



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: May 10, 2011

RE: Saco Industries, Inc. / 089-29986-00443

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

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot12/03/07



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May 10, 2011

Denise Purkey
Saco Industries, Inc.
P.O. Box 342
Lowell, IN 46356

Re: 089-29986-00443
Second Significant Revision to
F089-19460-00443

Dear Denise Purkey:

Saco Industries, Inc. was issued Federally Enforceable State Operating Permit (FESOP) Renewal No. F089-19460-00443 on February 21, 2007 for a stationary wood and particle board surface coating and manufacturing operation for bathroom and kitchen cabinets, located at 17151 Morse Street, Lowell, IN 46356.

On December 9, 2011, the Office of Air Quality (OAQ) received an application from the source requesting approval to construct and operate one (1) natural gas-fired regenerative thermal oxidizer to control VOC emissions from spray booth EU 03. The attached Technical Support Document (TSD) provides additional explanation of the changes to the source and permit. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Meredith Jones, of my staff, at 317-234-5176 or 1-800-451-6027, and ask for extension 4-5176.

Sincerely,

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

Attachments: Revised permit
Technical Support Document
Updated Calculations

ACD/MWJ

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



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Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

Saco Industries, Inc.
17151 Morse Street
Lowell, Indiana 46356

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

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 FESOP under 326 IAC 2-8.

Operation Permit No.: F089-19460-00443	
Original issued/signed by: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: February 21, 2007 Expiration Date: February 21, 2017

First Minor Permit Revision No.: 089-24054-00434, issued on April 23, 2007.

First Significant Permit Revision No.: 089-25570-00434, issued on April 8, 2008.

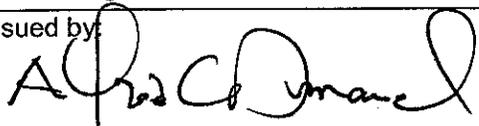
Second Significant Permit Revision No.: 089-29986-00443	
Issued by:  Alfred C. Dumauval, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: May 10, 2011 Expiration Date: February 21, 2017

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SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary wood and particle board surface coating and manufacturing operation for bathroom and kitchen cabinets.

Source Address:	17151 Morse Street, Lowell, Indiana 46356
General Source Phone Number:	(219) 696-2800
SIC Code:	2434
County Location:	Lake
Source Location Status:	Nonattainment for PM _{2.5} standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD, Emission Offset Rules, and Nonattainment NSR Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) One (1) spray booth (EU 03), which began operations in March 1999, with a maximum capacity of 43.75 wood pieces per hour, utilizing an HVLP application system and a dry filter for particulate control, and exhausting through stack S3. VOC emissions are controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-2, approved for construction in 2011, with a maximum heat input capacity of 4.0 MMBtu/hr, and exhausting to stack S12.
- (b) One (1) flat surface coating line (EU FL-1), constructed in 2007 and approved for modification in 2008, with a maximum capacity of 4.21 gallons of coating per hour, utilizing a Low Pressure Air Atomization application system, with emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer (RTO-1), rated at 1.16 MMBtu/hr, and exhausting through stack S10.
- (c) One (1) ultraviolet drying oven for the flat surface coating line (EU FL-1), with emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer (RTO-1), rated at 1.16 MMBtu/hr, and exhausting through stack S10.
- (d) Woodworking area equipped with the following miscellaneous woodworking equipment:
 - (1) One (1) molder unit, one (1) door shaper unit, and one (1) sanding unit, each with a maximum capacity of 43.75 units per hour, utilizing one (1) baghouse for particulate control (D-5) with a grain loading outlet of 0.003 grains/scf and 12,000 CFM, and exhausting to stack S-5; and
 - (2) One (1) rough milling unit, one (1) ripper unit, one (1) door shaper unit, one (1) lamination booth, one (1) dado machine, and two (2) panel saws, each with a

maximum capacity of 43.75 units per hour, utilizing one (1) baghouse (D-7) for particulate control with a grain loading outlet of 0.003 grains/scf and 70,000 CFM, and exhausting to stack S-7.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21).

- (a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.003 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking areas;
- (b) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (1) Fifteen (15) space heaters each with a maximum heat input rate of 0.05 mmBtu/hr;
- (c) Application of oils, greases, lubricants or other nonvolatile material applied as temporary protective coatings;
- (d) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs;
- (e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
- (f) Paved and unpaved roads and parking lots with public access;
- (g) One (1) welding department utilizing one (1) baghouse for particulate control (D-7), using E7018 welding material, constructing 43.75 units per hour;
- (h) One (1) lamination booth adhesive applicator, with a maximum capacity of 43.75 units per hour;
- (i) One (1) end panel adhesive applicator, with a maximum capacity of 3.38 pounds per hour of adhesive;
- (j) One (1) water based spray booth, identified as EU-5, using aqueous materials containing less than or equal to one percent (1%) by weight of VOCs that contain no HAPs.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]

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

B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, F089-19460-00443, 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]

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

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

B.4 Enforceability [326 IAC 2-8-6][IC 13-17-12]

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

B.5 Severability [326 IAC 2-8-4(4)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

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

B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

- (1) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
 - (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

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

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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.12 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, or Northwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Northwest Regional Office phone: (219) 757-0265; fax: (219) 757-0267.

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

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

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

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

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

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

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

- (a) All terms and conditions of permits established prior to F089-19460-00443 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.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

(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 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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 nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 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 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

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

and

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

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) **Emission Trades [326 IAC 2-8-15(c)]**
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) **Alternative Operating Scenarios [326 IAC 2-8-15(d)]**
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.19 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

- (a) Enter upon the Permittee's premises where a FESOP 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.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-8-4(6)][326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314][326 IAC 1-1-6]

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
- (1) The potential to emit volatile organic compounds (VOCs) from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period;
 - (2) The potential to emit any regulated pollutant from the entire source, except particulate matter (PM) and volatile organic compounds (VOCs), shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period;
 - (3) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (4) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

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

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

C.6 Fugitive Particulate Matter Emissions [326 IAC 6.8-10-3]

Pursuant to 326 IAC 6.8-10-3 (formerly 326 IAC 6-1-11.1) (Lake County Fugitive Particulate Matter Control Requirements), the particulate matter emissions from source wide activities shall meet the following requirements:

- (a) The average instantaneous opacity of fugitive particulate emissions from a paved road shall not exceed ten percent (10%).
- (b) The average instantaneous opacity of fugitive particulate emissions from an unpaved road shall not exceed ten percent (10%).
- (c) The opacity of fugitive particulate emissions from exposed areas shall not exceed ten percent (10%) on a six (6) minute average.
- (d) The opacity of fugitive particulate emissions from continuous transfer of material onto and out of storage piles shall not exceed ten percent (10%) on a three (3) minute average.
- (e) The opacity of fugitive particulate emissions from storage piles shall not exceed ten percent (10%) on a six (6) minute average.
- (f) There shall be a zero (0) percent frequency of visible emission observations of a material during the inplant transportation of material by truck or rail at any time.
- (g) The opacity of fugitive particulate emissions from the inplant transportation of material by front end loaders and skip hoists shall not exceed ten percent (10%).
- (h) Material processing facilities shall include the following:
 - (1) There shall be a zero (0) percent frequency of visible emission observations from a building enclosing all or part of the material processing equipment, except from a vent in the building.
 - (2) The PM₁₀ emissions from building vents shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.
 - (3) The PM₁₀ stack emissions from a material processing facility shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.

- (A) The opacity of fugitive particulate emissions from the material processing facilities, except a crusher at which a capture system is not used, shall not exceed ten percent (10%) opacity.
- (B) The opacity of fugitive particulate emissions from a crusher at which a capture system is not used shall not exceed fifteen percent (15%).
- (i) The opacity of particulate emissions from dust handling equipment shall not exceed ten percent (10%).
- (j) Material transfer limits shall be as follows:
 - (1) The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%).
 - (2) Where adequate wetting of the material for fugitive particulate emissions control is prohibitive to further processing or reuse of the material, the opacity shall not exceed ten percent (10%), three (3) minute average.
 - (3) Slag and kish handling activities at integrated iron and steel plants shall comply with the following particulate emissions limits:
 - (A) The opacity of fugitive particulate emissions from transfer from pots and trucks into pits shall not exceed twenty percent (20%) on a six (6) minute average.
 - (B) The opacity of fugitive particulate emissions from transfer from pits into front end loaders and from transfer from front end loaders into trucks shall comply with the fugitive particulate emission limits in 326 IAC 6.8-10-3(9).
- (k) Any facility or operation not specified in 326 IAC 6.8-10-3 shall meet a twenty percent (20%), three (3) minute average opacity standard.

The Permittee shall achieve these limits by controlling fugitive particulate matter emissions according to the attached Fugitive Dust Control Plan.

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

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

Testing Requirements [326 IAC 2-8-4(3)]

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

- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

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

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.11 Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

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

Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.12 Risk Management Plan [326 IAC 2-8-4][40 CFR 68]

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

C.13 Response to Excursions or Exceedances [326 IAC 2-8-4][326 IAC 2-8-5]

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

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system);
or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]

- (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.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)][326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:

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

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

Stratospheric Ozone Protection

C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) spray booth (EU 03), which began operations in March 1999, with a maximum capacity of 43.75 wood pieces per hour, utilizing an HVLP application system and a dry filter for particulate control, and exhausting through stack S3. VOC emissions are controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-2, approved for construction in 2011, with a maximum heat input capacity of 4.0 MMBtu/hr, and exhausting to stack S12.
- (b) One (1) flat surface coating line (EU FL-1), constructed in 2007 and approved for modification in 2008, with a maximum capacity of 4.21 gallons of coating per hour, utilizing a Low Pressure Air Atomization application system, with emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer (RTO-1), rated at 1.16 MMBtu/hr, and exhausting through stack S10.
- (c) One (1) ultraviolet drying oven for the flat surface coating line (EU FL-1), with emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer (RTO-1), rated at 1.16 MMBtu/hr, and exhausting through stack S10.

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compound (VOC) Limitation [326 IAC 2-8][326 IAC 8-7][326 IAC 8-11]

The VOC input delivered to surface coating operations, identified as EU 03 and EU FL-1, including coatings, dilution solvents, and clean-up solvents, shall be limited such that the VOC emissions are less than 24.73 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.

Compliance with this limit, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 25 tons per twelve (12) consecutive month period, and shall render 326 IAC 2-7 (Part 70 Permits), 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake County), and 326 IAC 8-11 (Wood Furniture Coatings) not applicable.

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

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets (utilized in EU 03 and EU FL-1) shall utilize one of the following application methods:

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

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between

one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.3 Hazardous Air Pollutants (HAPs) Limitations [326 IAC 2-4.1-1][326 IAC 2-8]

- (a) The input of any single HAP to the surface coating operations, identified as EU 03 and EU FL-1, shall be limited such that the single HAP emissions are less than 9.99 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.
- (b) The input of total HAPs to the surface coating operations, identified as EU 03 and EU FL-1, shall be limited such that the total HAPs emissions are less than 24.95 per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.

Compliance with these limits, combined with the potential to emit HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of any single HAP to less than ten (10) tons per twelve (12) consecutive month period, and total HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)) not applicable.

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

Pursuant to 326 IAC 6-3-2(d) (Particulate Emission Limitations for Manufacturing Processes), particulate matter from surface coating operations, identified as EU 03, shall be controlled by a dry filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for the surface coating operations, identified as EU 03 and EU FL-1, and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.6 VOC and HAPs Emissions

- (a) Compliance with Condition D.1.1 shall be determined no later than 30 days of the end of each month. For a particular month, this shall be based on the total volatile organic compounds emitted for that month added to the previous eleven (11)-month total VOC emitted so as to arrive at VOC emissions for the most recent twelve (12) consecutive month period. The VOC emissions for a month can be arrived at using the following equation:

$$\text{Total VOC emitted} = [(\text{VOC Input EU 03}) * ((100 - \% \text{ overall control efficiency from the most recent valid stack test})/100)] + [(\text{VOC Input EU FL-1}) * ((100 - \% \text{ overall control efficiency from the most recent valid stack test})/100)]$$

- (b) Compliance with Condition D.1.3(a) shall be determined no later 30 days of the end of each month. For a particular month, this shall be based on the amount of each individual HAP emitted for that month added to the previous eleven (11)-month total emitted of that HAP so as to arrive at individual HAP emissions for the most recent twelve (12) consecutive month period. The individual HAP emissions for a month can be arrived at using the following equation:

$$\text{Individual HAP emitted} = [(\text{individual HAP input in EU 03}) * ((100 - \% \text{ overall control efficiency from the most recent valid stack test})/100)] +$$

[[individual HAP input in EU FL-1) * ((100 - % overall control efficiency from the most recent valid stack test)/100)]

- (c) Compliance with Condition D.1.3(b) shall be determined no later 30 days of the end of each month. For a particular month, this shall be based on the total HAPs emitted for that month added to the previous eleven (11)-month total HAPs emitted so as to arrive at total HAP emissions for the most recent twelve (12) consecutive month period. The total HAP emissions for a month can be arrived at using the following equation:

$$\text{Total HAPs emitted} = \text{[(total HAPs input in EU 03) * ((100 - \% \text{ overall control efficiency from the most recent valid stack test})/100)] + \text{[(total HAPs input in EU FL-1) * ((100 - \% \text{ overall control efficiency from the most recent valid stack test})/100)]}$$

D.1.7 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC and HAP content and usage limitations contained in Conditions D.1.1 and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAP data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.8 Particulate Matter (PM) Control

The dry filter for particulate matter (PM) control shall be in operation and control emissions from the surface coating operations, identified as EU 03, at all times that the spray booth is in operation.

D.1.9 VOC and HAP Control

In order to comply with Conditions D.1.1 and D.1.3, the Permittee shall:

- (a) Operate the thermal oxidizer identified as RTO-1 and ensure that the capture hood is in the proper capture position; whenever the one (1) flat surface coating line (EU FL-1) is in operation; and
- (b) Operate the thermal oxidizer identified as RTO-2 and ensure that the capture hood is in the proper capture position whenever the one (1) spray booth (EU 03) is in operation.

D.1.10 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

- (a) In order to demonstrate compliance with Condition D.1.1 and D.1.3, the Permittee shall perform VOC/HAP testing of thermal oxidizer RTO-1 utilizing methods as approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.
- (b) Not later than 180 days after the issuance date of this permit, Significant Permit Revision No. 089-29986-00443, the Permittee shall perform VOC/HAP testing of the thermal oxidizer RTO-2 utilizing methods approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

D.1.11 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filter. To monitor the performance of the dry filter, weekly observations shall be made of the overspray from the surface coating booth stack (S3) while any one of the spray booths are in operation. If a condition exists which should result in a response step, 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.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps. 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.
- (c) Annual inspections of the primary heat exchanges and associated inlet and outlet valves for the thermal oxidizer and associated airflow dampers shall be performed. If a condition exists which should result in a response step, 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.1.12 Thermal Oxidizer Temperature

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on both of the thermal oxidizers (RTO-1 and RTO-2) for measuring operating temperature. For the purpose of this condition, continuous means no less than once per minute. The output of this system shall be recorded as a 3-hour average. From the date of startup until the approved stack test results are available, the Permittee shall operate both RTO-1 and RTO-2 at or above the 3-hour average temperature of 1,400°F.
- (b) The Permittee shall determine the 3-hour average temperatures from the most recent valid stack tests associated with the measured capture and destruction efficiency, as approved by IDEM.
- (c) On and after the date the approved stack test results are available, the Permittee shall operate the thermal oxidizers (RTO-1 and RTO-2) at or above the 3-hour average temperatures as observed during the compliant stack tests.

D.1.13 Parametric Monitoring

- (a) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test associated with the measured capture and destruction efficiency, as approved by IDEM.
- (b) The duct pressure or fan amperage shall be observed at least once per day when either of the thermal oxidizers (RTO-1 or RTO-2) is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal ranges as established in most recent compliant stack tests.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-16]

D.1.14 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.1.1 and D.1.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC, single HAP and total HAP usage limits established in Conditions D.1.1 and D.1.3.
- (1) The VOC and HAP content of each coating material and solvent used;
 - (2) The amount of coating material and solvent less water used on a monthly basis;
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used; and
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC and HAP usage for each month; and
 - (5) The weight of VOCs and HAPs emitted for each compliance period.
- (b) To document the compliance status with Condition D.1.11, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.
- (c) To document the compliance status with Condition D.1.12, the Permittee shall maintain continuous temperature records for the thermal oxidizers and the 3-hour average temperatures used to demonstrate compliance during the most recent compliant stack tests.
- (d) To document the compliance status with Condition D.1.13, the Permittee shall maintain daily records of the duct pressure or fan amperage for the RTO systems (RTO-1 and RTO-2). The Permittee shall include in its daily record the following: logs of the downtime control devices and monitoring equipment, when the duct pressures or fan amperages are not taken, and the reason for the lack of the reading (e.g., the process did not operate that day).
- (e) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.1.15 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.1 and D.1.3 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (d) Woodworking area equipped with the following miscellaneous woodworking equipment:
- (1) One (1) molder unit, one (1) door shaper unit, and one (1) sanding unit, each with a maximum capacity of 43.75 units per hour, utilizing one (1) baghouse for particulate control (D-5) with a grain loading outlet of 0.003 grains/scf and 12,000 CFM, and exhausting to stack S-5; and
 - (2) One (1) rough milling unit, one (1) ripper unit, one (1) door shaper unit, one (1) lamination booth, one (1) dado machine, and two (2) panel saws, each with a maximum capacity of 43.75 units per hour, utilizing one (1) baghouse (D-7) for particulate control with a grain loading outlet of 0.003 grains/scf and 70,000 CFM, and exhausting to stack S-7.

Insignificant Activities:

- (a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.003 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking areas.

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the molding/sanding/shaping operations, the sawing/cutting/rough milling operations, and the grinding and machining operations shall not exceed 3.11 pounds per hour each when operating at a process weight rate of 1,325 pounds per hour each.

The pounds per hour limitation was calculated with the following equation:

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

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

D.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for the molding/sanding/shaping operations, the sawing/cutting/rough milling operations, the grinding and machining operations and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.2.3 Particulate Control

- (a) In order to comply with Condition D.2.1,

- (1) the one (1) baghouse for particulate control (D-5) shall be in operation and control emissions from the one (1) molder unit, one (1) door shaper unit, and one (1) sanding unit at all times that one (1) or more of these units is in operation;
 - (2) the one (1) baghouse for particulate control (D-7) shall be in operation and control emissions from the one (1) rough milling unit, one (1) ripper unit, one (1) door shaper unit, one (1) lamination booth, one (1) dado machine, and two (2) panel saws at all times that one (1) or more of these units is in operation; and
 - (3) the fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators for particulate control shall be in operation and control emissions from the grinding and machining operations at all times that one (1) or more of these units is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

D.2.4 Visible Emissions Notations

The Permittee shall comply with the following:

- (a) Visible emission notations of the baghouse (D-5 and D-7) stack exhausts shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. 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

An inspection shall be performed each calendar quarter of all bags controlling the molding/sanding/shaping operations, the sawing/cutting/rough milling operations, and the grinding and machining 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 indoors. All defective bags shall be replaced.

D.2.6 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated

continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-16]

D.2.7 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.5 the Permittee shall maintain records of the results of the inspections required under Condition D.2.5, and the dates the vents are redirected.
- (b) To document the compliance status with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the baghouse exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (i.e. the process did not operate that day).
- (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**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Saco Industries, Inc.
Source Address: 17151 Morse Street, Lowell, Indiana 46356
FESOP Permit No.: F089-19460-00443

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

**100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: (317) 233-0178
Fax: (317) 233-6865**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Saco Industries, Inc.
Source Address: 17151 Morse Street, Lowell, Indiana 46356
FESOP Permit No.: F089-19460-00443

This form consists of 2 pages

Page 1 of 2

- | |
|---|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16 |
|---|

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

FESOP Quarterly Report

Source Name: Saco Industries, Inc.
 Source Address: 17151 Morse Street, Lowell, Indiana 46356
 FESOP Permit No.: F089-19460-00443
 Facility: Surface Coating Operations (EU 3 and EU FL-1)
 Parameter: VOC emissions
 Limit: The VOC input delivered to surface coating operations, identified as EU 03 and EU FL-1, including coatings, dilution solvents, and clean-up solvents, shall be limited such that the VOC emissions are less than 24.73 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.

Total VOC emitted = $[(\text{VOC Input EU 03}) * ((100 - \% \text{ overall control efficiency from the most recent valid stack test})/100)] + [(\text{VOC Input EU FL-1}) * ((100 - \% \text{ overall control efficiency from the most recent valid stack test})/100)]$

YEAR: _____

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

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

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

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

FESOP Quarterly Report

Source Name: Saco Industries, Inc.
 Source Address: 17151 Morse Street, Lowell, Indiana 46356
 FESOP Permit No.: F089-19460-00443
 Facility: Surface Coating Operations (EU 3 and EU FL-1)
 Parameter: Individual HAP emissions
 Limit: The input of any single HAP to the surface coating operations, identified as EU 03 and EU FL-1, shall be limited such that the single HAP emissions are less than 9.99 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.

Individual HAP emitted = $[(\text{individual HAP input in EU 03}) * ((100 - \% \text{ overall control efficiency from the most recent valid stack test})/100)] + [(\text{individual HAP input in EU FL-1}) * ((100 - \% \text{ overall control efficiency from the most recent valid stack test})/100)]$

YEAR: _____

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

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

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

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

FESOP Quarterly Report

Source Name: Saco Industries, Inc.
 Source Address: 17151 Morse Street, Lowell, Indiana 46356
 FESOP Permit No.: F089-19460-00443
 Facility: Surface Coating Operations (EU 3 and EU FL-1)
 Parameter: Total HAP emissions
 Limit: The input of total HAPs to the surface coating operations, identified as EU 03 and EU FL-1, shall be limited such that the total HAPs emissions are less than 24.95 per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.

Total HAPs emitted = $[(\text{total HAPs input in EU 03}) * ((100 - \% \text{ overall control efficiency from the most recent valid stack test})/100)] + [(\text{total HAPs input in EU FL-1}) * ((100 - \% \text{ overall control efficiency from the most recent valid stack test})/100)]$

YEAR: _____

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

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

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

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Saco Industries, Inc.
Source Address: 17151 Morse Street, Lowell, Indiana 46356
FESOP Permit No.: F089-19460-00443

Months: _____ to _____ Year: _____

Page 1 of 2

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

Technical Support Document (TSD) for a Significant Permit Revision to a
Federally Enforceable State Operating Permit (FESOP)

Source Description and Location

Source Name:	Saco Industries, Inc.
Source Location:	17151 Morse Street, Lowell, IN 46356
County:	Lake
SIC Code:	2434
Operation Permit No.:	F089-19460-00443
Operation Permit Issuance Date:	February 21, 2007
Significant Permit Revision No.:	089-29986-00443
Permit Reviewer:	Meredith W. Jones

On December 9, 2011, the Office of Air Quality (OAQ) received an application from Saco Industries, Inc. related to a modification to an existing stationary wood and particle board surface coating and manufacturing operation for bathroom and kitchen cabinets.

Existing Approvals

The source was issued FESOP Renewal No. F089-19460-00443 on February 21, 2007. The source has since received the following approvals:

- (a) Minor Permit Revision No. 089-24054-00443, issued on April 23, 2007; and
- (b) Significant Permit Revision No. 089-25570-00443, issued on April 8, 2008.

County Attainment Status

The source is located in Lake County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of East Chicago bounded by Columbus Drive on the north; the Indiana Harbor Canal on the west; 148 th Street, if extended, on the south; and Euclid Avenue on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of East Chicago and Lake County.
O ₃	Attainment effective May 11, 2010, for the 8-hour ozone standard. ¹
PM ₁₀	Attainment effective March 11, 2003, for the cities of East Chicago, Hammond, Whiting, and Gary. Unclassifiable effective November 15, 1990, for the remainder of Lake County.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ The U.S. EPA has acknowledged in both the proposed and final rulemaking for this redesignation that the anti-backsliding provisions for the 1-hour ozone standard no longer apply as a result of the redesignation under the 8-hour ozone standard. Therefore, permits in Lake County are no longer subject to review pursuant to Emission Offset, 326 IAC 2-3. Basic nonattainment designation effective federally April 5, 2005, for PM _{2.5} .	

- (a) **Ozone Standards**
 Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Lake County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
 U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Lake County as nonattainment for PM_{2.5}. On March 7, 2005, the Indiana Attorney General's Office, on behalf of IDEM, filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's New Source Review Rule for PM_{2.5} promulgated on May 8, 2008, and effective on July 15, 2008. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.
- (c) **Other Criteria Pollutants**
 Lake County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

Status of the Existing Source

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

Process (Emission Unit)	Potential To Emit of the Entire Source Prior to Revision (tons/year)								
	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Spray Booth (EU 03)	15.69	15.69	15.69	-	-	<24.86	-	<24.86	<9.99 (Xylene)
Flat Surface Coating Line (EU FL-1)	0.00	0.00	0.00	-	-		-		
RTO-1	9.65 E-03	0.04	0.04	3.05 E-03	0.51	0.03	0.43	9.59 E-03	9.15E-03 (Hexane)
Woodworking Area	<40.86	<40.86	<40.86	-	-	-	-	-	-
Grinding & Machining Operations				-	-	-	-	-	-
Space Heaters	6.24 E-03	0.02	0.02	1.97 E-03	0.33	0.02	0.28	6.20 E-03	5.91E-03 (Hexane)

Process (Emission Unit)	Potential To Emit of the Entire Source Prior to Revision (tons/year)								
	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Welding Department	2.24 E-03	2.24 E-03	2.24 E-03	-	-	-	-	7.07 E-05	7.07E-05 (Manganese)
Lamination Booth Adhesive Applicator	0.07	0.07	0.07	-	-	0.12	-	negl.	negl.
Total PTE of Entire Source	<56.63	<56.68	<56.68	0.01	0.84	<25.00	0.70	<25.00	<9.99 (Xylene)
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	NA	250	250	NA	NA	250	NA	NA

negl. = negligible
 These emissions are based upon the technical support document for Significant Permit Revision No. 089-25570-00443, issued on April 8, 2008.

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) This existing source is not a major stationary source under Emission Offset (326 IAC 2-3), because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or more.
- (c) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the Permittee has accepted limits on HAPs emissions to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Saco Industries, Inc. on December 9, 2011, relating to the construction and operation of one (1) natural gas-fired regenerative thermal oxidizer to control VOC emissions from spray booth EU 03.

The following is the new emission unit:

- (a) One (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-2, approved for construction in 2011, with a maximum heat input capacity of 4.0 MMBtu/hr, and exhausting to stack S12.

The following emission unit has been removed from the source, but inadvertently was not removed from the permit in the most recent approval:

- (a) One ultraviolet drying oven for the mister surface coating line (EU M-1). Emissions from the drying operation are vented through stack S11.

Enforcement Issues

There are no pending enforcement actions related to this revision.

Emission Calculations

See Appendix A of this TSD 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.

Permit Level Determination – FESOP Revision

The following table is used to determine the appropriate permit level under 326 IAC 2-8.11.1. This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

<i>Process (Emission Unit)</i>	PTE of Proposed Revision (tons/year)								
	<i>PM</i>	<i>PM₁₀[*]</i>	<i>PM_{2.5}</i>	<i>SO₂</i>	<i>NO_x</i>	<i>VOC</i>	<i>CO</i>	<i>Total HAPs</i>	<i>Worst Single HAP</i>
RTO-2	0.03	0.13	0.13	0.01	1.75	0.10	1.47	0.03	0.03 (Hexane)
Total PTE of Proposed Revision	0.03	0.13	0.13	0.01	1.75	0.10	1.47	0.03	0.03 (Hexane)

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

This FESOP is being revised through a FESOP Significant Permit Revision pursuant to 326 IAC 2-8-11.1 (g)(2) because it involves an adjustment to the existing source-wide emissions limitations to maintain the FESOP status of the source (see PTE of the Entire Source After The Issuance of the FESOP Revision Section).

PTE of the Entire Source After Issuance of the FESOP Revision

The table below summarizes the potential to emit of the entire source (reflecting adjustment of existing limits), with updated emissions shown as **bold** values and previous emissions shown as ~~strike through~~ values.

<i>Process (Emission Unit)</i>	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)								
	<i>PM</i>	<i>PM₁₀[*]</i>	<i>PM_{2.5}</i>	<i>SO₂</i>	<i>NO_x</i>	<i>VOC</i>	<i>CO</i>	<i>Total HAPs</i>	<i>Worst Single HAP</i>
Spray Booth (EU 03)	15.69	15.69	15.69	-	-	<24.86	-	<24.86	<9.99 (Xylene)
Flat Surface Coating Line (EU FL-1)	0.00	0.00	0.00	-	-	<24.73	-	<24.95	
RTO-2	0.03	0.13	0.13	0.01	1.75	0.10	1.47	0.03	0.03 (Hexane)

Process (Emission Unit)	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)								
	PM	PM ₁₀ *	PM _{2.5}	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
RTO-1	9.65 E-03	0.04	0.04	3.05 E-03	0.51	0.03	0.43	9.59 E-03	9.15E-03 (Hexane)
Woodworking Area				-	-	-	-	-	-
Grinding & Machining Operations	<40.86	<40.86	<40.86	-	-	-	-	-	-
Woodworking Area**	9.24	9.24	9.24	-	-	-	-	-	-
Grinding & Machining Operations**	22.53	22.53	22.53	-	-	-	-	-	-
Space Heaters	6.24 E-03	0.02	0.02	1.97 E-03	0.33	0.02	0.28	6.20 E-03	5.91E-03 (Hexane)
Welding Department	2.24 E-03	2.24 E-03	2.24 E-03	-	-	-	-	7.07 E-05	7.07E-05 (Manganese)
Lamination Booth Adhesive Applicator	0.07	0.07	0.07	-	-	0.12	-	negl.	negl.
Total PTE of Entire Source	56.63 47.57	56.68 47.72	56.68 47.72	0.01 0.02	0.84 2.59	<25.00	0.70 2.17	<25.00	<9.99 (Xylene)
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA

negl. = negligible
 *Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".
 ** Because controls on woodworking are now considered by IDEM to be integral to the process, the pounds per hour limitation on PM/PM-10 from the molding/sanding/shaping operations, sawing/cutting/rough milling operations, and the machining and grinding operations is no longer necessary to ensure that source-wide PM/PM-10 emissions are less than 100 tons per year and has therefore been removed.

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

Process (Emission Unit)	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)								
	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Spray Booth (EU 03)	15.69	15.69	15.69	-	-		-		
Flat Surface Coating Line (EU FL-1)	0.00	0.00	0.00	-	-	<24.73	-	<24.95	<9.99 (Xylene)

Process (Emission Unit)	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)								
	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
RTO-2	0.03	0.13	0.13	0.01	1.75	0.10	1.47	0.03	0.03 (Hexane)
RTO-1	9.65 E-03	0.04	0.04	3.05 E-03	0.51	0.03	0.43	9.59 E-03	9.15E-03 (Hexane)
Woodworking Area	9.24	9.24	9.24	-	-	-	-	-	-
Grinding & Machining Operations	22.53	22.53	22.53	-	-	-	-	-	-
Space Heaters	6.24 E-03	0.02	0.02	1.97 E-03	0.33	0.02	0.28	6.20 E-03	5.91E-03 (Hexane)
Welding Department	2.24 E-03	2.24 E-03	2.24 E-03	-	-	-	-	7.07 E-05	7.07E-05 (Manganese)
Lamination Booth Adhesive Applicator	0.07	0.07	0.07	-	-	0.12	-	negl.	negl.
Total PTE of Entire Source	47.57	47.72	47.72	0.02	2.59	<25.00	2.17	<25	<9.99 (Xylene)
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
negl. = negligible *Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".									

(a) *FESOP Status*

This revision to an existing Title V minor stationary source will not change the minor status because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP).

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

- (1) The VOC input delivered to surface coating operations, identified as EU 03 and EU FL-1, including coatings, dilution solvents, and clean-up solvents, shall be limited such that the VOC emissions are less than 24.73 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.
- (2) The input of any single HAP to the surface coating operations, identified as EU 03 and EU FL-1, shall be limited such that the single HAP emissions are less than 9.99 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.
- (3) The input of total HAPs to the surface coating operations, identified as EU 03 and EU FL-1, shall be limited such that the total HAPs emissions are less than 24.95 per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.

Compliance with these limits, combined with the potential to emit VOC and HAPs from all other

emission units at this source, shall limit the source-wide total potential to emit VOC to less than twenty-five (25) tons per 12 consecutive month period, any single HAP to less than ten (10) tons per 12 consecutive month period, and total HAPs to less than twenty-five (25) tons per 12 consecutive month period and shall render 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

(b) *PSD Minor Source*

This modification to an existing PSD minor stationary source will not change the PSD minor status because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

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

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

The following state rules are applicable to the proposed revision:

326 IAC 2-8-4 (FESOP)

This revision to an existing Title V minor stationary source will not change the minor status because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP). See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This modification to an existing PSD minor stationary source will not change the PSD minor status because the potential to emit of all regulated attainment pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

326 IAC 2-3 (Emission Offset) and 326 IAC 2-1.1-5 (Nonattainment New Source Review)

This modification to an existing Emission Offset minor stationary source will not change the Emission Offset minor status because the potential to emit of all regulated nonattainment pollutants from the entire source will continue to be less than the Emission Offset major source threshold levels. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

This modification to an existing minor stationary source under 326 IAC 2-1.1-5 (Nonattainment New Source Review) will not change the minor status because the potential to emit of PM_{2.5} from the entire source will continue to be less than 100 tons per year. Therefore, pursuant to 326 IAC 2-1.1-5, the Nonattainment New Source Review requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

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

The proposed revision is not subject to the requirements of 326 IAC 2-4.1 because the unlimited potential to emit of HAPs from the new unit is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1, this source is not subject to this rule because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is located in Lake County, it has actual emissions of NOx and VOC of less than twenty-five (25) tons per year, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

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 twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust 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.

RTO-2

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)

The one (1) natural gas-fired regenerative thermal oxidizer identified as RTO-2 is not subject to the requirements of 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating) because, pursuant to 326 IAC 1-2-19, this emission unit does not meet the definition of an indirect heating unit.

326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations)

The one (1) natural gas-fired regenerative thermal oxidizer identified as RTO-2 is not subject to the requirements of 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations) because the potential to emit sulfur dioxide from this emission unit is less than twenty-five (25) tons per year and ten (10) pounds per hour.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)

The requirements of 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties) were not applicable prior to this revision because VOC emissions from the source are limited to less than twenty-five (25) tons per year. This revision will continue to limit source-wide VOC emissions to less than twenty-five (25) tons per year; therefore, the source is still not subject to the requirements of this rule.

326 IAC 8-11 (Wood Furniture Coatings)

The requirements of 326 IAC 8-11 (Wood Furniture Coatings) were not applicable prior to this revision because VOC emissions from the source are limited to less than twenty-five (25) tons per year. This

revision will continue to limit source-wide VOC emissions to less than twenty-five (25) tons per year; therefore, the source is still not subject to the requirements of this rule.

Compliance Determination, Monitoring and Testing Requirements

- (a) The compliance determination and monitoring requirements applicable to this proposed revision are as follows:

Emission Unit/Control	Operating Parameters	Frequency
EU 03 (RTO-2)	Operating Temperature	3-hour average
EU 03 (RTO-2)	Duct Pressure or Fan Amperage	At least once per day

- (b) The testing requirements applicable to this proposed revision are as follows:

Testing Requirements				
Emission Unit	Control Device	Pollutant	Timeframe for Testing	Frequency of Testing
EU FL-1	RTO-1	VOC/HAP (capture and destruction efficiency)	At least once every five (5) years from the date of the most recent valid compliance demonstration	At least once every 5 years
EU 03	RTO-2	VOC/HAP (capture and destruction efficiency)	Not later than 180 days after the issuance date of Significant Permit Revision No. 089-29986-00443	At least once every 5 years

Proposed Changes

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

- (a) One (1) natural gas-fired regenerative thermal oxidizer to control VOC emissions from spray booth EU 03 has been added.
- (b) One ultraviolet drying oven for the mister surface coating line (EU M-1) has been removed from the permit.
- (c) The limits on VOC, individual HAPs, and total HAPs have been updated to account for emissions from the new RTO. The associated compliance determination, testing, compliance monitoring, and recordkeeping and reporting requirements have all been updated accordingly.
- (d) Because controls on woodworking are now considered by IDEM to be integral to the process, the pounds per hour limitation on PM/PM-10 from the molding/sanding/shaping operations, sawing/cutting/rough milling operations, and the machining and grinding operations is no longer necessary to ensure that source-wide PM/PM-10 emissions are less than 100 tons per year and has therefore been removed. Compliance determination, compliance monitoring, and recordkeeping requirements, however, are still required to ensure compliance with 326 IAC 6-3-2.
- (e) Because potential particulate emissions from the woodworking area exceed the threshold for insignificant activities, these emission units have been moved from the insignificant activities list to the significant activities list.

SECTION A SOURCE SUMMARY

...

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) One (1) spray booth (~~ID~~-EU 03), which began operations in March, 1999, with a maximum capacity of 43.75 wood pieces per hour, utilizing an HVLP application system and a dry filter for ~~overspray~~ particulate control, and exhausting through stack S3. **VOC emissions are controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-2, approved for construction in 2011, with a maximum heat input capacity of 4.0 MMBtu/hr, and exhausting to stack S12.**

...

- (d) **Woodworking area equipped with the following miscellaneous woodworking equipment:**

- (1) **One (1) molder unit, one (1) door shaper unit, and one (1) sanding unit, each with a maximum capacity of 43.75 units per hour, utilizing one (1) baghouse for particulate control (D-5) with a grain loading outlet of 0.003 grains/scf and 12,000 CFM, and exhausting to stack S-5; [326 IAC 2-7-1(21)(G)(xxix) and**
- (2) **One (1) rough milling unit, one (1) ripper unit, one (1) door shaper unit, one (1) lamination booth, one (1) dado machine, and two (2) panel saws, each with a maximum capacity of 43.75 units per hour, utilizing one (1) baghouse (D-7) for particulate control with a grain loading outlet of 0.003 grains/scf and 70,000 CFM, and exhausting to stack S-7. [326 IAC 2-7-1(21)(G)(xxix)]**

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21).

- ~~(a) Woodworking area equipped with the following miscellaneous woodworking equipment:~~

- ~~(1) One (1) molder unit, one (1) door shaper unit, and one (1) sanding unit, each with a maximum capacity of 43.75 units per hour, utilizing one (1) baghouse for particulate control (D-5) with a grain loading outlet of 0.003 grains/scf and 12,000 CFM, and exhausting to stack S-5; [326 IAC 2-7-1(21)(G)(xxix) and~~
- ~~(2) One (1) rough milling unit, one (1) ripper unit, one (1) door shaper unit, one (1) lamination booth, one (1) dado machine, and two (2) panel saws, each with a maximum capacity of 43.75 units per hour, utilizing one (1) baghouse (D-7) for particulate control with a grain loading outlet of 0.003 grains/scf and 70,000 CFM, and exhausting to stack S-7. [326 IAC 2-7-1(21)(G)(xxix)]~~

- ~~(ba) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.003 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking areas; [326 IAC 2-7-1(21)(G)(xxix)]~~

...

- ~~(I) One ultraviolet drying oven for the mister surface coating line (EU M-1). Emissions from the drying operation are vented through stack S11.~~

...

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

Facility Emissions Unit Description [~~326 IAC 2-8-4(10)~~]:

- (a) One (1) spray booth (~~ID~~-EU 03), which began operations in March, 1999, with a maximum capacity of 43.75 wood pieces per hour, utilizing an HVLP application system and a dry filter for ~~overspray~~ **particulate** control, and exhausting through stack S3. **VOC emissions are controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-2, approved for construction in 2011, with a maximum heat input capacity of 4.0 MMBtu/hr, and exhausting to stack S12.**

...

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compound (VOC) Limitation [326 IAC 2-8][~~326 IAC 8-7~~][326 IAC 8-11]

The VOC input delivered to surface coating operations, identified as EU 03 and EU FL-1, including coatings, dilution solvents, and clean-up solvents, shall be limited such that the VOC emissions are less than ~~24.86~~ **24.73** tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.

Compliance with this limit, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 25 tons per twelve (12) consecutive month period, and shall render 326 IAC 2-7 (Part 70 Permits), ~~326 IAC 2-3 (Emission Offset)~~, 326 IAC 8-7 ((Specific VOC Reduction Requirements for Lake County)), and 326 IAC 8-11 (Wood Furniture Coatings) not applicable.

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

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating, ~~utilized in EU 03 and EU FL-1~~, applied to wood furniture and cabinets (**utilized in EU 03 and EU FL-1**) shall utilize one of the following application methods:

...

D.1.3 Hazardous Air Pollutants (HAPs) Limitations [326 IAC 2-4.1-1][~~326 IAC 2-8~~]

...

- (b) The input of total HAPs to the surface coating operations, identified as EU 03 and EU FL-1, shall be limited such that the total HAPs emissions are less than ~~24.86~~ **24.95** per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.

Compliance with these limits, combined with the potential to emit HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of any single HAP to less than ten (10) tons per twelve (12) consecutive month period, and total HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)) not applicable.

...

Compliance Determination Requirements

D.1.6 VOC and HAPs Emissions

- (a) Compliance with Conditions D.1.1 shall be determined ~~within~~ **no later** 30 days of the end of each month. For a particular month, this shall be based on the total volatile organic

compounds emitted for that month added to the previous eleven (11)-month total VOC emitted so as to arrive at VOC emissions for the most recent twelve (12) consecutive month period. The VOC emissions for a month can be arrived at using the following equation:

$$\text{Total VOC emitted} = [(\text{VOC Input EU 03}) * ((100 - \% \text{ overall control efficiency from the most recent valid stack test})/100)] + [(\text{VOC Input EU FL-1}) * ((100 - \% \text{ overall control efficiency from the most recent valid stack test})/100)]$$

- (b) Compliance with Condition D.1.3(a) shall be determined ~~within~~ **no later** 30 days of the end of each month. For a particular month, this shall be based on the amount of each individual HAP emitted for that month added to the previous eleven (11)-month total emitted of that HAP so as to arrive at individual HAP emissions for the most recent twelve (12) consecutive month period. The individual HAP emissions for a month can be arrived at using the following equation:

$$\text{Individual HAP emitted} = [(\text{individual HAP input in EU 03}) * ((100 - \% \text{ overall control efficiency from the most recent valid stack test})/100)] + [(\text{individual HAP input in EU FL-1}) * ((100 - \% \text{ overall control efficiency from the most recent valid stack test})/100)]$$

- (c) Compliance with Condition D.1.3(b) shall be determined ~~within~~ **no later** 30 days of the end of each month. For a particular month, this shall be based on the total HAPs emitted for that month added to the previous eleven (11)-month total HAPs emitted so as to arrive at total HAP emissions for the most recent twelve (12) consecutive month period. The total HAP emissions for a month can be arrived at using the following equation:

$$\text{Total HAPs emitted} = [(\text{total HAPs input in EU 03}) * ((100 - \% \text{ overall control efficiency from the most recent valid stack test})/100)] + [(\text{total HAPs input in EU FL-1}) * ((100 - \% \text{ overall control efficiency from the most recent valid stack test})/100)]$$

...

D.1.9 VOC and HAP Control

In order to comply with Conditions D.1.1 and D.1.3, the Permittee shall:

- (a) ~~Operate the thermal oxidizer identified as {RTO-1} and ensure that the capture hood is in the proper capture position, whenever the one (1) flat surface coating line (EU FL-1) is in operation; and~~
- (b) **Operate the thermal oxidizer identified as RTO-2 and ensure that the capture hood is in the proper capture position whenever the one (1) spray booth (EU 03) is in operation.**

D.1.10 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

~~Within 60 days after achieving maximum capacity, but no later than 180 days after initial startup, the Permittee shall conduct a performance test to determine the VOC/HAP capture and destruction efficiency to verify compliance with Conditions D.1.1 and D.1.3 for the thermal oxidizer (RTO-1) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.~~

- (a) **In order to demonstrate compliance with Condition D.1.1 and D.1.3, the Permittee shall perform VOC/HAP testing of thermal oxidizer RTO-1 utilizing methods as**

approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee’s obligation with regard to the performance testing required by this condition.

- (b) **Not later than 180 days after the issuance date of this permit, Significant Permit Revision No. 089-29986-00443, the Permittee shall perform VOC/HAP testing of the thermal oxidizer RTO-2 utilizing methods approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee’s obligation with regard to the performance testing required by this condition.**

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

...

D.1.12 Thermal Oxidizer Temperature

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on **both** of the thermal oxidizers (RTO-1 **and** RTO-2) for measuring operating temperature. For the purpose of this condition, continuous means no less than once per minute. The output of this system shall be recorded as a 3-hour average. From the date of startup until the approved stack test results are available, the Permittee shall operate **both** RTO-1 **and** RTO-2 at or above the 3-hour average temperature of 1,400°F.
- (b) The Permittee shall determine the 3-hour average temperatures from the most recent valid stack tests associated with the measured capture and destruction efficiency, as approved by IDEM.
- (c) On and after the date the approved stack test results are available, the Permittee shall operate the thermal oxidizers (RTO-1 **and** RTO-2) at or above the 3-hour average temperatures as observed during the compliant stack tests.

D.1.13 Parametric Monitoring

- ...
- (b) The duct pressure or fan amperage shall be observed at least once per day when **either** of the thermal oxidizers (RTO-1 **or** RTO-2) is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal ranges as established in most recent compliant stack tests.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)][~~326 IAC 2-8-16~~]

...

SECTION D.2

FACILITY EMISSIONS UNIT OPERATION CONDITIONS

Facility Emissions Unit Description [~~326 IAC 2-8-4(10)~~]:

- (ad) Woodworking area equipped with the following miscellaneous woodworking equipment:
 - (1) One (1) molder unit, one (1) door shaper unit, and one (1) sanding unit, each with a maximum capacity of 43.75 units per hour, utilizing one (1) baghouse for particulate control (D-5) with a grain loading outlet of 0.003 grains/scf and 12,000 CFM, and exhausting to stack S-5; [~~326 IAC 2-7-1(21)(G)(xxix)~~] and

- (2) One (1) rough milling unit, one (1) ripper unit, one (1) door shaper unit, one (1) lamination booth, one (1) dado machine, and two (2) panel saws, each with a maximum capacity of 43.75 units per hour, utilizing one (1) baghouse (D-7) for particulate control with a grain loading outlet of 0.003 grains/scf and 70,000 CFM, and exhausting to stack S-7. [~~326 IAC 2-7-1(21)(G)(xxix)~~]

Insignificant Activities:

- (ba) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.003 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking areas. [~~326 IAC 2-7-1(21)(G)(xxix)~~]

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

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

~~The molding/sanding/shaping operations, the sawing/cutting/rough milling operations, and the grinding and machining operations each controlled by a baghouse shall be an insignificant activity for Title V permitting purposes provided that the baghouse operations meet the requirements of 326 IAC 2-7-1(21)(G)(xxix), including the following:~~

- ~~(a) Each woodworking baghouse shall not exhaust to the atmosphere greater than one hundred twenty five thousand (125,000) cubic feet of air per minute and shall not emit particulate matter with a diameter less than ten (10) microns in excess of three-thousandths (0.003) grain per dry standard cubic foot of outlet air.~~
- ~~(b) The opacity from each baghouse shall not exceed ten percent (10%).~~
- ~~(c) Visible emissions from the baghouse shall be observed daily using procedures in accordance with Method 22 and normal or abnormal emissions are recorded. In the event abnormal emissions are observed for greater than six (6) minutes in duration, the following shall occur:~~
- ~~(1) The baghouse shall be inspected.~~
- ~~(2) Corrective actions, such as replacing or reseating bags, are initiated, when necessary.~~

~~D.2.2 PM and PM-10 Limit [326 IAC 2-8][326 IAC 2-2][326 IAC 2-3]~~

~~Pursuant to 326 IAC 2-8-4, emissions of PM/PM-10 from the molding/sanding/shaping operations, sawing/cutting/rough milling operations, and the machining and grinding operations each shall not exceed 3.11 pounds of PM/PM-10 per hour.~~

~~This limit is equivalent to a total of less than one hundred (100) tons of PM/PM-10 emissions per twelve (12) consecutive month period, from the molding/sanding/shaping operations, sawing/cutting/rough milling operations, and the machining and grinding operations, including emissions from all other emission units at the source. Compliance with this limit will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) do not apply. This limit will render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) requirements not applicable. This limit will also render 326 IAC 2-3 (Emission Offset) requirements for PM2.5 not applicable.~~

D.2.31 Particulate Matter (PM) [326 IAC 6-3-2]

...

Compliance Determination Requirements

D.2.53 Particulate Control

~~The baghouse for particulate control shall be in operation and control emissions from the molding/sanding/shaping operations, the sawing/cutting/rough milling operations, and the grinding and machining operations at all times that the molding/sanding/shaping operations, the sawing/cutting/rough milling operations, and the grinding and machining operations are in operation.~~

- (a) In order to comply with Condition D.2.1,
- (1) the one (1) baghouse for particulate control (D-5) shall be in operation and control emissions from the one (1) molder unit, one (1) door shaper unit, and one (1) sanding unit at all times that one (1) or more of these units is in operation;
 - (2) the one (1) baghouse for particulate control (D-7) shall be in operation and control emissions from the one (1) rough milling unit, one (1) ripper unit, one (1) door shaper unit, one (1) lamination booth, one (1) dado machine, and two (2) panel saws at all times that one (1) or more of these units is in operation; and
 - (3) the fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators for particulate control shall be in operation and control emissions from the grinding and machining operations at all times that one (1) or more of these units is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

D.2.4 Visible Emissions Notations

The Permittee shall comply with the following:

- (a) Visible emission notations of the baghouse (D-5 and D-7) stack exhausts shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

- (d) **A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.**
- (e) **If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.**

...

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-16]

D.2.87 Record Keeping Requirements

- (a) To document **the compliance status** with Condition D.2.65 the Permittee shall maintain records of the results of the inspections required under ~~Condition D.2.1(c) and Condition D.2.65~~, and the dates the vents are redirected.
- (b) To document **the compliance status** with ~~Condition D.2.1(c)~~ or Condition D.2.74, the Permittee shall maintain records of daily visible emission notations of the baghouse exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (i.e. the process did not operate that day).
- ~~(c) The Permittee shall maintain records of corrective actions to document compliance with 326 IAC 2-7-21(1)(G)(xxix)(GG)(dd).~~
- (dc) ~~All records shall be maintained in accordance with~~ 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 DATA SECTION AND ENFORCEMENT BRANCH

FESOP Quarterly Report

Source Name: Saco Industries, Inc.
Source Address: 17151 Morse Street, Lowell, Indiana 46356
~~Mailing Address: 17151 Morse Street, P.O. Box 342, Lowell, Indiana 46356~~
FESOP No.: F089-19460-00443
Facility: Surface Coating Operations (EU 3 and EU FL-1)
Parameter: VOC emissions
Limit: The VOC input delivered to surface coating operations, identified as EU 03 and EU FL-1, including coatings, dilution solvents, and clean-up solvents, shall be limited such that the VOC emissions are less than ~~24.86~~ **24.73** tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.

Total VOC emitted = [VOC Input EU 03 * **((100 - % overall control efficiency from the most recent valid stack test)/100)**] + [(VOC Input EU FL-1) * ((100 - % overall control efficiency from the most recent valid stack test)/100)]

YEAR: _____

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

...

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Saco Industries, Inc.
 Source Address: 17151 Morse Street, Lowell, Indiana 46356
 Mailing Address: ~~17151 Morse Street, P.O. Box 342, Lowell, Indiana 46356~~
 FESOP No.: F089-19460-00443
 Facility: Surface Coating Operations (EU 3 and EU FL-1)
 Parameter: Individual HAP emissions
 Limit: The input of any single HAP to the surface coating operations, identified as EU 03 and EU FL-1, shall be limited such that the single HAP emissions are less than 9.99 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.

Individual HAP emitted = [individual HAP input in EU 03 * **((100 - % overall control efficiency from the most recent valid stack test)/100)**] + [(individual HAP input in EU FL-1) * **((100 - % overall control efficiency from the most recent valid stack test)/100)**]

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Single HAP Emissions This Month	Single HAP Emissions Previous 11 Months	Single HAP Emissions 12 Month Total
Month 1			

Month 2			
Month 3			

...

~~Attach a signed certification to complete this report.~~

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

FESOP Quarterly Report

Source Name: Saco Industries, Inc.
 Source Address: 17151 Morse Street, Lowell, Indiana 46356
~~Mailing Address: 17151 Morse Street, P.O. Box 342, Lowell, Indiana 46356~~
 FESOP No.: F089-19460-00443
 Facility: Surface Coating Operations (EU 3 and EU FL-1)
 Parameter: Total HAP emissions
 Limit: The input of total HAPs to the surface coating operations, identified as EU 03 and EU FL-1, shall be limited such that the total HAPs emissions are less than ~~24.86~~ **24.95** per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.

Total HAPs emitted = [total HAPs input in EU 03 * **((100 - % overall control efficiency from the most recent valid stack test)/100)**] + [(total HAPs input in EU FL-1) * **((100 - % overall control efficiency from the most recent valid stack test)/100)**]

YEAR: _____

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

...

~~Attach a signed certification to complete this report.~~

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

- (a) IDEM, OAQ has decided to remove all references to the source mailing address. IDEM, OAQ will continue to maintain records of the mailing address.
- (b) For clarity, IDEM has changed references to the general conditions: "in accordance with Section B", "in accordance with Section C", or other similar language, to "Section C ... contains the Permittee's obligations with regard to the records required by this condition."
- (c) IDEM has decided that the phrases "no later than" and "not later than" are clearer than "within" in relation to the end of a timeline. Therefore all timeline have been switched to "no later than" or "not later than."
- (d) IDEM, OAQ has decided to clarify Section B - Certification to be consistent with the rule.
- (e) IDEM has decided to clarify what rule requirements a certification needs to meet. IDEM has decided to remove the last sentence dealing with the need for certification from the forms because the conditions requiring the forms already address this issue.
- (f) Section B - Duty to Provide Information has been revised.
- (g) IDEM, OAQ is revising Section B - Emergency Provisions to delete paragraph (h). 326 IAC 2-8-4(3)(C)(ii) allows that deviations reported under an independent requirement do not have to be included in the Quarterly Deviation and Compliance Monitoring Report.
- (h) IDEM, OAQ has decided that having a separate condition for the reporting of deviations is unnecessary. Therefore, IDEM has removed Section B - Deviation form Permit Requirements and Conditions and added the requirements of that condition to Section C - General Reporting Requirements. Paragraph (d) of Section C - General Reporting Requirements has been removed because IDEM already states the timeline and certification needs of each report in the condition requiring the report.
- (i) IDEM has decided to state which rule establishes the authority to set a deadline for the Permittee to submit additional information. Therefore, Section B - Permit Renewal has been revised.
- (j) IDEM has added 326 IAC 5-1-1 to the exception clause of Section C - Opacity, since 326 IAC 5-1-1 does list exceptions.
- (k) IDEM has revised Section C - Incineration to more closely reflect the two underlying rules.
- (l) IDEM has changed the title, order, and wording of the condition formerly entitled Section C - Fugitive Dust Emissions to match 326 IAC 6.8-10-3.
- (m) IDEM has removed the first paragraph of Section C - Performance Testing due to the fact that specific testing conditions elsewhere in the permit will specify the timeline and procedures.
- (n) IDEM has revised Section C - Compliance Monitoring. The reference to recordkeeping has been removed due to the fact that other conditions already address recordkeeping. The voice of the condition has been change to clearly indicate that it is the Permittee that must follow the requirements of the condition.
- (o) IDEM has removed Section C - Monitoring Methods. The conditions that require the monitoring or testing, if required, state what methods shall be used.

- (p) IDEM has revised Section C - Response to Excursions or Exceedances. The introduction sentence has been added to clarify that it is only when an excursion or exceedance is detected that the requirements of this condition need to be followed. The word "excess" was added to the last sentence of paragraph (a) because the Permittee only has to minimize excess emissions. The middle of paragraph (b) has been deleted as it was duplicative of paragraph (a). The phrase "or are returning" was added to subparagraph (b)(2) as this is an acceptable response assuming the operation or emission unit does return to normal or its usual manner of operation. The phrase "within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable" was replaced with "normal or usual manner of operation" because the first phrase is just a limited list of the second phrase. The recordkeeping required by paragraph (e) was changed to require only records of the response because the previously listed items are required to be recorded elsewhere in the permit.
- (q) IDEM has revised Section C - Actions Related to Noncompliance Demonstrated by a Stack Test. The requirements to take response steps and minimize excess emissions have been removed because Section C - Response to Excursions or Exceedances already requires response steps related to exceedances and excess emissions minimization. The start of the timelines was switched from "the receipt of the test results" to "the date of the test." There was confusion if the "receipt" was by IDEM, the Permittee, or someone else. Since the start of the timelines has been moved up, the length of the timelines was increased. The new timelines require action within a comparable timeline; and the new timelines still ensure that the Permittee will return to compliance within a reasonable timeframe.
- (r) Paragraph (b) of Section C - Emission Statement has been removed. It was duplicative of the requirement in Section C - General Reporting Requirements.
- (s) The voice of paragraph (b) of Section C - General Record Keeping Requirements has been change to clearly indicate that it is the Permittee that must follow the requirements of the paragraph.
- (t) IDEM has decided to simplify the referencing in Section C - Compliance with 40 CFR 82 and 326 IAC 22-1.
- (u) IDEM has decided to clarify Section D - Testing Requirements.
- (v) IDEM has included the replacement of an instrument as an acceptable action.
- (w) The word "status" has been added to Section D - Reporting Requirements. The Permittee has the obligation to document the compliance status. The wording has been revised to properly reflect this.
- (x) The phrase "of this permit" has been added to the paragraph of the Quarterly Deviation and Compliance Monitoring Report to match the underlying rule.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary wood and particle board surface coating and manufacturing operation for bathroom and kitchen cabinets.

Source Address:	17151 Morse Street, Lowell, IN 46356
Mailing Address:	P.O. Box 342, Lowell, IN 46356
General Source Phone Number:	(219) 696-2800
SIC Code:	2434
County Location:	Lake
Source Location Status:	Moderate nonattainment for 8-hour ozone Nonattainment for PM _{2.5} standard Nonattainment for 1-hour ozone standard

Source Status: Attainment for all other criteria pollutants
Federally Enforceable State Operating Permit Program
Minor Source, under PSD, Emission Offset Rules, and
Nonattainment NSR
Minor Source, Section 112 of the Clean Air Act
Not 1 of 28 Source Categories

...

SECTION B GENERAL CONDITIONS

...

B.4 Enforceability [326 IAC 2-8-6][IC 13-17-12]

...

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. ~~The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~ Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

...

~~**B.8 Compliance Order Issuance [326 IAC 2-8-5(b)]**~~

~~IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.~~

~~**B.98 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]**~~

~~(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.~~

(a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

- (1) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and**
- (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.**

(b) The Permittee may use One (1) certification shall be included, using the attached Certification Form, or its equivalent, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

...

~~**B.109 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**~~

...

(c) The annual compliance certification report shall include the following:

...

The submittal by the Permittee does require ~~the~~ a certification **that meets the requirements of 326 IAC 2-8-5(a)(1)** by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

(a) ~~If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:~~ **A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:**

...

The Permittee shall implement the PMPs.

(b) **If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:**

- (1) **Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;**
- (2) **A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and**
- (3) **Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.**

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

(bc) **A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs and their submittal do not require the a certification that**

meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (ed) 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.12 Emergency Provisions [326 IAC 2-8-12]

...

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

...

- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and or Northwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

...

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

...

The notification which shall be submitted by the Permittee does not require the a certification **that meets the requirements of 326 IAC 2-8-5(a)(1)** by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

...

- ~~(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.~~

...

~~**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]**~~

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

~~Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2254~~

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

~~The Quarterly Deviation and Compliance Monitoring Report does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

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

~~B.1615~~ Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require ~~the~~ a certification **that meets the requirements of 326 IAC 2-8-5(a)(1)** by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

...

B.1716 Permit Renewal [326 IAC 2-8-3(h)]

- (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 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require ~~the~~ a certification **that meets the requirements of 326 IAC 2-8-5(a)(1)** by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

...

- (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 2-8 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 2-8-3(g)**, in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.1817 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

...

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

...

Any such application ~~shall be certified~~ **does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1)** by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

...

B.2019 Source Modification Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2-~~and~~ 326 IAC 2-8-11.1.

...

B.221 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

...

- (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:

...

~~The Any such application which shall be submitted by the Permittee does require the a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

...

B.2322 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-8-4(6)][326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, ~~within no later than~~ **no later than** thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

...

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-8-4(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.21 Overall Source Limit [326 IAC 2-8]

...

- (a) Pursuant to 326 IAC 2-8:
- (1) The potential to emit volatile organic compounds (VOCs) ~~and PM-10~~ from the entire source shall be limited to less than ~~one hundred (100)~~ **twenty-five (25)** tons per twelve (12) consecutive month period. ~~This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);~~
 - (2) The potential to emit any regulated pollutant from the entire source, except particulate matter (PM) **and volatile organic compounds (VOCs)**, shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period;
- ...
- (b) ~~The Pursuant to 326 IAC 2-2 (PSD),~~ potential to emit particulate matter (PM) from the entire source shall be limited to less than two-hundred ~~and~~ fifty (250) tons per twelve (12) consecutive month period, ~~respectively. This limitation shall render 326 IAC 2-2 (PSD) not applicable.~~

...

C.32 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:

...

C.54 Incineration [326 IAC 4-2][326 IAC 9-1-2]

~~The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.~~ **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.76 Fugitive Dust Emissions [326 IAC 6.8-10-3]

Pursuant to 326 IAC 6.8-10-3 (formerly 326 IAC 6-1-11.1) (Lake County Fugitive Particulate Matter Control Requirements), the particulate matter emissions from source wide activities shall meet the following requirements:

...

(c) ~~The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%).~~ **The opacity of fugitive particulate emissions from exposed areas shall not exceed ten percent (10%) on a six (6) minute average.**

...

(h) ~~There shall be a zero (0) percent frequency of visible emission observations from a building enclosing all or part of the material processing equipment, except from a vent in the building.~~

Material transfer limits shall be as follows:

- (1) **The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%).**
- (2) **Where adequate wetting of the material for fugitive particulate emissions control is prohibitive to further processing or reuse of the material, the opacity shall not exceed ten percent (10%), three (3) minute average.**
- (3) **Slag and kish handling activities at integrated iron and steel plants shall comply with the following particulate emissions limits:**
 - (A) **The opacity of fugitive particulate emissions from transfer from pots and trucks into pits shall not exceed twenty percent (20%) on a six (6) minute average.**
 - (B) **The opacity of fugitive particulate emissions from transfer from pits into front end loaders and from transfer from front end loaders into trucks shall comply with the fugitive particulate emission limits in 326 IAC 6.8-10-3(9).**

~~(i) The PM10 emissions from building vents shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.~~

(ji) The opacity of particulate emissions from dust handling equipment shall not exceed ten percent (10%).

(j) Material transfer limits shall be as follows:

- (1) **The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%).**

- (2) **Where adequate wetting of the material for fugitive particulate emissions control is prohibitive to further processing or reuse of the material, the opacity shall not exceed ten percent (10%), three (3) minute average.**
- (3) **Slag and kish handling activities at integrated iron and steel plants shall comply with the following particulate emissions limits:**
 - (A) **The opacity of fugitive particulate emissions from transfer from pots and trucks into pits shall not exceed twenty percent (20%) on a six (6) minute average.**
 - (B) **The opacity of fugitive particulate emissions from transfer from pits into front end loaders and from transfer from front end loaders into trucks shall comply with the fugitive particulate emission limits in 326 IAC 6.8-10-3(9).**

...

The Permittee shall achieve these limits by controlling fugitive particulate matter emissions according to the **attached** Fugitive Dust Control Plan, ~~submitted on November 12, 1998.~~

~~C.8 Stack Height [326 IAC 1-7]~~

~~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.97 Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]~~

...

- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

...

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification **that meets the requirements of 326 IAC 2-8-5(a)(1)** by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

...

Testing Requirements [326 IAC 2-8-4(3)]

~~C.408 Performance Testing [326 IAC 3-6]~~

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

For performance testing required by this permit, A a test protocol, except as provided elsewhere in this permit, shall be submitted to:

...

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification **that meets the requirements of 326 IAC 2-8-5(a)(1)** by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require **a certification that meets the requirements of 326 IAC 2-8-5(a)(1)** by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

...

Compliance Requirements [326 IAC 2-1.1-11]

...

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.4210 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, ~~for all monitoring and record-keeping requirements not already legally required, the Permittee shall be implemented within~~ **allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring.** ~~If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its the Permittee's control, that any monitoring equipment required by this permit cannot be installed and operated within no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:~~

...

The notification which shall be submitted by the Permittee does require ~~the~~ **a certification that meets the requirements of 326 IAC 2-8-5(a)(1)** by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

...

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

...

Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) ~~The Permittee prepared and submitted a written emergency reduction plans (ERPs) consistent with safe operating procedures on May 11, 2006.~~
- (b) ~~Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.~~
[326 IAC 1-5-3]

...

C.4713 Response to Excursions or Exceedances [326 IAC 2-8-4][326 IAC 2-8-5]

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

- (a) ~~Upon detecting an excursion or exceedance,~~ **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 ~~and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions).~~ Corrective actions **The response** may include, but ~~are~~ **is** not limited to, the following:

...

(2) recording that operations returned to normal **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 ~~within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable~~ **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:

...

(2) review of operation and maintenance procedures and records; **and/or**

...

~~(e) The Permittee shall maintain the following records:~~

~~(1) monitoring data;~~

~~(2) monitor performance data, if applicable; and~~

~~(3) corrective actions taken.~~

(e) The Permittee shall record the reasonable response steps taken.

~~C.4814~~ **Actions Related to Noncompliance Demonstrated by a Stack Test Federally Enforceable State Operating Permit [326 IAC 2-8-4][326 IAC 2-8-5]**

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall ~~take appropriate response actions. The Permittee shall~~ submit a description of ~~these~~ **its** response actions to IDEM, OAQ, ~~within no later than thirty (30)~~ **seventy-five (75) days of receipt after the date** of the test results. ~~The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.~~

(b) A retest to demonstrate compliance shall be performed ~~within no later than one hundred twenty (120)~~ **eighty (180) days of receipt after the date** of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred ~~twenty (120)~~ **eighty (180) days** is not practicable, IDEM, OAQ may extend the retesting deadline.

...

The response action documents submitted pursuant to this condition do require ~~the~~ **a** certification **that meets the requirements of 326 IAC 2-8-5(a)(1)** by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

~~C.1915~~ General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]

...

- (b) Unless otherwise specified in this permit, **for** all record keeping requirements not already legally required, **the Permittee shall be implemented within 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.2016 General Reporting Requirements [326 IAC 2-8-4(3)(C)][326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported **except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.** This report shall be submitted ~~within~~ **not later than thirty (30) days of after** the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include ~~the~~ **a certification that meets the requirements of 326 IAC 2-8-5(a)(1)** by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). **A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.**
- (b) ~~The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to~~ **address for report submittal is:**
- ...
- ~~(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~
- (ed) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.2117 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

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

Facility Emissions Unit Description [~~326 IAC 2-8-4(10)~~]:

- (a) One (1) spray booth (~~ID~~-EU 03), which began operations in March, 1999, with a maximum capacity of 43.75 wood pieces per hour, utilizing an HVLP application system and a dry filter for overspray particulate control, and exhausting through stack S3. **VOC emissions are controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-2, approved for construction in 2011, with a maximum heat input capacity of 4.0 MMBtu/hr, and exhausting to stack S12.**

...

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

...

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, ~~in accordance with Section B - Preventive Maintenance Plan, of this permit,~~ is required for the surface coating operations, identified as EU 03 and EU FL-1, and ~~any their~~ control devices. **Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.**

Compliance Determination Requirements

...

Compliance Monitoring Requirements [326 IAC 2-8-4][~~326 IAC 2-8-5(a)(1)~~]

D.1.11 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filter. To monitor the performance of the dry filter, weekly observations shall be made of the overspray from the surface coating booth stack (S3) while any one of the spray booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. ~~in accordance with Section C - Response to Excursions or Exceedances~~ **contains the Permittee's obligation with regard to the reasonable response steps required by this condition.** Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances,~~ shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps. ~~in accordance with Section C - Response to Excursions or Exceedances~~ **contains the Permittee's obligation with regard to the reasonable response steps required by this condition.** Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances,~~ shall be considered a deviation from this permit.
- (c) Annual inspections of the primary heat exchanges and associated inlet and outlet valves for the thermal oxidizer and associated airflow dampers shall be performed. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. ~~in accordance with Section C - Response to Excursions or Exceedances~~ **contains the Permittee's obligation with regard to the reasonable response steps required by this condition.** Failure to take response steps ~~in accordance with Section~~

~~C - Response to Excursions or Exceedances~~, shall be considered a deviation from this permit.

...

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]~~[326 IAC 2-8-16]~~

D.1.14 Record Keeping Requirements

- (a) To document **the compliance status** with Conditions D.1.1 and D.1.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC, single HAP and total HAP usage limits established in Conditions D.1.1 and D.1.3.
- ...
- (b) To document **the compliance status** with Condition D.1.11, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.
- (c) To document **the compliance status** with Condition D.1.12, the Permittee shall maintain continuous temperature records for the thermal oxidizers and the 3-hour average temperatures used to demonstrate compliance during the most recent compliant stack tests.
- (d) To document **the compliance status** with Condition D.1.13, the Permittee shall maintain daily records of the duct pressure or fan amperage for the RTO systems (RTO-1 and RTO-2). The Permittee shall include in its daily record the following: a logs of the downtime control devices and monitoring equipment, when the duct pressures or fan amperages **is are** not taken, and the reason for the lack of the reading (e.g., the process did not operate that day).
- (e) ~~All records shall be maintained in accordance with~~ Section C - General Record Keeping Requirements of this permit **contains the Permittee's obligations with regard to the records required by this condition.**

D.1.15 Reporting Requirements

A quarterly summary of the information to document **the compliance status** with Conditions D.1.1 and D.1.3 shall be submitted ~~to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within~~ **not later than** thirty (30) days after the end of the quarter being reported. **Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition.** The report submitted by the Permittee does require ~~the a~~ certification **that meets the requirements of 326 IAC 2-8-5(a)(1)** by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2

FACILITY EMISSIONS UNIT OPERATION CONDITIONS

Facility Emissions Unit Description ~~[326 IAC 2-8-4(10)]~~:

- (ad) Woodworking area equipped with the following miscellaneous woodworking equipment:
- (1) One (1) molder unit, one (1) door shaper unit, and one (1) sanding unit, each with a maximum capacity of 43.75 units per hour, utilizing one (1) baghouse for particulate control (D-5) with a grain loading outlet of 0.003 grains/scf and 12,000 CFM, and exhausting to stack S-5; ~~[326 IAC 2-7-1(21)(G)(xxix)]~~ and

- (2) One (1) rough milling unit, one (1) ripper unit, one (1) door shaper unit, one (1) lamination booth, one (1) dado machine, and two (2) panel saws, each with a maximum capacity of 43.75 units per hour, utilizing one (1) baghouse (D-7) for particulate control with a grain loading outlet of 0.003 grains/scf and 70,000 CFM, and exhausting to stack S-7. [326 IAC 2-7-1(21)(G)(xxix)]

Insignificant Activities:

- (ba) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.003 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking areas. [326 IAC 2-7-1(21)(G)(xxix)]

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

...

D.2.42 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, ~~in accordance with Section B - Preventive Maintenance Plan, of this permit,~~ is required for the molding/sanding/shaping operations, the sawing/cutting/rough milling operations, the grinding and machining operations and any control devices. **Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.**

...

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION

Source Name: Saco Industries, Inc.
Source Address: 17151 Morse Street, Lowell, Indiana 46356
~~Mailing Address: 17151 Morse Street, Lowell, Indiana 46356~~
FESOP No.: F089-19460-00443

...

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

...

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Saco Industries, Inc.
Source Address: 17151 Morse Street, Lowell, Indiana 46356

Mailing Address: 17151 Morse Street, Lowell, Indiana 46356
FESOP No.: F089-19460-00443

...
~~A certification is not required for this report.~~

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Saco Industries, Inc.
Source Address: 17151 Morse Street, Lowell, Indiana 46356
Mailing Address: 17151 Morse Street, P.O. Box 342, Lowell, Indiana 46356
FESOP No.: F089-19460-00443

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

...
~~Attach a signed certification to complete this report.~~

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on December 9, 2010.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Revision No. 089-29986-00443. The staff recommends to the Commissioner that this FESOP Significant Revision be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Meredith Jones at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5176 or toll free at 1-800-451-6027 extension 4-5176.
- (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

Company Name: Saco Industries, Inc.
Address: 17151 Morse Street, Lowell, IN 46356
Significant Permit Revision No.: 089-29986-00443
Reviewer: Meredith W. Jones
Date: 1/18/11

****Potential to Emit Summary: Uncontrolled (tons/yr)****

Prior to Revision										
<i>Emission Unit</i>	<i>PM</i>	<i>PM₁₀</i>	<i>PM_{2.5}</i>	<i>SOx</i>	<i>NOx</i>	<i>VOC</i>	<i>CO</i>	<i>Total HAPs</i>	<i>Highest Single HAP</i>	
Spray Booth (EU 03)	104.60	104.60	104.60	-	-	153.09	-	45.80	44.78	Xylene
Flat Surface Coating Line (EU FL-1)	0.00	0.00	0.00	-	-	101.54	-	1.24	1.24	Toluene
RTO-1	9.65E-03	0.04	0.04	3.05E-03	0.51	0.03	0.43	9.59E-03	9.15E-03	Hexane
Woodworking Area	9.24	9.24	9.24	-	-	-	-	-	-	-
Grinding & Machining Operations	22.53	22.53	22.53	-	-	-	-	-	-	-
Space Heaters	6.24E-03	0.02	0.02	1.97E-03	0.33	0.02	0.28	6.20E-03	5.91E-03	Hexane
Welding Department	2.24E-03	2.24E-03	2.24E-03	-	-	-	-	7.07E-05	7.07E-05	Manganese
Lamination Booth Adhesive Applicator	0.07	0.07	0.07	-	-	0.12	-	negl.	negl.	-
Total	136.45	136.50	136.50	0.01	0.84	254.79	0.70	47.06	44.78	Xylene

New Unit										
<i>Emission Unit</i>	<i>PM</i>	<i>PM₁₀</i>	<i>PM_{2.5}</i>	<i>SOx</i>	<i>NOx</i>	<i>VOC</i>	<i>CO</i>	<i>Total HAPs</i>	<i>Highest Single HAP</i>	
RTO-2	0.03	0.13	0.13	0.01	1.75	0.10	1.47	0.03	0.03	Hexane
Total	0.03	0.13	0.13	0.01	1.75	0.10	1.47	0.03	0.03	Hexane

After Revision										
<i>Emission Unit</i>	<i>PM</i>	<i>PM₁₀</i>	<i>PM_{2.5}</i>	<i>SOx</i>	<i>Nox</i>	<i>VOC</i>	<i>CO</i>	<i>Total HAPs</i>	<i>Highest Single HAP</i>	
Spray Booth (EU 03)	104.60	104.60	104.60	-	-	153.09	-	45.80	44.78	Xylene
RTO-2	0.03	0.13	0.13	0.01	1.75	0.10	1.47	0.03	0.03	Hexane
Flat Surface Coating Line (EU FL-1)	0.00	0.00	0.00	-	-	101.54	-	1.24	1.24	Toluene
RTO-1	9.65E-03	0.04	0.04	3.05E-03	0.51	0.03	0.43	9.59E-03	9.15E-03	Hexane
Woodworking Area	9.24	9.24	9.24	-	-	-	-	-	-	-
Grinding & Machining Operations	22.53	22.53	22.53	-	-	-	-	-	-	-
Space Heaters	6.24E-03	0.02	0.02	1.97E-03	0.33	0.02	0.28	6.20E-03	5.91E-03	Hexane
Welding Department	2.24E-03	2.24E-03	2.24E-03	-	-	-	-	7.07E-05	7.07E-05	Manganese
Lamination Booth Adhesive Applicator	0.07	0.07	0.07	-	-	0.12	-	negl.	negl.	-
Total	136.48	136.63	136.63	0.02	2.59	254.89	2.17	47.09	44.78	Xylene

Company Name: Saco Industries, Inc.
Address: 17151 Morse Street, Lowell, IN 46356
Significant Permit Revision No.: 089-29986-00443
Reviewer: Meredith W. Jones
Date: 1/18/11

****Potential to Emit Summary: Limited (tons/yr)****

Prior to Revision										
<i>Emission Unit</i>	<i>PM</i>	<i>PM₁₀</i>	<i>PM_{2.5}</i>	<i>SOx</i>	<i>NOx</i>	<i>VOC</i>	<i>CO</i>	<i>Total HAPs</i>	<i>Highest Single HAP</i>	
Spray Booth (EU 03)	15.69	15.69	15.69	-	-	<24.86	-	<24.86	<9.99	Xylene
Flat Surface Coating Line (EU FL-1)	0.00	0.00	0.00	-	-		-			
RTO-1	9.65E-03	0.04	0.04	3.05E-03	0.51	0.03	0.43	9.59E-03	9.15E-03	Hexane
Woodworking Area	<40.86	<40.86	<40.86	-	-	-	-	-	-	-
Grinding & Machining Operations				-	-	-	-	-	-	-
Space Heaters	6.24E-03	0.02	0.02	1.97E-03	0.33	0.02	0.28	6.20E-03	5.91E-03	Hexane
Welding Department	2.24E-03	2.24E-03	2.24E-03	-	-	-	-	7.07E-05	7.07E-05	Manganese
Lamination Booth Adhesive Applicator	0.07	0.07	0.07	-	-	0.12	-	negl.	negl.	-
Total	<56.63	<56.68	<56.68	0.01	0.84	<25	0.70	<25	<9.99	Xylene

New Unit										
<i>Emission Unit</i>	<i>PM</i>	<i>PM₁₀</i>	<i>PM_{2.5}</i>	<i>SOx</i>	<i>NOx</i>	<i>VOC</i>	<i>CO</i>	<i>Total HAPs</i>	<i>Highest Single HAP</i>	
RTO-2	0.03	0.13	0.13	0.01	1.75	0.10	1.47	0.03	0.03	Hexane
Total	0.03	0.13	0.13	0.01	1.75	0.10	1.47	0.03	0.03	Hexane

After Revision										
<i>Emission Unit</i>	<i>PM</i>	<i>PM₁₀</i>	<i>PM_{2.5}</i>	<i>SOx</i>	<i>Nox</i>	<i>VOC</i>	<i>CO</i>	<i>Total HAPs</i>	<i>Highest Single HAP</i>	
Spray Booth (EU 03)	15.69	15.69	15.69	-	-	<24.73	-	<24.95	<9.99	Xylene
Flat Surface Coating Line (EU FL-1)	0.00	0.00	0.00	-	-		-			
RTO-2	0.03	0.13	0.13	0.01	1.75	0.10	1.47	0.03	0.03	Hexane
RTO-1	9.65E-03	0.04	0.04	3.05E-03	0.51	0.03	0.43	9.59E-03	9.15E-03	Hexane
Woodworking Area	9.24	9.24	9.24	-	-	-	-	-	-	-
Grinding & Machining Operations	22.53	22.53	22.53	-	-	-	-	-	-	-
Space Heaters	6.24E-03	0.02	0.02	1.97E-03	0.33	0.02	0.28	6.20E-03	5.91E-03	Hexane
Welding Department	2.24E-03	2.24E-03	2.24E-03	-	-	-	-	7.07E-05	7.07E-05	Manganese
Lamination Booth Adhesive Applicator	0.07	0.07	0.07	-	-	0.12	-	negl.	negl.	-
Total	47.57	47.72	47.72	0.02	2.59	<25	2.17	<25	<9.99	Xylene

Company Name: Saco Industries, Inc.
Address: 17151 Morse Street, Lowell, IN 46356
Significant Permit Revision No.: 089-29986-00443
Reviewer: Meredith W. Jones
Date: 1/18/11

****Surface Coating: Spray Booth (EU 03)****

VOC and Particulate (PM)

Material (as applied)	Density (lbs/gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Non-VOC Volatiles	Weight % Organics	Volume % Water	Volume % Non-Vol (Solids)	Maximum Usage (gal/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Transfer Efficiency	VOC Control Efficiency	PM Control Efficiency	Uncontrolled Potential VOC (lbs/hr)	Uncontrolled Potential VOC (lbs/day)	Uncontrolled Potential VOC (tons/yr)	Controlled Potential VOC (tons/yr)	Uncontrolled Potential Particulate (tons/yr)	Controlled Potential Particulate (tons/yr)
Ash Blush	6.92	92.46%	65.01%	27.45%	0.00%	7.54%	11.36	1.90	1.90	75%	98%	85%	21.58	518.02	94.54	1.89	6.50	0.97
Chestnut	6.82	81.94%	65.08%	16.86%	0.00%	18.06%	11.36	1.15	1.15	75%	98%	85%	13.06	313.54	57.22	1.14	15.33	2.30
Toffee Stain	7.08	93.21%	72.59%	20.62%	0.00%	6.79%	11.36	1.46	1.46	75%	98%	85%	16.59	398.05	72.64	1.45	5.98	0.90
Frosted Oak	7.40	52.43%	45.81%	6.62%	0.00%	47.57%	11.36	0.49	0.49	75%	98%	85%	5.57	133.59	24.38	0.49	43.79	6.57
Cherry-Cinnamon	7.20	88.92%	69.06%	19.87%	0.00%	11.08%	11.36	1.43	1.43	75%	98%	85%	16.24	389.88	71.15	1.42	9.92	1.49
Nutmeg Stain	6.98	92.83%	72.77%	20.06%	0.00%	7.17%	11.36	1.40	1.40	75%	98%	85%	15.90	381.70	69.66	1.39	6.23	0.93
Cider Stain	6.83	89.16%	70.71%	18.45%	0.00%	10.84%	11.36	1.26	1.26	75%	98%	85%	14.31	343.53	62.69	1.25	9.21	1.38
Water Ash Honey	8.41	0.018%	0.00%	0.018%	0.00%	99.98%	11.36	0.00	0.00	75%	98%	85%	0.02	0.41	0.08	0.00	104.59	15.69
Water Ash Spice	8.41	0.039%	0.00%	0.039%	0.00%	99.96%	11.36	0.00	0.00	75%	98%	85%	0.04	0.89	0.16	0.00	104.57	15.69
Water Ash Blush	8.41	0.038%	0.00%	0.038%	0.00%	99.96%	11.36	0.00	0.00	75%	98%	85%	0.04	0.87	0.16	0.00	104.57	15.69
Water Honey Oak (Wipe)	6.92	89.28%	71.22%	18.06%	0.00%	10.72%	11.36	1.25	1.25	75%	98%	85%	14.20	340.80	62.20	1.24	9.23	1.38
Water Cherry-Cinnamon	8.41	0.043%	0.00%	0.043%	0.00%	99.96%	11.36	0.00	0.00	75%	98%	85%	0.04	0.99	0.18	0.00	104.57	15.69
Water Nutmeg	8.41	0.029%	0.00%	0.029%	0.00%	99.97%	11.36	0.00	0.00	75%	98%	85%	0.03	0.66	0.12	0.00	104.58	15.69
Water Fruitwood	8.41	0.015%	0.00%	0.015%	0.00%	99.99%	11.36	0.00	0.00	75%	98%	85%	0.01	0.34	0.06	0.00	104.60	15.69
Water Pickled Toner	8.41	0.078%	0.00%	0.078%	0.00%	99.92%	11.36	0.01	0.01	75%	98%	85%	0.07	1.79	0.33	0.01	104.53	15.68
Self Priming Precoat Lacquer	9.00	58.78%	24.66%	34.12%	0.00%	41.22%	11.36	3.07	3.07	75%	98%	85%	34.89	837.28	152.80	3.06	46.15	6.92
Clean-up Solvent-Butyl Cellosolve	7.52	100.00%	0.00%	100.00%	0.00%	0.00%	0.0088	7.5	7.52	100%	0%	0%	0.07	1.58	0.29	0.29	0.00	0.00
Worst-case Total													34.95	838.86	153.09	3.34	104.60	15.69

Methodology

Pounds VOC per gallon of coating less water = (Density (lbs/gal) * Weight % Organics) / (1-Volume % water)

Pounds VOC per gallon of coating = Density (lbs/gal) * Weight % Organics

Uncontrolled Potential VOC (lbs/hr) = Maximum Usage (gal/hr) * Pounds VOC per gallon of coating

Uncontrolled Potential VOC (lbs/day) = Maximum Usage (gal/hr) * Pounds VOC per gallon of coating * (24 hr/day)

Uncontrolled Potential VOC (tons/yr) = Maximum Usage (gal/hr) * Pounds VOC per gallon of coating * (8760 hrs/yr) * (1 ton/2000 lbs)

Controlled Potential VOC (tons/yr) = Maximum Usage (gal/hr) * Pounds VOC per gallon of coating * (8760 hrs/yr) * (1 - Control Efficiency)

Uncontrolled Potential Particulate (tons/yr) = Maximum Usage (gal/hr) * Density (lbs/gal) * (1 - Weight % Volatile (H₂O & Organics)) * (1 - Transfer Efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

Controlled Potential Particulate (tons/yr) = Maximum Usage (gal/hr) * Density (lbs/gal) * (1 - Weight % Volatile (H₂O & Organics)) * (1 - Transfer Efficiency) * (8760 hrs/yr) * (1 - Control Efficiency)

HAPs

Material (as applied)	Density (lbs/gal)	Maximum Usage (gal/hr)	Weight % Xylene	Weight % Ethyl Benzene	Xylene Emissions (tons/yr)	Ethyl Benzene Emissions (tons/yr)
Ash Blush	6.92	11.36	2.0%	0.0%	6.89	0.00
Chestnut	6.82	11.36	2.0%	0.0%	6.79	0.00
Toffee Stain	7.08	11.36	2.0%	0.0%	7.05	0.00
Frosted Oak	7.40	11.36	0.0%	0.0%	0.00	0.00
Cherry-Cinnamon	7.20	11.36	2.0%	0.0%	7.16	0.00
Nutmeg Stain	6.98	11.36	2.0%	0.0%	6.95	0.00
Cider Stain	6.83	11.36	2.0%	0.3%	6.80	1.02
Water Ash Honey	8.41	11.36	0.0%	0.0%	0.00	0.00
Water Ash Spice	8.41	11.36	0.0%	0.0%	0.00	0.00
Water Ash Blush	8.41	11.36	0.0%	0.0%	0.00	0.00
Water Honey Oak (Wipe)	6.92	11.36	2.0%	0.0%	6.89	0.00
Water Cherry-Cinnamon	8.41	11.36	0.0%	0.0%	0.00	0.00
Water Nutmeg	8.41	11.36	0.0%	0.0%	0.00	0.00
Water Fruitwood	8.41	11.36	0.0%	0.0%	0.00	0.00
Water Pickled Toner	8.41	11.36	0.0%	0.0%	0.00	0.00
Self Priming Precoat Lacquer	9.00	11.36	10.0%	0.0%	44.78	0.00
Worst-case Total					44.78	1.02

Methodology

HAP Emissions (tons/yr) = Density (lbs/gal) * Maximum Usage (gal/hr) * Weight % HAP * (8760 hrs/yr) * (1 ton/2000 lbs)

Company Name: Saco Industries, Inc.
Address: 17151 Morse Street, Lowell, IN 46356
Significant Permit Revision No.: 089-29986-00443
Reviewer: Meredith W. Jones
Date: 1/18/11

****One (1) Natural Gas-fired Regenerative Thermal Oxidizer (RTO-1)****

Natural Gas Combustion (MMBtu/Hr <100)

Heat Input Capacity (MMBtu/hr) = 4.0 Potential Throughput (MMCF/yr) = 35.04

	Pollutant						
	PM*	PM ₁₀ *	PM _{2.5}	SO ₂	NO _x **	VOC	CO
<i>Emission Factor (lbs/10⁶ scf)</i>	1.9	7.6	7.6	0.6	100	5.5	84
Potential Emissions (tons/yr)	0.03	0.13	0.13	0.01	1.75	0.10	1.47

*PM emission factor is filterable PM only. PM₁₀ emission factor is filterable and condensable PM combined.

**Emission Factors for NO_x: Uncontrolled = 100; Low NO_x Burner = 50; Low NO_x Burners/Flue gas recirculation = 32

	HAPs: Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
<i>Emission Factor (lbs/10⁶ scf)</i>	2.1E-03	1.2E-03	7.5E-02	1.8	3.4E-03
Potential Emissions (tons/yr)	3.68E-05	2.10E-05	1.31E-03	0.03	5.96E-05

	HAPs: Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
<i>Emission Factor (lbs/10⁶ scf)</i>	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emissions (tons/yr)	8.76E-06	1.93E-05	2.45E-05	6.66E-06	3.68E-05

Total HAPs (tons/yr) = 0.03

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

10⁶ scf = MMCF

Heating Value = 1000 MMBtu/10⁶ scf

Emission Factors are from US EPA's AP 42, Chapter 1.4, Tables 1.4-1 and 1.4-2.

The five highest of both organic and metal HAPs emission factors (from US EPA's AP 42, Chapter 1.4, Tables 1.4-2, 1.4-3, and 1.4-4) are provided; additional HAPs emission factors are available in AP 42, Chapter 1.4.

Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) * (8760 hrs/yr) * (1 MMCF/1000 MMBtu)

Potential Emissions (tons/yr) = Potential Throughput (MMCF/yr) * Emission Factor (lbs/10⁶ scf) * (1 ton/2000 lbs)

Company Name: Saco Industries, Inc.
Address: 17151 Morse Street, Lowell, IN 46356
Significant Permit Revision No.: 089-29986-00443
Reviewer: Meredith W. Jones
Date: 1/18/11

****Surface Coating: Flat Coating Line (EU FL-1)****

VOC and Particulate (PM)

Material	Density (lbs/gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Non-VOC Volatiles	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Maximum Usage (gal/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Transfer Efficiency	VOC Control Efficiency	Uncontrolled Potential VOC (lbs/hr)	Uncontrolled Potential VOC (lbs/day)	Uncontrolled Potential VOC (tons/yr)	Controlled Potential VOC (tons/yr)	Uncontrolled Potential Particulate (tons/yr)
Acrylic Self-Sealer Transparent Matte	9.159	100.0%	72.6%	27.40%	0.00%	0.00%	4.21	2.51	2.51	75%	99%	10.57	253.57	46.28	0.46	0.00
Adhesion Promoter	7.91	100.0%	32.0%	68.00%	0.00%	0.00%	4.21	5.38	5.38	75%	99%	22.64	543.47	99.18	0.99	0.00
Thinner for Dual Care - Zero VOC	6.878	100.0%	0.0%	100.00%	0.00%	0.00%	4.21	6.88	6.88	75%	99%	28.96	694.95	126.83	1.27	0.00
As Applied	7.83	100.0%	29.66%	70.34%	0.00%	0.00%	4.21	5.51	5.51	75%	99%	23.18	556.38	101.54	1.02	0.00

Methodology

Pounds VOC per gallon of coating less water = (Density (lbs/gal) * Weight % Organics) / (1-Volume % water)

Pounds VOC per gallon of coating = Density (lbs/gal) * Weight % Organics

Uncontrolled Potential VOC (lbs/hr) = Maximum Usage (gal/hr) * Pounds VOC per gallon of coating

Uncontrolled Potential VOC (lbs/day) = Maximum Usage (gal/hr) * Pounds VOC per gallon of coating * (24 hr/day)

Uncontrolled Potential VOC (tons/yr) = Maximum Usage (gal/hr) * Pounds VOC per gallon of coating * (8760 hr/yr) * (1 ton/2000 lbs)

Controlled Potential VOC (tons/yr) = Maximum Usage (gal/hr) * Pounds VOC per gallon of coating * (8760 hr/yr) * (1 ton/2000 lbs) * (1 - Control Efficiency)

Uncontrolled Potential Particulate (tons/yr) = Maximum Usage (gal/hr) * Density (lbs/gal) * (1 - Weight % Volatile (H₂O & Organics)) * (1 - Transfer Efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

HAPs

Material	Density (lbs/gal)	Maximum Usage (gal/hr)	Weight % Toluene	Toluene Emissions (tons/yr)
As Applied	7.83	4.21	0.86%	1.24

Methodology

HAP Emissions (tons/yr) = Density (lbs/gal) * Maximum Usage (gal/hr) * Weight % HAP * (8760 hrs/yr) * (1 ton/2000 lbs)

Company Name: Saco Industries, Inc.
Address: 17151 Morse Street, Lowell, IN 46356
Significant Permit Revision No.: 089-29986-00443
Reviewer: Meredith W. Jones
Date: 1/18/11

****One (1) Natural Gas-fired Regenerative Thermal Oxidizer (RTO-1)****

Natural Gas Combustion (MMBtu/Hr <100)

Heat Input Capacity (MMBtu/hr) = 1.16

Potential Throughput (MMCF/yr) = 10.16

	Pollutant						
	PM*	PM ₁₀ *	PM _{2.5}	SO ₂	NO _x **	VOC	CO
<i>Emission Factor (lbs/10⁶ scf)</i>	1.9	7.6	7.6	0.6	100	5.5	84
Potential Emissions (tons/yr)	9.65E-03	0.04	0.04	3.05E-03	0.51	0.03	0.43

*PM emission factor is filterable PM only. PM₁₀ emission factor is filterable and condensable PM combined.

**Emission Factors for NO_x: Uncontrolled = 100; Low NO_x Burner = 50; Low NO_x Burners/Flue gas recirculation = 32

	HAPs: Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
<i>Emission Factor (lbs/10⁶ scf)</i>	2.1E-03	1.2E-03	7.5E-02	1.8	3.4E-03
Potential Emissions (tons/yr)	1.07E-05	6.10E-06	3.81E-04	9.15E-03	1.73E-05

	HAPs: Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
<i>Emission Factor (lbs/10⁶ scf)</i>	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emissions (tons/yr)	2.54E-06	5.59E-06	7.11E-06	1.93E-06	1.07E-05

Total HAPs (tons/yr) = 9.59E-03

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

10⁶ scf = MMCF

Heating Value = 1000 MMBtu/10⁶ scf

Emission Factors are from US EPA's AP 42, Chapter 1.4, Tables 1.4-1 and 1.4-2.

The five highest of both organic and metal HAPs emission factors (from US EPA's AP 42, Chapter 1.4, Tables 1.4-2, 1.4-3, and 1.4-4) are provided; additional HAPs emission factors are available in AP 42, Chapter 1.4.

Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) * (8760 hrs/yr) * (1 MMCF/1000 MMBtu)

Potential Emissions (tons/yr) = Potential Throughput (MMCF/yr) * Emission Factor (lbs/10⁶ scf) * (1 ton/2000 lbs)

Company Name: Saco Industries, Inc.

Address: 17151 Morse Street, Lowell, IN 46356

Significant Permit Revision No.: 089-29986-00443

Reviewer: Meredith W. Jones

Date: 1/18/11

****Woodworking Area****

<i>Process</i>	<i>Design Outlet Grain Loading (gr/acfm)</i>	<i>Maximum Air Flow Rate (acfm)</i>	<i>Control Efficiency</i>	<i>Controlled Potential PM/PM₁₀/PM_{2.5} Emissions (lbs/hr)</i>	<i>Controlled Potential PM/PM₁₀/PM_{2.5} Emissions (tons/yr)</i>
One (1) Molder Unit, One (1) Door Shaper Unit, and One (1) Sanding Unit	0.003	12,000	99.99%	0.31	1.35
One (1) Rough Milling Unit, One (1) Ripper Unit, One (1) Door Shaper Unit, One (1) Lamination Booth, One (1) Dado Machine, and Two (2) Panel Saws	0.003	70,000	99.99%	1.80	7.88
Total				2.11	9.24

Methodology

Controlled Potential PM/PM₁₀/PM_{2.5} Emissions (lbs/hr) = Design Outlet Grain Loading (gr/acfm) * Maximum Air Flow Rate (acfm) * (60 min/hr) * (1 lb/7000 gr)

Controlled Potential PM/PM₁₀/PM_{2.5} Emissions (tons/yr) = Design Outlet Grain Loading (gr/acfm) * Maximum Air Flow Rate (acfm) * (60 min/hr) * (1 lb/7000 gr) * (8760 hr/yr) * (1 ton/2000 lbs)

Company Name: Saco Industries, Inc.
Address: 17151 Morse Street, Lowell, IN 46356
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Reviewer: Meredith W. Jones
Date: 1/18/11

****Grinding and Machining Operations****

Process	Maximum Process Throughput (tons/hr)	Design Outlet Grain Loading (gr/acfm)	Maximum Air Flow Rate (acfm)	Control Efficiency	Controlled		Uncontrolled	
					Potential PM/PM ₁₀ /PM _{2.5} Emissions (lbs/hr)	Potential PM/PM ₁₀ /PM _{2.5} Emissions (tons/yr)	Potential PM/PM ₁₀ /PM _{2.5} Emissions (lbs/hr)	Potential PM/PM ₁₀ /PM _{2.5} Emissions (tons/yr)
Grinding & Machining	0.66	0.003	4000	98%	0.10	0.45	5.14	22.53

Methodology

Controlled Potential PM/PM₁₀/PM_{2.5} Emissions (lbs/hr) = Design Outlet Grain Loading (gr/acfm) * Maximum Air Flow Rate (acfm) * (60 min/hr) * (1 lb/7000 gr)

Controlled Potential PM/PM₁₀/PM_{2.5} Emissions (tons/yr) = Design Outlet Grain Loading (gr/acfm) * Maximum Air Flow Rate (acfm) * (60 min/hr) * (1 lb/7000 gr) * (8760 hr/yr) * (1 ton/2000 lbs)

Uncontrolled Potential PM/PM₁₀/PM_{2.5} Emissions (lbs/hr) = Controlled Potential PM/PM₁₀/PM_{2.5} Emissions (lbs/hr) / (1 - Control Efficiency)

Uncontrolled Potential PM/PM₁₀/PM_{2.5} Emissions (tons/yr) = Controlled Potential PM/PM₁₀/PM_{2.5} Emissions (lbs/hr) / (1 - Control Efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

Company Name: Saco Industries, Inc.
Address: 17151 Morse Street, Lowell, IN 46356
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****Space Heaters****

Natural Gas Combustion (MMBtu/Hr <100)

The source contains fifteen (15) space heaters, each with a heat input capacity of 0.05 MMBtu/hr.

Heat Input Capacity (MMBtu/hr) = 0.75 Potential Throughput (MMCF/yr) = 6.57

	Pollutant						
	PM*	PM ₁₀ *	PM _{2.5}	SO ₂	NO _x **	VOC	CO
<i>Emission Factor (lbs/10⁶ scf)</i>	1.9	7.6	7.6	0.6	100	5.5	84
Potential Emissions (tons/yr)	6.24E-03	0.02	0.02	1.97E-03	0.33	0.02	0.28

*PM emission factor is filterable PM only. PM₁₀ emission factor is filterable and condensable PM combined.

**Emission Factors for NO_x: Uncontrolled = 100; Low NO_x Burner = 50; Low NO_x Burners/Flue gas recirculation = 32

	HAPs: Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
<i>Emission Factor (lbs/10⁶ scf)</i>	2.1E-03	1.2E-03	7.5E-02	1.8	3.4E-03
Potential Emissions (tons/yr)	6.90E-06	3.94E-06	2.46E-04	5.91E-03	1.12E-05

	HAPs: Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
<i>Emission Factor (lbs/10⁶ scf)</i>	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emissions (tons/yr)	1.64E-06	3.61E-06	4.60E-06	1.25E-06	6.90E-06

Total HAPs (tons/yr) = 6.20E-03

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

10⁶ scf = MMCF

Heating Value = 1000 MMBtu/10⁶ scf

Emission Factors are from US EPA's AP 42, Chapter 1.4, Tables 1.4-1 and 1.4-2.

The five highest of both organic and metal HAPs emission factors (from US EPA's AP 42, Chapter 1.4, Tables 1.4-2, 1.4-3, and 1.4-4) are provided; additional HAPs emission factors are available in AP 42, Chapter 1.4.

Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) * (8760 hrs/yr) * (1 MMCF/1000 MMBtu)

Potential Emissions (tons/yr) = Potential Throughput (MMCF/yr) * Emission Factor (lbs/10⁶ scf) * (1 ton/2000 lbs)

Company Name: Saco Industries, Inc.
Address: 17151 Morse Street, Lowell, IN 46356
Significant Permit Revision No.: 089-29986-00443
Reviewer: Meredith W. Jones
Date: 1/18/11

****Welding Department****

Process	Number of Stations	Max. Electrode Consumption per Station (lb/hr)	Emission Factor (lb pollutant/lb electrode)		Potential to Emit (lbs/hr)		
			PM/PM ₁₀ /PM _{2.5}	Mn	PM/PM ₁₀ /PM _{2.5}	Mn	Total HAPs
Welding							
Electric Arc	1	0.00500	0.036	0.0009	1.80E-04	4.50E-06	4.50E-06
Electric Arc	1	0.00400	0.036	0.0009	1.44E-04	3.60E-06	3.60E-06
Stick (E7018 electrode)	1	0.00493	0.0211	0.0009	1.04E-04	4.44E-06	4.44E-06
Stick (E7018 electrode)	1	0.00400	0.0211	0.0009	8.44E-05	3.60E-06	3.60E-06
Totals							
Potential to Emit (lbs/hr)					5.12E-04	1.61E-05	1.61E-05
Potential to Emit (lbs/day)					0.01	3.87E-04	3.87E-04
Potential to Emit (tons/yr)					2.24E-03	7.07E-05	7.07E-05

Methodology

Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

Potential to Emit (lbs/hr) = Number of Stations * Max. Electrode Consumption per Station (lb/hr) * Emission Factor (lb pollutant/lb electrode)

Potential to Emit (lbs/day) = Number of Stations * Max. Electrode Consumption per Station (lb/hr) * Emission Factor (lb pollutant/lb electrode) * (24 hrs/day)

Potential to Emit (tons/yr) = Number of Stations * Max. Electrode Consumption per Station (lb/hr) * Emission Factor (lb pollutant/lb electrode) * (8760 hr/yr) * (1 ton/2000 lbs)

Company Name: Saco Industries, Inc.
Address: 17151 Morse Street, Lowell, IN 46356
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Reviewer: Meredith W. Jones
Date: 1/18/11

****Lamination Booth Adhesive Applicator****

Material (as applied)	Density (lbs/gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Maximum Usage (gal/unit)	Maximum Throughput (units/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Transfer Efficiency	Potential VOC (lbs/hr)	Potential VOC (lbs/day)	Potential VOC (tons/yr)	Potential Particulate (tons/yr)
Quick Stick Panel & Construction Adhesive	10.25	27.9%	0.00%	27.90%	0.00%	45.00%	0.0002	43.75	2.9	2.86	75%	0.03	0.60	0.11	0.07
Titebond Extend Wood Glue	9.66	57.7%	57.68%	0.02%	66.91%	32.93%	0.0090	43.75	0.0	0.00	100%	0.00	0.02	0.00	0.00
Titebond Extend White Glue	9.08	54.5%	54.45%	0.05%	59.35%	40.60%	0.0010	43.75	0.0	0.00	100%	0.00	0.00	0.00	0.00
Titebond Extend White Glue	9.08	54.5%	54.45%	0.05%	59.35%	40.60%	0.0010	43.75	0.0	0.00	100%	0.00	0.00	0.00	0.00
Titebond Extend White Glue	9.08	54.5%	54.45%	0.05%	59.35%	40.60%	0.0010	43.75	0.0	0.00	100%	0.00	0.00	0.00	0.00
Titebond Extend White Glue	9.08	54.5%	54.45%	0.05%	59.35%	40.60%	0.0010	43.75	0.0	0.00	100%	0.00	0.00	0.00	0.00
Total												0.03	0.64	0.12	0.07

Methodology

Pounds VOC per gallon of coating less water = (Density (lbs/gal) * Weight % Organics) / (1 - Volume % water)

Pounds VOC per gallon of coating = Density (lbs/gal) * Weight % Organics

Potential VOC (lbs/hr) = Maximum Usage (gal/hr) * Pounds VOC per gallon of coating

Potential VOC (lbs/day) = Maximum Usage (gal/hr) * Pounds VOC per gallon of coating * (24 hr/day)

Potential VOC (tons/yr) = Maximum Usage (gal/hr) * Pounds VOC per gallon of coating * (8760 hr/yr) * (1 ton/2000 lbs)

Potential Particulate (tons/yr) = Maximum Usage (gal/hr) * Density (lbs/gal) * (1 - Weight % Volatile (H₂O & Organics)) * (1 - Transfer Efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

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

TO: Denise Purkey
Saco Industries, Inc.
PO Box 342
Lowell IN 46536

DATE: May 10, 2011

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

SUBJECT: Final Decision
Significant Permit Revision
089-29986-00443

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

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

A copy of the final decision and supporting materials has also been sent via standard mail to:
Fred Krikau Fred Krikau & Associates
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 11/30/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

May 10, 2011

TO: Lowell Public Library

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

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

Applicant Name: Saco Industries, Inc.
Permit Number: 089-29986-00443

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

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

IDEM Staff	BMILLER 5/10/2011 Saco Industries, Inc. 089-29986-00443 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	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		Denise Purkey Saco Industries, Inc. PO Box 342 Lowell IN 46356 (Source CAATS) <i>Via Confirm Delivery</i>									
2		East Chicago City Council 4525 Indianapolis Blvd East Chicago IN 46312 (Local Official)									
3		Gary - Hobart Water Corp 650 Madison St, P.O. Box M486 Gary IN 46401-0486 (Affected Party)									
4		Lake County Health Department-Gary 1145 W. 5th Ave Gary IN 46402-1795 (Health Department)									
5		WJOB / WZVN Radio 6405 Olcott Ave Hammond IN 46320 (Affected Party)									
6		Laurence A. McHugh Barnes & Thornburg 100 North Michigan South Bend IN 46601-1632 (Affected Party)									
7		Lowell Public Library 1505 East Commercial Lowell IN 46356 (Library)									
8		Lowell Town Council and Town Manager PO Box 157, 501 East Main Street Lowell IN 46356 (Local Official)									
9		Shawn Sobocinski 3229 E. Atlanta Court Portage IN 46368 (Affected Party)									
10		Ms. Carolyn Marsh Lake Michigan Calumet Advisory Council 1804 Oliver St Whiting IN 46394-1725 (Affected Party)									
11		Mark Coleman 9 Locust Place Ogden Dunes IN 46368 (Affected Party)									
12		Mr. Chris Hernandez Pipefitters Association, Local Union 597 8762 Louisiana St., Suite G Merrillville IN 46410 (Affected Party)									
13		Craig Hogarth 7901 West Morris Street Indianapolis IN 46231 (Affected Party)									
14		Lake County Commissioners 2293 N. Main St, Building A 3rd Floor Crown Point IN 46307 (Local Official)									
15		Anthony Copeland 2006 E. 140th Street East Chicago IN 46312 (Affected Party)									

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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Mail Code 61-53

IDEM Staff	BMILLER 5/10/2011 Saco Industries, Inc. 089-29986-00443 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handling Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		Barbara G. 506 Lilac Street East Chicago IN 46312 (Affected Party)									
2		Mr. Robert Garcia 3733 Parrish Avenue East Chicago IN 46312 (Affected Party)									
3		Ms. Karen Kroczek 8212 Madison Ave Munster IN 46321-1627 (Affected Party)									
4		Calumet Township Trustee 31 E 5th Avenue Gary IN 46402 (Affected Party)									
5		Joseph Hero 11723 S Oakridge Drive St. John IN 46373 (Affected Party)									
6		Fred Krikau Fred Krikau & Associates 1056 Killarney Dr. Dyer IN 46311 (Consultant)									
7		Gary City Council 401 Broadway # 209 Gary IN 46402 (Local Official)									
8		Mr. Larry Davis 268 South, 600 West Hebron IN 46341 (Affected Party)									
9		Gitte Laasby Post Tribune 1433 E. 83rd Ave Merrillville IN 46410 (Affected Party)									
10		Susan Severtson City of Gary Law Dept. 401 Broadway 4th Floor Gary IN 46402 (Local Official)									
11		Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 (Affected Party)									
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 Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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