



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: Dec. 22, 2010
RE: Native Hardwoods, Inc. / 039-29305-00460
FROM: Matthew Stuckey, Deputy Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

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

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

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

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

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

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

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

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

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

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

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

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

**Part 70 Operating Permit Renewal
OFFICE OF AIR QUALITY**

**Native Hardwoods, Inc.
316 Roske Drive
Elkhart, Indiana 46516**

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

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

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

Operation Permit No.: T039-29305-00460	
Issued by:  Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: Dec. 22, 2010 Expiration Date: Dec. 22, 2015

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary wood furniture milling, sanding and surface coating plant.

Source Address:	316 Roske Drive, Elkhart, Indiana 46514
General Source Phone Number:	(574) 293-9690
SIC Code:	2499
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) Four (4) air-assisted airless paint spray booths, identified as EU-01A through EU-01D, each constructed in 1997, each coating a maximum of 208.5 square feet of wood per hour, each using dry filters for overspray control, and exhausting to stacks S1 through S4, respectively;
- (b) One (1) spray booth equipped with HVLP spray guns, identified as EU-01E, constructed in 1997, applying adhesives to wood surfaces at a maximum rate of 12.5 square feet of wood per hour, using dry filters for overspray control, and exhausting to stack S5;
- (c) One (1) spray booth equipped with HVLP spray guns, identified as EU-01F, constructed in 2002, with a maximum throughput capacity of 160 square feet of wood per hour, using dry filters for particulate control, and exhausting to stack S6;
- (d) One (1) spray booth equipped with HVLP spray guns, identified as EU-01G, constructed in 2006, with a maximum throughput capacity of 160 square feet of wood per hour, using dry filters for particulate control, and exhausting to stack S7; and
- (e) One (1) flat-line spray booth equipped with HVLP spray guns, identified as EU-01H, approved in 2010 for construction, with a maximum throughput capacity of 864 square feet of wood per hour, using dry filters for particulate control, and exhausting to stacks S8, S9, S10, and S11.

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

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

- (a) Woodworking operations, processing a combined maximum of 815 pounds of wood per hour, having a maximum outlet grain loading of 0.01 grain per dry standard cubic foot of outlet air and a maximum exhaust flow rate of 40,000 cubic feet per minute. The portion of woodworking operations processing a maximum of 765 pounds of wood per hour is controlled by baghouse BH-1 and the portion of woodworking operations processing a

maximum of 50 pounds of wood per hour is controlled by baghouse BH-2. [326 IAC 2-7-1(21)(G)(xxx)] [326 IAC 6-3-2]

- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, consisting of one (1) corian countertop operation processing a maximum of 250 pounds of countertops per hour. Particulate emissions from the corian countertop operation are controlled by one (1) dust collector, identified as BH-3, and exhausting within the building and then to general ventilation. [326 IAC 2-7-1(21)(G)(xxiii)] [326 IAC 6-3-2]
- (c) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].

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 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5) (Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

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

- (a) This permit, T039-17724-00460, 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.5 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.6 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.7 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.8 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.9 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. 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.10 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:

(1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(34), and

(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent, 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.11 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 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) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
- (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.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) 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.13 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, or Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance and Enforcement Branch), or

Telephone Number: 317-233-0178 (ask for Office of Air Quality,
Compliance and Enforcement Branch)

Facsimile Number: 317-233-6865

Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

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

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

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

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

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

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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.

B.14 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.15 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 T039-29305-00460 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 combined permit, all previous registrations and permits are superseded by this combined new source review and 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.16 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.17 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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.18 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.19 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 does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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.20 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 or notice 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.21 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

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

this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

- (4) The Permittee notifies the:

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

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

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b),(c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

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

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

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

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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.22 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.23 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.24 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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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.25 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.26 Advanced Source Modification Approval [326 IAC 2-7-5(16)] [326 IAC 2-7-10.5]

- (a) The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

B.27 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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

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

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

C.7 Performance Testing [326 IAC 3-6]

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

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.10 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 maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.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]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to 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 excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning 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 normal or usual manner of operation.
- (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 record the reasonable response steps 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 submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.

- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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]

Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit an emission statement by July 1 triennially, beginning in 2007 and every three (3) years thereafter. 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

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

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

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that 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. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The

Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

- (b) The address for report submittal is:

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) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.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 applicable standards for recycling and emissions reduction.

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) Four (4) air-assisted airless paint spray booths, identified as EU-01A through EU-01D, each constructed in 1997, each coating a maximum of 208.5 square feet of wood per hour, each using dry filters for overspray control, and exhausting to stacks S1 through S4, respectively;
- (b) One (1) spray booth equipped with HVLP spray guns, identified as EU-01E, constructed in 1997, applying adhesives to wood surfaces at a maximum rate of 12.5 square feet of wood per hour, using dry filters for overspray control, and exhausting to stack S5;
- (c) One (1) spray booth equipped with HVLP spray guns, identified as EU-01F, constructed in 2002, with a maximum throughput capacity of 160 square feet of wood per hour, using dry filters for particulate control, and exhausting to stack S6;
- (d) One (1) spray booth equipped with HVLP spray guns, identified as EU-01G, constructed in 2006, with a maximum throughput capacity of 160 square feet of wood per hour, using dry filters for particulate control, and exhausting to stack S7; and
- (e) One (1) flat-line spray booth equipped with HVLP spray guns, identified as EU-01H, approved in 2010 for construction, with a maximum throughput capacity of 864 square feet of wood per hour, using dry filters for particulate control, and exhausting to stacks S8, S9, S10, and S11.

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

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

D.1.1 PSD Minor Limit VOC [326 IAC 2-2]

The total VOC input (including coatings, dilution solvents, and cleaning solvents) to the surface coating operations, identified as EU-01A through EU-01H, combined, shall not exceed 249 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This requirement limits source-wide VOC emissions to less than 250 tons per year.

Compliance with this limit renders 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.2 Hazardous Air Pollutants (HAP) [40 CFR 63, Subpart JJ] [326 IAC 20-14]

Emissions of HAPs from the surface coating operations, identified as EU-01A through EU-01H, shall be limited as follows:

- (a) The total HAP input, including coatings, dilution solvents, and cleaning solvents, to the surface coating operations, identified as EU-01A through EU-01H, combined, shall be limited such that any single HAP emitted is less than nine and nine-tenths (9.9) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit source-wide single HAP emissions to less than ten (10) tons per twelve (12) consecutive month period.
- (b) The total HAP input, including coatings, dilution solvents, and cleaning solvents, to the surface coating operations, identified as EU-01A through EU-01H, combined, shall be limited such that combined HAPs emitted is less than twenty-four and eight-tenths (24.8) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit source-wide HAP emissions to less than twenty-five (25) tons per twelve (12) consecutive month period.

Compliance with these limits renders 326 IAC 20-14 and 40 CFR 63, Subpart JJ not applicable.

D.1.3 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 by spray booths EU-01A, EU-01B, EU-01C, EU-01D, EU-01E, EU-01F, EU-01G and EU-01H shall utilize one (1) 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.1.4 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating operations, identified as EU-01A through EU-01H, shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-4(a)(3)(A)][326 IAC 8-1-2(a)]

Compliance with the VOC limitation contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets or Certified Product Data Sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4

D.1.7 Hazardous Air Pollutants (HAP) [40 CFR 63, Subpart JJ] [326 IAC 20-14] [326 IAC 2-4.1]

Compliance with the HAP content limitations contained in Condition D.1.2 shall be determined by the following equations;

- (a) Single HAP emissions shall be based on the following equation:

$$\text{Source-wide Single HAP Emissions (tpy)} = \Sigma (\text{Single HAP containing material usage (Gallons)} \times \text{HAP content (lbs/gallon)} \times 1 \text{ ton} / 2000 \text{ lbs})$$

- (b) Combined HAP emissions shall be based on the following equation:

$$\text{Total HAP emissions (tpy)} = \Sigma (\text{Combined HAP containing material usage (Gallons)} \times \text{HAP content (lbs/gallon)} \times 1 \text{ ton} / 2000 \text{ lbs})$$

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

D.1.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry particulate filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S1,

S2, S3, S4, S5, S6 and S7, S8, S9, S10 and S11) while one (1) or more of the booths are in operation. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground, weather permitting. If a noticeable change in overspray emission, or evidence of overspray emission is observed at any stack exhaust, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.9 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.1, 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 limitation established in Condition D.1.1.
- (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) A log of the dates of use;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document the compliance status with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits and/or the HAP emission limits established in Condition D.1.2. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.
- (1) The HAP content and amount of each coating material, adhesive and solvent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) The total HAP usage for each month; and
 - (3) The weight of HAPs emitted for each compliance period.
- (c) To document the compliance status with Condition D.1.8:
- (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).
- (d) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

D.1.10 Reporting Requirements

- (a) A quarterly summary of the information to document the compliance status with Conditions D.1.1 and D.1.2 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official," as defined by 326 IAC 2-7-1 (34).

SECTION D.2

FACILITY OPERATION CONDITIONS

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

Insignificant Activities

- (a) Woodworking operations, processing a combined maximum of 815 pounds of wood per hour, having a maximum outlet grain loading of 0.01 grain per dry standard cubic foot of outlet air and a maximum exhaust flow rate of 40,000 cubic feet per minute. The portion of woodworking operations processing a maximum of 765 pounds of wood per hour is controlled by baghouse BH-1 and the portion of woodworking operations processing a maximum of 50 pounds of wood per hour is controlled by baghouse BH-2. [326 IAC 2-7-1(21)(G)(xxx)] [326 IAC 6-3-2].
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, consisting of one (1) corian countertop operation processing a maximum of 250 pounds of countertops per hour. Particulate emissions from the corian countertop operation are controlled by one (1) dust collector, identified as BH-3, and exhausting within the building and then to general ventilation. [326 IAC 2-7-1(21)(G)(xxiii)] [326 IAC 6-3-2].

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

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

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

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

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

D.2.2 Particulate [326 IAC 6-3-2]

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

- (a) The insignificant corian countertop operation controlled by dust collector BH-3 shall not exceed 1.02 pounds per hour when operating at a process weight rate of 250 pounds per hour.
- (b) The insignificant woodworking facilities controlled by baghouse BH-1 shall not exceed 2.15 pounds per hour when operating at a process weight rate of 765 pounds per hour.

- (c) The insignificant woodworking facilities controlled by baghouse BH-2 shall not exceed 0.551 pounds per hour when operating at a process weight rate of less than 100 pounds per hour.

Interpolation of the data for the process weight rate from 100 pounds per hour up to 60,000 pounds per hour shall be accomplished by use of the equation:

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

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

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.2.4 Particulate Control [326 IAC 2-7-21(1)(G)(xxx)(DD)][326 IAC 6-3-2][326 IAC 2-7-6(6)]

- (a) The baghouses for particulate control (BH-1 and BH-2) shall be in operation at all times when the insignificant woodworking facilities are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.2.5 Particulate Control [326 IAC 6-3-2] [326 IAC 2-7-6(6)]

- (a) Pursuant to 326 IAC 6-3-2, the baghouse (BH-3) for particulate control shall be in operation at all times when the insignificant corian countertop operation is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.2.6 Baghouse Inspections [326 IAC 2-7-21(1)(G)(xxx)(FF)]

An inspection shall be performed each calendar quarter of all bags controlling the insignificant woodworking facilities when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

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

D.2.7 Broken or Failed Bag Detection [40 CFR 64][326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

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

event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

D.2.8 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.2.1(c) and D.2.6, the Permittee shall maintain records of the results of the inspections required under Conditions D.2.1(c) and D.2.6 and the dates the vents are redirected.
- (b) To document the compliance status with Condition D.2.1(c), the Permittee shall maintain records of daily visible emission notations of the baghouse exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation, (i.e. the process did not operate that day).
- (c) The Permittee shall maintain records of corrective actions to document the compliance status with 326 IAC 2-7-21(1)(G)(xxx)(GG)(dd).
- (d) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Native Hardwoods, Inc.
Source Address: 316 Roske Drive, Elkhart, Indiana 46514
Part 70 Permit No.: T039-17724-00460

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Native Hardwoods, Inc.
Source Address: 316 Roske Drive, Elkhart, Indiana 46514
Part 70 Permit No.: T039-17724-00460

This form consists of 2 pages

Page 1 of 2

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

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:

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

Part 70 Operating Permit Quarterly Report

Source Name: Native Hardwoods, Inc.
 Source Address: 316 Roske Drive, Elkhart, Indiana 46514
 Part 70 Permit No.: T039-17724-00460
 Facility: Surface coating operations identified as EU-01A through EU-01H
 Parameter: Volatile Organic Compound (VOC) Usage
 Limit: Two hundred forty-nine (249) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

Month	Emission Units	Column 1	Column 2	Column 1 + Column 2
		This Month	Previous 11 Months	12 Month Total
Month 1	EU-01A - EU-01H			
Month 2	EU-01A - EU-01H			
Month 3	EU-01A - EU-01H			

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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

Part 70 Operating Permit Quarterly Report

Source Name: Native Hardwoods, Inc.
 Source Address: 316 Roske Drive, Elkhart, Indiana 46514
 Part 70 Permit No.: T039-17724-00460
 Facility: Surface coating operations identified as EU-01A through EU-01H
 Parameter: Single HAP and Combined HAP Emissions
 Limit: Nine and nine-tenths (9.9) tons of any single HAP per twelve (12) consecutive month period, with compliance determined at the end of each month, and twenty-four and eight -tenths(24.8) tons of any combination of HAPs per twelve (12) consecutive month period, with compliance determined at the end of each month.

Single HAP emissions (tpy) = Σ (Single HAP containing material usage (Gallons) X HAP content (lbs/gallon) X 1 ton / 2000 lbs)

Total HAP emissions (tpy) = Σ (Combined HAP containing material usage (Gallons) X HAP content (lbs/gallon) X 1 ton / 2000 lbs)

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2	Column 3	Column 4	Column 3 + Column 4
	Single HAP This Month	Single HAP Previous 11 Months	Single HAP 12 Month Total	Combined HAPs This Month	Combined HAPs Previous 11 Months	Combined HAPs 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 _____

Phone: _____

Date: _____

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

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

Source Name: Native Hardwoods, Inc.
Source Address: 316 Roske Drive, Elkhart, Indiana 46514
Part 70 Permit No.: T039-17724-00460

Months: _____ to _____ Year: _____

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements of this permit, 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:

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name:	Native Hardwoods, Inc.
Source Location:	316 Roske Drive, Elkhart, Indiana 46514
County:	Elkhart
SIC Code:	2499, 2498
Permit Renewal No.:	T039-29305-00460
Permit Reviewer:	APT

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Renewal application from Native Hardwoods, Inc., relating to the operation of a stationary wood furniture milling, sanding and surface coating plant. On May 26, 2010, Native Hardwoods, Inc. submitted an application to the OAQ requesting to renew its operating permit. Native Hardwoods, Inc. was issued its first Part 70 Operating Permit Renewal (T039-17724-00460) on March 29, 2006.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Four (4) air-assisted airless paint spray booths, identified as EU-01A through EU-01D, each constructed in 1997, each coating a maximum of 208.5 square feet of wood per hour, each using dry filters for overspray control, and exhausting to stacks S1 through S4, respectively;
- (b) One (1) spray booth equipped with HVLP spray guns, identified as EU-01E, constructed in 1997, applying adhesives to wood surfaces at a maximum rate of 12.5 square feet of wood per hour, using dry filters for overspray control, and exhausting to stack S5;
- (c) One (1) spray booth equipped with HVLP spray guns, identified as EU-01F, constructed in 2002, with a maximum throughput capacity of 160 square feet of wood per hour, using dry filters for particulate control, and exhausting to stack S6;
- (d) One (1) spray booth equipped with HVLP spray guns, identified as EU-01G, constructed in 2006, with a maximum throughput capacity of 160 square feet of wood per hour, using dry filters for particulate control, and exhausting to stack S7; and
- (e) One (1) flat-line spray booth equipped with HVLP spray guns, identified as EU-01H, approved in 2010 for construction, with a maximum throughput capacity of 864 square feet of wood per hour, using dry filters for particulate control, and exhausting to stacks S8, S9, S10, and S11.

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

There are no unpermitted emission units operating at this source during this review process.

Insignificant Activities

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

- (a) Woodworking operations, processing a combined maximum of 815 pounds of wood per hour, having a maximum outlet grain loading of 0.01 grains per dry standard cubic foot of outlet air and a maximum exhaust flow rate of 40,000 cubic feet per minute. The portion of woodworking operations processing a maximum of 765 pounds of wood per hour is controlled by baghouse BH-1 and the portion of woodworking operations processing a maximum of 50 pounds of wood per hour is controlled by baghouse BH-2. [326 IAC 2-7-1(21)(G)(xxx)] [326 IAC 6-3-2]
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, consisting of one (1) corian countertop operation processing a maximum of 250 pounds of countertops per hour. Particulate emissions from the corian countertop operation are controlled by one (1) dust collector, identified as BH-3, and exhausting within the building and then to general ventilation. [326 IAC 2-7-1(21)(G)(xxiii)] [326 IAC 6-3-2]
- (c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (d) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, consisting of:
 - (1) Three (3) natural gas-fired split heating systems, identified as HU01 - HU03, each rated at 0.125 million British thermal units per hour (MMBtu/hr);
 - (2) Fifteen (15) natural gas-fired infrared heaters, identified as HU04 - HU11, and HU-14 - HU-20, each rated at 0.200 MMBtu/hr; and
 - (3) Two (2) natural gas-fired unit heaters, identified as HU12 and HU13, each rated at 0.175 MMBtu/hr.
- (e) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.
- (f) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (g) Blowdown from any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

Existing Approvals

Since the issuance of the Part 70 Operating Permit Renewal (039-17724-00460) on March 29, 2006, the source has constructed or has been operating under the following additional approvals:

- (a) Administrative Amendment No. 039-20924-00460, issued on April 22, 2005.
- (b) Minor Source Modification No. 039-22714-00460, issued on May 18, 2006.
- (c) Minor Permit Modification No. 039-22824-00460, issued on July 20, 2006.
- (d) Significant Source Modification 039-29317-00460, issued on September 29, 2010.
- (e) Significant Permit Modification 039-29327-00460, issued on October 15, 2010.

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

Enforcement Issue

There are no enforcement actions pending.

Air Pollution Control Justification as an Integral Part of the Process

In October 1993, a Final Order Granting Summary Judgment was signed by Administrative Law Judge ("ALJ") Garrettson, resolving an appeal filed by Kimball Hospitality Furniture Inc. (Cause Nos. 92-A-J-730 and 92-A-J-833) related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls are necessary for the facility to produce its normal product and are integral to the normal operation of the facility, and therefore, potential emissions should be calculated after controls. Based on this ruling, for Part 70 purposes potential emissions for particulate matter were calculated after consideration of the controls.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective July 19, 2007, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.

¹Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including Elkhart County, and is a maintenance area for the 1-hour National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM_{2.5}.

- (a) **Ozone Standards**
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. Elkhart 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) Elkhart County has been classified as attainment for PM_{2.5}. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions. This rule became effective on July 15, 2008. Indiana has three (3) years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions until 326 IAC 2-2 is revised.

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

Fugitive Emissions

Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD and Part 70 Permit applicability.

Unrestricted Potential Emissions

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

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM, PM₁₀, and VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 and will be issued a Part 70 Operating Permit Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, because the source met the following:

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

Potential to Emit After Issuance

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

Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)								
Process / Emission Unit	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	Total HAPs	Worst Single HAP
All Surface Coating - EU01A, EU01B, EU01C, EU01D, EU01E, EU01F, EU01G, EU-01H and wipe stain booth	controlled to less than < 10	controlled to less than < 10	-----	Source-wide limit < 250	-----	-----	Limited to < 24.8	Limited to < 9.9
Wood Working (BH-1 through BH-3)	Limited to 15.4	Limited to 15.4	< 2		< 2	< 2		
Natural Gas-Fired Heaters (HU01 - HU13)	< 1	< 1						
Total PTE of Entire Source	< 100	< 100	< 1	< 250	< 2	< 2	<25	<10
Title V Major Source Thresholds	NA	100	100	100	100	100	25	10
PSD Major Source Threshold	250	250	250	250	250	250	NA	NA

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

- (a) This existing stationary source is not major for PSD because the emissions of each regulated pollutant are less than two hundred fifty (<250) tons per year, and it is not in one (1) of the twenty-eight (28) listed source categories.

Federal Rule Applicability

NSPS:

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

NESHAP:

There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) applicable to this proposed renewal.

This source is not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart JJ, which is incorporated by reference as 326 IAC 20-14. Although the source is engaged, either in part or in whole, in the manufacture of wood furniture or wood furniture components, the source has limited source-wide single HAP emissions to less than ten (10) tons per year and source-wide combined HAP to less than twenty-five (25) tons per year in order to avoid becoming a major source of HAPs as defined in 40 CFR 63.2. Therefore, the requirements of the National Emission Standards for Wood Furniture Manufacturing Operations (40 CFR 63, Subpart JJ, 326 IAC 20-14) are not included in the permit for the surface coating operations at this source.

Emissions of HAPs from the surface coating operations, identified as EU-01A through EU-01H, shall be limited as follows:

- (a) The total HAP input, including coatings, dilution solvents, and cleaning solvents, to the surface coating operations, identified as EU-01A through EU-01H, combined, shall be limited such that any single HAP emitted is less than nine and nine-tenths (9.9) tons per twelve (12) consecutive month period, with compliance determined at the end of each

month. This will limit source-wide single HAP emissions to less than ten (10) tons per twelve (12) consecutive month period.

- (b) The total HAP input, including coatings, dilution solvents, and cleaning solvents, to the surface coating operations, identified as EU-01A through EU-01H, combined, shall be limited such that combined HAPs emitted is less than twenty-four and eight-tenths (24.8) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit source-wide HAP emissions to less than twenty-five (25) tons per twelve (12) consecutive month period.

CAM:

Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each pollutant-specific emission unit that meets the following criteria:

- (1) has a potential to emit before controls equal to or greater than the Part 70 major source threshold for the pollutant involved;
- (2) is subject to an emission limitation or standard for that pollutant; and
- (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each new or modified emission unit involved:

CAM Applicability Analysis								
Emission Unit	Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (ton/yr)	Controlled PTE (ton/yr)	Part 70 Major Source Threshold (ton/yr)	CAM Applicable (Y/N)	Large Unit (Y/N)
EU-01A	VOC	N	Y	27.01	27.01	100	N	N
EU-01A	PM/PM10	Y	Y	2.317	0.23	100	N	N
EU-01B	VOC	N	Y	27.01	27.01	100	N	N
EU-01B	PM/PM10	Y	Y	2.317	0.23	100	N	N
EU-01C	VOC	N	Y	20.36	20.36	100	N	N
EU-01C	PM/PM10	Y	Y	8.054	0.79	100	N	N
EU-01D	VOC	N	Y	20.36	20.36	100	N	N
EU-01D	PM/PM10	Y	Y	8.054	0.79	100	N	N
EU-01E	VOC	N	Y	0.981	0.981	100	N	N
EU-01E	PM/PM10	Y	Y	0.077	0.01	100	N	N
EU-01F	VOC	N	Y	25.743	25.743	100	N	N
EU-01F	PM/PM10	Y	Y	1.917	0.19	100	N	N
EU-01G	VOC	N	Y	20.725	20.725	100	N	N
EU-01G	PM/PM10	Y	Y	1.778	0.17	100	N	N
EU-01H	VOC	N	Y	127.05	127.05	100	N	N
EU-01H	PM/PM10	Y	Y	16.88	1.67	100	N	N
BH-1	PM/PM10	Y	Y	249	2.49	100	Y	N
BH-2	PM/PM10	Y	Y	231	2.31	100	Y	N
BH-3	PM/PM10	Y	Y	4.42	0.04	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring (CAM), are applicable to the woodworking operations at this source identified as BH-1, BH-2

The CAM plan for these emission units is as follows:

- (a) The Permittee shall use baghouses to control particulate emissions from the insignificant woodworking operations (BH-1 and BH-2). The baghouses for particulate control shall be in operation at all times when the insignificant woodworking facilities are in operation. An inspection shall be performed each calendar quarter of all bags controlling the insignificant woodworking facilities when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced. For the baghouses controlling the insignificant woodworking facilities, in the event that bag failure has been observed:
- (1) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
 - (2) For a single compartment baghouse controlling emissions from a process operated continuously, failed units and the associated process shall be shut down immediately until the failed unit have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

The total VOC input (including coatings, dilution solvents, and cleaning solvents) to the surface coating operations, identified as EU-01A through EU-01H, combined, shall not exceed 249 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This requirement limits source-wide VOC emissions to less than 250 tons per year.

Compliance with this limit renders 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

326 IAC 2-4.1 (Hazardous Air Pollutants)

The source has accepted source-wide HAP limits to maintain minor status under the provisions of Section 112(b) of the CAA. Compliance with those limits ensures the source will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source, not located in Lake, Porter, or LaPorte County, is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit pursuant to 326 IAC 2-7 (Part 70). The potential to emit of VOC and PM₁₀ is less than 250 tons per year; and the potential to emit of

CO, NO_x, and SO₂ is less than 2,500 tons per year. Therefore, pursuant to 326 IAC 2-6-3(a)(2), triennial reporting is required. An emission statement shall be submitted in accordance with the compliance schedule in 326 IAC 2-6-3 by July 1, 2013, and every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)

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

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

326 IAC 6-4 (Fugitive Dust)

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.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

Pursuant to 326 IAC 6-5-1(a), the source is not subject to the requirements of 326 IAC 6-5 because it does not operate any facilities with the potential to emit twenty-five (25) tons per year of fugitive particulate matter.

326 IAC 8-6 (Organic Solvent Emission Limitations)

Pursuant to 326 IAC 8-6-1, the source is not subject to the requirements of 326 IAC 8-6 because it was constructed after January 1, 1980, is not located in Lake or Marion Counties, and is limited by other article 8 rules.

State Rule Applicability – Individual Facilities

State Rule Applicability - Surface Coating Booths

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

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating facilities at this source (EU-01A through EU-01H) shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

326 IAC 8-1-6 (Volatile Organic Compounds (VOC))

Pursuant to 326 IAC 8-1-6(3)(A), spray booths EU-01A through EU-01H are not subject to the requirements of 326 IAC 8-1-6. Although they were constructed after January 1, 1980, and have potential VOC emissions over twenty-five (25) tons per year, these units are not subject to 326 IAC 8-1-6 because they are specifically regulated by 326 IAC 8-2-12.

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

Spray booths EU-01A through EU-01H are subject to the requirements of 326 IAC 8-2-12 because they were constructed after July 1, 1990, apply surface coatings to wood furniture, and have actual pre-control VOC emissions greater than fifteen (15) pounds per day.

- (a) Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the coatings applied to wood furniture and cabinets by spray booths EU-01A through EU-01H shall utilize one (1) 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.

State Rule Applicability - Insignificant Activities

326 IAC 2-7-1(21)(G)(xxx)(AA),(BB), and (CC) (Insignificant Baghouse Limitations)

The exhaust from baghouses BH-1 and BH-2, controlling emissions from the insignificant woodworking equipment, shall not (when exhausting to the atmosphere):

- (a) Exceed forty thousand (40,000) cubic feet of air per minute, in aggregate;
- (b) Contain particulate matter with a diameter less than ten (10) microns (PM_{10}) in excess of one-hundredth (0.01) grain per dry standard cubic foot of outlet air; and
- (c) Exceed ten percent (10%) opacity.

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

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

- (a) The insignificant corian countertop operation controlled by dust collector BH-3 shall not exceed 1.02 pounds per hour when operating at a process weight rate of 250 pounds per hour.
- (b) The insignificant woodworking facilities controlled by baghouse BH-1 shall not exceed 2.15 pounds per hour when operating at a process weight rate of 765 pounds per hour.
- (c) The insignificant woodworking facilities controlled by baghouse BH-2 shall not exceed 0.551 pounds per hour when operating at a process weight rate of less than 100 pounds per hour.

Interpolation of the data for the process weight rate from 100 pounds per hour up to 60,000 pounds per hour shall be accomplished by use of the equation:

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

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

The baghouses (BH-1, BH-2 and BH-3) for PM control shall be in operation at all times that the insignificant woodworking facilities and the Corian countertop operation are in operation in order to comply with these limits.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The insignificant natural gas-fired combustion sources HU-01 through HU-20 are not subject to the requirements of 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations) because they each have the potential to emit less than twenty-five (25) tons per year of SO_2 .

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.

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

1. The insignificant woodworking operations (BH-1, BH-2) have applicable compliance monitoring conditions as specified below:
 - (a) Visible emissions from the baghouse shall be observed daily using procedures in accordance with Method 22 and normal or abnormal emissions are recorded. In the event abnormal emissions are observed for greater than six (6) minutes in duration, the baghouse shall be inspected and corrective actions, such as replacing or reseating bags, shall be initiated, when necessary.
 - (b) The opacity from baghouses BH-1 and BH-2 shall not exceed ten percent (10%).
 - (c) An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.
 - (d) In the event that bag failure has been observed:
 - (1) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
 - (2) For a single compartment baghouse controlling emissions from a process operated continuously, failed units and the associated process shall be shut down immediately until the failed unit have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be

shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

These monitoring conditions are necessary because the baghouses for the insignificant woodworking operations must operate properly to ensure compliance with 326 IAC 6-3-2, 326 IAC 2-7-1(21)(G)(xxx), and 326 IAC 2-7 (Part 70).

2. The surface coating operations identified as EU-01A through EU-01H, have applicable compliance monitoring conditions as specified below:
 - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry particulate filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S1, S2, S3, S4, S5, S6 and S7, S8, S9, S10 and S11) while one (1) or more of the booths are in operation. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.
 - (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground, weather permitting. If a noticeable change in overspray emission, or evidence of overspray emission is observed at any stack exhaust, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

These monitoring conditions are necessary because the dry filters for the surface coating operations must operate properly to ensure compliance with 326 IAC 6-3-2, 326 IAC 2-7 (Part 70) and 40 CFR 64 (CAM).

Recommendation

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

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

An application for the purposes of this review was received on May 26, 2010.

Conclusion

The operation of this stationary wood furniture milling, sanding and surface coating plant shall be subject to the conditions of Part 70 Operating Permit Renewal T039-29305-00460.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Angela Taylor at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCM 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-6543 or toll free at 1-800-451-6027 extension 6543.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov.

**Appendix A: Emissions Calculations
Emissions Summary**

Company Name: Native Hardwoods, Inc.
Address: 316 Roske Drive, Elkhart, IN 46514
SIC Code: 2499, 2498
Permit Number: TVOPR 039-29305-00460
Reviewer: APT
Date: 7/10/2010

Emission Units	Uncontrolled				CRITERIA POLLUTANTS				Highest Single HAP	
	PM	PM10	PM2.5	SO2	NOx	VOC	CO			
EU-01A	2.317	2.317	2.317	-----	-----	27.007	-----	1.962	Xylene	
EU-01B	2.317	2.317	2.317	-----	-----	27.007	-----	1.962	Xylene	
EU-01C	8.054	8.054	8.054	-----	-----	20.359	-----	1.993	Toluene	
EU-01D	8.054	8.054	8.054	-----	-----	20.359	-----	1.993	Toluene	
EU-01E	0.077	0.077	0.077	-----	-----	0.981	-----	0.260	Toluene	
EU-01F	1.917	1.917	1.917	-----	-----	25.743	-----	0.664	Cumene	
EU-01G	1.778	1.778	1.778	-----	-----	20.725	-----	1.506	Xylene	
EU-01H	16.878	16.878	16.878	-----	-----	127.047	-----	24.640	Xylene	
Woodworking	484.663	484.663	484.663	-----	-----	-----	-----	-----	-----	
Natural Gas Combustion / heaters	0.124	0.124	0.124	0.010	1.632	0.090	1.371	0.029	Hexane	
TOTALS	526.178	526.178	526.178	0.010	1.632	269.317	1.371	30.071	Xylene	

Emission Units	Controlled/Limited				CRITERIA POLLUTANTS				Highest Single HAP	Combined HAPs
	PM	PM10	PM2.5	SO2	NOx	VOC	CO			
EU-01A	0.23	0.23	0.23	-----	-----	< 249	-----	< 9.9	< 24.8	
EU-01B	0.23	0.23	0.23	-----	-----		-----			
EU-01C	0.79	0.79	0.79	-----	-----		-----			
EU-01D	0.79	0.79	0.79	-----	-----		-----			
EU-01E	0.01	0.01	0.01	-----	-----		-----			
EU-01F	0.19	0.19	0.19	-----	-----		-----			
EU-01G	0.17	0.17	0.17	-----	-----		-----			
EU-01H	1.66	1.66	1.66	-----	-----		-----			
Woodworking	4.85	4.85	4.85	-----	-----		-----			
Natural Gas Combustion / heaters	0.12	0.12	0.12							

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

TSD Appendix A: Page 2 of 5

Company Name: Native Hardwoods, Inc.
Address: 316 Roske Drive, Elkhart, IN 46514
SIC Code: 2499, 2498
Permit Number: TVOPR 039-29305-00460
Reviewer: APT
Date: 7/10/2010

Material	Unit ID	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. - gal/unit (gal./sq. ft.)	Maximum unit/hour (sq. ft. / hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	lb VOC/gal solids	Transfer Efficiency	Uncontrolled Particulate Potential (lb/hr)	PM Control Efficiency	Controlled Particulate Potential (lb/hr)	Uncontrolled Particulate Potential (ton/yr)	Controlled Particulate Potential (tons/yr)
Chemcraft Optiseal 900	EU-01A	7.6	78.61%	21.1%	57.9%	19.2%	14.19%	0.00625	208.500	5.44	4.40	5.73	137.54	25.10	30.99	75%	0.53	90%	0.05	2.32	0.23
Laquer Thinner	EU-01A	7.0	100.00%	0.0%	100.0%	0.0%	0.00%	0.00026	208.500	7.00	7.00	0.37	8.93	1.63	0.00	75%	0.00	90%	0.00	0.00	0.00
MEK	EU-01A	6.7	100.00%	0.0%	100.0%	0.0%	0.00%	0.00005	208.500	6.73	6.73	0.06	1.52	0.28	0.00	100%	0.00	90%	0.00	0.00	0.00
Chemcraft Optiseal 900	EU-01B	7.6	78.61%	21.1%	57.9%	19.2%	14.19%	0.00625	208.500	5.44	4.40	5.73	137.54	25.10	30.99	75%	0.53	90%	0.05	2.32	0.23
Laquer Thinner	EU-01B	7.0	100.00%	0.0%	100.0%	0.0%	0.00%	0.00026	208.500	7.00	7.00	0.37	8.93	1.63	0.00	75%	0.00	90%	0.00	0.00	0.00
MEK	EU-01B	6.7	100.00%	0.0%	100.0%	0.0%	0.00%	0.00005	208.500	6.73	6.73	0.06	1.52	0.28	0.00	100%	0.00	90%	0.00	0.00	0.00
Plasticlear 90 Sheen	EU-01C	8.4	38.40%	0.0%	38.4%	0.0%	61.60%	0.00685	208.500	3.21	3.21	4.58	110.04	20.08	5.21	75%	1.84	90%	0.18	8.05	0.79
MEK	EU-01C	6.7	100.00%	0.0%	100.0%	0.0%	0.00%	0.00005	208.500	6.73	6.73	0.06	1.52	0.28	0.00	100%	0.00	0%	0.00	0.00	0.00
Plasticlear 90 Sheen	EU-01D	8.4	38.40%	0.0%	38.4%	0.0%	61.60%	0.00685	208.500	3.21	3.21	4.58	110.04	20.08	5.21	75%	1.84	90%	0.18	8.05	0.79
MEK	EU-01D	6.7	100.00%	0.0%	100.0%	0.0%	0.00%	0.00005	208.500	6.73	6.73	0.06	1.52	0.28	0.00	100%	0.00	NA	0.00	0.00	0.00
Clear Spray Adhesive	EU-01E	6.3	82.25%	26.5%	55.8%	0.0%	0.00%	0.00500	12.500	3.52	3.52	0.22	5.29	0.96	0.00	75%	0.02	90%	0.00	0.08	0.01
MEK	EU-01E	6.7	100.00%	0.0%	100.0%	0.0%	0.00%	0.00005	12.500	6.73	6.73	0.00	0.09	0.02	0.00	100%	0.00	NA	0.00	0.00	0.00
Windsor Birch	EU-01F	7.6	76.90%	0.0%	76.9%	0.0%	0.0%	0.00625	160.000	5.83	5.83	5.83	139.90	25.53	0.00	75%	0.44	90%	0.04	1.92	0.19
MEK	EU-01F	6.7	100.00%	0.0%	100.0%	0.0%	0.00%	0.00005	160.000	6.73	6.73	0.05	1.16	0.21	0.00	100%	0.00	NA	0.00	0.00	0.00
Chemcraft Optiseal 900	EU-01G	7.6	78.61%	21.1%	57.9%	19.2%	14.19%	0.00625	160.000	5.44	4.40	4.40	105.54	19.26	30.99	75%	0.41	90%	0.04	1.78	0.17
Laquer Thinner	EU-01G	7.0	100.00%	0.0%	100.0%	0.0%	0.00%	0.00026	160.000	7.00	7.00	0.29	6.85	1.25	0.00	75%	0.00	90%	0.00	0.00	0.00
MEK	EU-01G	6.7	100.00%	0.0%	100.0%	0.0%	0.00%	0.00005	160.000	6.73	6.73	0.05	1.16	0.21	0.00	75%	0.00	90%	0.00	0.00	0.00
Sealer - 6627SS	EU-01H	7.7	72.60%	24.3%	48.3%	22.4%	27.40%	0.00850	864.000	4.76	3.70	27.17	652.11	119.01	13.50	75%	3.85	90%	0.39	16.88	1.66
Topcoat - Medium Rub Precat	EU-01H	7.4	77.00%	35.9%	41.1%	31.9%	23.00%	0.01010	864.000	4.47	3.04	26.54	636.97	116.25	13.22	75%	3.71	90%	0.37	16.26	1.60
Laquer Thinner	EU-01H	7.0	100.00%	0.0%	100.0%	0.0%	0.00%	0.00026	864.000	7.00	7.00	1.57	37.74	6.89	0.00	75%	0.00	NA	NA	NA	NA
MEK	EU-01H	6.8	100.00%	0.0%	100.0%	0.0%	0.00%	0.00005	864.000	6.75	6.75	0.26	6.30	1.15	0.00	75%	0.00	NA	NA	NA	NA
PTE														269.23							
																			41.39	4.06	

METHODOLOGY

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

Appendix A: Emission Calculations
HAP Emissions from Spray Coating Operations
Company Name: Native Hardwoods, Inc.
Address: 316 Roske Drive, Elkhart, IN 46514
SIC Code: 2499, 2498
Permit Number: TVOPR 039-29305-00460
Reviewer: APT
Date: 7/10/2010

Material	Unit ID	Density (lb/gal)	Gal of Mat. - gal/unit (gal./sq. ft.)	Maximum unit/hour (sq. ft. / hr)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Ethylbenzene	Weight % Cumene	Weight % Hexane	PTE Xylene (ton/yr)	PTE Toluene (ton/yr)	PTE Formaldehyde (ton/yr)	PTE Ethylbenzene (ton/yr)	PTE Cumene (ton/yr)	PTE Hexane (ton/yr)	Line Combined HAPS (ton/yr)
Chemcraft Optiseal 900	EU-01A	7.6	0.00625	208.500	4.53%	0.00%	0.07%	0.94%	0.00%	0.00%	1.96	0.00	0.03	0.41	0.00	0.00	2.74
Laquer Thinner	EU-01A	7.0	0.00026	208.500	0.00%	20.71%	0.00%	0.00%	0.00%	0.00%	0.00	0.34	0.00	0.00	0.00	0.00	
Chemcraft Optiseal 900	EU-01B	7.6	0.00625	208.500	4.53%	0.00%	0.07%	0.94%	0.00%	0.00%	1.96	0.00	0.03	0.41	0.00	0.00	2.74
Laquer Thinner	EU-01B	7.0	0.00026	208.500	0.00%	20.71%	0.00%	0.00%	0.00%	0.00%	0.00	0.34	0.00	0.00	0.00	0.00	
Plasticlear 90 Sheen	EU-01C	8.4	0.00685	208.500	0.87%	3.81%	1.78%	1.22%	0.00%	0.00%	0.45	1.99	0.93	0.64	0.00	0.00	4.01
Plasticlear 90 Sheen	EU-01D	8.4	0.00685	208.500	0.87%	3.81%	1.78%	1.22%	0.00%	0.00%	0.45	1.99	0.93	0.64	0.00	0.00	4.01
Clear Spray Adhesive	EU-01E	6.3	0.00500	12.500	0.00%	15.0%	0.00%	0.00%	0.00%	5.0%	0.00	0.26	0.00	0.00	0.00	0.09	0.35
Windsor Birch	EU-01F	7.6	0.00625	160.000	1.0%	0.00%	0.00%	1.00%	2.00%	0.00%	0.33	0.00	0.00	0.33	0.66	0.00	1.33
Chemcraft Optiseal 900	EU-01G	7.59	0.00625	160	4.53%	0.00%	0.07%	0.94%	0.00%	0.00%	1.51	0.00	0.02	0.31	0.00	0.00	2.11
Laquer Thinner	EU-01G	7.00	0.00026	160	0.00%	20.71%	0.00%	0.00%	0.00%	0.00%	0.00	0.26	0.00	0.00	0.00	0.00	
Sealer - 6627SS	EU-01H	7.7	0.00850	864.000	10.0%	0.00%	1.00%	1.00%	0.00%	0.00%	24.64	0.00	2.46	2.46	0.00	0.00	31.36
Topcoat - Medium Rub Precat	EU-01H	7.4	0.01010	864.000	0.00%	0.00%	1.0%	0.00%	0.00%	0.00%	0.00	0.00	2.83	0.00	0.00	0.00	
Laquer Thinner	EU-01H	7.0	0.00026	864.000	0.00%	20.71%	0.00%	0.00%	0.00%	0.00%	0.00	1.43	0.00	0.00	0.00	0.00	
Individual HAP Totals											31.31	6.61	4.77	5.20	0.66	0.09	
Combined HAP Total											48.64						

METHODOLOGY

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

Appendix A: Emission Calculations
Particulate Emissions from Woodworking Operations

Company Name: Native Hardwoods, Inc.
Address: 316 Roske Drive, Elkhart, IN 46514
SIC Code: 2499, 2498
Permit Number: TVOPR 039-29305-00460
Reviewer: APT
Date: 7/10/2010

Baghouse	Process Weight Rate (lbs/hr)	Air Flow Rate (acfm)	Outlet Grain Loading (gr/ascf)	Control Efficiency (%)	PTE PM/PM10/PM2.5 Uncontrolled (ton/yr)	PTE PM/PM10/PM2.5 Controlled (ton/yr)	326 IAC 6-3-2 Maximum Allowable Emissions (lb/hr)	Maximum Allowable Emissions (tons/yr)
BH-1	765	24600	0.0027	99.0%	249	2.49	2.15	9.4
BH-2	50	20500	0.003	99.0%	231	2.31	0.35	1.5
BH-3	250	3000	0.00039	99.0%	4.42	0.04	1.02	4.5
TOTAL					485	4.85	3.52	15.4

Methodology

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

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

**Appendix A: Emissions Calculations
Natural Gas Fired Space Heaters**

Company Name: Native Hardwoods, Inc.
Address: 316 Roske Drive, Elkhart, IN 46514
SIC Code: 2499, 2498
Permit Number: TVOPR 039-29305-00460
Reviewer: APT
Date: 7/10/2010

# of Emission Units	Emission Unit ID	Total Heat Input Capacity (MMBtu/hr)	Total Maximum Potential Throughput (MMCF/yr)
3	HU01-HU-03	0.38	3.29
15	HU04-HU11, HU14-HU20	3.00	26.3
2	HU12-HU13	0.35	3.07

Emission Factors (lbs/MMCF)					
PM*	PM10*	SO ₂	NO _x **	CO	VOC
7.6	7.6	0.6	100	84.0	5.5

Potential To Emit (tons/yr)						
Emission Unit ID	PM	PM10	SO ₂	NO _x	CO	VOC
HU01-HU03	0.01	0.01	0.00	0.16	0.14	0.01
HU04-HU11, HU14-HU20	0.10	0.10	0.01	1.31	1.10	0.07
HU12-HU13	0.01	0.01	0.00	0.15	0.13	0.01
TOTALS	0.12	0.12	0.01	1.63	1.37	0.09

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

**Emission factor for NO_x: Uncontrolled = 100 lb/MMCF

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

1 MMBtu = 1,000,000 Btu

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

All Emission factors are based on normal firing.

Methodology

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

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

Total HAP emissions from the natural gas boiler are negligible.

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.10E-03	1.20E-03	7.50E-02	1.80E+00	3.40E-03
HU01-HU-03 Potential Emissions in tons/yr	3.45E-06	1.97E-06	1.23E-04	2.96E-03	5.58E-06
HU04-HU11, HU14-HU20 Potential Emissions in tons/yr	2.76E-05	1.58E-05	9.86E-04	2.37E-02	4.47E-05
HU12-HU13 Potential Emissions in tons/yr	3.22E-06	1.84E-06	1.15E-04	2.76E-03	5.21E-06
Total	3.43E-05	1.96E-05	1.22E-03	2.94E-02	5.55E-05

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.00E-04	1.10E-03	1.40E-03	3.80E-04	2.10E-03
HU01-HU-03 Potential Emissions in tons/yr	8.21E-07	1.81E-06	2.30E-06	6.24E-07	3.45E-06
HU04-HU11, HU14-HU20 Potential Emissions in tons/yr	6.57E-06	1.45E-05	1.84E-05	4.99E-06	2.76E-05
HU12-HU13 Potential Emissions in tons/yr	7.67E-07	1.69E-06	2.15E-06	5.83E-07	3.22E-06
Total	8.16E-06	1.79E-05	2.28E-05	6.20E-06	3.43E-05

Methodology

Total HAPs
0.031

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.

(SUPPLEMENT D 3/98)

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

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.



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: Jim Edmundson
President
Native Hardwoods, Inc.
316 Roske Dr.
Elkhart IN 46516

DATE: Dec. 22, 2010

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

SUBJECT: Final Decision
Title V Renewal
039-29305-00460

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:
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

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

Dec. 22, 2010

TO: Elkhart Public Library

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

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

Applicant Name: Native Hardwoods, Inc.
Permit Number: 039-29305-00460

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

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											Remarks
1		Jim Edmunsdon President Native Hardwoods, Inc. 316 Roske Dr Elkhart IN 46516 (Source CAATS) <i>Via Confirm Delivery</i>									
2		Elkhart City Council and Mayors Office 229 South Second Street Elkhart IN 46516 (Local Official)									
3		Elkhart Public Library 300 S 2nd St Elkhart IN 46516-3184 (Library)									
4		Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 (Health Department)									
5		Laurence A. McHugh Barnes & Thornburg 100 North Michigan South Bend IN 46601-1632 (Affected Party)									
6		Bristol Town Council and Town Manager P.O. Box 122 Bristol IN 46507 (Local Official)									
7		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 (Local Official)									
8		Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 (Affected Party)									
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