



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: February 12,2010

RE: Four Woods Laminating, Inc. / 087-28451-00036

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

Notice of Decision: Approval – Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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



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

Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**Four Woods Laminating, Inc.
7640 W. 500 S.
Topeka, Indiana 46571**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

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

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

Operation Permit No.: T087-28451-00036	
Issued by:  Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: February 12, 2010 Expiration Date: February 12, 2015

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

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

Source Address:	7640 W. 500 S., Topeka, Indiana 46571
Mailing Address:	7500 W. 500 S., Topeka, IN, 46571
General Source Phone Number:	260-593-2246
SIC Code:	2499
County Location:	LaGrange
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) surface coating booth, constructed in 1985, identified as Booth 1, equipped with airless spray guns and dry filters as overspray control, exhausting through stack 1, capacity: 37.5 doors per hour.
- (b) One (1) surface coating booth, constructed in 1994, identified as Booth 2, equipped with airless spray guns and dry filters as overspray control, exhausting through stack 2, capacity: 37.5 doors per hour.
- (c) One (1) surface coating booth, constructed in 1998, identified as Booth 3, equipped with airless spray guns and dry filters as overspray control, exhausting through stack 3, capacity: 62.5 doors per hour.
- (d) One (1) surface coating booth, constructed in 1998, identified as Booth 4, equipped with airless spray guns and dry filters as overspray control, exhausting through stack 4, capacity: 62.5 doors per hour.
- (e) One (1) surface coating booth, constructed in 1998, identified as Booth 5, equipped with airless spray guns and dry filters as overspray control, exhausting through stack 5, capacity: 62.5 doors per hour.
- (f) One (1) surface coating booth, constructed in 1998, identified as Booth 6, equipped with airless spray guns and dry filters as overspray control, exhausting through stack 6, capacity: 62.5 doors per hour.
- (g) One (1) diesel generator, constructed in 1998, identified as Engine 3, exhausting through stack 9, capacity: 350 horsepower.
- (h) One (1) waste wood-fired heater, constructed in 1998, identified as Wood 1, exhausting

through stack 10, capacity: 0.04 million British thermal units per hour.

- (i) Two (2) diesel generators, constructed in 1988, identified as Engine 1 and Engine 2, exhausting through stacks 7 and 8, capacity: 300 horsepower, each.
- (j) One (1) diesel emergency generator, constructed in 1999, identified as Engine 4, with a maximum capacity of 350 horsepower and 2.45 million British thermal units per hour.

A.3 Specifically Regulated Insignificant Activities
[326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(15)]

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

- (a) Woodworking equipment controlled by a baghouse with a design grain loading of less than or equal to 0.01 grains per dry standard cubic foot and a gas flow rate less than or equal to 40,000 actual cubic feet per minute:

Woodworking operations including table saws, coping, and sanding operations, located in the Mill Room, equipped with a dust collection system for particulate control, exhausted through vent B1, capacity: 937 pounds of wood per hour. [326 IAC 6-3-2]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, T087-28451-00036, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]

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

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

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

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

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by the "responsible official" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(34).

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

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

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

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

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

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

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

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

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

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

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

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed

compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

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

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

- (a) All terms and conditions of permits established prior to T087-28451-00036 and issued pursuant to permitting programs approved into the state implementation plan have been either:

- (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

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

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

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

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

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
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 the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

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

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
 - (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b),(c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

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

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

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

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

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

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

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

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

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
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 the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

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

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

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

C.6 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 the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana 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 2-7-6(1)]

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.8 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 2-7-5(1)][326 IAC 2-7-6(1)]

C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

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

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

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

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

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

C.10 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.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

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

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

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

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

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

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

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

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

- (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
- (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

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

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue

MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

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

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

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

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

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

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

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Surface Coating Booths

- (a) One (1) surface coating booth, constructed in 1985, identified as Booth 1, equipped with airless spray guns and dry filters as overspray control, exhausting through stack 1, capacity: 37.5 doors per hour.
- (b) One (1) surface coating booth, constructed in 1994, identified as Booth 2, equipped with airless spray guns and dry filters as overspray control, exhausting through stack 2, capacity: 37.5 doors per hour.
- (c) One (1) surface coating booth, constructed in 1998, identified as Booth 3, equipped with airless spray guns and dry filters as overspray control, exhausting through stack 3, capacity: 62.5 doors per hour.
- (d) One (1) surface coating booth, constructed in 1998, identified as Booth 4, equipped with airless spray guns and dry filters as overspray control, exhausting through stack 4, capacity: 62.5 doors per hour.
- (e) One (1) surface coating booth, constructed in 1998, identified as Booth 5, equipped with airless spray guns and dry filters as overspray control, exhausting through stack 5, capacity: 62.5 doors per hour.
- (f) One (1) surface coating booth, constructed in 1998, identified as Booth 6, equipped with airless spray guns and dry filters as overspray control, exhausting through stack 6, capacity: 62.5 doors per hour.
- (g) One (1) diesel generator, constructed in 1998, identified as Engine 3, exhausting through stack 9, capacity: 350 horsepower.
- (h) One (1) waste wood-fired heater, constructed in 1998, identified as Wood 1, exhausting through stack 10, capacity: 0.04 million British thermal units per hour.
- (i) Two (2) diesel generators, constructed in 1988, identified as Engine 1 and Engine 2, exhausting through stacks 7 and 8, capacity: 300 horsepower, each.
- (j) One (1) diesel emergency generator, constructed in 1999, identified as Engine 4, with a maximum capacity of 350 horsepower and 2.45 million British thermal units per hour.

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12] [326 IAC 8-1-6]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), for booths 2 through 6, and pursuant to 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) and F087-8992-00036, issued on January 12, 1999, for booth 1, the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application

Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

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

D.1.2 PSD Minor Limit [326 IAC 2-2]

The total volatile organic compounds (VOCs) delivered to the coating applicators at the six (6) surface coating booths shall be limited to less than 238 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit, combined with the unrestricted potential to emit VOC from all other facilities at the source, including insignificant activities, will render the requirements of 326 IAC 2-2 not applicable.

D.1.3 Hazardous Air Pollutants (HAPs) Limitations [40 CFR Part 63, Subpart JJ]

- (a) The worst case single HAP delivered to the coating applicators in the six (6) surface coating booths, identified as booths 1 through 6, shall be limited to less than a total of ten (10.0) tons per twelve (12) consecutive month period, including coatings, dilution solvents, and cleaning solvents, with compliance determined at the end of each month. Therefore, the requirements of 40 CFR Part 63, Subpart JJ are not applicable.
- (b) The combination of HAPs delivered to the coating applicators in the six (6) surface coating booths, identified as booths 1 through 6, shall be limited to less than a total of twenty-five (25.0) tons per twelve (12) consecutive month period, including coatings, dilution solvents, and cleaning solvents, with compliance determined at the end of each month. Therefore, the requirements of 40 CFR Part 63, Subpart JJ are not applicable.

D.1.4 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the six (6) surface coating booths shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for booths 1 through 6 and their control devices.

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC usage limitations contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 Hazardous Air Pollutants (HAPs)

Compliance with the HAPs usage limitation contained in Condition D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

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

D.1.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks 1 through 6 while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The amount of coating material and solvent less water used on daily basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (2) The cleanup solvent usage for each month;
 - (3) The total VOC usage for each month; and
 - (4) The weight of VOCs emitted for each compliance period.

- (b) To document compliance with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits established in Condition D.1.3.
 - (1) The amount and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) The cleanup solvent usage for each month;

- (3) The total single and combination of HAPs usage for each month; and
 - (4) The weight of single and combination HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.2 and D.1.3 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (a) Woodworking equipment controlled by a baghouse with a design grain loading of less than or equal to 0.01 grains per dry standard cubic foot and a gas flow rate less than or equal to 40,000 actual cubic feet per minute:

Woodworking operations including table saws, coping, and sanding operations, located in the Mill Room, equipped with a dust collection system for particulate control, exhausted through vent B1, capacity: 937 pounds of wood per hour. [326 IAC 6-3-2]

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

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

D.2.1 Opacity [326 IAC 2-7-1(21)(G)(xxx)]

Pursuant to 326 IAC 2-7-1(21)(G)(xxx), in order for the woodworking operations to be classified as an insignificant activity, the opacity from the woodworking operations shall not exceed ten percent (10%) when vented to the atmosphere.

D.2.2 Dust Collection System Limitations [326 IAC 2-7-1(21)(G)(xxx)]

Pursuant to 326 IAC 2-7-1(21)(G)(xxx), in order for the woodworking operations to be classified as an insignificant activity, the dust collection system shall not exhaust to the atmosphere greater than forty thousand (40,000) cubic feet of outlet air per minute and shall not emit particulate matter with a diameter less than ten (10) microns in excess of one-hundredth (0.01) grain per dry standard cubic feet of outlet air.

D.2.3 PSD Minor Limit [326 IAC 2-2]

Pursuant to T087-16242-00036 issued on August 29, 2005, the PM and PM₁₀ emissions from the woodworking area shall be limited to less than 3.42 pounds per hour, equivalent to 15.0 tons per year. Compliance with this limit, combined with the unrestricted potential to emit PM and PM₁₀ from all other facilities at the source, including insignificant activities, will render the requirements of 326 IAC 2-2 not applicable.

D.2.4 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking operations shall not exceed 1.15 pounds per hour when operating at a process weight rate of 937 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.2.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.2.6 Particulate Control [326 IAC 2-7-1(21)(G)(xxx)]

Pursuant to 326 IAC 2-7-1(21)(G)(xxx), and in order to comply with Conditions D.2.3 and D.2.4, the dust collection system for particulate control shall be in operation and control emissions from the woodworking operations at all times that the woodworking operations are in operation.

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

D.2.7 Visible Emissions Notations [326 IAC 2-7-1(21)(G)(xxx)][40 CFR 64]

- (a) Pursuant to 326 IAC 2-7-1(21)(G)(xxx), daily visible emission notations of the woodworking operations stack exhaust shall be performed during normal daylight operations when exhausting directly to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Excursions or Exceedances shall be considered a deviation from this permit.

D.2.8 Baghouse Inspections [326 IAC 2-7-1(21)(G)(xxx)][40 CFR 64]

Pursuant to 326 IAC 2-7-1(21)(G)(xxx), an inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.2.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

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

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

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

D.2.10 Record Keeping Requirements

- (a) To document compliance with Condition D.2.7, the Permittee shall maintain records of daily visible emission notations of the woodworking operations stack exhaust.
- (b) To document compliance with Condition D.2.8, the Permittee shall maintain records of the results of the inspections required under Condition D.2.8 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

Source Name: Four Woods Laminating, Inc.
Source Address: 7640 W. 500 S., Topeka, Indiana 46571
Mailing Address: 7500 W. 500 S., Topeka, IN, 46571
Part 70 Permit No.: T087-28451-00036

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Four Woods Laminating, Inc.
Source Address: 7640 W. 500 S., Topeka, Indiana 46571
Mailing Address: 7500 W. 500 S., Topeka, IN, 46571
Part 70 Permit No.: T087-28451-00036

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

Part 70 Quarterly Report

Source Name: Four Woods Laminating, Inc.
Source Address: 7640 W. 500 S., Topeka, Indiana 46571
Mailing Address: 7500 W. 500 S., Topeka, IN, 46571
Part 70 Permit No.: T 087-28451-00036
Facilities: Six (6) surface coating booths, identified as 1 through 6
Parameter: Worst case single HAP
Limit: Total less than 10.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	Single HAP (tons)	Single HAP (tons)	Single HAP (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Four Woods Laminating, Inc.
 Source Address: 7640 W. 500 S., Topeka, Indiana 46571
 Mailing Address: 7500 W. 500 S., Topeka, IN, 46571
 Part 70 Permit No.: T 087-28451-00036
 Facilities: Six (6) surface coating booths, identified as 1 through 6
 Parameter: Worst case combined HAPs
 Limit: Total less than 25.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	Total HAP (tons)	Total HAP (tons)	Total HAP (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.
 Deviation has been reported on: _____

Submitted by: _____
 Title/Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Four Woods Laminating, Inc.
Source Address: 7640 W. 500 S., Topeka, Indiana 46571
Mailing Address: 7500 W. 500 S., Topeka, IN, 46571
Part 70 Permit No.: T087-28451-00036
Facilities: Six (6) surface coating booths, identified as 1 through 6
Parameter: VOC
Limit: 238 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER :

YEAR:

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on:

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE AND ENFORCEMENT BRANCH
 PART 70 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Four Woods Laminating, Inc.
 Source Address: 7640 W. 500 S., Topeka, Indiana 46571
 Mailing Address: 7500 W. 500 S., Topeka, IN, 46571
 Part 70 Permit No.: T087-28451-00036

Months: _____ to _____ Year: _____

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Quality**

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	Four Woods Laminating, Inc.
Source Location:	7640 W. 500 S., Topeka, Indiana 46571
County:	LaGrange
SIC Code:	2499
Operation Permit No.:	T087-28451-00036
Permit Reviewer:	Roger Osburn

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit application from Four Woods Laminating, Inc. relating to the operation of a wood cabinet and bath door manufacturing source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) surface coating booth, constructed in 1985, identified as Booth 1, equipped with airless spray guns and dry filters as overspray control, exhausting through stack 1, capacity: 37.5 doors per hour.
- (b) One (1) surface coating booth, constructed in 1994, identified as Booth 2, equipped with airless spray guns and dry filters as overspray control, exhausting through stack 2, capacity: 37.5 doors per hour.
- (c) One (1) surface coating booth, constructed in 1998, identified as Booth 3, equipped with airless spray guns and dry filters as overspray control, exhausting through stack 3, capacity: 62.5 doors per hour.
- (d) One (1) surface coating booth, constructed in 1998, identified as Booth 4, equipped with airless spray guns and dry filters as overspray control, exhausting through stack 4, capacity: 62.5 doors per hour.
- (e) One (1) surface coating booth, constructed in 1998, identified as Booth 5, equipped with airless spray guns and dry filters as overspray control, exhausting through stack 5, capacity: 62.5 doors per hour.
- (f) One (1) surface coating booth, constructed in 1998, identified as Booth 6, equipped with airless spray guns and dry filters as overspray control, exhausting through stack 6, capacity: 62.5 doors per hour.
- (g) One (1) diesel generator, constructed in 1998, identified as Engine 3, exhausting through stack 9, capacity: 350 horsepower.
- (h) One (1) waste wood-fired heater, constructed in 1998, identified as Wood 1, exhausting through stack 10, capacity: 0.04 million British thermal units per hour.
- (i) Two (2) diesel generators, constructed in 1988, identified as Engine 1 and Engine 2, exhausting through stacks 7 and 8, capacity: 300 horsepower, each.
- (j) One (1) diesel emergency generator, constructed in 1999, identified as Engine 4, with a maximum capacity of 350 horsepower and 2.45 million British thermal units per hour.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Propane for liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) British thermal units per hour, including:

One (1) air makeup unit with a capacity of 2.33 million British thermal units per hour.
- (b) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (c) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (d) Paved and unpaved roads and parking lots with public access.
- (e) Woodworking equipment controlled by a baghouse with a design grain loading of less than or equal to 0.01 grains per dry standard cubic foot and a gas flow rate less than or equal to 40,000 actual cubic feet per minute:

Woodworking operations including table saws, coping, and sanding operations, located in the Mill Room, equipped with a dust collection system for particulate control, exhausted through vent B1, capacity: 937 pounds of wood per hour. [326 IAC 6-3-2]

Existing Approvals

Since the issuance of the Part 70 Operating Permit, T087-16242-00036, on August 29, 2005, the source has constructed or has been operating under the following approval as well:

- (a) Significant Permit Modification No. 087-22257-00036 issued on March 15, 2006.

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

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

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 for Part 70 purposes.

See Appendix A of this document for detailed emissions calculations.

County Attainment Status

The source is located in LaGrange County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM _{2.5} .	

(a) Ozone Standards

- (1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, and St. Joseph Counties as attainment for the 8-hour ozone standard.
- (3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, and Shelby Counties as attainment for the 8-hour ozone standard.
- (4) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. LaGrange 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) LaGrange County has been classified as attainment for PM_{2.5}. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions. These rules became effective on July 15, 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 PM_{2.5} emissions until 326 IAC 2-2 is revised.

(c) Other Criteria Pollutants

LaGrange County has been classified as attainment or unclassifiable in Indiana for PM₁₀, NO₂, SO₂, Pb, and CO. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(d) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	Potential to Emit (tons/yr)
PM	19,103
PM ₁₀	19,103
SO ₂	8.55
VOC	608
CO	28.1
NO _x	131

HAPs	Potential to Emit (tons/yr)
Xylene	44.3
Ethylene Glycol	4.04
Total	48.3

Note: This PTE is a worst case representation of HAP emissions

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

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM₁₀, VOC, and NO_x are equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

No previous emission data has been received from the source.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 permit renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Limited Potential To Emit (tons/yr)							
Process/Emission Unit	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Six (6) Surface Coating Booths	58.3	58.3	--	Less than 238	--	--	Single Less than 10, Total less than 25
Three (3) Diesel Generators	9.15	9.15	8.53	10.5	27.8	129	--
One (1) Waste Wood Fired Heater	0.171	0.154	0.003	0.027	0.078	0.013	Negligible
Woodworking (Insignificant Activity)	Less than 15.0	Less than 15.0	--	--	--	--	--
Other Insignificant Activities	1.00	1.00	0.016	1.00	0.206	1.52	--
Total Emissions	Less than 83.6	Less than 83.6	8.55	Less than 250	28.0	131	Single Less than 10, Total less than 25

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) The source will limit HAP usage at the six (6) surface coating booths, identified as booth 1 through booth 6, to less than ten (10) tons per twelve (12) consecutive months of any single HAP, including coatings, dilution solvents, and cleaning solvents, and less than twenty-five (25) tons per twelve (12) consecutive months of any combination of HAPs, including coatings, dilution solvents, and cleaning solvents.
- (c) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Part 70 Operating Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 Operating Permits.
- (b) Monitoring and related record keeping requirements which assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing pollutant-specific emission unit that meets the following criteria:
 - (1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;
 - (2) is subject to an emission limitation or standard for that pollutant; and
 - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each existing emission unit and specified pollutant subject to CAM:

Emission Unit / Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Booth #1/ PM ₁₀	Y	Y	<100	<100	100	N	N
Booth #2/ PM ₁₀	Y	Y	<100	<100	100	N	N
Booth #3/ PM ₁₀	Y	Y	<100	<100	100	N	N
Booth #4/ PM ₁₀	Y	Y	<100	<100	100	N	N
Booth #5/ PM ₁₀	Y	Y	<100	<100	100	N	N
Booth #6/ PM ₁₀	Y	Y	<100	<100	100	N	N
Woodworking operations/ PM ₁₀	Y	Y	>100	<100	100	Y	N

Based on this evaluation, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are applicable to the woodworking operations for PM₁₀. The applicant submitted a CAM plan on December 22, 2004. Specific requirements of the plan are listed in the "Compliance Requirements" section of this document.

- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (c) This wood cabinet and bath door manufacturing plant is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart JJ because the source is not a major source as defined by 40 CFR Part 63.2. The source will limit HAP usage at the six (6) surface coating booths, identified as booth 1 through booth 6, to less than ten (10) tons per twelve (12) consecutive months of any single HAP, including coatings, dilution solvents, and cleaning solvents, and less than twenty-five (25) tons per twelve (12) consecutive months of any combination of HAPs, including coatings, dilution solvents, and cleaning solvents. Therefore, the emission limitations listed in 40 CFR Part 63, Subpart JJ are not applicable. However, the source shall keep records to show that this is a minor source of HAPs.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This existing source, constructed after the August 7, 1977 rule applicability date, is not considered as a major source since it is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and source emissions are limited below the major source threshold of 250 tons per year, as follows:

- (a) In order for the woodworking operations to qualify as an insignificant activity under 2-7-1(21)(G) (xxx), the outlet grain loading shall not exceed 0.01 grains per actual cubic foot at a flow rate not to exceed 40,000. This is equivalent to PM and PM₁₀ emissions of 3.42 pounds per hour, equivalent to 15.0 tons per year. Compliance with this limit, combined with the potential to emit PM and PM₁₀ from all other facilities at the source, including insignificant activities, will render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration), not applicable.
- (b) The total volatile organic compounds (VOCs) delivered to the coating applicators at the six (6) surface coating booths shall be limited to less than 238 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit, combined with the unrestricted potential to emit VOC from all other facilities at the source, including insignificant activities, will render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit under 326 IAC 2-7, Part 70 program. Pursuant to this rule, the Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This source is not located in Lake, LaPorte, or Porter County, and will not emit VOCs or PM₁₀ greater than 250 tons per year. Therefore, in accordance with the compliance schedule specified in 326 IAC 2-6-3, an emission statement must be submitted triennially. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

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 the 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.

State Rule Applicability – Individual Facilities

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

- (a) Pursuant to 326 IAC 6-3-2, the particulate from the woodworking operation shall not exceed 1.15 pounds per hour, when operating at a process weight rate of 0.4685 tons per hour. The PM emissions from the woodworking operation after control by the dust

collection system are 0.435 pounds per hour. Therefore, the woodworking operation is able to comply with this rule.

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:

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

The dust collection system shall be in operation at all times the woodworking operation is in operation, in order to comply with this limit.

- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate from the six (6) surface coating booths, shall be controlled by a dry particulate filter at all times the surface coating booths are in operation and the Permittee shall operate the control device in accordance with manufacturer's specifications.

326 IAC 7-1 (Sulfur Dioxide Emission Limitations)

Since there is no facility at this source with a potential to emit twenty-five (25) tons per year or ten (10) pounds per hour or more of SO₂, the requirements of 326 IAC 7-1 will not apply.

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

Pursuant to F 087-8992-00036, issued on January 12, 1999, the one (1) surface coating booth, identified as booth 1, constructed prior to 1990, is not subject to the requirements of 326 IAC 8-2-12. However, since the booth was constructed after 1980 and the potential to emit VOC is greater than or equal to twenty-five (25) tons per year, the surface coating booth, identified as booth 1, is subject to the requirements of 326 IAC 8-1-6. Pursuant to this rule, the source will be required to use the best available control technology (BACT) for this facility. Since 326 IAC 8-2-12 specifies the requirements for wood furniture and cabinet coating, the requirements of 326 IAC 8-2-12 will be BACT for this facility. Since the surface coating booth identified as booth 1 uses airless spray guns, the surface coating booth will comply with the requirements of this rule.

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

- (a) The one (1) surface coating booth, identified as booth 1, was constructed prior to 1990. Therefore, the surface coating booth, identified as booth 1, is not subject to the requirements of 326 IAC 8-2-12.
- (b) Since the five (5) surface coating booths, identified as booths 2 through 6, were constructed after 1990 and the actual VOC emissions from each booth is greater than 15 pounds per day, the five (5) surface coating booths, identified as booths 2 through 6, are subject to the requirements of 326 IAC 8-2-12. This rule requires that the owner/operator of a wood furniture or cabinet coating operation apply all coating material, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repairs, using one (1) or more of the following application systems:

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

High-volume low-pressure spray is an acceptable alternative application of air-assisted airless spray. High-volume low-pressure (HVLP) spray means technology used to apply coating to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

Since the surface coating booths identified as booth 2, booth 3, booth 4, booth 5, and booth 6 use airless spray guns, the five (5) surface coating booths are able to comply with this rule.

State Rule Applicability – Insignificant Facilities

326 IAC 2-7-1(21) (Insignificant Activities)

Pursuant to 326 IAC 2-7-1(21)(G)(xxx), in order for the woodworking operations to be classified as an insignificant activity, the Permittee has agreed to the following limitations:

- (a) The opacity from the woodworking operations shall not exceed ten percent (10%) when vented to the atmosphere.
- (b) The baghouse shall not exhaust to the atmosphere greater than forty thousand (40,000) cubic feet of outlet air per minute and shall not emit particulate matter with a diameter less than ten (10) microns in excess of one-hundredth (0.01) grain per dry standard cubic feet of outlet air.
- (c) The baghouse is in operation at all times the woodworking operations are in use.
- (d) Visible emissions from the baghouse are observed daily using procedures in accordance with 40 CFR 60, Appendix A, Method 22* and normal or abnormal emissions are recorded. In the event abnormal emissions are observed for greater than six (6) minutes in duration, the following shall occur:
 - (1) The baghouse shall be inspected.
 - (2) Corrective actions, such as replacing or reseating bags, are initiated, when necessary.
- (e) The baghouse is inspected quarterly when vented to the atmosphere.
- (f) The owner or operator keeps the following records:
 - (1) Records documenting the date when the baghouse redirected indoors or to the atmosphere.
 - (2) Quarterly inspection reports, when vented to the atmosphere.
 - (3) Visible observation reports.
 - (4) Records of corrective actions.

Testing Requirements

There is no stack testing required for this source. Emission calculations for all combustion units are based on AP-42 emission factors. Emission calculations for the surface coating booths are based on usage and information from Material Safety Data Sheets.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

- (a) The woodworking operations have applicable compliance monitoring conditions as specified below:
 - (1) Visible emission notations of the woodworking stack shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
 - (2) 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.
 - (3) 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.
 - (4) 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.
 - (5) If abnormal emissions are observed, the Permittee shall take reasonable steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Excursions or Exceedances shall be considered a deviation from this permit.
 - (6) In the event that bag failure has been observed:
 - (A) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

- (B) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (7) An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

These monitoring conditions are necessary to ensure compliance with 40 CFR Part 64.

- (b) The six (6) surface coating booths, identified as booths 1 through 6, have applicable compliance monitoring conditions as specified below:
 - (1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (stacks 1-6) while one or more of the booths are in operation. Section C - Response to Excursions or Exceedances shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a violation of this permit.
 - (2) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

These monitoring conditions are necessary to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), 326 IAC 2-2 (Prevention of Significant Deterioration), and 40 CFR Part 64.

Recommendation

The staff recommends to the Commissioner that the Part 70 Operating Permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on September 10, 2009.

Conclusion

The operation of this wood cabinet and bath door manufacturing source shall be subject to the conditions of this Part 70 Operating Permit T087-28451-00036.

**Appendix A: Federal Potential Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

**Company Name: Four Woods Laminating, Inc.
Address City IN Zip: 7640 W. 500 S., Topeka, IN 46571
Part 70 Renewal No.: T087-28451-00036
Reviewer: Roger Osburn
Date: 5-Oct-2009**

Material	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential tons per year	lb VOC /gal solids	Transfer Efficiency
Booth 1																	
Facett 50	7.78	66.69%	0.0%	66.7%	0.0%	14.50%	0.13000	37.5	1.000	5.19	5.19	25.3	607	110.8	13.8	35.8	75%
Booth 2																	
Dutch Sunset	9.84	8.60%	0.0%	8.6%	0.0%	25.00%	0.05000	37.5	1.000	0.85	0.85	1.59	38.1	6.95	18.5	3.38	75%
Booth 3																	
Waterford	7.38	97.70%	0.0%	97.7%	0.0%	1.00%	0.05000	62.5	1.000	7.21	7.21	22.53	541	98.7	0.58	721	75%
Booth 4																	
Facett 50	7.78	66.69%	0.0%	66.7%	0.0%	14.50%	0.13000	62.5	1.000	5.19	5.19	42.2	1012	184.6	23.1	35.8	75%
Booth 5																	
Oak Light	7.42	96.70%	0.0%	96.7%	0.0%	1.40%	0.05000	62.5	1.000	7.18	7.18	22.42	538	98.2	0.84	513	75%
Booth 6																	
Fruitwood	7.47	94.20%	0.0%	94.2%	0.0%	3.30%	0.05000	62.5	1.000	7.04	7.04	21.99	528	96.3	1.48	213	75%
Add worst case coating to all solvents																	
												136	3264	596	58.3		

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * Flash-off
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day) * Flash-off
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs) * Flash-off
Particulate Potential Tons per Year = (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) * Flash-off
Total = Worst Coating + Sum of all solvents used

HAP Emission Calculations

Company Name: Four Woods Laminating, Inc.
Plant Location: 7640 W. 500 S., Topeka, IN 46571
Part 70 Renewal No.: T087-28451-00036
Reviewer: Roger Osburn
Date: 5-Oct-2009

Material	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Weight % Xylene	Weight % Ethylene Glycol	Xylene Emissions (tons/yr)	Ethylene Glycol Emissions (tons/yr)	Total HAP Emissions (tons/yr)
Booth 1									
Facett 50	7.78	0.13000	37.5	1.00	10.00%	0.00%	16.61	0.00	16.61
Booth 2									
Dutch Sunset	9.84	0.05000	37.5	1.00	0.00%	5.00%	0.00	4.04	0.00
Booth 3									
Waterford	7.38	0.05000	62.5	1.00	0.00%	0.00%	0.00	0.00	0.00
Booth 4									
Facett 50	7.78	0.13000	62.5	1.00	10.00%	0.00%	27.69	0.00	27.69
Booth 5									
Oak Light	7.42	0.05000	62.5	1.00	0.00%	0.00%	0.00	0.00	0.00
Booth 6									
Fruitwood	7.47	0.05000	62.5	1.00	0.00%	0.00%	0.00	0.00	44.30

Total Potential Emissions

TOTALS:	(tons/yr):	44.3	4.04	44.30
	(lb/hr):	10.114	0.923	10.1

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

Wood-Fired Stoker Boilers

Commercial Boiler

0.5 - 10 MMBtu/hr

Company Name: Four Woods Laminating, Inc.
 Address City IN Zip: 7640 W. 500 S., Topeka, IN 46571
 Part 70 Renewal No.: T087-28451-00036
 Reviewer: Roger Osburn
 Date: 5-Oct-2009

Heat Input Capacity (MMBtu/hr)	Heating Value of Wood (Btu/lb)	Potential Throughput (tons/yr)	Moisture (%)	Wet Potential Throughput (tons/yr)
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0.04	8000	22	30.0	31
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Pollutant

Uncontrolled Emissions	PM	PM10	SO2	NOx	VOC	CO	Lead
Uncontrolled Emission Factor in lb/ton (at 4500 Btu/lb)	8.8	7.9	0.15	0.68	1.4	4.0	0.00031
Uncontrolled Emission Factor in lb/ton (Corrected for wood Btu)	15.6	14.0	0.267	1.21	2.489	7.11	0.00055
Uncontrolled Potential Emission in tons	0.171	0.154	0.003	0.013	0.027	0.078	0.000006

Methodology

AP-42 Heating Value of Wood = 4500 Btu/lb

Potential Throughput (tons/yr) = [Heat Input Capacity (MMBtu/hr)] X [1 lb/4500 Btu] X [10⁶/MM] X [8760 hrs/yr] X [1 ton/2000 lbs]

Adjusting Throughput from 4500 Btu/lb: Throughput(@ Adj Btu/lb = [Throughput @ 4500 Btu/lb (tons/yr)] X [4500 Btu/lb] / [Adj Btu value (Btu/lb)]

Emission Factors from AP-42, Chap. 1.6, Tables 1.6-1, 1.6-2 and 1.6-3, and AIRS, SCC #1-03-009-03

Emission Factor Btu Adjustment: [EF@Btu (lb/ton)] = [EF @4500 Btu/lb (lb/ton)] X [Adjusted Btu/lb] / [4500 Btu/lb]

Emission (tons/yr) = [Throughput (tons/yr)] X [Emission Factor (lb/ton)] X [1 ton/2000 lbs]

Woodworking Operations

Company Name: Four Woods Laminating, Inc.
 Address City IN Zip: 7640 W. 500 S., Topeka, IN 46571
 Part 70 Renewal No.: T087-28451-00036
 Reviewer: Roger Osburn
 Date: 5-Oct-2009

Woodworking Operations

Control Efficiency

99.99%

Pollutant	Inlet Grain Loading per Actual Cubic foot of Outlet Air (grains/acfm)	Flow Rate (acfm)	Emission Rate before Controls (lb/hr)	Emission Rate before Controls (tons/yr)	Emission Rate after Controls (lb/hr)	Emission Rate after Controls (tons/yr)
PM	0.004	12675	4346	19034	0.435	1.90
PM10	0.004	12675	4346	19034	0.435	1.90

Methodology

Emission Rate in lbs/hr (after controls) = (grains/acfm) (acfm) (60 min/hr) (lb/7000 grains)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Allowable Rate of Emissions

Process Rate (lbs/hr)	Process Weight Rate (tons/hr)	Allowable Emissions (lbs/hr)
300	0.150	1.15

Methodology

Allowable Emissions = 4.10(Process Weight Rate)^{0.67}

Appendix A: Emission Calculations
Internal Combustion Engines - Diesel Fuel
Turbine (>250 and <600 HP)
Reciprocating

Company Name: Four Woods Laminating, Inc.
Address City IN Zip: 7640 W. 500 S., Topeka, IN 46571
Part 70 Renewal No.: T087-28451-00036
Reviewer: Roger Osburn
Date: 5-Oct-2009

Three (3) Generators

Total Output Rating Horsepower (hp)	Potential Throughput hp-hr/yr
950	8322000

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/hp-hr	0.0022	0.0022	0.0021	0.0310	0.0025	0.0067
Potential Emission in tons/yr	9.15	9.15	8.53	129	10.5	27.8

Methodology

Potential Throughput (hp-hr/yr) = hp * 8760 hr/yr

Emission Factors are from AP42 (Fifth edition, January 1995), Table 3.3-2

Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 8760 hr/yr / (2,000 lb/ton)

Emission (tons/yr) = [Potential Throughput (hp-hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton)

Appendix A: Emission Calculations

LPG-Propane - Commercial Boilers

(Heat input capacity: > .3 MMBtu/hr and < 10 MMBtu/hr)

Company Name: Four Woods Laminating, Inc.
Address City IN Zip: 7640 West 500 South, Topeka, IN 46571
Part 70 Renewal No.: T087-28451-00036
Reviewer: Roger Osburn
Date: 5-Oct-2009

Heat Input Capacity
MMBtu/hr

Potential Throughput
kgals/year

SO2 Emission factor = 0.10 x S

S = Weight % Sulfur = 1.50

2.33

217

Emission Factor in lb/kgal	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
	0.4	0.4	0.2 (0.10S)	14.0	0.5	1.9
Potential Emission in tons/yr	0.043	0.043	0.016	1.52	0.054	0.206

Methodology

1 gallon of LPG has a heating value of 94,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.094 MMBtu

Emission Factors are from AP42, Fifth Edition (January 1995), Table 1.5-2 (SCC #1-02-010-02)

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



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

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Glen Yoder
Four Woods Laminating, Inc.
7500 W 500 S
Topeka, IN 46571

DATE: February 12, 2010

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

SUBJECT: Final Decision
Title V
087-28451-00036

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
Ms. Stephanie Redding
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 11/30/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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February 12, 2010

TO: LaGrange County Public Library

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

Subject: **Important Information for Display Regarding a Final Determination**

Applicant Name: Four Woods Laminating, Inc.
Permit Number: 087-28451-00036

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or 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.

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

IDEM Staff	CDENNY 2/12/2010 Four Woods Laminating, Inc. 087-28451-00036 (final)		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	Handling 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		Glen Yoder Four Woods Laminating, Inc. 7500 W 500 S Topeka IN 46571 (Source CAATS)									
2		LaGrange County Public Library (Topeka Branch) 105 South Main Street Topeka IN 46571 (Library)									
3		Mr. Steve Christman NISWMD 2320 W 800 S, P.O. Box 370 Ashley IN 46705 (Affected Party)									
4		Topeka Town Council P.O. Box 127 Topeka IN 46571 (Local Official)									
5		LaGrange County Health Dept. 304 B Townline Road Lagrange IN 46761 (Health Department)									
6		LaGrange County Commissioners 114 W. Michigan St. LaGrange IN 46761 (Local Official)									
7		Ms. Stephanie Redding American Consulting PO Box 59 Osceola IN 46561 (Consultant)									
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