



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

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

## NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a  
Minor Source Operating Permit (MSOP)

for Specialized Wood Products, Inc. in Elkhart County

**Permit No. M039-30244-00296**

The Indiana Department of Environmental Management (IDEM) has received an application from Specialized Wood Products, Inc. located at 4221 Middlebury Street, Elkhart, Indiana 46516 to transition from their Federally Enforceable State Operating Permit (FESOP) No. F039-17688-00296, issued on November 21, 2006, to a Minor Source Operating Permit (MSOP). If approved by IDEM's Office of Air Quality (OAQ), this proposed transition would allow Specialized Wood Products, Inc. to continue to operate their existing source.

The applicant intends to construct and operate new equipment that will emit air pollutants, therefore the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed or removed. IDEM has reviewed this application, and has developed preliminary findings, consisting of a draft permit and several supporting documents, that would allow the applicant to make this change.

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

Elkhart Public Library  
300 South Second Street  
Elkhart, IN 46516

and

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

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

### How can you participate in this process?

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

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

you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number M039-30244-00296 in all correspondence.

**Comments should be sent to:**

Summer Keown  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for extension 4-5175  
Or dial directly: (317) 234-5175  
E-mail: [skeown@idem.in.gov](mailto:skeown@idem.in.gov)

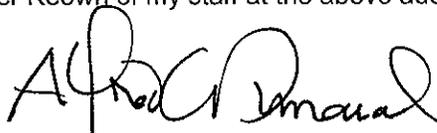
All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have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

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

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

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

If you have any questions please contact Summer Keown or my staff at the above address.



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

SJK



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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DRAFT

## Minor Source Operating Permit OFFICE OF AIR QUALITY

**Specialized Wood Products, Inc.**  
**4221 Middlebury Street**  
**Elkhart, Indiana 46516**

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

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

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

Operation Permit No.: M039-30244-00296	
Issued by:	Issuance Date:
Alfred C. Dumauval, Ph. D., Section Chief Permits Branch Office of Air Quality	Expiration Date:

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## SECTION A SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary wood moulding manufacturing and surface coating source.

Source Address:	4221 Middlebury Street, Elkhart, Indiana 46516
General Source Phone Number:	(574) 522-6376
SIC Code:	2459, 2499
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) Five (5) surface coating stations, identified as EU1 - EU5, installed in 1994, exhausting to Stacks EU1X - EU5X, respectively. Each station uses flowcoating as the method of application. Maximum capacity: 3,000 wood mouldings per hour per station.
- (b) One (1) surface coating station, identified as EU6, and dry filters for PM control, exhausting to Stack EU6X, installed in 2004, with a maximum capacity of 933 wood mouldings per hour and using the HVLP application method of application.
- (c) Two (2) inking stations, identified as EU8 and EU9, approved for construction in 2011, using the roll coating method of application, with a maximum capacity of 4,500 wood mouldings per hour, each.
- (d) One (1) UV finishing system, consisting of sanding, coating, and UV curing, identified as UVC, with particulate emissions controlled by a cyclone/baghouse, identified as UVC1DC, with filtered air exhausted back into the building, installed in 2006 with a maximum capacity of 1000 pounds per hour.
- (e) One (1) woodworking operation, identified as EU7, with particulate emissions controlled by a return-air cyclone/baghouse, identified as DC1, with filtered air exhausted back into the building, installed in 1994, maximum capacity: 15,000 pounds of wood per hour.
- (f) Fourteen (14) natural gas-fired radiant heaters, with a maximum input capacity of 0.1 MMBtu per hour, each.
- (g) One (1) natural gas-fired furnace, with a maximum input capacity of 0.15 MMBtu per hour.

## SECTION B GENERAL CONDITIONS

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

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

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

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- (a) This permit, M039-30244-00296, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

### B.4 Enforceability

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

### B.5 Severability

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

### B.6 Property Rights or Exclusive Privilege

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

### B.7 Duty to Provide Information

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

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

---

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

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

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- (a) If required by specific condition(s) in Section D of this permit, 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

- (b) The Permittee shall implement the PMPs.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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- (a) All terms and conditions of permits established prior to M039-30244-00296 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

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

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

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

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

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

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

**B.14 Source Modification Requirement**

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

**B.15 Inspection and Entry**

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[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

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

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

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

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

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

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

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

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

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

**SECTION C SOURCE OPERATION CONDITIONS**

Entire Source

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

- (e) Procedures for Asbestos Emission Control  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

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- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
no later than thirty-five (35) days prior to the intended test date.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

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

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

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

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

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

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

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

**Corrective Actions and Response Steps**

**C.12 Response to Excursions or Exceedances**

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

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

**C.13 Actions Related to Noncompliance Demonstrated by a Stack Test**

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.

- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

#### **C.14 Malfunctions Report [326 IAC 1-6-2]**

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

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

#### **C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]**

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

#### **C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]**

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

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

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

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) Five (5) surface coating stations, identified as EU1 - EU5, installed in 1994, exhausting to Stacks EU1X - EU5X, respectively. Each station uses flowcoating as the method of application. Maximum capacity: 3,000 wood mouldings per hour per station.
- (b) One (1) surface coating station, identified as EU6, and dry filters for PM control, exhausting to Stack EU6X, installed in 2004, with a maximum capacity of 933 wood mouldings per hour and using the HVLP application method of application.
- (c) Two (2) inking stations, identified as EU8 and EU9, approved for construction in 2011, using the roll coating method of application, with a maximum capacity of 4,500 wood mouldings per hour, each.

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

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

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

The VOC usage, including coatings and clean-up solvents, from the one (1) surface coating station, identified as EU6, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with this limit shall render the requirements of 326 IAC 8-1-6 not applicable to surface coating station EU6.

#### D.1.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d):

- (a) Particulate from the surface coating station, identified as EU6, shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
  - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
  - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

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

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A Preventive Maintenance Plan is required for the surface coating stations 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 Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

#### D.1.4 Monitoring

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- (a) To ensure compliance with Condition D.1.2, daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating station stacks while one or more of the stations 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 and 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 and 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 2-6.1-5(a)(2)]

#### D.1.5 Record Keeping Requirements

---

- (a) To document the compliance status with Condition D.1.1, 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 usage limit established in Condition D.1.1.
  - (1) The VOC content of each coating material and solvent used.
  - (2) The amount of coating material and solvent 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.
    - (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 usage for each month; and
  - (5) The weight of VOCs emitted for each compliance period.
- (b) To document the compliance status with Condition D.1.2, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.
- (c) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

#### D.1.6 Reporting Requirements

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A quarterly summary of the information to document the compliance status with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days after the end of the quarter being reported.

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (d) One (1) UV finishing system, consisting of sanding, coating, and UV curing, identified as UVC, with particulate emissions controlled by a cyclone/baghouse, identified as UVC1DC, with filtered air exhausted back into the building, installed in 2006 with a maximum capacity of 1000 pounds per hour.
- (e) One (1) woodworking operation, identified as EU7, with particulate emissions controlled by a return-air cyclone/baghouse, identified as DC1, with filtered air exhausted back into the building, installed in 1994, maximum capacity: 15,000 pounds of wood per hour.

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

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

#### D.2.1 Particulate Limitations [326 IAC 2-2]

The PM, PM10 and PM2.5 emissions from the woodworking operation, identified as EU7, shall be limited to 15.82 pounds per hour, each. Compliance with this limit, combined with the potential to emit PM, PM10 and PM2.5 from all other emission units at the source, shall limit the potential to emit of PM, PM10 and PM2.5 to less than 250 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

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

- (a) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the woodworking operation, identified as EU7, shall not exceed 15.82 pounds per hour when operating at a process weight rate of 15,000 pounds (7.50 tons) per hour.
- (b) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the UV finishing system, identified as UVC, shall not exceed 2.58 pounds per hour when operating at a process weight rate of 1000 pounds (0.5 tons) per hour.

The pound per hour limitations were calculated with the following equation:

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

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

#### D.2.3 Preventive Maintenance Plan [326 1-6-3]

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

### Compliance Determination Requirements

#### D.2.4 Particulate Control

In order to comply with Conditions D.2.1 and D.2.2, the cyclones and baghouses for particulate control shall be in operation and control emissions from the woodworking operations at all times that the woodworking operations are in operation.

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

### D.2.5 Visible Emissions Notations

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

### D.2.6 Baghouse Inspections

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

### D.2.7 Broken or Failed Bag Detection

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- (a) For 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.
- (b) 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 C - Response to Excursions or Exceedances).
- (c) For a single compartment baghouses 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 C - Response to Excursions or Exceedances).

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

#### D.2.8 Cyclone Inspections

---

An inspection shall be performed each calendar quarter of all cyclones controlling the woodworking operations when venting to the atmosphere. A cyclone inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors.

#### D.2.9 Cyclone Failure Detection

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

Cyclone failure can be indicated by a significant drop in the cyclone'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**

#### D.2.10 Record Keeping Requirements

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- (a) To document the compliance status with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhausts when exhausting to the atmosphere.
- (b) To document the compliance status with Conditions D.2.6 and D.2.8, the Permittee shall maintain records of the results of the inspections required under Conditions D.2.6 and D.2.8 and the dates the vents are redirected.
- (c) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

**Indiana Department of Environmental Management  
Office of Air Quality  
Compliance and Enforcement Branch**

**Quarterly Report**

Source Name: Specialized Wood Products, Inc.  
Source Address: 4221 Middlebury Street, Elkhart, Indiana 46516  
MSOP Permit No.: M039-30244-00296  
Facilities: Surface coating station EU6  
Pollutant: VOC  
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month

Year: \_\_\_\_\_

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

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

<b>Company Name:</b>	Specialized Wood Products, Inc.
<b>Address:</b>	4221 Middlebury Street
<b>City:</b>	Elkhart, Indiana 46516
<b>Phone #:</b>	(574) 522-6376
<b>MSOP #:</b>	M039-30244-00296

I hereby certify that Specialized Wood Products, Inc. is :  still in operation.  
 no longer in operation.

I hereby certify that Specialized Wood Products, Inc. is :  in compliance with the requirements of MSOP M039-30244-00296.  
 not in compliance with the requirements of MSOP M039-30244-00296.

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

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

<b>Noncompliance:</b>

**MALFUNCTION REPORT**

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

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

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

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

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

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

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

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

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

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

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

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

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

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

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

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

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

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

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

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

\*SEE PAGE 2

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

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

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

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

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

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

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

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

Technical Support Document (TSD) for a FESOP Transitioning to a  
Minor Source Operating Permit (MSOP)

**Source Description and Location**

<b>Source Name:</b>	<b>Specialized Wood Products, Inc.</b>
<b>Source Location:</b>	<b>4221 Middlebury Street</b>
<b>County:</b>	<b>Elkhart</b>
<b>SIC Code:</b>	<b>2459 and 2499</b>
<b>Permit Renewal No.:</b>	<b>M039-30244-00296</b>
<b>Permit Reviewer:</b>	<b>Summer Keown</b>

On February 18, 2011, the Office of Air Quality (OAQ) received an application from Specialized Wood Products, Inc. related to the construction and operation of new emission units at an existing stationary wood moulding and trim manufacturing and surface coating source and transition from a FESOP to a MSOP.

**Existing Approvals**

The source has been operating under FESOP No. F039-17688-00296, issued on November 21, 2006.

Due to this application, the source is transitioning from a FESOP to a MSOP.

**County Attainment Status**

The source is located in Elkhart County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Attainment effective July 19, 2007, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
<sup>1</sup> Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including Elkhart County, and is a maintenance area for the 1-hour National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM <sub>2.5</sub> .	

- (a) **Ozone Standards**  
 Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b)  $PM_{2.5}$   
Elkhart County has been classified as attainment for  $PM_{2.5}$ . On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for  $PM_{2.5}$  emissions. These rules became effective on July 15, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate  $PM_{10}$  emissions as a surrogate for  $PM_{2.5}$  emissions until 326 IAC 2-2 is revised.
- (c) Other Criteria Pollutants  
Elkhart County has been classified as nonattainment in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

#### Fugitive Emissions

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

#### Background and Description of Permitted and New Emission Units

The Office of Air Quality (OAQ) has reviewed an application, submitted by Specialized Wood Products, Inc. on February 18, 2011, relating to the construction of two new inking stations and a transition from a FESOP to a MSOP.

The source consists of the following permitted emission units:

- (a) Five (5) surface coating stations, identified as EU1 - EU5, installed in 1994, exhausting to Stacks EU1X - EU5X, respectively. Each station uses flowcoating as the method of application. Maximum capacity: 3,000 wood mouldings per hour per station.
- (b) One (1) surface coating station identified as EU6, and dry filters for PM control, exhausting to Stack EU6X, installed in 2004, with a maximum capacity of 933 wood mouldings per hour and using the HVLP application method of application.
- (c) One (1) woodworking operation, identified as EU7, with particulate emissions controlled by a return-air cyclone/baghouse, identified as DC1, with filtered air exhausted back into the building, installed in 1994, maximum capacity: 15,000 pounds of wood per hour.
- (d) One (1) UV finishing system, consisting of sanding, coating, and UV curing, identified as UVC, with particulate emissions controlled by a cyclone/baghouse, identified as UVC1DC, with filtered air exhausted back into the building, installed in 2006 with a maximum capacity of 1000 pounds per hour.
- (e) Fourteen (14) natural gas-fired radiant heaters, with a maximum input capacity of 0.1 MMBtu per hour, each.
- (f) One (1) natural gas-fired furnace, with a maximum input capacity of 0.15 MMBtu per hour.

The following is a list of the new emission units:

- (g) Two (2) inking stations, identified as EU8 and EU9, approved for construction in 2011, using the roll coating method of application, with a maximum capacity of 4,500 wood mouldings per hour, each.

**“Integral Part of the Process” Determination**

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

**Enforcement Issues**

There are no pending enforcement actions related to this source.

**Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

**Permit Level Determination – MSOP**

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	15.59
PM10 <sup>(1)</sup>	15.63
PM2.5	15.63
SO <sub>2</sub>	0.00
NO <sub>x</sub>	0.68
VOC	97.90
CO	0.57

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

HAPs	Potential To Emit (tons/year)
toluene	4.15
hexane	0.01
<b>TOTAL HAPs</b>	<b>4.17</b>

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of VOC is less than one hundred (100) tons per year, but greater than or equal to twenty-five (25) tons per year. The PTE of all other regulated criteria pollutants are less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) will be issued.

- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

**PTE of the Entire Source After Issuance of the MSOP**

The table below summarizes the potential to emit of the entire source after issuance of this MSOP, reflecting all limits, of the emission units.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of MSOP (tons/year)								
	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Surface Coating (Excepting Station EU6)	0.00	0.00	0.00	0.00	0.00	63.24	0.00	0.00	0.00
Surface Coating Station EU6	0.60	0.60	0.60	0.00	0.00	<25.0	0.00	4.15	4.15 (toluene)
Woodworking EU7	69.29	69.29	69.29	0.00	0.00	0.00	0.00	0.00	0.00
UV Woodworking	4.04	4.04	4.04	0.00	0.00	0.00	0.00	0.00	0.00
Natural Gas Combustion	0.01	0.05	0.05	0.00	0.68	0.04	0.57	0.01	negl.
<b>Total PTE of Entire Source</b>	73.35	73.39	73.30	0.00	0.68	<88.28	0.57	4.17	4.15 (toluene)
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".									

In order to comply with the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), the source shall comply with the following:

- (1) The PM, PM10 and PM2.5 emissions from the woodworking operation, identified as EU7, shall be limited to 15.8 pounds per hour, each.
- (2) The potential to emit VOC from the surface coating station, identified as EU6, is greater than twenty-five (25) tons per year. The source has elected to limit the VOC usage, including coatings and clean-ups solvents, from this surface coating station to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit renders the requirements of 326 IAC 8-1-6 not applicable to this surface coating station.

Compliance with these limits, combined with the potential to emit of all other emission units at the source, shall limit the source-wide potential to emit of PM, PM10 and PM2.5 to less than 250 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable. Compliance with these limits will also limit the VOC from surface coating station EU6 to less than 25 tons and shall render 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable to surface coating station EU6.

### **Federal Rule Applicability Determination**

#### New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included in the permit for the fourteen (14) natural gas-fired radiant heaters and the one (1) natural gas-fired furnace, since they each have a maximum design heat input capacity of less than ten (10) MMBtu per hour and they are not steam generating units as defined in 40 CFR 60.41c.
- (b) 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)

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Wood Furniture Manufacturing Operations, 40 CFR 63, Subpart JJ (326 IAC 20-14), are not included in this permit because the wood mouldings produced at this source are not wood furniture components as defined in 40 CFR 63. 801 and this source is not a major source of HAPs.
- (d) The requirements of National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Wood Building Products, 40 CFR 63, Subpart QQQQ (326 IAC 20-79) are not included in this permit because although the source participates in the surface coating of wood mouldings, the source is not a major source of HAPs.
- (e) 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)

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

### **State Rule Applicability Determination**

The following state rules are applicable to the source:

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))  
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))  
The PM, PM10 and PM2.5 emissions from the woodworking operation, identified as EU7, shall be limited to 15.82 pounds per hour, each. Compliance with this limit, combined with the potential to emit PM, PM10 and PM2.5 from all other emission units at the source, shall limit the potential to emit of PM, PM10 and PM2.5 to less than 250 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (d) 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 not located in Lake, Porter, or LaPorte County, 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.
- (e) 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:
- (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) 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.
- (f) 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.

#### Woodworking Operations

- (g) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
- (1) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the woodworking operation, identified as EU7, shall not exceed 15.82 pounds per hour when operating at a process weight rate of 15,000 pounds (7.50 tons) per hour.  
  
The uncontrolled potential PM is 263.07 pounds per hour. The cyclone and baghouse, identified as DC1, shall be in operation at all times the woodworking operation is in operation, in order to comply with the above stated limit.
  - (2) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the UV finishing system, identified as UVC, shall not exceed 2.58 pounds per hour when operating at a process weight rate of 1000 pounds (0.5 tons) per hour.  
  
The uncontrolled potential PM is 0.92 pounds per hour. Therefore, the cyclone and baghouse, identified as UVC1DC, are not required to comply with this limit.

The pound per hour limitations were calculated with the following equation:

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

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

### Surface Coating Stations

- (h) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
- (1) The surface coating stations and inking stations, identified as EU1 through EU5, EU8 and EU9, all use either roll coating or flow coating as the method of coating application. Therefore, pursuant to 326 IAC 6-3-1, they are exempt from the conditions of this rule.
  - (2) Surface coating station EU6 utilizes the HVLP method of application. Pursuant to 326 IAC 6-3-2(d), the surface coating station, identified as EU6, shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, subject to the following:
    - (1) The source shall operate the control device in accordance with manufacturer's specifications.
    - (2) If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such observation:
      - (A) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
      - (B) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the source shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.
- (i) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
- (1) The unlimited VOC potential emissions from the surface coating station identified as EU6 is greater than twenty-five (25) tons per year. However, the source shall limit the VOC potential emissions from the surface coating station to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.
  - (2) The unlimited VOC potential emissions from surface coating stations and inking stations EU1 through EU5, EU8, EU9, and the UVC coating line UVC1, are each less than twenty-five (25) tons per year. Therefore, the conditions of 326 IAC 8-1-6 are not applicable to these units.
- (j) 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)  
This source does not conduct surface coating of the types of miscellaneous metal and plastic parts listed in 326 IAC 8-2-9(a). Therefore, the requirements of this rule are not applicable to the surface coating stations.
- (k) 326 IAC 8-2-12 (Wood furniture and cabinet coating)  
The requirements of 326 IAC 8-2-12 apply to surface coated wood furnishings. The wood mouldings coated at this source are not considered wood furniture. Therefore, the requirements of 326 IAC 8-2-12 are not applicable to the surface coating stations.
- (l) There are no other 326 IAC 8 Rules that are applicable to the surface coating stations.

<b>Compliance Determination, Monitoring and Testing Requirements</b>
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- (a) The compliance determination and monitoring requirements applicable to the woodworking operations are as follows:

- (a) The baghouses for particulate control of the woodworking operations shall be in operation and control emissions from the woodworking operation at all times that these facilities are in operation.
  - (b) An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.
  - (c) In the event that bag failure is observed:
    - (1) For a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
    - (2) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section C - Response to Excursions or Exceedances).
    - (3) For a single compartment baghouses 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 C - Response to Excursions or Exceedances).
- Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.
- (d) An inspection shall be performed each calendar quarter of all cyclones controlling the woodworking operations when venting to the atmosphere. A cyclone inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors.
  - (e) In the event that cyclone failure is observed:
    - (1) For a cyclone controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section C - Response to Excursions or Exceedances).

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

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

These monitoring conditions are necessary because the cyclone/baghouse for the woodworking operation must operate properly to avoid the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration).

- (b) The compliance determination and monitoring requirements applicable to the surface coating station, identified as EU6, are as follows:
  - (1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating performed when surface coating station EU6 is 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 and 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.
  - (2) Monthly inspections shall be performed of the coating emissions from the Stack EU6X for 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 and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

These monitoring conditions are necessary because to show compliance with 326 IAC 6-3-2.

#### 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 February 18, 2011.

The operation of this source shall be subject to the conditions of the attached proposed MSOP No. M039-30244-00296. The staff recommends to the Commissioner that this MSOP be approved.

#### IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Summer Keown 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) 234-5175 or toll free at 1-800-451-6027 extension 4-5175.
- (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.in.gov/idem](http://www.in.gov/idem)

**Appendix A: Emissions Calculations  
Summary of Emissions Calculations**

Company Name: Specialized Wood Products, Inc.  
Address: 4221 Middlebury Street, Elkhart, IN 46516  
MSOP No.: M039-30244-00296  
Reviewer: Summer Keown  
Date: March 8, 2011

Uncontrolled Potential Emissions (tons/year)					
Emissions Generating Activity					
Pollutant	Surface Coating Emissions	Woodworking Emissions*	UV Woodworking Emissions	Natural Gas Combustion	TOTAL
PM	0.60	1,152.23	4.04	0.01	1,156.89
PM10/PM2.5	0.60	1,152.23	4.04	0.05	1,156.92
SO2	0.00	0.00	0.00	0.00	0.00
NOx	0.00	0.00	0.00	0.68	0.68
VOC	97.86	0.00	0.00	0.04	97.90
CO	0.00	0.00	0.00	0.57	0.57
total HAPs	4.15	0.00	0.00	0.01	4.17
worst case single HAP	4.15	0.00	0.00	0.00	4.15 (toluene)
Controlled Potential Emissions (tons/year)					
Emissions Generating Activity					
Pollutant	Surface Coating Emissions	Woodworking Emissions*	UV Woodworking Emissions	Natural Gas Combustion	TOTAL
PM	0.01	11.52	0.04	0.01	11.59
PM10/PM2.5	0.01	11.52	0.04	0.05	11.63
SO2	0.00	0.00	0.00	0.00	0.00
NOx	0.00	0.00	0.00	0.68	0.68
VOC	97.86	0.00	0.00	0.04	97.90
CO	0.00	0.00	0.00	0.57	0.57
total HAPs	4.15	0.00	0.00	0.01	4.17
worst case single HAP	4.15	0.00	0.00	0.00	4.15 (toluene)
Limited Potential Emissions (tons/year)					
Emissions Generating Activity					
Pollutant	Surface Coating Emissions	Woodworking Emissions*	UV Woodworking Emissions	Natural Gas Combustion	TOTAL
PM	0.01	69.29	4.04	0.01	73.35
PM10/PM2.5	0.01	69.29	4.04	0.05	73.39
SO2	0.00	0.00	0.00	0.00	0.00
NOx	0.00	0.00	0.00	0.68	0.68
VOC	<88.24	0.00	0.00	0.04	<88.28
CO	0.00	0.00	0.00	0.57	0.57
total HAPs	4.15	0.00	0.00	0.01	4.17
worst case single HAP	4.15	0.00	0.00	0.00	4.15 (toluene)

\*In October 1993 a Final Order Granting Summary Judgment was signed by Administrative Law Judge ("ALJ") Garrettson resolving an appeal filed by Kimball Hospitality Furniture Inc. (Cause Nos. 92-A-J-730 and 92-A-J-833) related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls are necessary for the facility to produce its normal product and are integral to the normal operation of the facility, and therefore, potential emissions should be calculated after controls. Based on this ruling, potential emissions for particulate matter were calculated after consideration of the controls for determining operating permit level purposes. This integral determination does not negate the requirement for a limit to comply with 326 IAC 2-2 (Prevention of Significant Deterioration).



**Appendix A: Emissions Calculations  
Hazardous Air Pollutants  
From Surface Coating Operations**

**Company Name:** Specialized Wood Products, Inc.  
**Address:** 4221 Middlebury Street, Elkhart, IN 46516  
**MSOP No.:** M039-30244-00296  
**Reviewer:** Summer Keown  
**Date:** March 8, 2011

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Toluene	Toluene Emissions (tons/yr)	Total HAP (tons/yr)
<b>EU1 - Stain Application</b>						
WBS-1425 Stain	8.40	0.002300	3,000.00	0.00%	0.00	0.00
<b>EU2 - Stain Application</b>						
WBS-1425 Stain	8.40	0.002300	3,000.00	0.00%	0.00	0.00
<b>EU3 - Stain Application</b>						
WBS-1425 Stain	8.40	0.002300	3,000.00	0.00%	0.00	0.00
<b>EU4 - Topcoat Application</b>						
Waterborne Topcoat	8.49	0.002300	3,000.00	0.00%	0.00	0.00
<b>EU5 - Topcoat Application</b>						
Waterborne Topcoat	8.49	0.002300	3,000.00	0.00%	0.00	0.00
<b>EU6 - Topcoat Application</b>						
Lacquer Topcoat	7.26	0.001750	933.00	8.00%	4.15	4.15
<b>EU8 - Wood Inking Roller</b>						
844-9955 Lamp Black	9.17	0.000025	4,500.00	0.00%	0.00	0.00
<b>EU9 - Wood Inking Roller</b>						
844-9955 Lamp Black	9.17	0.000025	4,500.00	0.00%	0.00	0.00
<b>UVC1 - UV Coating Line***</b>						
UV Acrylic Topcoat	8.93	0.271933	5.00	0.00%	0.00	0.00
<b>Clean-up - All Listed Units</b>						
Laquer Thinner	6.45	0.000007	24,938.00	0.00%	0.00	0.00

Total State Potential Emissions

**4.15**

**4.15**

**METHODOLOGY**

HAPS emission rate (tons/yr) = Density (lbs/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs

**Appendix A: Emission Calculations  
Woodworking Operations (EU7)**

**Company Name:** Specialized Wood Products, Inc.  
**Address:** 4221 Middlebury Street, Elkhart, IN 46516  
**MSOP No.:** M039-30244-00296  
**Reviewer:** Summer Keown  
**Date:** March 8, 2011

Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	PM Emission Rate before Controls (lb/hr)	PM Emission Rate before Controls (tons/yr)	PM Emission Rate after Controls (lb/hr)	PM Emission Rate after Controls (tons/yr)
Cyclone/Baghouse DC1	99.0%	0.011711	26207	263.07	1152.2	2.63	11.5

**Methodology**

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

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

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

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

**Allowable Rate of Emissions [326 IAC 6-3-2]**

Process Rate (lbs/hr)	Process Weight Rate (tons/hr)	Allowable Emissions (lbs/hr)
15000	7.50	15.82

**Methodology**

Allowable Emissions = 4.10(Process Weight Rate)<sup>0.67</sup>

**Appendix A: Emission Calculations  
Woodworking Operations**

**Company Name:** Specialized Wood Products, Inc.  
**Address:** 4221 Middlebury Street, Elkhart, IN 46516  
**MSOP No.:** M039-30244-00296  
**Reviewer:** Summer Keown  
**Date:** March 8, 2011

Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	PM Emission Rate before Controls (lb/hr)	PM Emission Rate before Controls (tons/yr)	PM Emission Rate after Controls (lb/hr)	PM Emission Rate after Controls (tons/yr)
Cyclone/Baghouse							
UVC1DC	99.0%	0.0005	2152	0.92	4.0	0.01	0.04

**Methodology**

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

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

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

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

**Allowable Rate of Emissions [326 IAC 6-3-2]**

Process Rate (lbs/hr)	Process Weight Rate (tons/hr)	Allowable Emissions (lbs/hr)
1000	0.50	2.58

**Methodology** Allowable Emissions = 4.10(Process Weight Rate)<sup>0.67</sup>

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

**Company Name:** Specialized Wood Products, Inc.  
**Address:** 4221 Middlebury Street, Elkhart, IN 46516  
**MSOP No.:** M039-30244-00296  
**Reviewer:** Summer Keown  
**Date:** March 8, 2011

Heat Input Capacity  
MMBtu/hr

1.55

Potential Throughput  
MMCF/yr

13.6

14 Radiant Heaters @ 0.100 MMBtu/hr each  
1 furnace at 0.15 MMBtu/hr

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100 **see below	5.50	84.0
Potential Emission in tons/yr	0.013	0.052	0.004	0.679	0.037	0.570

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

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

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

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

**Company Name:** Specialized Wood Products, Inc.  
**Address:** 4221 Middlebury Street, Elkhart, IN 46516  
**MSOP No.:** M039-30244-00296  
**Reviewer:** Summer Keown  
**Date:** March 8, 2011

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.10E-03	Dichlorobenzene 1.20E-03	Formaldehyde 7.50E-02	Hexane 1.80E+00	Toluene 3.40E-03
Potential Emission in tons/yr	1.43E-05	8.15E-06	5.09E-04	1.22E-02	2.31E-05

HAPs - Metals						
Emission Factor in lb/MMcf	Lead 5.00E-04	Cadmium 1.10E-03	Chromium 1.40E-03	Manganese 3.80E-04	Nickel 2.10E-03	<b>Total HAPs</b>
Potential Emission in tons/yr	3.39E-06	7.47E-06	9.50E-06	2.58E-06	1.43E-05	<b>0.013</b>

Methodology is the same as criteria pollutants.

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



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
**Governor**

*Thomas W. Easterly*  
**Commissioner**

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

May 2, 2011

VP Terry Miller  
Specialized Wood Products, Inc.  
4221 Middlebury St.  
Elkhart IN 46516

Re: Public Notice  
Specialized Wood Products, Inc.  
Permit Level: MSOP  
Permit Number: 039-30244-00296

Dear VP Miller;

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

The Office of Air Quality (OAQ) has submitted the draft permit package to the Elkhart Public Library, 300 S. 2<sup>nd</sup>. St. in Elkhart, IN. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper. The OAQ has requested that the Elkhart Truth in Elkhart, IN publish this notice no later than Thurs. May 5, 2011.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Summer Keown, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-5175 or dial (317) 234-5175.

Sincerely,

*Bonnie Miller*

Bonnie Miller  
Permits Branch  
Office of Air Quality

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



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## ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

May 2, 2011

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

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Specialized Wood Products, Inc., Elkhart County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than Thurs. May 5, 2011.

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

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

Sincerely,

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

cc: Pat Cuzzort: OAQ Billing, Licensing and Training Section  
Permit Level: MSOP  
Permit Number: 039-30244-00296

Enclosure  
PN Newspaper.dot 3/27/08



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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

May 2, 2011

To: Elkhart Public Library

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

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

**Applicant Name: Specialized Wood Products, Inc.**  
**Permit Number: 039-30244-00296**

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

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

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

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

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

Enclosures  
PN Library.dot 03/27/08



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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## Notice of Public Comment

**May 2, 2011**

**Specialized Wood Products, Inc.**

**039-30244-00296**

Dear Concerned Citizen(s):

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

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

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

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

Enclosure  
PN AAA Cover.dot 3/27/08

# Mail Code 61-53

IDEM Staff	BMILLER 5/2/2011 Specialized Wood Products, Inc. 039-30244-00296 (draft)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING	
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	

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		Terry Miller VP Specialized Wood Products, Inc. 4221 Middlebury St Elkhart IN 46516 (Source CAATS)									
2		Elkhart City Council and Mayors Office 229 South Second Street Elkhart IN 46516 (Local Official)									
3		Elkhart Public Library 300 S 2nd St Elkhart IN 46516-3184 (Library)									
4		Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 (Health Department)									
5		Laurence A. McHugh Barnes & Thornburg 100 North Michigan South Bend IN 46601-1632 (Affected Party)									
6		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 (Local Official)									
7		Mr. Doug Elliott D & B Environmental Services, Inc. 401 Lincoln Way West Osceola IN 46561 (Consultant)									
8		Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 (Affected Party)									
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