



# 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](http://www.idem.IN.gov)

## NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

### Preliminary Findings Regarding the Renewal of a **Minor Source Operating Permit (MSOP)**

for **JEJ Molding** in **Elkhart County**

**Permit No. M039-29432-00337**

The Indiana Department of Environmental Management (IDEM), has received an application from JEJ Molding located at 1940 W Market St, Nappanee, IN for a renewal of their MSOP No. M039-21031-00337 issued on November 2, 2005. If approved by IDEM's Office of Air Quality (OAQ), this proposed renewal would allow JEJ Molding to continue to operate their existing source.

This draft MSOP Renewal does not contain any new equipment that would emit air pollutants; however, some conditions from previously issued permits/approvals have been corrected, changed or removed. This notice fulfills the public notice procedures to which those conditions are subject. IDEM has reviewed this application, and has developed preliminary findings, consisting of a draft permit and several supporting documents, that would allow for these changes.

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

Nappanee Public Library  
157 N Main St  
Nappanee, IN 46550

and

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

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

### **How can you participate in this process?**

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

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

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number M039-29432-00337 in all correspondence.

**Comments should be sent to:**

Christine L. Filutze  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for extension (3-8397)  
Or dial directly: (317) 233-8397  
E-mail: [cfilutze@idem.in.gov](mailto:cfilutze@idem.in.gov)

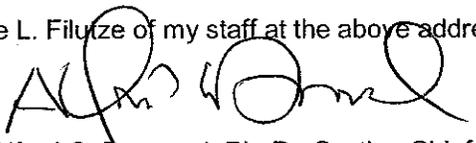
All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have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

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

**What will happen after IDEM makes a decision?**

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

If you have any questions please contact Christine L. Filutze or my staff at the above address.



Alfred C. Dumauval, Ph. D., Section Chief  
Permits Branch  
Office of Air Quality



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DRAFT

## Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

**JEJ Molding**  
**1940 W Market St**  
**Nappanee, Indiana 46550**

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

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

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

Operation Permit No.: M039-29432-00337	
Issued by:  Alfred C. Dumauval, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date:  Expiration Date:

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## SECTION A SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary wood molding and panel manufacturing source.

Source Address:	1940 W Market St, Nappanee, Indiana 46550
General Source Phone Number:	574-773-7941
SIC Code:	2431
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary

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

#### North Building

- (a) two (2) HVLP spray coating booths, each constructed in 1995, each with a maximum capacity of 5300 units per hour, using dry filters for overspray control, and each exhausting through one (1) stack (E8 and E9);
- (b) one (1) vacuum coater, constructed in 1995, with a maximum capacity of 5300 units per hour;
- (c) one (1) Acimall Compo machine, constructed in 1995, with a maximum capacity of 1800 feet per hour. This machine puts a line of wood dough on trim to add decorative accent. It is not a stain or adhesive, but does adhere to the wood;
- (d) eight (8) natural gas fired heaters, each constructed in 1986, each rated at 0.26 million Btu per hour (MMBtu/hr), and each exhausting through one (1) stack (H11, H12 H13, H14, H15, H16, H17, and H18);
- (e) nine (9) natural gas fired heaters, each constructed in 1986, each rated at 0.1 MMBtu/hr, and each exhausting through one (1) stack (H9, H10 and H32 - H38);
- (f) one (1) natural gas fired heater, constructed in 1995, rated at 2.675 MMBtu/hr, and exhausting through one (1) stack (H31);
- (g) miscellaneous woodworking equipment, each constructed in 1986, that includes: one (1) Dima 4 head adjustable sander; two (2) ten inch chop saws, four (4) voorwood vinyl laminator, and one (1) voorwood vinyl splitter;

- (h) one (1) 25 horsepower (HP) Honeyville cyclone, constructed in 1986, for controlling particulate matter (PM) emissions from woodworking equipment in north building, exhausting through one (1) stack (E7);
- (i) one (1) compressor, constructed in 1995.

### **South Building**

- (a) one (1) roller coater adhesive, constructed in 1986, with a maximum capacity of 200 units per hour;
- (b) six (6) natural gas-fired heaters, each constructed in 1986, each rated at 0.06 MMBtu/hr, and each exhausting through one (1) stack (H25, H26, H27, H28, H29, and H30);
- (c) four (4) natural gas-fired heaters, each constructed in 1986, each rated at 0.05 MMBtu/hr, and each exhausting through one (1) stack (H21, H22, H23, and H24);
- (d) one (1) natural gas-fired heater, constructed in 1986, rated at 0.125 MMBtu/hr, and exhausting through one (1) stack (H6);
- (e) one (1) natural gas-fired heater, constructed in 1986, rated at 0.3 MMBtu/hr, and exhausting through one (1) stack (H5);
- (f) four (4) natural gas-fired heaters, each constructed in 1986, each rated at 0.15 MMBtu/hr, and each exhausting through one (1) stack (H3, H4, H7, and H8);
- (g) one (1) natural gas-fired heater, constructed in 1986, rated at 0.13 MMBtu/hr, and exhausting through one (1) stack (H2);
- (h) one (1) natural gas-fired heater, constructed in 1986, rated at 0.2 MMBtu/hr, and exhausting through one (1) stack (H1);
- (i) two (1) natural gas-fired heaters, each constructed in 1986, each rated at 0.1 MMBtu/hr, and each exhausting through one (1) stack (H19 and H20);
- (j) miscellaneous woodworking equipment, each constructed in 1986, that includes: one (1) V groover with king E/2 feeder, two (2) Hermance gang rip saws, one (2) voorwood vinyl cutter, one (1) Sears radial arm saw, one (1) Delta motorized chop saw, nine (9) whirlwind upcut chop saws, one (1) Delta miter saw, one (1) L & L electronic edge gluer, one (1) Weinig molder (8 head), one (1) Weinig molder (6 head), one (1) Weinig molder (6 head, hi-speed), two (2) Delta miter boxes, two (2) Delta radial arm saws, one (1) Hermance gang rip saw, one (1) sanding master wide belt, one (1) Fod band resaw, two (2) Dip chain gang rip saws, two (2) DeWalt radial arm saws, one (1) Rockwell radial arm saw, one (1) Sicar Shaper, one (1) Tannewitz table saw, one (1) SCMI planer, one (1) Weinig profile grinder, one (1) Diehl straight line rip saw, one (1) Makita miter saw knife cutting, and one (1) Schutte Hammermill wood hog;
- (k) six cyclones and one (1) baghouse, each constructed in 1986, combined to control PM emissions from woodcutting equipment in the south building: one (1) 25 HP General Ind. Cyclone (exhausting through stack E1), one (1) 25 HP Honeyville cyclone (exhausting through stack E2), one (1) 100 HP Honeyville cyclone (exhausting through baghouse then stack E3), one (1) 50 HP Claredge cyclone (exhausting through stack E5), two (2) 30 HP Honeyville cyclones (each exhausting through stacks E6 and E7, respectively), and one (1) 20 HP Honeyville baghouse (exhausting through stack E3);
- (l) one (1) compressor, constructed in 1995.

- (m) miscellaneous woodworking equipment, each constructed in 2006, which includes: two (2) panel saws, one (1) pin router, one (1) gang rip saw, and two (2) cut off saws, with a maximum process weight rate of 8,601 pounds of panels and wood per hour, with particulate emissions controlled by existing cyclones and baghouse.

## SECTION B GENERAL CONDITIONS

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

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

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

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- (a) This permit, M039-29432-00337, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

### B.4 Enforceability

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

### B.5 Severability

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

### B.6 Property Rights or Exclusive Privilege

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

### B.7 Duty to Provide Information

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- (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.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]**

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- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

**B.9 Preventive Maintenance Plan [326 IAC 1-6-3]**

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- (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 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.
- (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.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of permits established prior to M039-29432-00337 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

**B.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]**

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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 one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

**B.12 Permit Renewal [326 IAC 2-6.1-7]**

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
  - (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the

document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

**B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]**

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

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

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

- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

**B.14 Source Modification Requirement**

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

**B.15 Inspection and Entry  
[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]**

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

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

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

**B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]**

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

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

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

**B.17 Annual Fee Payment [326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

**B.18 Credible Evidence [326 IAC 1-1-6]**

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

**SECTION C SOURCE OPERATION CONDITIONS**

Entire Source

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

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

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

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

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

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

**C.3 Opacity [326 IAC 5-1]**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (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.4 Open Burning [326 IAC 4-1] [IC 13-17-9]**

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

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

The Permittee shall not operate an incinerator 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.6 Fugitive Dust Emissions [326 IAC 6-4]

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

C.7 Stack Height [326 IAC 1-7]

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The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

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

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- (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.

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

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

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

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

### **Compliance Requirements [326 IAC 2-1.1-11]**

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

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

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

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

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

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

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

**Corrective Actions and Response Steps**

**C.13 Response to Excursions or Exceedances**

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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**

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- (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.

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

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

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

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

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

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, 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 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]**

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

Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue

MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

**SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS**

**Emissions Unit Description:**

**North Building**

- (a) two (2) HVLP spray coating booths, each constructed in 1995, each with a maximum capacity of 5300 units per hour, using dry filters for overspray control, and each exhausting through one (1) stack (E8 and E9);
- (b) one (1) vacuum coater, constructed in 1995, with a maximum capacity of 5300 units per hour;
- (c) one (1) Acimall Compo machine, constructed in 1995, with a maximum capacity of 1800 feet per hour. This machine puts a line of wood dough on trim to add decorative accent. It is not a stain or adhesive, but does adhere to the wood;

**South Building**

- (a) one (1) roller coater adhesive, constructed in 1986, with a maximum capacity of 200 units per hour;

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

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

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

Pursuant to 326 IAC 8-2-12, each of the two (2) spray coating booths shall utilize one of the following application methods when applying surface coatings to wood furniture and cabinets,

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

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

**D.1.2 Particulate [326 IAC 6-3-2(d)]**

- (a) Particulate from each of the two (2) HVLP spray coating booths shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

- (1) Repair the control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

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

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A Preventive Maintenance Plan is required for the two (2) HVLP spray coating booths and control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

**Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]**

**D.1.4 Record Keeping Requirements**

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- (a) To document the compliance status with Condition D.1.2, the Permittee shall maintain a record of any actions taken if overspray is visibly detected.
- (b) Section C - General Record Keeping Requirements, of this permit contains the Permittee's obligations with regard to the records required by this condition.

**SECTION D.2**

**EMISSIONS UNITS OPERATION CONDITIONS**

**Facility Description: Woodworking Operations**

**North Building**

- (g) miscellaneous woodworking equipment, each constructed in 1986, that includes: one (1) Dima 4 head adjustable sander; two (2) ten inch chop saws, four (4) voorwood vinyl laminator, and one (1) voorwood vinyl splitter;
- (h) one (1) 25 horsepower (HP) Honeyville cyclone, constructed in 1986, for controlling particulate matter (PM) emissions from woodworking equipment in north building, exhausting through one (1) stack (E7);
- (i) one (1) compressor, constructed in 1995.

**South Building**

- (j) miscellaneous woodworking equipment, each constructed in 1986, that includes: one (1) V groover with king E/2 feeder, two (2) Hermance gang rip saws, one (2) voorwood vinyl cutter, one (1) Sears radial arm saw, one (1) Delta motorized chop saw, nine (9) whirlwind upcut chop saws, one (1) Delta miter saw, one (1) L & L electronic edge gluer, one (1) Weinig molder (8 head), one (1) Weinig molder (6 head), one (1) Weinig molder (6 head, hi-speed), two (2) Delta miter boxes, two (2) Delta radial arm saws, one (1) Hermance gang rip saw, one (1) sanding master wide belt, one (1) Fod band resaw, two (2) Dip chain gang rip saws, two (2) DeWalt radial arm saws, one (1) Rockwell radial arm saw, one (1) Sicar Shaper, one (1) Tannewitz table saw, one (1) SCMI planer, one (1) Weinig profile grinder, one (1) Diehl straight line rip saw, one (1) Makita miter saw knife cutting, and one (1) Schutte Hammermill wood hog;
- (k) six cyclones and one (1) baghouse, each constructed in 1986, combined to control PM emissions from woodcutting equipment in the south building: one (1) 25 HP General Ind. Cyclone (exhausting through stack E1), one (1) 25 HP Honeyville cyclone (exhausting through stack E2), one (1) 100 HP Honeyville cyclone (exhausting through baghouse then stack E3), one (1) 50 HP Claredge cyclone (exhausting through stack E5), two (2) 30 HP Honeyville cyclones (each exhausting through stacks E6 and E7, respectively), and one (1) 20 HP Honeyville baghouse (exhausting through stack E3);
- (l) one (1) compressor, constructed in 1995.
- (m) miscellaneous woodworking equipment, each constructed in 2006, which includes: two (2) panel saws, one (1) pin router, one (1) gang rip saw, and two (2) cut off saws, with a maximum process weight rate of 8,601 pounds of panels and wood per hour, with particulate emissions controlled by existing cyclones and baghouse.

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

**Emission Limitations and Standards**

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the woodworking operations shall not exceed 9.13 pounds per hour (north building) based on a process weight rate equal to 6,608 pounds of wood per hour and 16.4

pounds per hour (south building) based on a process weight rate equal to 15, 820 pounds of wood per hour. The pound per hour limitation was calculated with the following equation:

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

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

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

The cyclone control devices shall be in operation at all times the woodworking equipment is in operation, in order to comply with this limit.

#### D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

---

A Preventive Maintenance Plan is required for the woodworking equipment and control devices in the north and south buildings. 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.2.3 Particulate Control

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In order to comply with Condition D.2.1:

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

### Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

#### D.2.4 Visible Emissions Notations

---

- (a) Daily visible emission notations of the north building and south building woodworking operation stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. 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.

#### D.2.5 Baghouse Inspections

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An inspection shall be performed each calendar quarter of all bags controlling the woodworking operations 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.

#### D.2.6 Broken or Failed Bag Detection

---

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

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

#### D.2.7 Cyclone Inspections

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An inspection shall be performed each calendar quarter of all cyclones controlling the north building and south building woodworking operations.

#### D.2.8 Cyclone Failure Detection

---

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section C- Response to Excursions or Exceedances).

### **Record Keeping and Reporting Requirement [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]**

#### D.2.9 Record Keeping Requirements

---

- (a) To document the compliance status with Conditions D.2.4, the Permittee shall maintain records of daily visible emission notations of the north building and south building woodworking operation stack exhaust. 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).

- (b) To document the compliance status with Conditions D.2.5 and D.2.7, the Permittee shall maintain records of results of inspections required under Conditions D.2.5 and D.2.7 and the dates vents are redirected.
  
- (c) Section C - General Record Keeping Requirements, of this permit 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**

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

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

<b>Company Name:</b>	JEJ Molding
<b>Address:</b>	1940 W Market St
<b>City:</b>	Nappanee, Indiana 46550
<b>Phone #:</b>	574-773-7941
<b>MSOP #:</b>	M039-29432-00337

I hereby certify that JEJ Molding is :

still in operation.

I hereby certify that JEJ Molding is :

no longer in operation.

in compliance with the requirements of MSOP M039-29432-00337.

not in compliance with the requirements of MSOP M039-29432-00337.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

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

<b>Noncompliance:</b>

**MALFUNCTION REPORT**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  
FAX NUMBER: (317) 233-6865**

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

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_

INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

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

**326 IAC 1-6-1 Applicability of rule**

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

**326 IAC 1-2-39 "Malfunction" definition**

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

**\*Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

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

Technical Support Document (TSD) for a  
Minor Source Operating Permit (MSOP) Renewal

<b>Source Background and Description</b>
--

<b>Source Name:</b>	<b>JEJ Molding</b>
<b>Source Location:</b>	<b>1940 W Market St, Nappanee, IN 46550</b>
<b>County:</b>	<b>Elkhart</b>
<b>SIC Code:</b>	<b>2431</b>
<b>Permit Renewal No.:</b>	<b>M039-29432-00337</b>
<b>Permit Reviewer:</b>	<b>Christine L. Filutze</b>

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from JEJ Molding relating to the operation of a stationary wood molding and panel manufacturing source. On July 6, 2010, JEJ Molding submitted an application to the OAQ requesting to renew its operating permit. JEJ Molding was issued MSOP No. M039-21031-00337 on November 2, 2005.

<b>Permitted Emission Units and Pollution Control Equipment</b>
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The source consists of the following permitted emission units:

**North Building**

- (a) two (2) HVLP spray coating booths, each constructed in 1995, each with a maximum capacity of 5300 units per hour, using dry filters for overspray control, and each exhausting through one (1) stack (E8 and E9);
- (b) one (1) vacuum coater, constructed in 1995, with a maximum capacity of 5300 units per hour;
- (c) one (1) Acimall Compo machine, constructed in 1995, with a maximum capacity of 1800 feet per hour. This machine puts a line of wood dough on trim to add decorative accent. It is not a stain or adhesive, but does adhere to the wood;
- (d) eight (8) natural gas fired heaters, each constructed in 1986, each rated at 0.26 million Btu per hour (MMBtu/hr), and each exhausting through one (1) stack (H11, H12 H13, H14, H15, H16, H17, and H18);
- (e) nine (9) natural gas fired heaters, each constructed in 1986, each rated at 0.1 MMBtu/hr, and each exhausting through one (1) stack (H9, H10 and H32 - H38);
- (f) one (1) natural gas fired heater, constructed in 1995, rated at 2.675 MMBtu/hr, and exhausting through one (1) stack (H31);
- (g) miscellaneous woodworking equipment, each constructed in 1986, that includes: one (1) Dima 4 head adjustable sander; two (2) ten inch chop saws, four (4) voorwood vinyl laminator, and one (1) voorwood vinyl splitter;

- (h) one (1) 25 horsepower (HP) Honeyville cyclone, constructed in 1986, for controlling particulate matter (PM) emissions from woodworking equipment in north building, exhausting through one (1) stack (E7);
- (i) one (1) compressor, constructed in 1995.

### **South Building**

- (a) one (1) roller coater adhesive, constructed in 1986, with a maximum capacity of 200 units per hour;
- (b) six (6) natural gas-fired heaters, each constructed in 1986, each rated at 0.06 MMBtu/hr, and each exhausting through one (1) stack (H25, H26, H27, H28, H29, and H30);
- (c) four (4) natural gas-fired heaters, each constructed in 1986, each rated at 0.05 MMBtu/hr, and each exhausting through one (1) stack (H21, H22, H23, and H24);
- (d) one (1) natural gas-fired heater, constructed in 1986, rated at 0.125 MMBtu/hr, and exhausting through one (1) stack (H6);
- (e) one (1) natural gas-fired heater, constructed in 1986, rated at 0.3 MMBtu/hr, and exhausting through one (1) stack (H5);
- (f) four (4) natural gas-fired heaters, each constructed in 1986, each rated at 0.15 MMBtu/hr, and each exhausting through one (1) stack (H3, H4, H7, and H8);
- (g) one (1) natural gas-fired heater, constructed in 1986, rated at 0.13 MMBtu/hr, and exhausting through one (1) stack (H2);
- (h) one (1) natural gas-fired heater, constructed in 1986, rated at 0.2 MMBtu/hr, and exhausting through one (1) stack (H1);
- (i) two (1) natural gas-fired heaters, each constructed in 1986, each rated at 0.1 MMBtu/hr, and each exhausting through one (1) stack (H19 and H20);
- (j) miscellaneous woodworking equipment, each constructed in 1986, that includes: one (1) V groover with king E/2 feeder, two (2) Hermance gang rip saws, one (2) voorwood vinyl cutter, one (1) Sears radial arm saw, one (1) Delta motorized chop saw, nine (9) whirlwind upcut chop saws, one (1) Delta miter saw, one (1) L & L electronic edge gluer, one (1) Weinig molder (8 head), one (1) Weinig molder (6 head), one (1) Weinig molder (6 head, hi-speed), two (2) Delta miter boxes, two (2) Delta radial arm saws, one (1) Hermance gang rip saw, one (1) sanding master wide belt, one (1) Fod band resaw, two (2) Dip chain gang rip saws, two (2) DeWalt radial arm saws, one (1) Rockwell radial arm saw, one (1) Sicar Shaper, one (1) Tannewitz table saw, one (1) SCMI planer, one (1) Weinig profile grinder, one (1) Diehl straight line rip saw, one (1) Makita miter saw knife cutting, and one (1) Schutte Hammermill wood hog;
- (k) six cyclones and one (1) baghouse, each constructed in 1986, combined to control PM emissions from woodcutting equipment in the south building: one (1) 25 HP General Ind. Cyclone (exhausting through stack E1), one (1) 25 HP Honeyville cyclone (exhausting through stack E2), one (1) 100 HP Honeyville cyclone (exhausting through baghouse then stack E3), one (1) 50 HP Claredge cyclone (exhausting through stack E5), two (2) 30 HP Honeyville cyclones (each exhausting through stacks E6 and E7, respectively), and one (1) 20 HP Honeyville baghouse (exhausting through stack E3);
- (l) one (1) compressor, constructed in 1995.

- (m) miscellaneous woodworking equipment, each constructed in 2006, which includes: two (2) panel saws, one (1) pin router, one (1) gang rip saw, and two (2) cut off saws, with a maximum process weight rate of 8,601 pounds of panels and wood per hour, with particulate emissions controlled by existing cyclones and baghouse.

#### Existing Approvals

Since the issuance of the MSOP No. M039-21031-00337 on November 2, 2005, the source has constructed or has been operating under the following additional approvals:

- (a) Notice-Only Change No. 039-23441-00337 issued on October 6, 2006.

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

#### Enforcement Issue

There are no enforcement actions pending.

#### Emission Calculations

See Appendix A of this document for detailed emission calculations.

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

#### County Attainment Status

The source is located in Elkhart County.

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

<sup>1</sup>Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including Elkhart County, and is a maintenance area for the 1-hour National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X\*. The 1-hour standard was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM2.5.

- (a) Ozone Standards  
Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) 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<sub>x</sub> 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<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM<sub>2.5</sub>**  
Elkhart County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> emissions. These rules became effective on July 15, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions until 326 IAC 2-2 is revised.
- (c) **Other Criteria Pollutants**  
Elkhart County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

#### **Fugitive Emissions**

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

#### **"Integral Part of the Process" Determination**

In October 1993, a Final Order Granting Summary Judgement was signed by Administrative Law Judge ("ALJ") Garrettson resolving an appeal filed by Kimball Hospitality Furniture Inc (Cause Nos. 92-A-J0730 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 were necessary for the facility to produce its normal product and are integral to the normal operation of the facility, and therefore, potential emissions should be calculated after controls. Based on this ruling, potential emissions for particulate matter were calculated after consideration of the controls for the woodworking operations.

#### **Unrestricted Potential Emissions**

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	374.90
PM <sub>10</sub> <sup>(1)</sup>	50.15
PM <sub>2.5</sub>	50.15
SO <sub>2</sub>	0.02
VOC	19.13
CO	2.86
NO <sub>x</sub>	3.40
Single HAP	0.061 (Hexane)
Total HAP	0.064

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

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 all regulated\* pollutants is less than 100 tons per year. However, PM10 is equal to or greater than twenty-five (25) tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source will be issued an MSOP Renewal.
- (c) This existing stationary source is not major for PSD because the emissions of each regulated\* pollutant is less than two hundred fifty (<250) tons per year and the source is not in one of the twenty-eight (28) listed source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

\* 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."

<b>Federal Rule Applicability</b>
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- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (c) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart JJ, Wood Furniture Manufacturing (40 CFR Part 63.800 - 63.808) (326 IAC 20-14-1), because this source is not a major source of HAPs as defined in 40 CFR 63.2.

- (d) The requirements of the 40 CFR 63, Subpart MMMM, NESHAP for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR Part 63.3880 through 63.3981), are not included in this permit, because this source is not a major source of HAPs as defined in 40 CFR 63.2 and only surface coats wood molding and panels.
- (e) The requirements of 40 CFR 63 Subpart OOOO, NESHAP for Printing, Coating, and Dyeing of Fabrics and Other Textiles (63.4280 through 63.4371) (326 IAC 20-77-1), are not included in this permit, because this source is not a major source of HAPs as defined in 40 CFR 63.2 and only surface coats wood molding and panels.
- (f) The requirements of the 40 CFR 63, Subpart PPPP, NESHAP for Surface Coating of Plastic Parts and Products (40 CFR Part 63.4480 - 63.4581), are not included in this permit, because the source is not a major source of HAPs as defined in 40 CFR 63.2 and only surface coats wood molding and panels.
- (g) The requirements of the 40 CFR 63, Subpart QQQQ, NESHAP for Surface Coating of Wood Building Products (40 CFR Part 63.4680 - 63.4781)(326 IAC 20-79-1), are not included in this permit, because this source is not a major source of HAPs as defined in 40 CFR 63.2.
- (h) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

<b>State Rule Applicability - Entire Source</b>
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**326 IAC 2-2 (Prevention of Significant Deterioration)**

The cyclones and the baghouse shall be in operation at all times when woodworking processes are in operation; PM emissions from E1, E2, E3, E4, E5, and E6 combined shall be limited to 9.69 lbs/hr (42.4 tons/yr); and PM emissions from E7 shall be limited to 9.13 lbs/hr (40.0 tons/yr) (based on the requirements of 326 IAC 6-3-2). Thus, the potential to emit PM from the entire source is limited to less than 250 tons per year. Compliance with these limits render 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

**326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))**

The operation of this stationary wood molding and panel manufacturing source will emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

**326 IAC 2-6 (Emission Reporting)**

This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, or LaPorte County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

**326 IAC 5-1 (Opacity Limitations)**

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

- (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) in a six (6) hour period 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 Emissions Limitations)**

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

**326 IAC 6.5 PM Limitations Except Lake County**

This source is not subject to 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

**326 IAC 6.8 PM Limitations for Lake County**

This source is not subject to 326 IAC 6.8 because it is not located in Lake County.

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

The requirements of 326 IAC 8-1-6 are not applicable, since each of the emission units at this source does not have the potential to emit greater than twenty-five (25) tons of VOCs per year.

<b>State Rule Applicability – Individual Facilities</b>
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**State Rule Applicability - Surface Coating Operations**

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

- (a) Pursuant to 326 IAC 6-3-1(b)(14), the one (1) vacuum coater, the one (1) Acimall Compo machine, and the one (1) roller coater adhesive are each exempt from the requirements of 326 IAC 6-3, because the potential particulate emissions are each less than five hundred fifty-one thousandths (0.551) pound per hour.
- (b) Each of the two (2) HVLP spray coating booths has potential particulate emissions that are greater than five hundred fifty-one thousandths (0.551) pound per hour and has the potential to use greater than five (5) gallons per day of surface coatings. Therefore, the requirements of 326 IAC 6-3-2 are applicable to each of the spray coating booths. Pursuant to 326 IAC 6-3-2(d), particulate from each of the two (2) HVLP spray coating booths shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

- (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

**326 IAC 8-2-10 (Volatile Organic Compounds, Flat Wood Panels Manufacturing Operations)**

- (a) Pursuant to 326 IAC 8-2-1(4), the one (1) roller coater adhesive, the one (1) vinyl wrap laminator and the one (1) vacuum coater are each not subject to the requirements of 326 IAC 8-2-10, since they have VOC emissions less than or equal to fifteen (15) pounds per

day before add-on controls. Pursuant to 326 IAC 8-2-10, the one (1) vinyl wrap laminator and the one (1) vacuum coater are each not subject to the requirements of 326 IAC 8-2-10, since they apply surface coatings to luan (softwood), softwood particleboard, and/or Medium Density Fiberboard (MDF), which are not considered "hardwood particleboard", "hardwood plywood", or "hardboard paneling", as defined in 326 IAC 8-2-10(a).

- (b) Each of the two (2) spray coating booths have VOC emissions greater than fifteen (15) pounds per day before add-on controls. Based on information provided by the source on July 14, 2005, the source occasionally manufactures panels made of solid hardwood (oak, maple, hard maple, cherry and ash) that are ultimately used for cabinet doors and end panels for cabinets and furniture. Pursuant to 326 IAC 8-2-10(a), each of the two (2) spray coating booths are not subject to the requirements of 326 IAC 8-2-10, since the solid hardwood used at this source to manufacture panels is not considered "hardwood particleboard", "hardwood plywood", or "hardboard paneling", as defined in 326 IAC 8-2-10(a).

326 IAC 8-2-12 (Volatile Organic Compounds, Wood Furniture and Cabinet Coating)

- (a) Pursuant to 326 IAC 8-2-1(4), the one (1) roller coater adhesive, the one (1) vinyl wrap laminator, and the one (1) vacuum coater is not subject to the requirements of 326 IAC 8-2-12, since they have VOC emissions less than or equal to fifteen (15) pounds per day before add-on controls.
- (b) The requirements of 326 IAC 8-2-12 are applicable to each of the two (2) spray coating booths, since they each have VOC emissions greater than fifteen (15) pounds per day before add-on controls and they apply surface coatings to wood panels and parts used as furniture components. Based on information provided by the source on July 14, 2005, the source is capable of manufacturing furniture components (cabinet stiles, door stiles, door interiors and other furniture parts) for desks, kitchen islands, hutches and cabinets that are made of solid hardwood (oak, maple, hard maple, cherry and ash). Pursuant to 326 IAC 8-2-12(b), the owner of a wood furniture or wood cabinets surface coating operation shall apply all coating material, with the exception of no more than ten (10) gallons per day used for touch-up and repair operations, using one (1) or more of the allowable application methods specified in 326 IAC 8-2-12(b).

Each of the two (2) spray coating booths shall utilize one of the following application methods when applying surface coatings to wood furniture and cabinets,

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.

Both of the two (2) spray coating booths use High Volume, Low Pressure (HVLP) application method, which is an accepted alternative method of application for Air Assisted Airless Spray Application, which is a method allowed in the rule.

326 IAC 8-11-3 (Volatile Organic Compounds, Wood Furniture Coatings)  
 The requirements of 326 IAC 8-11-3 are not applicable to this source, since this source is not located in Lake, Porter, Clark, or Floyd County.

**State Rule Applicability - Woodworking Operations**

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
 Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the woodworking operations from the north building shall not exceed 9.13 pounds per hour, based on a process weight rate equal to 6,608 pounds of wood per hour; and the particulate emissions from the woodworking operations from the south building shall not exceed 16.4 pounds per hour, based on a process weight rate equal to 15,820 pounds of wood per hour. The pound per hour limitation was calculated with the following equation:

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

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

$$E_{\text{north building}} = 9.13 \quad E_{\text{south building}} = 16.4$$

The cyclone control devices shall be in operation at all times the woodworking equipment is in operation, in order to comply with this limit.

**State Rule Applicability – Natural Gas Combustion Sources**

326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)  
 The natural gas-fired space heaters are not subject to 326 IAC 6-2 as they are not sources of indirect heating.

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
 Pursuant to 326 IAC 6-3-1(b)(14), each of the natural gas-fired heaters are exempt from the requirements of 326 IAC 6-3, because they each have potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

326 IAC 7-1 (Sulfur dioxide emission limitations: applicability)  
 Each of the natural gas-fired heaters are not subject to the requirements of 326 IAC 7-1, because the potential and the actual emissions are less than twenty-five (25) tons per year and less than ten (10) pounds per hour.

<b>Compliance Determination and Monitoring Requirements</b>
---

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

Control	Parameter	Frequency	Range	Excursions and Exceedances
All Baghouses	Water Pressure Drop	Daily	3.0 to 6.0 inches	Response Steps
	Visible Emissions		Normal - Abnormal	

<b>Emission Unit/Control</b>	<b>Operating Parameters</b>	<b>Frequency</b>
All Spray Coating Booths	Overspray	As needed

These monitoring conditions are necessary because the cyclones and the baghouse for the woodworking operation must operate properly to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)).

#### **Recommendation**

The staff recommends to the Commissioner that the MSOP 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 July 6, 2010. Additional information was received on July 20, 2010.

#### **Conclusion**

The operation of this stationary wood molding and panel manufacturing source shall be subject to the conditions of the attached MSOP Renewal No. M039-29432-00337.

#### **IDEM Contact**

- (a) Questions regarding this proposed permit can be directed to Christine L. Filutze at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-8397 or toll free at 1-800-451-6027 extension 3-8397.
- (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](http://www.idem.in.gov)

**Appendix A: Emissions Calculations  
Emission Summary**

**Company Name: JEJ Molding  
Address City IN Zip: 1940 W Market St, Nappanee, IN 46550  
Permit Number: M039-29432-00337  
Reviewer: Christine L. Filutze  
Date: August 30, 2010**

Category	Uncontrolled Potential Emissions (tons/year)				
	Emissions Generating Activity				
	Pollutant	Surface Coatings	Natural Gas Combustion	Woodworking**	TOTAL
Criteria Pollutants	PM	20.0	0.06	354.8	374.90
	PM10 = PM2.5*	20.0	0.26	29.9	50.15
	SO2		0.02		0.02
	NOx		3.40		3.40
	VOC	18.9	0.19		19.13
	CO		2.86		2.86
Hazardous Air Pollutants	Benzene		7.1E-05		7.1E-05
	Dichlorobenzene		4.1E-05		4.1E-05
	Formaldehyde		2.6E-03		2.6E-03
	Hexane		0.06		0.06
	Toluene		1.2E-04		1.2E-04
	Lead		1.7E-05		1.7E-05
	Cadmium		3.7E-05		3.7E-05
	Chromium		4.8E-05		4.8E-05
	Manganese		1.3E-05		1.3E-05
	Nickel		7.1E-05		7.1E-05
				<b>Total HAPs</b>	<b>0.064</b>
			<b>Single Highest HAP</b>	<b>0.061</b>	

Category	Controlled Potential Emissions (tons/year)				
	Emissions Generating Activity				
	Pollutant	Surface Coatings	Natural Gas Combustion	Woodworking**	TOTAL
Criteria Pollutants	PM	0.60	0.06	32.3	32.98
	PM10 = PM2.5*	0.60	0.26	14.5	15.40
	SO2		0.02		0.02
	NOx		3.40		3.40
	VOC	18.9	0.19		19.13
	CO		2.86		2.86
Hazardous Air Pollutants	Benzene		7.1E-05		7.1E-05
	Dichlorobenzene		4.1E-05		4.1E-05
	Formaldehyde		2.6E-03		2.6E-03
	Hexane		0.06		0.06
	Toluene		1.2E-04		1.2E-04
	Lead		1.7E-05		1.7E-05
	Cadmium		3.7E-05		3.7E-05
	Chromium		4.8E-05		4.8E-05
	Manganese		1.3E-05		1.3E-05
	Nickel		7.1E-05		7.1E-05
				<b>Total HAPs</b>	<b>0.064</b>
			<b>Single Highest HAP</b>	<b>0.061</b>	

\*Assume PM10=PM2.5

\*\*Pursuant to a Final Order Granting Summary Judgment, signed by Administrative Law Judge ("ALJ") Garrettson in October 1993, 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, potential emissions for particulate matter shall be calculated after controls, with respect to determining permit level.

**Appendix A: Emissions Calculations  
Surface Coatings**

**Company Name: JEJ Molding  
Address City IN Zip: 1940 W Market St, Nappanee, IN 46550  
Permit Number: M039-29432-00337  
Reviewer: Christine L. Filutze  
Date: #####**

**Volatile Organic Comounds (VOC) and Particulate Matter (PM)**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water + Non-VOCs	Weight % Solids	Weight % VOCs	Volume % Water + Non-VOCs	Volume % Solids	Potential Paint Usage (gal/unit)	Maximum Capacity (unit/hour)	Maximum Usage (gal/day)*	Maximum Usage (lbs/hour)	Pounds VOC per gallon of coating less water and non-VOCs	Pounds VOC per gallon of coating	Potential VOC (lbs/hr)	Potential VOC (lbs/day)	Potential VOC (tons/year)	Particulate Matter Potential (lb/hr)	Particulate Matter Potential (tons/yr)	lb VOC per gal solids	Transfer Efficiency
<b>Spray Booth 1 (SB-1) or Spray Booth 2 (SB-2)</b>																				
Topcoat (S-1347)	8.52	60.40%	49.01%	39.60%	11.39%	50.14%	33.44%	0.000387	5300	49.2	17.48	1.95	0.97	1.99	47.77	8.72	1.73	7.58	2.90	75%
Topcoat (S-1482)	8.95	67.37%	57.73%	32.63%	9.64%	60.02%	29.88%	0.000387	5300	49.2	18.36	2.16	0.86	1.77	42.47	7.75	1.50	6.56	2.89	75%
Topcoat (S-1345)	8.50	68.4%	67.38%	31.57%	1.05%	69.81%	29.14%	0.000387	5300	49.2	17.43	0.30	0.09	0.18	4.39	0.80	1.38	6.03	0.31	75%
<b>Spray Booth 1 (SB-1) or Spray Booth 2 (SB-2)</b>																				
Primer (SB-377)	10.11	52.08%	42.99%	47.92%	9.09%	52.20%	34.05%	0.001	1900	45.6	19.21	1.92	0.92	1.75	41.91	7.65	2.30	10.08	2.70	75%
<b>Spray Booth 1 (SB-1), Spray Booth 2 (SB-2), or Vacuum Coater 1 (VC-1)</b>																				
Stain (WBS-269)	8.60	82.93%	80.28%	17.07%	2.65%	82.11%	15.25%	0.000279	5300	35.5	12.72	1.27	0.23	0.34	8.09	1.48	0.54	2.38	1.49	75%
Stain (WBS-410)	8.38	99.18%	99.05%	0.82%	0.13%	99.44%	0.43%	0.000279	5300	35.5	12.39	1.95	0.01	0.02	0.39	0.07	0.03	0.11	2.53	75%
Stain (WBS-164)	8.46	86.74%	86.14%	13.26%	0.60%	87.43%	11.97%	0.000279	5300	35.5	12.51	0.40	0.05	0.08	1.80	0.33	0.41	1.82	0.42	75%
Stain (WBS-424)	8.37	97.33%	97.02%	2.67%	0.31%	97.42%	2.27%	0.000279	5300	35.5	12.38	1.01	0.03	0.04	0.92	0.17	0.08	0.36	1.14	75%
Stain (WBS-425)	8.51	94.49%	93.60%	5.51%	0.89%	95.12%	4.01%	0.000279	5300	35.5	12.58	1.55	0.08	0.11	2.69	0.49	0.17	0.76	1.89	75%
Stain (WBS-426)	8.38	98.40%	98.13%	1.60%	0.27%	98.71%	1.01%	0.000279	5300	35.5	12.39	1.75	0.02	0.03	0.80	0.15	0.05	0.22	2.24	75%
Stain (WBS-427)	8.51	95.80%	94.70%	4.20%	1.10%	96.34%	2.61%	0.000279	5300	35.5	12.58	2.56	0.09	0.14	3.32	0.61	0.13	0.58	3.59	75%
<b>Maximum (Topcoat + Primer + Stain)</b>										<b>130.3</b>	<b>50.3</b>			<b>4.07</b>	<b>97.8</b>	<b>17.8</b>	<b>4.57</b>	<b>20.0</b>		
<b>Vinyl Wrap</b>																				
56-5343 Adhesive	9.10	42.22%	42.0%	57.8%	0.22%	45.0%	50.0%	0.002	6250	300.0	113.75	0.04	0.02	0.25	6.01	1.10	0	0	0.04	100%
<b>Compo Machine</b>																				
HC Natural Versafil	7.72	52.4%	52.4%	47.6%	0.0%	0.0%	38.8%	0.0045	1800	194.4	62.53	0	0	0	0	0	0	0	0	100%

<b>Total HAPs</b>	<b>3.4</b>	<b>Total Uncontrolled Maximum Emissions from SB-1, SB-2, VC-1, Vinyl Wrap, and Compo Machine</b>	<b>4.32</b>	<b>103.8</b>	<b>18.9</b>	<b>4.57</b>	<b>20.0</b>
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**METHODOLOGY**

Maximum Usage (gal/day) = Potential Paint Usage (gallons/unit) \* maximum capacity (units/hour) \* 24 hours/day  
 Maximum Usage (lbs/hr) = Maximum Usage (gal/day) \* Density (lb/gal) / (24 hour/day)  
 Pounds of VOC per Gallon Coating less Water and non-VOCs = (Density (lb/gal) \* Weight % VOCs) / (1-Volume % water and non-VOCs)  
 Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % VOCs)  
 Potential VOC Pounds per Hour = Maximum Usage (lbs/hr) \* Weight % VOCs  
 Potential VOC Pounds per Day = Potential VOC (lbs/hr) \* (24 hours/day)  
 Potential VOC Tons per Year = Potential VOC (lbs/day) \* (365 days/yr) \* (1 ton/2000 lbs)  
 Particulate Potential Tons per Year = Density (lbs/gal) \* Maximum Usage (gal/day) \* (Weight % Solids) \* (1-Transfer efficiency) \* (365 days/yr) \* (1 ton/2000 lbs)

<b>Control Efficiency:</b>	0.0%	0.0%	0.0%	97.0%	97.0%
<b>Controlled Emissions:</b>	<b>4.32</b>	<b>103.8</b>	<b>18.9</b>	<b>0.14</b>	<b>0.60</b>

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

**Company Name: JEJ Molding**  
**Address City IN Zip: 1940 W Market St, Nappanee, IN 46550**  
**Permit Number: M039-29432-00337**  
**Reviewer: Christine L. Filutze**  
**Date: #####**

Emission Unit	Number of Units	Unit Heat Input Capacity MMBtu/hr	Combined Total Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Pollutant					
					PM*	PM10=PM2.5*	SO2	NOx**	VOC	CO
Emission Factor (lb/MMCF)					1.9	7.6	0.6	100	5.5	84.0
					Potential Emission tons/yr					
					PM*	PM10=PM2.5*	SO2	NOx**	VOC	CO
Radiant Heaters	8	0.260	2.1	18.22	0.017	0.069	0.005	0.911	0.050	0.765
Radiant Heaters	9	0.100	0.9	7.88	0.007	0.030	0.002	0.394	0.022	0.331
Forced Air Heater	1	2.675	2.7	23.43	0.022	0.089	0.007	1.172	0.064	0.984
Radiant Heaters	6	0.060	0.4	3.15	0.003	0.012	0.001	0.158	0.009	0.132
Radiant Heaters	4	0.050	0.2	1.75	0.002	0.007	0.001	0.088	0.005	0.074
Radiant Heater	1	0.125	0.1	1.10	0.001	0.004	0.000	0.055	0.003	0.046
Radiant Heater	1	0.300	0.3	2.63	0.002	0.010	0.001	0.131	0.007	0.110
Radiant Heaters	4	0.150	0.6	5.26	0.005	0.020	0.002	0.263	0.014	0.221
Radiant Heater	1	0.130	0.1	1.14	0.001	0.004	0.000	0.057	0.003	0.048
Radiant Heater	1	0.200	0.2	1.75	0.002	0.007	0.001	0.088	0.005	0.074
Radiant Heaters	2	0.100	0.20	1.75	1.7E-03	0.007	0.001	0.088	0.005	0.074
<b>Totals</b>	<b>38</b>		<b>7.8</b>		<b>0.065</b>	<b>0.259</b>	<b>0.020</b>	<b>3.403</b>	<b>0.187</b>	<b>2.859</b>

Pollutant	Benzene	DCB	Formaldehyde	Hexane	Toluene	Pb	Cd	Cr	Mn	Ni
Emission Factor (lb/MMCF)	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Emission Unit	Potential Emission tons/yr									
	Benzene	DCB	Formaldehyde	Hexane	Toluene	Pb	Cd	Cr	Mn	Ni
Radiant Heaters	1.9E-05	1.1E-05	6.8E-04	0.016	3.1E-05	4.6E-06	1.0E-05	1.3E-05	3.5E-06	1.9E-05
Radiant Heaters	8.3E-06	4.7E-06	3.0E-04	0.007	1.3E-05	2.0E-06	4.3E-06	5.5E-06	1.5E-06	8.3E-06
Forced Air Heater	2.5E-05	1.4E-05	8.8E-04	0.021	4.0E-05	5.9E-06	1.3E-05	1.6E-05	4.5E-06	2.5E-05
Radiant Heaters	3.3E-06	1.9E-06	1.2E-04	0.003	5.4E-06	7.9E-07	1.7E-06	2.2E-06	6.0E-07	3.3E-06
Radiant Heaters	1.8E-06	1.1E-06	6.6E-05	0.002	3.0E-06	4.4E-07	9.6E-07	1.2E-06	3.3E-07	1.8E-06
Radiant Heater	1.1E-06	6.6E-07	4.1E-05	0.001	1.9E-06	2.7E-07	6.0E-07	7.7E-07	2.1E-07	1.1E-06
Radiant Heater	2.8E-06	1.6E-06	9.9E-05	0.002	4.5E-06	6.6E-07	1.4E-06	1.8E-06	5.0E-07	2.8E-06
Radiant Heaters	5.5E-06	3.2E-06	2.0E-04	0.005	8.9E-06	1.3E-06	2.9E-06	3.7E-06	1.0E-06	5.5E-06
Radiant Heater	1.2E-06	6.8E-07	4.3E-05	0.001	1.9E-06	2.8E-07	6.3E-07	8.0E-07	2.2E-07	1.2E-06
Radiant Heater	1.8E-06	1.1E-06	6.6E-05	0.002	3.0E-06	4.4E-07	9.6E-07	1.2E-06	3.3E-07	1.8E-06
Radiant Heaters	1.8E-06	1.1E-06	6.6E-05	0.002	3.0E-06	4.4E-07	9.6E-07	1.2E-06	3.3E-07	1.8E-06
<b>Totals</b>	<b>7.1E-05</b>	<b>4.1E-05</b>	<b>2.6E-03</b>	<b>0.061</b>	<b>1.2E-04</b>	<b>1.7E-05</b>	<b>3.7E-05</b>	<b>4.8E-05</b>	<b>1.3E-05</b>	<b>7.1E-05</b>

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

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

The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Methodology**

Potential Throughput (MMCF) = Combined Total Heat Input Capacity (MMBtu/hr) \* 8,760 hrs/yr \* 1 MMCF/1,000 MMBtu

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

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)

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu, MMCF = 1,000,000 Cubic Feet of Gas

**Appendix A: Emissions Calculations  
Particulate Matter Emissions from Woodworking**

**Company Name: JEJ Molding**  
**Address City IN Zip: 1940 W Market St, Nappanee, IN 46550**  
**Permit Number: M039-29432-00337**  
**Reviewer: Christine L. Filutze**  
**Date: August 30, 2010**

Source ID	Particulate Matter Control Equipment Description	Collection Efficiency (%)**		Exhaust Flow Rate (acfm)	Outlet Grain Loading (grains/cf)	Potential Controlled Emissions (lbs/hr)***		Potential Controlled Emissions (tons/yr)***		Potential Uncontrolled Emissions (lbs/hr)		Potential Uncontrolled Emissions (tons/yr)	
		PM	PM10*			PM	PM10*	PM	PM10*	PM	PM10*		
<b>South Building</b>													
E-1	Cyclone A	94.0%	50%	7100	0.002	0.12	0.05	0.5	0.24	2.0	0.11	8.9	0.48
E-2	Cyclone B	91.0%	50%	7100	0.019	1.2	0.5	5.1	2.3	12.8	1.04	56.3	4.6
E-3	Cyclone C/Baghouse D	99.8%	99.8%	4500	0.0001	0.004	0.002	0.02	0.01	1.9	0.87	8.4	3.8
E-4	Cyclone G	94.0%	50%	8000	0.0001	0.007	0.003	0.03	0.01	0.11	0.01	0.5	0.03
E-5	Cyclone E	91.0%	50%	15800	0.01	1.4	0.6	5.9	2.7	15.0	1.22	65.9	5.3
E-6	Cyclone F	90.0%	50%	8700	0.043	3.2	1.4	14.0	6.3	32.1	2.89	140.4	12.6
<b>Subtotal</b>						<b>5.8</b>	<b>2.6</b>	<b>25.6</b>	<b>11.5</b>	<b>64.0</b>	<b>6.1</b>	<b>280.5</b>	<b>26.8</b>
<b>North Building</b>													
E-7	Cyclone H	91.0%	0%	6600	0.027	1.5	0.7	6.7	3.0	17.0	0.69	74.3	3.0
<b>Subtotal</b>						<b>1.5</b>	<b>0.7</b>	<b>6.7</b>	<b>3.0</b>	<b>17.0</b>	<b>0.7</b>	<b>74.3</b>	<b>3.0</b>
<b>TOTALS</b>						<b>7.4</b>	<b>3.3</b>	<b>32.3</b>	<b>14.5</b>	<b>81.0</b>	<b>6.8</b>	<b>354.8</b>	<b>29.9</b>

\*Assume PM10=PM2.5

\*\* Assume cyclone PM10 control efficiencies of 50% based on AP 42, Appendix B.2, Table B.2-3. Cyclone C/Baghouse D control efficiency is for both PM10 and PM.

\*\*\* Assume exhaust is 100% by weight PM and 45% PM10 by weight, based on information provided by the source

**Methodology**

Potential Controlled Emissions (lbs/hr) = Outlet Loading (grains/cf) \* Exhaust Flow Rate (acfm) \* 1 lb/7,000 grains \* 60 min/hr

Potential Uncontrolled Emissions (lbs/hr) = Potential Controlled Emissions (lbs/hr) / (1 - Control Efficiency)

Emissions (tons/yr) = Emissions (lbs/hr) \* 8760 hr/yr \* 1 ton/2,000 lbs

**Compliance with 326 IAC 6-3-2:**

<b>South Building</b>	<b>North Building</b>
Allowable Emissions, $E = 4.10 * P^{0.67}$ (for weight rates up to 60,000 lb/hr) where $E$ = emissions in lbs/hr $P$ = process weight in tons/hr $P = 15,820 \text{ lbs/hr}$ $= 7.91 \text{ tons/hr}$  Allowable PM Emissions, $E = 16.39 \text{ lbs/hr}$ $= 393.3 \text{ lbs/day}$ $= 71.8 \text{ tons/yr}$	Allowable Emissions, $E = 4.10 * P^{0.67}$ (for weight rates up to 60,000 lb/hr) where $E$ = emissions in lbs/hr $P$ = process weight in tons/hr $P = 6,608 \text{ lbs/hr}$ $= 3.30 \text{ tons/hr}$  Allowable PM Emissions, $E = 9.13 \text{ lbs/hr}$ $= 219.2 \text{ lbs/day}$ $= 40.0 \text{ tons/yr}$
The use of cyclones and baghouses ensures compliance with the limits above.	The use of cyclones and baghouses ensures compliance with the limits above.

In south building, E1, E2, E3, E4, E5 and E6 (Cyclones A, B, C, E, F and G plus Baghouse D) are used to control an area that processes 15,820 lb/hr of raw material.

In north building, E7 (Cyclone H) is used to control an area that processes 6,608 lb/hr of raw material.



# 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](http://www.idem.IN.gov)

Oct. 1, 2010

Ms. Polly Mishler  
JEJ Molding  
502 S. Oakland Ave  
Nappanee IN 46550

Re: Public Notice  
JEJ Molding  
Permit Level: MSOP  
Permit Number: 039-29432-00337

Dear Ms. Mishler,

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

The Office of Air Quality (OAQ) has submitted the draft permit package to the Nappanee Public Library, 157 N. Main St. in Nappanee IN. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper. The OAQ has requested that the Elkhart Truth in Elkhart IN publish this notice no later than Tues. Oct. 5, 2010.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Christine Filutze Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-8397 or dial (317) 233-8397.

Sincerely,

*Bonnie Miller*

Bonnie Miller  
Permits Branch  
Office of Air Quality

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



# 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](http://www.idem.IN.gov)

## ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

Oct. 1, 2010

Elkhart Truth  
Teri Fritz-Lint  
PO Box 487  
Elkhart IN 46515

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for JEJ Molding, Elkhart County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than Tues. Oct. 5, 2010.

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

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Bonnie Miller at 800-451-6027 and ask for extension 2-0286 or dial 317-232-0286.

Sincerely,

*Bonnie Miller*  
Bonnie Miller  
Permit Branch  
Office of Air Quality

cc: Pat Cuzzort: OAQ Billing, Licensing and Training Section  
Permit Level: MSOP  
Permit Number: 039-29432-00337

Enclosure  
PN Newspaper.dot 3/27/08



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Oct. 1, 2010

To: Nappanee Public Library

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

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

**Applicant Name: JEJ Molding**  
**Permit Number: 039-29432-00337**

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

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

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

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

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

Enclosures  
PN Library.dot 03/27/08



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## Notice of Public Comment

**Oct. 1, 2010**  
**JEJ Molding**  
**039-29432-00337**

Dear Concerned Citizen(s):

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

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

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

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

Enclosure  
PN AAA Cover.dot 3/27/08

# Mail Code 61-53

IDEM Staff	BMILLER 10/1/2010 JEJ Molding 039-29432-00337 (draft)		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		Polly Mishler JEJ Molding 502 S Oakland Ave Nappanee IN 46550 (Source CAATS)									
2		James F Shea President JEJ Molding 502 S Oakland Ave Nappanee IN 46550 (RO CAATS)									
3		JEJ Molding 1940 West Street Nappanee IN 46550 (Affected Party)									
4		Agriliance 1952 W Market Street Nappanee IN 46550 (Affected Party)									
5		M Line Electric 355 Tomahawk Nappanee IN 46550 (Affected Party)									
6		Redford Manufacturing 357 Tomahawk Nappanee IN 46550 (Affected Party)									
7		Commercial Structures 655 N Tomahawk Trail Nappanee IN 46550 (Affected Party)									
8		ASCOT 503 S Main Street Nappanee IN 46550 (Affected Party)									
9		Breckenridge 656 N Delaware Street Nappanee IN 46550 (Affected Party)									
10		Newmar Corp 355 N Delaware Street Nappanee IN 46550 (Affected Party)									
11		Nappanee Self Storage 112 East Market Street Nappanee IN 46550 (Affected Party)									
12		Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 (Health Department)									
13		Laurence A. McHugh Barnes & Thornburg 100 North Michigan South Bend IN 46601-1632 (Affected Party)									
14		Nappanee Public Library 157 N Main St Nappanee IN 46550-1956 (Library)									
15		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 (Local Official)									

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		John 130 N. Main St. PO Box 575 Goshen IN 46527 (Affected Party)									
2		Mr. Ken Brinker 502 S. Oakland Ave Nappanee IN 46550 (Affected Party)									
3											
4											
5											
6											
7											
8											
9											
10											
11											
12											
13											
14											
15											

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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