 2009
Nu-Wood Company, LLC
039-28310-00586

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

Please Note: *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 2-8469 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
PN AAA Cover.dot 3/27/08

Mail Code 61-53

IDEM Staff	CDENNY 12/2/2009 Nu-Wood Company, LLC 039-28310-00586 (draft)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		John Olafson Nu-Wood Company, LLC 1722 Eishenhower Dr N Goshen IN 46526 (Source CAATS)										
2		Len Morris President Nu-Wood Company, LLC 1722 Eishenhower Dr N Goshen IN 46526 (RO CAATS)										
3		Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 (Health Department)										
4		Goshen City Council and Mayors Office 202 South 5th Street Suite 1 Goshen IN 46528 (Local Official)										
5		Laurence A. McHugh Barnes & Thornburg 100 North Michigan South Bend IN 46601-1632 (Affected Party)										
6		Goshen Public Library 601 S 5th St Goshen IN 46526-3994 (Library)										
7		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 (Local Official)										
8												
9												
10												
11												
12												
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