



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: June 10, 2010

RE: MasterBrand Cabinets, Inc. / 037-28900-00051

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

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification 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 13-15-7-3 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 Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit 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.



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Michael Decker
MasterBrand Cabinets, Inc. - Ferdinand Operations
PO Box 420
Jasper, IN 47547

JUNE 10, 2010

Re: 037-28900-00051
First Significant Permit Modification to
Part 70 Renewal No.: T037-26606-00051

Dear Mr. Decker,

MasterBrand Cabinets, Inc., was issued a Part 70 Operating Permit Renewal (T037-26606-00051) on April 23, 2009, for a stationary woodworking and surface coating operation manufacturing kitchen and bath cabinets and home entertainment centers. A letter requesting changes to this permit was received on January 21, 2010. This modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(b)(1), because the modification involves significant changes to existing monitoring, reporting, or record keeping requirements in the Part 70 permit. Therefore, pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of revised capture and destruction efficiencies for the regenerative thermal oxidizer and the addition of one (1) UV Oven for curing, identified as OV-23. The one (1) UV Oven (OV-23) is an identical unit to other permitted units at the source, and is an insignificant activity as defined by 326 IAC 2-7-1(21)(A) and (B), as the potential emissions of VOC are less than exemption levels (and have already been accounted for in the coating operations) and there are no particulate emissions. The source-wide potential to emit will not increase due to the addition of this unit, and there are no changes in rule applicability as a result, because the new unit (OV-23) is not a specifically regulated insignificant activity. At this time, additional administrative changes will be made to the permit, such as requirement restructuring and corrections of clerical errors. All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire Part 70 Operating Permit Renewal as modified.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Angela Taylor, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, or call at (800) 451-6027, and ask for Angela Taylor or extension 4-6543, or dial (317) 234-6543.

Sincerely,

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

cc: File - Dubois County
U.S. EPA, Region V
Dubois County Health Department
Southwest Regional Office
Southeast Regional Office
Air Compliance and Enforcement Branch

Attachments:
Significant Permit Modification, T037-28900-00051
Technical Support Document (TSD)

APT



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Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

MasterBrand Cabinets, Inc.
614 West Third Street
Ferdinand, Indiana 47532

(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.: T037-26606-00051	
Issued by: Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: April 23, 2009 Expiration Date: April 23, 2014

Significant Permit Modification No.: 037-28900-00051	
Issued by:  Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: June 10, 2010 Expiration Date: April 23, 2014

TABLE OF CONTENTS

A. SOURCE SUMMARY	5
A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]	
A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]	
A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]	
A.4 Part 70 Permit Applicability [326 IAC 2-7-2]	
B. GENERAL CONDITIONS.....	9
B.1 Definitions [326 IAC 2-7-1]	
B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]	
B.3 Term of Conditions [326 IAC 2-1.1-9.5]	
B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]	
B.5 Severability [326 IAC 2-7-5(5)]	
B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]	
B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]	
B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]	
B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]	
B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)][326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]	
B.11 Emergency Provisions [326 IAC 2-7-16]	
B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]	
B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]	
B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]	
B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]	
B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]	
B.17 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]	
B.18 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12] [40 CFR 72]	
B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]	
B.20 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]	
B.21 Source Modification Requirement [326 IAC 2-7-10.5]	
B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]	
B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]	
B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]	
B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]	
C. SOURCE OPERATION CONDITIONS.....	19
Emission Limitations and Standards [326 IAC 2-7-5(1)]	
C.1 Opacity [326 IAC 5-1]	
C.2 Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.3 Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.4 Fugitive Dust Emissions [326 IAC 6-4]	
C.5 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
Testing Requirements [326 IAC 2-7-6(1)]	
C.6 Performance Testing [326 IAC 3-6]	
Compliance Requirements [326 IAC 2-1.1-11]	
C.7 Compliance Requirements [326 IAC 2-1.1-11]	

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

- C.8 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]
- C.9 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]
- C.10 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)]
[326 IAC 2-7-6(1)]

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

- C.11 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.12 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]
- C.13 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]
- C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

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

- C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)]
[326 IAC 2-6]
- C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2]
[326 IAC 2-3]
- C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]
[326 IAC 2-2]

Stratospheric Ozone Protection

- C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1. EMISSIONS UNIT OPERATION CONDITIONS - Surface Coating..... 28

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

- D.1.1 Particulate Matter Emission Limitations [326 IAC 6.5]
- D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]
- D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.1.4 Particulate Control

Compliance Monitoring Requirements

- D.1.5 Monitoring

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

- D.1.6 Record Keeping Requirements

D.2. EMISSIONS UNIT OPERATION CONDITIONS - Woodworking..... 31

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

- D.2.1 PSD Minor Limit [326 IAC 2-2]
- D.2.2 Particulate Matter Emission Limitations [326 IAC 6.5-1]
- D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.2.4 Particulate Matter Control (PM and PM₁₀)

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

- D.2.5 Visible Emissions Notations
- D.2.6 Broken or Failed Bag Detection

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

- D.2.7 Record Keeping Requirements

D.3. EMISSIONS UNIT OPERATION CONDITIONS - Surface Coating 34

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

- D.3.1 PSD Minor Limits [326 IAC 2-2]
- D.3.2 Particulate Matter Emission Limitations [326 IAC 6.5-1]
- D.3.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]
- D.3.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]

- D.3.5 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]
- D.3.6 Testing Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]
- D.3.7 Volatile Organic Compounds (VOC) Control
- D.3.8 PM and PM₁₀ Control

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

- D.3.9 Thermal Oxidizer Temperature
- D.3.10 Parametric Monitoring
- D.3.11 Monitoring

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

- D.3.12 Record Keeping Requirements
- D.3.13 Reporting Requirements

E.1. EMISSIONS UNIT OPERATION CONDITIONS - NESHAP Requirements..... 39

National Emissions Standards for Hazardous Air Pollutants (NESHAP) Requirements

- E.1.1 General Provisions Relating to National Emissions Standards for Hazardous Air Pollutants [326 IAC 20-1] [40 CFR Part 63, Subpart A]
- E.1.2 National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations [40 CFR 63, Subpart JJ]

E.2. EMISSIONS UNIT OPERATION CONDITIONS - NESHAP Requirements..... 42

National Emissions Standards for Hazardous Air Pollutants (NESHAP) Requirements

- E.2.1 General Provisions Relating to National Emissions Standards for Hazardous Air Pollutants [326 IAC 20-1] [40 CFR Part 63, Subpart A]
- E.2.2 National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products [40 CFR 63, Subpart DDDD]

Certification 43

Emergency Occurrence Report 44

Quarterly Report..... 46

Quarterly Deviation and Compliance Monitoring Report 47

Attachment A - Subpart JJ—National Emission Standards for Wood Furniture Manufacturing Operations

Attachment B - Subpart DDDD—National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products

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, A.3, and A.4 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 kitchen and bath cabinet manufacturing operation.

Source Address:	614 West Third Street, Ferdinand, Indiana 47532
Mailing Address:	614 West Third Street, Ferdinand, Indiana 47532
General Source Phone Number:	812-639-2940
SIC Code:	2434
County Location:	Dubois
Source Location Status:	Nonattainment for PM _{2.5} standard Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under PSD Rules Major 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)]

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

- (a) One (1) conventional surface coating line, constructed in 1973. Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components. The conventional surface coating line is comprised of the following surface coating facilities:
- (1) One (1) toner booth, identified as CLB-1, with a maximum capacity of 225 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stack CLS-1;
 - (2) One (1) stain booth, identified as CLB-2, with a maximum capacity of 225 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stack CLS-2;
 - (3) One (1) sealer booth, identified as CLB-3, with a maximum capacity of 225 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stacks CLS-3 and CLS-4;
 - (4) One (1) top coat booth, identified as CLB-4, with a maximum capacity of 225 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stacks CLS-5 and CLS-6;
 - (5) One (1) parts booth, identified as CLB-5, with a maximum capacity of 225 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stack CLS-7;
 - (6) One (1) parts booth, identified as CLB-6, with a maximum capacity of 225 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stack CLS-8; and

- (7) One (1) natural gas-fired oven identified as OV-1, constructed in 1973, with a maximum heat input capacity of 1 Million British Thermal Units per hour (MMBtu), and exhausting to stack OVS-1.
- (b) Woodworking equipment controlled by baghouses, including:
- (1) One (1) woodworking cell, identified as WW-1, constructed in 1968, controlled by a 61,000 cubic feet per minute baghouse, identified as BH-1, and exhausting either internally or to stack BHS-1;
 - (2) One (1) woodworking cell, identified as WW-2, constructed in 1998, controlled by a 61,000 cubic feet per minute baghouse, identified as BH-2, and exhausting either internally or to stack BHS-2;
 - (3) One (1) woodworking cell, identified as WW-3, constructed in 1968, controlled by a 35,000 cubic feet per minute baghouse, identified as BH-3, and exhausting either internally or to stack BHS-3.
 - (4) One (1) woodworking cell, identified as WW-4, constructed in 1997, controlled by a 61,000 cubic feet per minute baghouse, identified as BH-4, and exhausting either internally or to stack BHS-4;
 - (5) One (1) woodworking cell, identified as WW-5, constructed in 1986, controlled by a 61,000 cubic feet per minute baghouse, identified as BH-5, and exhausting either internally or to stack BHS-5;
 - (6) One (1) woodworking cell, identified as WW-6, constructed in 1986, controlled by a 48,000 cubic feet per minute baghouse, identified as BH-6, and exhausting either internally or to stack BHS-6.
 - (7) One (1) woodworking cell, identified as WW-7, to be constructed in 2005, controlled by a 61,000 cubic feet per minute baghouse, identified as BH-7, and exhausting either internally or to stack BHS-7.
- (c) One (1) finishing line, identified as Line A, approved for construction in 2005 and completed in 2008. Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components. The Line A finishing line consists of the following facilities:
- (1) Two (2) toner spray booths, identified as LAB-1 and LAB-2, equipped with spray application equipment as described in 326 IAC 8-2-12 (airless air assisted or HVLP), using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOS-1.
 - (2) Two (2) stain spray booths, identified as LAB-3 and LAB-4, equipped with spray application equipment as described in 326 IAC 8-2-12 (airless air assisted or HVLP), using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOS-1.
 - (3) Two (2) sealer booths, identified as LAB-5 and LAB-6, equipped with spray application equipment as described in 326 IAC 8-2-12 (airless air assisted or HVLP), using UV curable coatings and dry filters for particulate control, and exhausting through stacks LAS-5 and LAS-6, respectively.
 - (4) Two (2) topcoat booths, identified as LAB-7 and LAB-8, equipped with spray application equipment as described in 326 IAC 8-2-12 (airless air assisted or HVLP), using UV curable coatings and dry filters for particulate control, and exhausting through stacks LAS-7 and LAS-8, respectively.

- (5) Two (2) sanding operations (associated with Line A) , controlled by a cartridge filter type dust collector DC-1, and exhausting 22,500 cubic feet per minute through stack DCS-1A and 22,500 cubic feet per minute through stack DCS-1B.
- (d) One (1) finishing line, identified as Line B, approved for construction in 2005. Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components. The Line B finishing line consists of the following facilities:
 - (1) Two (2) toner spray booths, identified as LBB-1 and LBB-2, equipped with spray application equipment as described in 326 IAC 8-2-12 (airless air assisted or HVLP), using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOS-1.
 - (2) Two (2) stain spray booths, identified as LBB-3 and LBB-4, equipped with spray application equipment as described in 326 IAC 8-2-12 (airless air assisted or HVLP), using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOS-1.
 - (3) Two (2) sealer booths, identified as LBB-5 and LBB-6, equipped with spray application equipment as described in 326 IAC 8-2-12 (airless air assisted or HVLP), using UV curable coatings and dry filters for particulate control, and exhausting through stacks LBS-5 and LBS-6, respectively.
 - (4) Two (2) topcoat booths, identified as LBB-7 and LBB-8, equipped with spray application equipment as described in 326 IAC 8-2-12 (airless air assisted or HVLP), using UV curable coatings and dry filters for particulate control, and exhausting through stacks LBS-7 and LBS-8, respectively.
 - (5) Two (2) sanding operations (associated with Line B), controlled by a cartridge filter type dust collector DC-1, and exhausting 22,500 cubic feet per minute through stack DCS-1A and 22,500 cubic feet per minute through stack DCS-1B.

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) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6.5]
- (b) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].
- (c) Emission units with PM and PM₁₀ emissions less than five (5) tons per year, SO₂, NO_x, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and a half (2.5) tons per year:
 - (1) One (1) natural gas-fired oven, identified as OV-2, with a maximum heat input capacity of 1 MMBtu per hour, and exhausting at stack OVS-2. [326 IAC 6.5]
- (d) Two (2) spray booths, identified as STB-19 and STB-20, each constructed in 2003, each with a maximum capacity of 220 units per hour, each with particulate emissions controlled by a dry filter, and exhausting through stacks STS-5 and STS-6. [326 IAC 6.5]

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (e) One (1) Edge-banding process applying veneer to wood panels, using a PVA adhesive meeting the definition of a *Non-HAP coating*, specified in 40 CFR 63, Subpart DDDD as a coating with HAP contents below 0.1 percent by mass for Occupational Safety and Health Administration-defined carcinogens as specified in 29 CFR 1910.1200(d)(4), and below 1.0 percent by mass for other HAP compounds. Under 40 CFR 63, Subpart DDDD, this edge-banding process is considered an existing affected source at a PCWP manufacturing facility.
- (f) One (1) Regenerative thermal oxidizer utilized for VOC control, with a maximum heat input capacity of 7.9 MMBtu/hr and a maximum flow rate of 30,000 acfm.[326 IAC 2-2]
- (g) One (1) end coat booth, identified as ECB-1, constructed in 1994, with particulate emissions controlled by a dry filter, and exhausting through stack ECS-1. Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.
- (h) One (1) end coat booth, identified as UVPB-1, constructed in 1994, with particulate emissions controlled by a dry filter, and exhausting through stack UVPS-1. Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.
- (i) One (1) UV Stickline, identified as UVC-4, constructed in 1999, and exhausting internally. Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components;
- (j) One (1) UV Flatline, identified as UVC-3, constructed in 1994, and exhausting internally. Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components;
- (k) One (1) UV Stickline, identified as UVC-2, constructed in 1994, and exhausting internally. Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components;
- (l) One (1) UV cured vacuum coater booth to coat wood molding with a capacity of 300 wood moldings per hour, identified as UVC-1, constructed in 1994, and exhausting to stacks UVS-1 and UVS-2. Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.
- (m) Two (2) edge coaters using roll coating, identified as ECR-1 and ECR-2 , Under 40 CFR 63, Subpart JJ, these are affected facilities that are engaged in the manufacture of wood furniture or wood furniture components.

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, T037-26606-00051, 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 or of permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control).

(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, Compliance and Enforcement Branch, Office of Air Quality 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 Southwest 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
Southwest Regional Office phone: (812) 380-2305; fax: (812) 380-2304.

- (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.

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 T037-26606-00051 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, except for permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control)

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] [40 CFR 72]

- (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) Pursuant to 326 IAC 2-7-11(b) and 326 IAC 2-7-12(a), administrative Part 70 operating permit amendments and permit modifications for purposes of the acid rain portion of a Part 70 permit shall be governed by regulations promulgated under Title IV of the Clean Air Act. [40 CFR 72]
- (c) 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).

- (d) 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
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

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

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
 - (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and 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.
- (f) This condition does not apply to emission trades of SO₂ or NO_x under 326 IAC 21 or 326 IAC 10-4.

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

- (a) 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 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 thirty percent (30%) 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.2 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.3 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.4 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.5 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.6 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.7 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.8 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.9 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.10 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.11 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 prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval 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 ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) 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.12 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.13 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.14 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.15 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) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year 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.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2][326 IAC 2-3]

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

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

(c) If there is a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A), 40 CFR 51.165(a)(6)(vi)(B), 40 CFR 51.166(r)(6)(vi)(a), and/or 40 CFR 51.166(r)(6)(vi)(b)) that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:

- (1) Before beginning actual construction of the "project" (as defined in

326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, document and maintain the following records:

- (A) A description of the project.
- (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
- (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1 (mm)(2)(A)(iii); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (d) If there is a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A) and/or 40 CFR 51.166(r)(6)(vi)(a)) that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
 - (1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
 - (2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]

- (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.
- (f) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
 - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
 - (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
 - (4) Any other information that the Permittee deems fit to include in this report.

Reports required in this part shall be submitted to:

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

- (h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description 1:

- (a) One (1) conventional surface coating line, constructed in 1973. Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components. The conventional surface coating line is comprised of the following surface coating facilities:
 - (1) One (1) toner booth, identified as CLB-1, with a maximum capacity of 225 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stack CLS-1;
 - (2) One (1) stain booth, identified as CLB-2, with a maximum capacity of 225 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stack CLS-2;
 - (3) One (1) sealer booth, identified as CLB-3, with a maximum capacity of 225 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stacks CLS-3 and CLS-4;
 - (4) One (1) top coat booth, identified as CLB-4, with a maximum capacity of 225 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stacks CLS-5 and CLS-6;
 - (5) One (1) parts booth, identified as CLB-5, with a maximum capacity of 225 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stacks CLS-5 and CLS-6;
 - (6) One (1) parts booth, identified as CLB-6, with a maximum capacity of 225 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stack CLS-7; and
 - (7) One (1) natural gas-fired oven identified as OV-1, constructed in 1973, with a maximum heat input capacity of 1 Million British Thermal Units per hour (MMBtu), and exhausting to stack OVS-1.
- (b) One (1) natural gas-fired oven, identified as OV-2, with a maximum heat input capacity of 1 MMBtu per hour, and exhausting at stack OVS-2. [326 IAC 6.5]
- (c) One (1) UV Stickline, identified as UVC-4, constructed in 1999, and exhausting internally. Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components;
- (d) One (1) UV Flatline, identified as UVC-3, constructed in 1994, and exhausting internally. Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components;
- (e) One (1) UV Stickline, identified as UVC-2, constructed in 1994, and exhausting internally. Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components;
- (f) One (1) UV cured vacuum coater booth to coat wood molding with a capacity of 300 wood moldings per hour, identified as UVC-1, constructed in 1994, and exhausting to stacks UVS-1 and UVS-2. Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.
- (g) Two (2) spray booths, identified as STB-19 and STB-20, each constructed in 2003, each with a maximum capacity of 220 units per hour, each with particulate emissions controlled by a dry filter, and exhausting through stacks STS-5 and STS-6. [326 IAC 6.5] Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

Emissions Unit Description 1 (Continued):

- (h) One (1) end coat booth, identified as ECB-1, constructed in 1994, with particulate emissions controlled by a dry filter, and exhausting through stack ECS-1. Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.
- (i) One (1) end coat booth, identified as UVPB-1, constructed in 1994, with particulate emissions controlled by a dry filter, and exhausting through stack UVPS-1. Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

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

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

D.1.1 Particulate Matter Emission Limitations Except Lake County [326 IAC 6.5]

Pursuant to 326 IAC 6.5 (Particulate Matter Emission Limitations Except Lake County), the particulate matter emissions from the conventional surface coating line (CLB-1 through CLB-6), the two (2) end coat booths (ECB-1 and UVPB-1), the UV Sticklines (UVC-2 and UVC-4), the UV Flatline (UVC-3), the cured vacuum coater booth (UVC-1), two (2) spray booths (STB-19 and STB-20), and the two (2) natural gas fired ovens (OV1 and OV-2), shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

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

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets by the end coat booths (ECB-1 and UVPB-1), the UV lines consisting of the UV Sticklines (UVC-4 and UVC-2), the UV Flatline (UVC-3), and the UV cured vacuum coater (UVC-1), each shall utilize one of the following application methods:

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

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

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.4 Particulate Control

In order to comply with Condition D.1.1, the dry filters for particulate control shall be in operation and control emissions from the conventional surface coating line (CLB-1 through CLB-6), the two (2) end coat booths (ECB-1 and UVPB-1), and the two (2) spray booths (STB-19 and STB-20) at all times that these facilities are in operation.

Compliance Monitoring Requirements

D.1.5 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 CLS-1 through CLS-7 while one or more of the booths are in operation. Section C- Response to Excursions or Exceedences 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 Exceedences shall be considered a deviation from this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the spray booths in the Conventional surface coating line identified as CLB-1 through CLB-6 (stacks CLS-1 through CLS-7), for the presence of overspray on the rooftops and the nearby ground. Section C- Response to Excursions or Exceedences for these units shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Response to Excursions or Exceedences 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 Exceedences shall be considered a deviation from this permit.

These monitoring conditions are necessary because these spray booths must operate properly to ensure compliance with 326 IAC 6.5 (Particulate Matter Limitations Except Lake County).

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

D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.4, the Permittee shall comply with the following:
 - (1) The Permittee shall maintain a log of weekly overspray observations and monthly inspections.
 - (2) The Permittee shall maintain a log of daily inspections. The Permittee shall include in its daily log when an inspection was not performed and the reason for the lack of an inspection (e.g. the process did not operate that day).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description 2:

- (a) Woodworking equipment controlled by baghouses, including:
 - (1) One (1) woodworking cell, identified as WW-1, constructed in 1968, controlled by a 61,000 cubic feet per minute baghouse, identified as BH-1, and exhausting either internally or to stack BHS-1;
 - (2) One (1) woodworking cell, identified as WW-2, constructed in 1998, controlled by a 61,000 cubic feet per minute baghouse, identified as BH-2, and exhausting either internally or to stack BHS-2;
 - (3) One (1) woodworking cell, identified as WW-3, constructed in 1968, controlled by a 35,000 cubic feet per minute baghouse, identified as BH-3, and exhausting either internally or to stack BHS-3.
 - (4) One (1) woodworking cell, identified as WW-4, constructed in 1997, controlled by a 61,000 cubic feet per minute baghouse, identified as BH-4, and exhausting either internally or to stack BHS-4;
 - (5) One (1) woodworking cell, identified as WW-5, constructed in 1986, controlled by a 61,000 cubic feet per minute baghouse, identified as BH-5, and exhausting either internally or to stack BHS-5;
 - (6) One (1) woodworking cell, identified as WW-6, constructed in 1986, controlled by a 48,000 cubic feet per minute baghouse, identified as BH-6, and exhausting either internally or to stack BHS-6.
 - (7) One (1) woodworking cell, identified as WW-7, to be constructed in 2005, controlled by a 61,000 cubic feet per minute baghouse, identified as BH-7, and exhausting either internally or to stack BHS-7.
- (b) Two (2) sanding operations (associated with Line A) , controlled by a cartridge filter type dust collector DC-1, and exhausting 22,500 cubic feet per minute through stack DCS-1A and 22,500 cubic feet per minute through stack DCS-1B.
- (c) Two (2) sanding operations (associated with Line B), controlled by a cartridge filter type dust collector DC-1, and exhausting 22,500 cubic feet per minute through stack DCS-1A and 22,500 cubic feet per minute through stack DCS-1B.
- (d) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].

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

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

D.2.1 PSD Minor Limit [326 IAC 2-2]

Pursuant to Significant Source Modification No. 037-20223-00051 (issued August 26, 2005) and Significant Permit Modification No. 037-20407-00051 (issued September 15, 2005), and as revised by this Part 70 Permit Renewal No. 037-26606-00051, in order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the Permittee shall comply with the following:

The facilities identified as WW-2 WW-4, WW-5, WW-6, WW-7 and the four (4) sanding operations associated with Lines A and B, shall not exceed the following pound per hour limitations:

- (a) The PM emissions from cartridge filter DC-1 shall not exceed 2.5 lbs/hr.
- (b) The PM₁₀ emissions from cartridge filter DC-1 shall not exceed 1.2 lbs/hr.

- (c) The PM emissions from baghouse BH-7 shall not exceed 2.6 lbs/hr.
- (d) The PM₁₀ emissions from baghouse BH-7 shall not exceed 1.6 lbs/hr.
- (e) The PM emissions from baghouse BH-2 shall not exceed 5.68 lbs/hr.
- (f) The PM₁₀ emissions from baghouse BH-2 shall not exceed 3.4 lbs/hr.
- (g) The PM emissions from baghouse BH-4 shall not exceed 5.68 lbs/hr.
- (h) The PM₁₀ emissions from baghouse BH-4 shall not exceed 3.4 lbs/hr.
- (i) The PM emissions from baghouse BH-5 and Baghouse BH-6 combined shall not exceed 5.68 lbs/hr.

These emission limits ensure that the PM and PM₁₀ emissions increase from the modifications permitted in Significant Source Modification No. 037-20223-00051 (issued August 26, 2005) and Significant Permit Modification No. 037-20407-00051 (issued September 15, 2005) are less than twenty-five (25) and fifteen (15) tons per twelve (12) consecutive month period, respectively. Compliance with these limits renders 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.2.2 Particulate Matter Emission Limitations [326 IAC 6.5-1]

Pursuant to 326 IAC 6.5-1 (Particulate Matter Limitations Except Lake County), the particulate matter emissions from the woodworking operations (WW-1, WW-2, WW-3, WW-4, WW-5, WW-6, and WW-7) and the four (4) sanding operations (two (2) associated with Line A and two (2) associated with Line B) shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf) of exhaust air.

D.2.3 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 the baghouses and cartridge/dry filters controlling woodworking cells WW-1 through WW-7 and the four (4) sanding operations associated with Lines A and B.

Compliance Determination Requirements

D.2.4 Particulate Matter Control (PM and PM₁₀)

In order to comply with Conditions D.2.1 and D.2.2, the baghouses and cartridge/dry filters for PM and PM₁₀ control shall be in operation and control emissions from the woodworking facilities (WW-1, WW-2, WW-3, WW-4, WW-5, WW-6, and WW-7) and the four (4) sanding operations associated with Lines A and B at all times that the facilities are in operation.

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

D.2.5 Visible Emissions Notations

- (a) Visible emission notations of the baghouse stack exhaust from stacks BHS-1 through BHS-7 and stacks DCS-1A and DCS-1B 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.
- (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.2.6 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.2.7 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the baghouse exhausts when venting to the atmosphere.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description 3:

- (a) One (1) finishing line, identified as Line A, approved for construction in 2005 and completed in 2008. Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components. The Line A finishing line consists of the following facilities:
- (1) Two (2) toner spray booths, identified as LAB-1 and LAB-2, equipped with spray application equipment as described in 326 IAC 8-2-12 (airless air assisted or HVLP), using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOS-1.
 - (2) Two (2) stain spray booths, identified as LAB-3 and LAB-4, equipped with spray application equipment as described in 326 IAC 8-2-12 (airless air assisted or HVLP), using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOS-1.
 - (3) Two (2) sealer booths, identified as LAB-5 and LAB-6, equipped with spray application equipment as described in 326 IAC 8-2-12 (airless air assisted or HVLP), using UV curable coatings and dry filters for particulate control, and exhausting through stacks LAS-5 and LAS-6, respectively.
 - (4) Two (2) topcoat booths, identified as LAB-7 and LAB-8, equipped with spray application equipment as described in 326 IAC 8-2-12 (airless air assisted or HVLP), using UV curable coatings and dry filters for particulate control, and exhausting through stacks LAS-7 and LAS-8, respectively.
- (b) One (1) finishing line, identified as Line B, approved for construction in 2005. Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components. The Line B finishing line consists of the following facilities:
- (1) Two (2) toner spray booths, identified as LBB-1 and LBB-2, equipped with spray application equipment as described in 326 IAC 8-2-12 (airless air assisted or HVLP), using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOS-1.
 - (2) Two (2) stain spray booths, identified as LBB-3 and LBB-4, equipped with spray application equipment as described in 326 IAC 8-2-12 (airless air assisted or HVLP), using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOS-1.
 - (3) Two (2) sealer booths, identified as LBB-5 and LBB-6, equipped with spray application equipment as described in 326 IAC 8-2-12 (airless air assisted or HVLP), using UV curable coatings and dry filters for particulate control, and exhausting through stacks LBS-5 and LBS-6, respectively.
 - (4) Two (2) topcoat booths, identified as LBB-7 and LBB-8, equipped with spray application equipment as described in 326 IAC 8-2-12 (airless air assisted or HVLP), using UV curable coatings and dry filters for particulate control, and exhausting through stacks LBS-7 and LBS-8, respectively.
- (c) One (1) Regenerative thermal oxidizer utilized for VOC control, with a maximum heat input capacity of 7.9 MMBtu/hr and a maximum flow rate of 30,000 acfm.
- (d) One (1) halogen oven, identified as OV-3, equipped in conjunction with Line A, controlled by the existing RTO, and exhausting through stack RTOS-1.
- (e) One (1) halogen oven, identified as OV-13, equipped in conjunction with Line B, controlled by the existing RTO, and exhausting through stack RTOS-1.

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

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

D.3.1 PSD Minor Limits [326 IAC 2-2]

(a) Pursuant to Significant Source Modification No. 037-20223-00051 (issued August 26, 2005), Significant Permit Modification No. 037-20407-00051 (issued September 15, 2005), and as revised by this Significant Permit Modification, the VOC and particulate matter emissions from the finishing Lines A and B have been limited in order to render the requirements of 326 IAC 2-2 (PSD) not applicable. Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), the Permittee shall comply with the following:

- (1) The input of VOC to spray booths LAB-1 through LAB-8 and LBB-1 through LBB-8 shall be limited such that the VOC emissions shall be less than three hundred thirty-one (331) tons per twelve (12) consecutive month period with compliance determined at the end of each month. When using the RTO to comply with this limitation, the following formula shall be used to determine compliance:

$$i \text{ (VOC Emissions (tons/month))} = ((1 - (\text{DRE} \times \text{Ecap}) \times X) + Y)$$

Where: i = VOC emissions for month in tons per month.

Ecap = Averaged Capture Efficiency for Spray Booths LAB-1 through LAB-4 and LBB-1 through LBB-4, which will be determined by Condition D.3.6.

DRE = Averaged Destruction Removal Efficiency for Spray Booth LAB1 through LAB-4 and LBB-1 through LBB-4, which will be determined by Condition D.3.6.

X = Total monthly VOC Input to Spray Booths LAB-1 through LAB-4 and LBB-1 through LBB-4.

Y = Total monthly VOC Input to Spray Booths LAB-5 through LAB-8 and LBB-5 through LBB-8.

- (b) The PM/PM₁₀ emissions from spray booths LAB-1 through LAB-8 and LBB-1 through LBB-8 shall not exceed 2.43 tons/yr. The Permittee will show compliance with this limit by using dry filters for all these booths and vent the emissions from booths LAB-1 through LAB-4 and LBB-1 through LBB-4 to the existing RTO. The cartridge/dry filters, shall be in operation at all times when these emission units are in operation.

Compliance with these limits shall ensure that the VOC emissions increase from the installation of Lines A and B are below thirty-nine (39) tons per year. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.

D.3.2 Particulate Matter Limitations Except Lake County [326 IAC 6.5-1]

Pursuant to 326 IAC 6.5-1 (Particulate Matter Limitations Except Lake County), the particulate matter emissions from the each of the spray coating booths in Line A and Line B (LAB-1 through LAB-8 and LBB-1 through LAB-8) shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf) of exhaust air.

D.3.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets in the finishing Lines A and B (LAB-1 through LAB-8 and LBB-1 through LAB-8), shall utilize one of the following application methods:

Airless Spray Application
Heated Airless Spray Application
Air Assisted Airless Spray Application

Roller Coating
Electrostatic Spray Application
Brush or Wipe Application
Electrostatic Bell or Disc 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.3.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]

D.3.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC usage content limitations contained in Condition D.3.1(a) 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.3.6 Testing Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]

- (a) In order to demonstrate compliance with Condition D.3.1(a), the Permittee shall perform a VOC destruction efficiency test for the existing RTO within 180 days after the issuance of this permit, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.
- (b) In order to demonstrate compliance with Condition D.3.1(a), the Permittee shall perform VOC capture efficiency testing for spray booths LAB-1 through LAB-4, within 180 days after the issuance of this permit, utilizing methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C - Performance Testing.
- (c) In order to demonstrate compliance with Condition D.3.1(a), the Permittee shall perform VOC capture efficiency testing for spray booths LAB-1 through LAB-4 and LBB-1 through LBB-4, within 180 days after initial startup of Line B, utilizing methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C - Performance Testing.

D.3.7 VOC Control

- (a) In order to comply with Condition D.3.1(a), the existing thermal oxidizer shall be in operation and control emissions from the spray booths LAB-1 through LAB-4 and LBB-1 through LBB-4 at all times that the source is using the RTO to comply with the VOC emission limitation established in D.3.1(a).
- (b) When using the RTO to comply with Condition D.3.1(a), the emissions from spray booths LAB-1 through LAB-4 and LBB-1 through LBB-4 shall be controlled by a RTO with a destruction efficiency determined by Condition D.3.6.

D.3.8 PM and PM₁₀ Control

In order to comply with Conditions D.3.1(b) and D.3.2, dry filters shall be in operation and control emissions from the spray booths LAB-1 through LAB-8 and LBB-1 through LBB-8 at all times that these units are in operation.

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

D.3.9 Thermal Oxidizer Temperature [40 CFR 64.2 (CAM)]

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer (RTO) for measuring operating temperature. For the purpose of this condition, continuous means no less than once per minute. The output of this system shall be recorded as a 3-hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature of 1,400°F.
- (b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Condition D.3.1(a), as approved by IDEM.
- (c) On and after the date the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature as observed during the compliant stack test.

D.3.10 Parametric Monitoring [40 CFR 64.2 (CAM)]

- (a) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with limits in Condition D.3.1(a), as approved by IDEM.
- (b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.

D.3.11 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters for spray booths LAB-1 through LAB-4 and LBB-1 through LBB-4. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks LAS-5 through LAS-8 and LBS-5 through LBS-8 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 deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the two (2) finishing lines A and B, for the booths identified as LAB-5 through LAB-8 and LBB-5 through LBB-8 (stacks LAS-5 through LAS-8 and LBS-5 through LBS-8), for the presence of overspray on the rooftops and the nearby ground. Section C- Response to Excursions or Exceedances for these units shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The 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 deviation from this permit.

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

D.3.12 Record Keeping Requirements

- (a) To document compliance with Condition D.3.1(a), the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limitations established Condition D.3.1(a):

- (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly 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.
 - (3) The total monthly VOC usage for spray booths Booths LAB-1 through LAB-4 and LBB-1 through LBB-4.
 - (4) The total monthly VOC usage for spray booths LAB-5 through LAB-8 and LBB-5 through LBB-8.
- (b) To document compliance with Condition D.3.9, the Permittee shall maintain continuous temperature records for the thermal oxidizer and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.
 - (c) To document compliance with Condition D.3.10, the Permittee shall maintain daily records of the duct pressure or fan amperage for the thermal oxidizer.
 - (d) To document compliance with Condition D.3.11, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.
 - (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.13 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1(a) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description 4:

- (a) One (1) conventional surface coating line, constructed in 1973. Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components. The conventional surface coating line is comprised of the following surface coating facilities:
- (1) One (1) toner booth, identified as CLB-1, with a maximum capacity of 225 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stack CLS-1;
 - (2) One (1) stain booth, identified as CLB-2, with a maximum capacity of 225 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stack CLS-2;
 - (3) One (1) sealer booth, identified as CLB-3, with a maximum capacity of 225 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stacks CLS-3 and CLS-4;
 - (4) One (1) top coat booth, identified as CLB-4, with a maximum capacity of 225 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stacks CLS-5 and CLS-6;
 - (5) One (1) parts booth, identified as CLB-5, with a maximum capacity of 225 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stacks CLS-5 and CLS-6;
 - (6) One (1) parts booth, identified as CLB-6, with a maximum capacity of 225 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stack CLS-7; and
 - (7) One (1) natural gas-fired oven identified as OV-1, constructed in 1973, with a maximum heat input capacity of 1 Million British Thermal Units per hour (MMBtu), and exhausting to stack OVS-1.
- (b) One (1) UV Stickline, identified as UVC-4, constructed in 1999, and exhausting internally. Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components;
- (c) One (1) UV Flatline, identified as UVC-3, constructed in 1994, and exhausting internally. Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components;
- (d) One (1) UV Stickline, identified as UVC-2, constructed in 1994, and exhausting internally. Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components;
- (e) One (1) UV cured vacuum coater booth to coat wood molding with a capacity of 300 wood moldings per hour, identified as UVC-1, constructed in 1994, and exhausting to stacks UVS-1 and UVS-2. Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.
- (f) Two (2) spray booths, identified as STB-19 and STB-20, each constructed in 2003, each with a maximum capacity of 220 units per hour, each with particulate emissions controlled by a dry filter, and exhausting through stacks STS-5 and STS-6. [326 IAC 6.5] Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.
- (g) One (1) end coat booth, identified as ECB-1, constructed in 1994, with particulate emissions controlled by a dry filter, and exhausting through stack ECS-1. Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.
- (h) One (1) end coat booth, identified as UVPB-1, constructed in 1994, with particulate emissions controlled by a dry filter, and exhausting through stack UVPS-1. Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.
- (i) One (1) finishing line, identified as Line A, approved for construction in 2005 and completed in 2008. Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components. The Line A finishing line consists of the following facilities:

SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS (Continued)

Emissions Unit Description 4 (Continued):

- (1) Two (2) toner spray booths, identified as LAB-1 and LAB-2, equipped with spray application equipment as described in 326 IAC 8-2-12 (airless air assisted or HVLP), using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOS-1.
 - (2) Two (2) stain spray booths, identified as LAB-3 and LAB-4, equipped with spray application equipment as described in 326 IAC 8-2-12 (airless air assisted or HVLP), using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOS-1.
 - (3) Two (2) sealer booths, identified as LAB-5 and LAB-6, equipped with spray application equipment as described in 326 IAC 8-2-12 (airless air assisted or HVLP), using UV curable coatings and dry filters for particulate control, and exhausting through stacks LAS-5 and LAS-6, respectively.
 - (4) Two (2) topcoat booths, identified as LAB-7 and LAB-8, equipped with spray application equipment as described in 326 IAC 8-2-12 (airless air assisted or HVLP), using UV curable coatings and dry filters for particulate control, and exhausting through stacks LAS-7 and LAS-8, respectively.
- (j) One (1) finishing line, identified as Line B, approved for construction in 2005. Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components. The Line B finishing line consists of the following facilities:
- (1) Two (2) toner spray booths, identified as LBB-1 and LBB-2, equipped with spray application equipment as described in 326 IAC 8-2-12 (airless air assisted or HVLP), using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOS-1.
 - (2) Two (2) stain spray booths, identified as LBB-3 and LBB-4, equipped with spray application equipment as described in 326 IAC 8-2-12 (airless air assisted or HVLP), using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOS-1.
 - (3) Two (2) sealer booths, identified as LBB-5 and LBB-6, equipped with spray application equipment as described in 326 IAC 8-2-12 (airless air assisted or HVLP), using UV curable coatings and dry filters for particulate control, and exhausting through stacks LBS-5 and LBS-6, respectively.
 - (4) Two (2) topcoat booths, identified as LBB-7 and LBB-8, equipped with spray application equipment as described in 326 IAC 8-2-12 (airless air assisted or HVLP), using UV curable coatings and dry filters for particulate control, and exhausting through stacks LBS-7 and LBS-8, respectively.
- (k) One (1) Regenerative thermal oxidizer utilized for VOC control, with a maximum heat input capacity of 7.9 MMBtu/hr and a maximum flow rate of 30,000 acfm.
- (l) One (1) halogen oven, identified as OV-3, equipped in conjunction with Line A, controlled by the existing RTO, and exhausting through stack RTOS-1.
- (m) One (1) halogen oven, identified as OV-13, equipped in conjunction with Line B, controlled by the existing RTO, and exhausting through stack RTOS-1.
- (n) Two (2) edge coaters using roll coating, identified as ECR-1 and ECR-2, Under 40 CFR 63, Subpart JJ, these are affected facilities that are engaged in the manufacture of wood furniture or wood furniture components.

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

National Emissions Standards for Hazardous Air Pollutants (NESHAP) Requirements:

E.1.1 General Provisions Relating to National Emissions Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR 63.800, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1 unless otherwise specified in 40 CFR 63, Subpart JJ (National Emission Standards for Wood Furniture Manufacturing Operations), for the conventional line surface coating operations, the finishing line (Line A) surface coating operations, the finishing line (Line B) surface coating operations, the two (2) end coat booths (ECB-1 and UVPB-1), UV Sticklines (UVC-4 and UVC-2), UV Flatline (UVC-3), UV cured vacuum coater (UVC-1), and the two (2) spray booths (STB-19 and STB-20).

- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

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

E.1.2 National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations [40 CFR 63, Subpart JJ]

Pursuant to 40 CFR Part 63, Subpart JJ, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart JJ for the conventional line surface coating operations, the finishing line (Line A) surface coating operations, the finishing line (Line B) surface coating operations, the two (2) end coat booths (ECB-1 and UVPB-1), UV Sticklines (UVC-4 and UVC-2), UV Flatline (UVC-3), UV cured vacuum coater (UVC-1), and the two (2) spray booths (STB-19 and STB-20) and all other activities associated with the wood furniture manufacturing operations as specified in 40 CFR Part 63, Subpart JJ. All of the wood furniture coating operations and emission units listed above must comply with the following provisions of 40 CFR Part 63, Subpart JJ:

- 1) 40 CFR 63.800 (a)(b)(c)(d)(e)(f)(g)
- 2) 40 CFR 63.801 (a)
- 3) 40 CFR 63.802 (a)
- 4) 40 CFR 63.803 (a)(b)(c)(d)(e)(f)(g)(h)(i)(j)(k)(l)
- 5) 40 CFR 63.804 (a)(b)(c)(f)(g)
- 6) 40 CFR 63.805 (a)(b)(c)(d)(e)
- 7) 40 CFR 63.806 (a)(b)(c)(d)(e)(f)(g)(h)(i)(j)
- 8) 40 CFR 63.807 (a)(b)(c)(d)(e)
- 9) 40 CFR 63.808 (a)(b)(c)
- 10) Table 1
- 11) Table 2
- 12) Table 3
- 13) Table 4
- 14) Table 5
- 15) Table 6

SECTION E.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description 5:

- (a) One (1) Edge-banding process applying veneer to wood panels, using a PVA adhesive meeting the definition of a *Non-HAP coating*, specified in 40 CFR 63, Subpart DDDD as a coating with HAP contents below 0.1 percent by mass for Occupational Safety and Health Administration-defined carcinogens as specified in 29 CFR 1910.1200(d)(4), and below 1.0 percent by mass for other HAP compounds. Under 40 CFR 63, Subpart DDDD, this edge-banding process is considered an existing affected source at a PCWP manufacturing facility.

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

National Emissions Standards for Hazardous Air Pollutants (NESHAP) Requirements:

E.2.1 General Provisions Relating to National Emissions Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR 63.800, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1 unless otherwise specified in 40 CFR 63, Subpart DDDD (National Emission Standards for Plywood and Composite Wood Products), for the one (1) Edge-banding process applying veneer to wood panels.
- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

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

E.2.2 National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products [40 CFR 63, Subpart DDDD]

Pursuant to 40 CFR Part 63, Subpart DDDD, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart DDDD for the insignificant edge-banding operations and all other activities associated with the production of plywood or composite wood products as specified in 40 CFR Part 63, Subpart DDDD. The insignificant edge-banding operations must comply with the provisions of 40 CFR Part 63, Subpart DDDD:

- (1) 63.2230
- (2) 63.2231 (a) (b)
- (3) 63.2232 (a) (b) (e)
- (4) 63.2233 (b) (d)
- (5) 63.2250 (a) (b)
- (6) 63.2252

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH, OFFICE OF AIR QUALITY
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: MasterBrand Cabinets, Inc.
Source Address: 614 West Third Street, Ferdinand, Indiana 47532
Mailing Address: P.O. Box 420, Jasper, IN 47547
Part 70 Permit No.: T037-26606-00051

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, OFFICE OF AIR QUALITY
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: MasterBrand Cabinets, Inc.
Source Address: 614 West Third Street, Ferdinand, Indiana 47532
Mailing Address: P.O. Box 420, Jasper, IN 47547
Part 70 Permit No.: T037-26606-00051

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) 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, OFFICE OF AIR QUALITY**

Part 70 Quarterly Report

Source Name: MasterBrand Cabinets, Inc.
 Source Address: 614 West Third Street, Ferdinand, Indiana 47532
 Mailing Address: P.O. Box 420, Jasper, IN 47547
 Part 70 Permit No.: T037-26606-00051
 Facility: Finishing Lines A and B
 Parameter: VOC Emissions
 Limit: The input of VOC to spray booths LAB-1 through LAB-8 and LBB-1 through LBB-8 shall be limited such that the VOC emissions shall be less than three hundred thirty-one (331) tons per twelve (12) consecutive month period with compliance determined at the end of each month. When using the RTO to comply with this limitation, the following formula shall be used to determine compliance:

$$i \text{ (VOC Emissions (tons/month))} = ((1 - (0.95 \text{ DRE} \times \text{Ecap}) \times X) + Y)$$

Where: i = VOC emissions for month in tons per month.

Ecap = Averaged Capture Efficiency for Spray Booths LAB-1 through LAB-4 and LBB-1 through LBB-4, which will be determined by Condition D.3.6.

DRE = Averaged Destruction Removal Efficiency for Spray Booth LAB1 through LAB-4 and LBB-1 through LBB-4, which will be determined by Condition D.3.6.

X = Total monthly VOC Input to Spray Booths LAB-1 through LAB-4 and LBB-1 through LBB-4.

Y = Total monthly VOC Input to Spray Booths LAB-5 through LAB-8 and LBB-5 through LBB-8.

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, OFFICE OF AIR QUALITY
PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: MasterBrand Cabinets, Inc.
Source Address: 614 West Third Street, Ferdinand, Indiana 47532
Mailing Address: P.O. Box 420, Jasper, IN 47547
Part 70 Permit No.: T037-26606-00051

Months: _____ to _____ Year: _____

Page 1 of 2

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

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 Significant Permit Modification

Source Description and Location

Source Name:	MasterBrand Cabinets, Inc. - Ferdinand Operations
Source Location:	614 West Third Street, Ferdinand, Indiana 47532
County:	Dubois
SIC Code:	2434
Operation Permit No.:	T037-26606-00051
Operation Permit Issuance Date:	April 23, 2009
Significant Permit Modification No.:	037-28900-00051
Reviewer:	APT

Existing Approvals

Since the issuance of the Part 70 Operating Permit Renewal No. T037-26606-00051, on April 23, 2009, for the operation of a stationary woodworking and surface coating operation manufacturing kitchen and bath cabinets and home entertainment centers, the source has not constructed or has not been operating under any other approvals.

County Attainment Status

The source is located in Dubois County. The following attainment status designations are applicable to Dubois 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 standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.

¹Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.

Basic nonattainment designation effective federally 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 (NO_x) 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 NO_x emissions are considered when evaluating the rule applicability relating to ozone. Dubois County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Dubois County has been classified as nonattainment for PM_{2.5} in 70 FR 943 dated January 5, 2005. On May 8, 2008, U.S. EPA promulgated specific New Source Review rules for PM_{2.5} emissions, and the effective date of these rules is July 15, 2008. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.
- (c) **Other Criteria Pollutants**
 Dubois 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.

Source Status

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

Pollutant	Emissions (ton/yr)
PM	> 250
PM ₁₀	> 250
PM _{2.5}	> 250
SO ₂	< 100
VOC	> 250
CO	< 100
NO _x	< 100
HAPs Single / Combined	> 10 / > 25

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOCs, PM₁₀ and PM_{2.5} 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 (Part 70 Permit Program).
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than one hundred (100) tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 (Part 70 Permit Program).
- (d) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

Description of Proposed Modification

On January 21, 2010, the Office of Air Quality (OAQ) received an application from MasterBrand Cabinets, Inc. - Ferdinand Operations requesting that the permit be revised to reflect the changing nature of the capture efficiency of the RTO for control of VOCs. Based on recent test data, the RTO is achieving capture and destruction efficiency greater than 57% and 95% as prescribed in the permit, and the source would like this data to be reflected in the permit. At this time, additional administrative changes will be made, requirement restructuring, and clerical errors found in the permit will be corrected.

In addition to the aforementioned changes, the source will be adding one (1) UV Oven for curing, identified as OV-23. The one (1) UV Oven (OV-23) is an identical unit to other permitted units at the source, and is an insignificant activity as defined by 326 IAC 2-7-1(21)(A) and (B), as the potential emissions of VOC are less than exemption levels (and have already been accounted for in the coating operations) and there are no particulate emissions. The source-wide potential to emit will not increase due to the addition of this unit, and there are no changes in rule applicability as a result, because the new unit (OV-23) is not a specifically regulated insignificant activity. The new oven (OV-23) will be added to the Line A, Associated Insignificant Activities in this Technical Support Document as a record of the change, but no changes will be made to the permit as a result of the addition of this unit.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

There are no emission calculations associated with this modification.

Permit Level Determination – Part 70

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

The no new emission unit (OV-23), included in this permit modification, has potential emissions less than the exemption levels outlined in 326 IAC 2-7-1(21)(A) and (B). Therefore, this modification is not subject to the source modification requirements under 326 IAC 2-7-10.5.

This modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d)(1), because the modification does not qualify as a minor permit modification, as it will include a significant change in existing monitoring Part 70 permit terms or conditions.

Permit Level Determination – PSD

The new emission unit (OV-23), included in this permit modification, has potential emissions less than the exemption levels outlined in 326 IAC 2-7-1(21)(A) and (B). Therefore, this permit modification is not subject to 326 IAC 2-2 (PSD). This source will remain a major source pursuant to 326 IAC 2-2 (PSD).

Federal Rule Applicability Determination

- (b) New Source Performance Standards (NSPS)
There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit for to this proposed modification.
- (c) National Emission Standards for Hazardous Air Pollutants (NESHAPs)
There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 20 and 40 CFR Part 63) included in this permit for to this proposed modification.

State Rule Applicability Determination

There are no new state regulations included in this permit for to this proposed modification.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a 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 Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements 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.

There are no new compliance determination or compliance monitoring requirements applicable to this source as a result of this modification. However, existing monitoring conditions have been modified, as will be shown in the Proposed Changes Section of this document.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. 037-26606-00051. Deleted language appears as ~~strike throughs~~ and new language appears in **bold**:

- Modification No. 1**
- (a) IDEM, OAQ has determined that Condition D.3.1(a)(1) will be moved from the Emission Limitations and Standards section of the permit to the Compliance Determination section of the permit as Condition D.3.7, as it represents a method used to determine compliance with the VOC limitation. The remaining Conditions in the permit will be renumbered as necessary but not shown as individual changes.
- (b) The source has completed the required testing for the RTO that is used to control the spray booth emissions outlined in Condition D.3.1(a)(2). The results of these tests show that the VOC capture efficiency is greater than 57% (the efficiency from a valid stack test completed in 2001 from a similar unit) that was used in the permit as a minimum for compliance with applicable rules. Furthermore, the destruction efficiency was greater than the minimum

of 95% required by this permit. In order to maintain operational flexibility, the following changes have been made to the permit Condition D.3.1:

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

D.3.1 PSD Minor Limits [326 IAC 2-2]

(a) Pursuant to Significant Source Modification No. 037-20223-00051 (issued August 26, 2005), and Significant Permit Modification No. 037-20407-00051 (issued September 15, 2005), ~~and as revised by this Part 70 Permit Renewal No. 037-26606-00051,~~ **and as revised by this Significant Permit Modification**, the VOC and particulate matter emissions from the finishing Lines A and B have been limited in order to render the requirements of 326 IAC 2-2 (PSD) not applicable. Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), the Permittee shall comply with the following:

~~(1) The emissions from spray booths LAB-1 through LAB-4 and LBB-1 through LBB-4 shall be controlled by a RTO with a destruction efficiency of at least 95%.~~

(21) The input of VOC to spray booths LAB-1 through LAB-8 and LBB-1 through LBB-8 shall be limited such that the ~~potential to emit of~~ **VOC emissions** shall be less than three hundred thirty-one (331) tons per twelve (12) consecutive month period with compliance determined at the end of each month. **When using the RTO to comply with this limitation**, the following **formula** shall be used to determine compliance:

$$i \text{ (VOC Emissions (tons/month))} = ((1 - (0.95 \text{ DRE} \times E_{\text{cap}}) X) + Y)$$

Where: **i = VOC emissions for month in tons per month.**

E_{cap} = Averaged Capture Efficiency for Spray Booths LAB-1 through LAB-4 and LBB-1 through LBB-4, which will be determined by Condition D.3.6. ~~Until such time, E_{cap} shall be 57%.~~

DRE = Averaged Destruction Removal Efficiency for Spray Booth LAB1 through LAB-4 and LBB-1 through LBB-4, which will be determined by Condition D.3.6.

~~i = Month.~~

X = Total monthly VOC Input to Spray Booths LAB-1 through LAB-4 and LBB-1 through LBB-4.

Y = Total monthly VOC Input to Spray Booths LAB-5 through LAB-8 and LBB-5 through LBB-8.

(b) The PM/PM₁₀ emissions from spray booths LAB-1 through LAB-8 and LBB-1 through LBB-8 shall not exceed 2.43 tons/yr. The Permittee will show compliance with this limit by using dry filters for all these booths and vent the emissions from booths LAB-1 through LAB-4 and LBB-1 through LBB-4 to the existing RTO. The cartridge/dry filters, ~~and the RTO~~ shall be in operation at all times when these emission units are in operation.

Compliance with these limits shall ensure that the VOC emissions increase from the installation of Lines A and B are below thirty-nine (39) tons per year. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.

Modification No. 2 As shown in Modification No. 1 above, Condition D.3.1(a)(1) will be moved from the Emission Limitations and Standards section of the permit to the Compliance Determination section of the permit as Condition D.3.7, as it represents a method used to determine compliance with the VOC limitation. IDEM has also determined that the source can comply with the VOC emission limitation established in Condition

D.3.1 without the continual use of the RTO, depending on VOC input to the Lines A and B. In order to maintain operational flexibility, the following changes have been made to the permit Condition D.3.7:

D.3.7 VOC Control

- (a) In order to comply with Condition D.3.1(a), the existing thermal oxidizer shall be in operation and control emissions from the spray booths LAB-1 through LAB-4 and LBB-1 through LBB-4 at all times that **the source is using the RTO to comply with the VOC emission limitation established in D.3.1(a).** ~~these units are in operation.~~
- (b) **When using the RTO to comply with Condition D.3.1(a), the emissions from spray booths LAB-1 through LAB-4 and LBB-1 through LBB-4 shall be controlled by a RTO with a destruction efficiency determined by Condition D.3.6.**

Modification No. 3 As shown in Modifications No. 1 and No. 2 above, Condition D.3.1(a)(1) will be moved from the Emission Limitations and Standards section of the permit to the Compliance Determination section of the permit as Condition D.3.7. Therefore, all references to the Conditions D.3.1(a)(1) and D.3.1(a)(2) will be changed as follows:

D.3.6 Testing Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]

- (a) In order to demonstrate compliance with Condition D.3.1(a)~~(1)~~, the Permittee shall perform a VOC destruction efficiency test for the existing RTO within 180 days after the issuance of this permit, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.
- (b) In order to demonstrate compliance with Condition D.3.1(a)~~(2)~~, the Permittee shall perform VOC capture efficiency testing for spray booths LAB-1 through LAB-4, within 180 days after the issuance of this permit, utilizing methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C - Performance Testing.
- (c) In order to demonstrate compliance with Condition D.3.1(a)~~(2)~~, the Permittee shall perform VOC capture efficiency testing for spray booths LAB-1 through LAB-4 and LBB-1 through LBB-4, within 180 days after initial startup of Line B, utilizing methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C - Performance Testing.

D.3.10 Parametric Monitoring [40 CFR 64.2 (CAM)]

- (a) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with limits in Condition D.3.1(a)~~(1)~~, as approved by IDEM.
- (b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.

D.3.12 Record Keeping Requirements

- (a) To document compliance with Condition D.3.1(a)~~(2)~~, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limitations established Condition D.3.1(a)~~(2)~~:

* * *

D.3.13 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1(a)~~(2)~~ shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using

the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Modification No. 4 The quarterly report form has been changed to reflect the changes made to Condition D.3.1 as follows:

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

Part 70 Quarterly Report

Source Name: MasterBrand Cabinets, Inc.
Source Address: 614 West Third Street, Ferdinand, Indiana 47532
Mailing Address: P.O. Box 420, Jasper, IN 47547
Part 70 Permit No.: T037-26606-00051
Facility: Finishing Lines A and B
Parameter: VOC Emissions
Limit: The input of VOC to spray booths LAB-1 through LAB-8 and LBB-1 through LBB-8 shall be limited such that the ~~potential to emit of~~ **emissions** shall be less than three hundred thirty-one (331) tons per twelve (12) consecutive month period with compliance determined at the end of each month. **When using the RTO to comply with this limitation**, the following **formula** shall be used to determine compliance:

$$i \text{ (VOC Emissions (tons/month))} = ((1 - (0.95 \text{ DRE} \times E_{\text{cap}}) \times X) + Y)$$

Where: **i = VOC emissions for month in tons per month.**

E_{cap} = Averaged Capture Efficiency for Spray Booths LAB-1 through LAB-4 and LBB-1 through LBB-4, which will be determined by Condition D.3.6. ~~Until such time, E_{cap} shall be 57%.~~

DRE = Averaged Destruction Removal Efficiency for Spray Booth LAB1 through LAB-4 and LBB-1 through LBB-4, which will be determined by Condition D.3.6.

~~$i =$ _____ Month.~~

X = Total monthly VOC Input to Spray Booths LAB-1 through LAB-4 and LBB-1 through LBB-4.

Y = Total monthly VOC Input to Spray Booths LAB-5 through LAB-8 and LBB-5 through LBB-8.

Modification No. 5 The following record keeping requirement was inadvertently omitted from the renewal permit. Therefore, the following Condition D.1.6 Record Keeping Requirements has been added to the permit and the Table of Contents has been updated accordingly:

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

D.1.6 Record Keeping Requirements

(a) To document compliance with Condition D.1.4, the Permittee shall comply with the following:

- (1) The Permittee shall maintain a log of weekly overspray observations and monthly inspections.**
- (2) The Permittee shall maintain a log of daily inspections. The Permittee shall include in its daily log when an inspection was not performed and the reason for the lack of an inspection (e.g. the process did not operate that day).**

All other conditions of the permit shall remain unchanged and in effect.

Conclusion and Recommendation

This proposed permit modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 037-28900-00051. The staff recommend to the Commissioner that this Part 70 Significant Permit Modification be approved.



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: Michael Decker
MasterBrand Cabinets, Inc.
PO Box 420
Jasper IN 47547

DATE: June 10, 2010

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

SUBJECT: Final Decision
Significant Permit Modification
037-28900-00051

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:
Glen Meservy GM MasterBrand Cabinets, Inc.
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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June 10, 2010

TO: Jasper Public Library

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

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

Applicant Name: MasterBrand Cabinets, Inc.
Permit Number: 037-28900-00051

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	BMILLER 6/10/2010 MasterBrand Cabinets, Inc-# 4/22 037-28900-00051 (final)		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	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		Michael Decker MasterBrand Cabinets, Inc-# 4/22 PO Box 420 Jasper IN 47547-0420 (Source CAATS) <i>Via Confirmed Delivery</i>									
2		Glen Meservy GM MasterBrand Cabinets, Inc-# 4/22 614 W 3rd St Ferdinand IN 47532 (RO CAATS)									
3		Mr. Randy Brown Plumbers & Steam Fitters Union, Local 136 2300 St. Joe Industrial Park Dr Evansville IN 47720 (Affected Party)									
4		Dubois County Commissioners One Courthouse Square Jasper IN 47546 (Local Official)									
5		DuBois County Health Department 1187 S St. Charles Street Jasper IN 47546 (Health Department)									
6		Jasper Public Library 1116 Main Street Jasper IN 47546 (Library)									
7		Mr. John Blair 800 Adams Ave Evansville IN 47713 (Affected Party)									
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Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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