



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: November 23, 2011

RE: Accessory Match, Inc. / 033-30880-00106

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

Notice of Decision: Approval - Registration

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 4-21.5-3-4(d) this order is effective when it is served. When served by U.S. mail, the order is effective three (3) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FN-REGIS.dot 1/2/08



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REGISTRATION OFFICE OF AIR QUALITY

**Accessory Match, Inc.
600 West Maple Street
Waterloo, Indiana 46793**

Pursuant to 326 IAC 2-5.1 (Construction of New Sources: Registrations) and 326 IAC 2-5.5 (Registrations), (herein known as the Registrant) is hereby authorized to construct and operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this registration.

Registration No. R033-30880-00106	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: November 23, 2011

SECTION A

SOURCE SUMMARY

This registration 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 Registrant 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 Registrant to obtain additional permits pursuant to 326 IAC 2.

A.1 General Information

The Registrant owns and operates a stationary hardwood mill work, stain and seal - pre-made wood molding, cabinets and construction molding facility.

Source Address:	600 West Maple Street, Waterloo, IN 46793
General Source Phone Number:	(260) 837-6000
SIC Code:	2431 (Millwork)
County Location:	Dekalb County
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Registration

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) Woodworking operations, identified as EU-001, approved for construction in 2011, consisting of chop saws, table saw, belt sander, profile sanders, equipped with two (2) baghouses for particulate control: one, identified as BH-1, with a maximum flow rate of 2200 acfm and a outlet grain loading of 0.00005 gr/dscf and one, identified as BH-2, with a maximum flow rate of 1450 acfm and a outlet grain loading of 0.00005 gr/dscf, each with a maximum capacity of 5,000 pounds of wood per hour exhausting indoors.
- (b) Two (2) Paint Booths, identified as PB-01 and PB-02, approved for construction in 2011, each with a maximum production rate of 10 units per hour, equipped with high volume low pressure (HVLP) spray guns and dry filters for particulate control, exhausting to stacks SV-01 and SV-02, respectively.
- (c) Two (2) Spray Machines, identified as SM-1 and SM-2, approved for construction in 2011, each equipped with enclosed conveyors for spraying the long molded pieces with a fixed spray for water based surface coating at a maximum capacity of 0.75 gallons per hour, each, and both exhausting to stack SV-03.
- (d) Paved roads and parking lots with public access.

SECTION B GENERAL CONDITIONS

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

Terms in this registration 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 Effective Date of Registration [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, this registration is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

B.3 Registration Revocation [326 IAC 2-1.1-9]

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

- (a) Violation of any conditions of this registration.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this registration.
- (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 registration shall not require revocation of this registration.
- (d) For any cause which establishes in the judgment of IDEM the fact that continuance of this registration is not consistent with purposes of this article.

B.4 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to Registration No.R033-30880-00106 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 registration.

B.5 Annual Notification [326 IAC 2-5.1-2(f)(3)] [326 IAC 2-5.5-4(a)(3)]

Pursuant to 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3):

- (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 registration.
- (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, IN 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.6 Source Modification Requirement [326 IAC 2-5.5-6(a)]

Pursuant to 326 IAC 2-5.5-6(a), an application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

B.7 Registrations [326 IAC 2-5.1-2(i)]

Pursuant to 326 IAC 2-5.1-2(i), this registration does not limit the source's potential to emit.

B.8 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this registration, the Registrant shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this registration 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 Registrant's control, the PMPs cannot be prepared and maintained within the above time frame, the Registrant may extend the date an additional ninety (90) days provided the Registrant notifies:

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

The Registrant 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 Registrant 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 Registrant is required by 40 CFR Part 60 or 40 CFR Part 63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such OMM Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

C.1 Opacity [326 IAC 5-1]

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

- (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.2 Fugitive Dust Emissions [326 IAC 6-4]

The Registrant 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).

SECTION D.1

OPERATION CONDITIONS

Facility Description [326 IAC 2-5.1-2(f)(2)] [326 IAC 2-5.5-4(a)(2)]:

- (a) Woodworking operations, identified as EU-001, approved for construction in 2011, consisting of chop saws, table saw, belt sander, profile sanders, equipped with two (2) baghouses for particulate control: one, identified as BH-1, with a maximum flow rate of 2200 acfm and a outlet grain loading of 0.00005 gr/dscf and one, identified as BH-2, with a maximum flow rate of 1450 acfm and a outlet grain loading of 0.00005 gr/dscf, each with a maximum capacity of 5,000 pounds of wood per hour exhausting indoors.

(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 2-5.1-2(f)(1)] [326 IAC 2-5.5-4(a)(1)]

D.1.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking facilities shall not exceed 12.1 pounds per hour when operating at a process weight rate of 10,000 pounds per hour.

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

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

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

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

Compliance Determination Requirements

D.1.2 Particulate Control

- (a) In order to comply with Condition D.1.1, the baghouses for particulate control shall be in operation and control emissions from the woodworking facility at all times the woodworking facility is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

SECTION D.2

OPERATION CONDITIONS

Facility Description [326 IAC 2-5.1-2(f)(2)] [326 IAC 2-5.5-4(a)(2)]:

- (b) Two (2) Paint Booths, identified as PB-01 and PB-02, approved for construction in 2011, each with a maximum production rate of 10 units per hour, equipped with high volume low pressure (HVLP) spray guns and dry filters for particulate control, exhausting to stacks SV-01 and SV-02, respectively.
- (c) Two (2) Spray Machines, identified as SM-1 and SM-2, approved for construction in 2011, each equipped with enclosed conveyors for spraying the long molded pieces with a fixed spray for water based surface coating at a maximum capacity of 0.75 gallons per hour, each, and both exhausting to stack SV-03.

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

Emission Limitations and Standards [326 IAC 2-5.1-2(f)(1)] [326 IAC 2-5.5-4(a)(1)]

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

Pursuant to 326 IAC 6-3-2(d), the surface coating process (PB-01 and PB-02) shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, subject to the following:

- (a) The source 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 source 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 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.

D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood cabinets in surface coating booths PB-01 and PB-02, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, shall utilize one of the following application methods:

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

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

Record Keeping and Reporting Requirements [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

D.2.3 Record Keeping Requirements

To document compliance with Condition D.2.1(c), the Registrant shall maintain a record of any actions taken if overspray is visibly detected.

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

**REGISTRATION
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3).

Company Name:	Accessory Match. Inc.
Address:	600 West Maple Street
City:	Waterloo, Indiana 46793
Phone Number:	(260) 837-6000
Registration No.:	R033-30880-00106

I hereby certify that Accessory Match. Inc. is:

- still in operation.
- no longer in operation.
- in compliance with the requirements of Registration No. R033-30880-00106.
- not in compliance with the requirements of Registration No. R033-30880-00106.

I hereby certify that Accessory Match. Inc. is:

Authorized Individual (typed):
Title:
Signature:
Phone Number:
Date:

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.

Noncompliance:

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

Technical Support Document (TSD) for a Registration

Source Description and Location
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Source Name:	Accessory Match, Inc.
Source Location:	600 West Maple Street, Waterloo, IN 46793
County:	DeKalb
SIC Code:	2431 (Millwork)
Registration No.:	R033-30880-00106
Permit Reviewer:	Charles Sullivan

On September 6, 2011, the Office of Air Quality (OAQ) received an application from Accessory Match, Inc. related to the construction and operation of a new hardwood mill work, stain and seal - pre-made wood molding, cabinets and construction molding facility.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in DeKalb County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM _{2.5} .	

- (a) **Ozone Standards**
 Volatile organic compounds (VOC) and Nitrogen Oxides (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. DeKalb 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) Dekalb 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. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM_{2.5} significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

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

Fugitive Emissions

The fugitive emissions of criteria pollutants, hazardous air pollutants, and greenhouse gases are counted toward the determination of 326 IAC 2-5.1-2 (Registrations) applicability.

Background and Description of Unpermitted Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Accessory Match, Inc. on September 6, 2011, relating to the construction and operation of an existing hardwood mill work, stain and seal - pre-made wood molding, cabinets and construction molding facility.

The following is a list of the unpermitted emission unit(s) and pollution control device(s):

- (a) Woodworking operations, identified as EU-001, approved for construction in 2011, consisting of chop saws, table saw, belt sander, profile sanders, equipped with two (2) baghouses for particulate control: one, identified as BH-1, with a maximum flow rate of 2200 acfm and a outlet grain loading of 0.00005 gr/dscf and one, identified as BH-2, with a maximum flow rate of 1450 acfm and a outlet grain loading of 0.00005 gr/dscf, each with a maximum capacity of 5,000 pounds of wood per hour exhausting indoors.
- (b) Two (2) Paint Booths, identified as PB-01 and PB-02, approved for construction in 2011, each with a maximum production rate of 10 units per hour, equipped with high volume low pressure (HVLP) spray guns and dry filters for particulate control, exhausting to stacks SV-01 and SV-02, respectively.
- (c) Two (2) Spray Machines, identified as SM-1 and SM-2, approved for construction in 2011, each equipped with enclosed conveyors for spraying the long molded pieces with a fixed spray for water based surface coating at a maximum capacity of 0.75 gallons per hour, each, and both exhausting to stack SV-03.
- (d) Paved roads and parking lots with public access.

"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 purposes of determining permit level. However, for purposes of determining the applicability of Prevention of Significant Deterioration (PSD) and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), potential particulate matter emissions from the woodworking operations were calculated before consideration of the baghouse controls.

Enforcement Issues

IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit rules.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – Registration

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.

Process/ Emission Unit	Potential To Emit of the Entire Source (tons/year)									
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Woodworking *** (EU-0001)	0.29	0.29	0.29	0.0	0.0	0.0	0.0	--	0.0	0.0
Paint Spray booths (PB-1 and PB-2)	6.53	6.53	6.53	0.0	0.0	13.56	0.0	--	0.0	0.0
Top Coat Paint	4.45	4.45	4.45	0.0	0.0	0.50	0.0	--	0.03	0.03
Spray Machines (SM-1 and SM-2)	12.08	12.08	12.08	0.0	0.0	6.30	0.0	--	0.0	0.0
Paved Roads (fugitives)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	--	0.0	0.0
Total PTE of Entire Source	23.34	23.34	23.34	0.0	0.0	20.36	0.0	--	0.03	0.03
Exemptions Levels**	5	5	5	10	10	5	25	100,000	25	10
Registration Levels**	25	25	25	25	25	25	100	100,000	25	10
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". **The 100,000 CO ₂ e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD. ***The PTE of woodworking is after integral controls.										

Criteria Pollutants (PM10, PM2.5, SO₂, NO_x, VOC, and CO)

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of PM, PM10, PM2.5 and VOC are within the ranges listed in 326 IAC 2-5.1-2(a)(1). The PTE of all other regulated criteria pollutants are less than the ranges listed in 326 IAC 2-5.1-2(a)(1). Therefore, the source is subject to the provisions of 326 IAC 2-5.1-2 (Registrations). A Registration will be issued.

Hazardous Air Pollutants

- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) 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.

Greenhouse Gases (GHGs) as CO₂e

- (c) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Surface Coating of Metal Furniture, 40 CFR 60, Subpart EE (326 IAC 12), are not included in the permit. This source does not engage in the surface coating of metal furniture.
- (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 (63.800 through 63.808) (326 IAC 20-14), are not included in the permit, since this source does not manufacture plywood or composite wood products (PCWP) and this source is not a major source of HAPs.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Plywood and Composite Wood Products, 40 CFR 63, Subpart DDDD, are not included in the permit. The source does not manufacture plywood and composite wood products and this source is not a major source of HAPs.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products, 40 CFR Part 63, Subpart QQQQ (63.4670 through 63.4781) (326 IAC 20-79), are not included in the permit, because this source is not a major source of HAP emissions and does include surface coating of wood building products as defined by 40 CFR 63.4781. This source only manufactures wood cabinets (kitchen, bath, and entertainment centers), which are not used in the construction of buildings.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Subpart HHHHHH - Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH, are not included in the permit, since this area source does not use the target HAPs.
- (g) There are no other 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)

- (h) 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 2-5.1-2 (Registrations)
Registration applicability is discussed under the Permit Level Determination – Registration section above.

- (b) 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.
- (c) 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.
- (d) 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.
- (e) 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.
- (f) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.
- (g) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Each of the emission units at this source is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each emission unit is less than twenty-five (25) tons per year.

Woodworking Operation

- (h) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the woodworking operation shall not exceed 12.1 pounds per hour when operating at a process weight rate of 10,000 pounds per hour. The pound per hour limitation was 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:

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

$$E = 4.10 [(5,000 \text{ pounds/hour}) * (2) / (2000 \text{ tons/pound})]^{0.67} = 4.10 [5]^{0.67} = 12.1 \text{ pounds/hour}$$

Since the particulate emissions of 1.56 pounds per hour are less than the 12.1 pounds per hour limit calculated above, the woodworking process is able to comply with 326 IAC 6-3 without the use of a control device. However, the baghouses will be required to operate since they are considered integral to the process.

Surface Coating Operation

- (i) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2(d), the surface coating process for PB-1 and PB-2 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.
 - (3) 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.
- (j) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The surface coating operation is not subject to 326 IAC 8-1-6 because the unlimited VOC potential emissions from each spray booth is less than twenty-five (25) tons per year and the spray booths are regulated by 326 IAC 8-2-12.
- (k) 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)
Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood cabinets in surface coating booths PB-1 and PB-2, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, shall utilize one of the following application methods:

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

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

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 September 6, 2011.

The construction and operation of this source shall be subject to the conditions of the attached proposed Registration No. 033-30880-00106. The staff recommends to the Commissioner that this Registration be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Charles Sullivan 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) 232-8422 or toll free at 1-800-451-6027 extension 2-8422.
- (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

**Appendix A: Emissions Calculations
VOC and Particulate
Emission Summary**

**Company Name: Accessory Match
Address City IN Zip: 600 West Maple Street, Waterloo, IN 46793
Permit Number: R033-30880-00106
Reviewer: Charles Sullivan
Date: 9/6/2011**

Uncontrolled Emissions

Emission Units	PM (tons/yr)	PM₁₀ (tons/yr)	PM_{2.5} (tons/yr)	SO₂ (tons/yr)	VOC (tons/yr)	CO (tons/yr)	NOx (tons/yr)	GHGs (tons/yr)	HAPs (tons/yr)	Worst Case HAPs (tons/yr)
Paint Booths 1 & 2 (PB-01 & PB-02)	6.53	6.53	6.53	0.00	13.56	0.00	0.00	--	--	--
Top Coat Paint	4.45	4.45	4.45	0.00	0.50	0.00	0.00	--	0.03	0.03
Wood Working* (EU-001)	6.85	6.85	6.85	0.00	0.00	0.00	0.00	--	0.00	--
Paved Roads	0.0004	0.0001	0.0000	0.00	0.00	0.00	0.00	--	0.00	--
Waterbased stains, primers and topcoats (SM-1 & 2)	12.08	12.08	12.08	0.00	6.30	0.00	0.00	--	0.00	--
Total	29.91	29.91	29.91	0.00	20.36	0.00	0.00	--	0.03	

Limited Emissions

Emission Units	PM (tons/yr)	PM₁₀ (tons/yr)	PM_{2.5} (tons/yr)	SO₂ (tons/yr)	VOC (tons/yr)	CO (tons/yr)	NOx (tons/yr)	GHGs (tons/yr)	HAPs (tons/yr)	Worst Case HAPs (tons/yr)
Paint Booths 1 & 2 (PB-01 & PB-02)	6.53	6.53	6.53	0.00	13.56	0.00	0.00	--	--	--
Top Coat Paint	4.45	4.45	4.45	0.00	0.50	0.00	0.00	--	0.03	0.025
Woodworking** (EU-001)	0.29	0.29	0.29	0.00	0.00	0.00	0.00	--	0.00	--
Paved Roads	0.00	0.00	0.00	0.00	0.00	0.00	0.00	--	0.00	--
Waterbased stains, primers and topcoats (SM-1 & 2)	12.08	12.08	12.08	0.00	6.30	0.00	0.00	--	0.00	--
Total	23.34	23.34	23.34	0.00	20.36	0.00	0.00	--	0.03	

** The dust collection system associated with the woodworking operations is considered integral to the process. Therefore, potential emissions will be considered after the use of the control device.

*In October 1993 a Final Order Granting Summary Judgment was signed by Administrative Law Judge ("ALJ") Garretson 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 purposes of determining permit level. However, for purposes of determining the applicability of Prevention of Significant Deterioration (PSD) and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), potential particulate matter emissions from the woodworking operations were calculated before consideration of the baghouse controls.

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations (Paintbooths 1 & 2)**

**Company Name: Accessory Match
Address City IN Zip: 600 West Maple Street, Waterloo, IN 46793
Permit Number: R033-30880-00106
Reviewer: Charles Sullivan
Date: 9/6/2011**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Surface Coating																
Precat Laquer T77XXC57-1402	7.85	74.00%	0.0%	74.00%	0.0%	26.00%	0.05000	10.000	5.81	5.81	2.90	69.71	12.72	1.12	22.34	75%
Vinal Seal T67FS	10.20	100.00%	0.0%	25.02%	0.0%	51.00%	0.05000	10.000	2.55	2.55	1.28	30.62	5.59	0.00	5.00	75%
Conversion Varnish V85XXC	11.98	26.43%	0.0%	26.43%	0.0%	50.35%	0.05000	10.000	3.17	3.17	1.58	38.00	6.93	4.83	6.29	75%
Water Base Stain Base 5400-6741/105	8.41	17.57%	82.4%	1.71%	0.0%	15.86%	0.05000	10.000	0.14	0.14	0.07	1.73	0.31	3.80	0.91	75%
Water Base Stain Clear S64T508	8.35	14.30%	0.0%	14.3%	0.0%	74.60%	0.05000	10.000	1.19	1.19	0.60	14.33	2.61	3.92	1.60	75%
Sovent Dye Base ADDR N 564 C9485	12.30	3.00%	0.0%	1.3%	0.0%	40.30%	0.05000	10.000	0.16	0.16	0.08	1.92	0.35	6.53	0.40	75%
Wipe Solvent Stain Base S64TH2	6.58	100.00%	4.8%	95.2%	0.0%	3.00%	0.02500	10.000	6.26	6.26	1.57	37.58	6.86	0.00	208.81	75%
Butyl Acetate	7.31	100.00%	0.0%	100.0%	0.0%	0.00%	0.02500	10.000	7.31	7.31	1.83	43.86	8.00	0.00	0.00	75%
Waterbase Primer T65f550	8.62	49.50%	46.1%	6.0%	0.0%	61.40%	0.05000	10.000	0.52	0.52	0.26	6.21	1.13	2.38	0.84	75%
Acetone	6.59	100.00%	0.0%	100.0%	0.0%				6.59	6.59	0.00	0.00	0.00	0.00	0.00	75%
Waterbase Topcoat T75F557	8.48	71.00%	60.3%	10.7%	0.0%	29.00%	0.05000	10.000	0.91	0.91	0.45	10.89	1.99	1.35	3.13	75%
Water Primer E60WJ535	12.91	49.50%	46.1%	3.2%	0.0%	61.40%	0.05000	10.000	0.41	0.41	0.21	4.96	0.90	3.57	0.67	75%
Cleanup Solvent (Acetone)	6.59	100.00%	0.0%	100.0%	0.0%	0.00%	0.02900	1.000	6.59	6.59	0.19	4.59	0.84	0.00	NA	75%

Highlighted items are topcoats

Add worst case coating to all solvents

	10.82	259.80	12.72	6.53
	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)
Total PTE	11.02	264.39	13.56	6.53

METHODOLOGY

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

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations (Top Coat)**

Company Name: Accessory Match
Address City IN Zip: 600 West Maple Street, Waterloo, IN 46793
Permit Number: R033-30880-00106
Reviewer: Charles Sullivan
Date: 9/6/2011

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Top Coat																
Water base Stain Clear ¹	8.35	2.75%	0.0%	2.75%	0.0%	26.00%	0.05000	10.000	0.23	0.23	0.11	2.76	0.50	4.45	0.88	75%

¹ 1 Unit = 3000LF of Wood Molding

1 - This is from SM-2 most of the time but during low volume it may be sprayed in SB-1

Add worst case coating to all solvents

	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)
Total PTE	0.11	2.76	0.50	4.45

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

**Appendix A: Emission Calculations
Woodworking Operation
Grain Loading Calculations**

Company Name: Accessory Match
Address City IN Zip: 600 West Maple Street, Waterloo, IN 46793
Permit Number: R033-30880-00106
Reviewer: Charles Sullivan
Date: 9/6/2011

Woodworking Operations EU-001 *

Unit ID (s)	Baghouse ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	PM/PM10/PM2.5 Emission Rate before Controls (lb/hr)	PM/PM10/PM2.5 Emission Rate before Controls (tons/yr)	PM/PM10/PM2.5 Emission Rate after Controls (lb/hr)	PM/PM10/PM2.5 Emission Rate after Controls (tons/yr)
CS-1	BH 1	99.9%	0.00005	2200	0.94	4.13	0.001	0.004
CS-2	BH 2	99.9%	0.00005	1450	0.62	2.72	0.001	0.003
Total				3650	1.56	6.85	0.002	0.007

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)

Limited Potential to Emit from Woodworking Operations

Unit ID	Baghouse ID	Grain Loading Per Actual Cubic foot of Outlet air (grains/acf)	Gas or Air Flow Rate (acfm)	PM/PM10/PM2.5 Emissions (grains/hr)	PM/PM10/PM2.5 Emissions (lbs/hr)	PM/PM10/PM2.5 Emissions (tons/yr)
EU-001	BH 1 & 2	0.004	1900	456	0.07	0.29
Total				456	0.07	0.29

Methodology

PM/PM10/PM2.5 Emissions (grains/hr) = Grain Loading (gr/acf) * Air Flow (acf/min) * 60 (min/hr)
 PM/PM10/PM2.5 Emissions (lbs/hr) = PM/PM10/PM2.5 Emissions (grains/hr) * (1 lb/7000 grains)
 PM/PM10/PM2.5 Emissions (tons/yr) = PM/PM10/PM2.5 Emissions (lbs/hr) * 8760 hrs/yr * 2000 lbs/ton

* The baghouse controlling emissions for the woodworking operation have been determined by IDEM to be integral to the process. Therefore only the potential emissions after controls are considered when determining the permit level.

**Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads**

**Company Name: Accessory Match
Address City IN Zip: 600 West Maple Street, Waterloo, IN 46793
Permit Number: R033-30880-00106
Reviewer: Charles Sullivan
Date: 9/6/2011**

Paved Roads at Industrial Site

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	5.0	1.0	5.0	1.5	7.5	100	0.019	0.1	34.6
Vehicle (leaving plant) (one-way trip)	5.0	1.0	5.0	1.5	7.5	100	0.019	0.1	34.6
Total			10.0		15.0			0.2	69.1

Average Vehicle Weight Per Trip = $\frac{1.5}{0.02}$ tons/trip
Average Miles Per Trip = $\frac{0.02}{0.02}$ miles/trip

Unmitigated Emission Factor, $E_f = [k * (sL)^{0.91} * (W)^{1.02}]$ (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	1.5	1.5	1.5	tons = average vehicle weight (provided by source)
sL =	0.6	0.6	0.6	g/m ² = ubiquitous baseline silt loading value for ADT < 500 - Table 13.2.1-2)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E * [1 - (p/4N)]$ (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, $E_{ext} = E_f * [1 - (p/4N)]$
where p = $\frac{125}{365}$ days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N = $\frac{365}{365}$ days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f =$	0.010	0.002	0.0005	lb/mile
Mitigated Emission Factor, $E_{ext} =$	0.010	0.002	0.0005	lb/mile
Dust Control Efficiency =	50%	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	0.0002	0.00004	0.00001	0.0002	0.0000	0.0000	0.00	0.00	0.00
Vehicle (leaving plant) (one-way trip)	0.0002	0.00004	0.00001	0.0002	0.0000	0.0000	0.00	0.00	0.00
	0.0004	0.0001	0.0000	0.00	0.00	0.00	0.00	0.00	0.00

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] * [1 - Dust Control Efficiency]

Abbreviations

PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particle Matter (<2.5 um)
PTE = Potential to Emit



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
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Toll Free (800) 451-6027
www.idem.IN.gov

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

TO: Dave Cox
Accessory Match
PO Box 128
Waterloo, IN 46793

DATE: November 23, 2011

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

SUBJECT: Final Decision
Registration
033-30880-00106

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

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

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

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

Final Applicant Cover letter.dot 11/30/07

Mail Code 61-53

IDEM Staff	CDENNY 11/23/2011 Accessory Match 033-30880-00106 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Dave Cox Accessory Match PO Box 128 Waterloo IN 46793 (Source CAATS)										
2		Dave Cox President Accessory Match PO Box 128 Waterloo IN 46793 (RO CAATS)										
3		Peter Keck Compliance Consulting Service, Inc. 207 Hoosier Drive, Suite 4 Angola IN 46703 (Consultant)										
4		Mr. Steve Christman NISWMD 2320 W 800 S, P.O. Box 370 Ashley IN 46705 (Affected Party)										
5		DeKalb County Commissioners 100 South Main Street Auburn IN 46706 (Local Official)										
6		Ms. Diane Leroy 303 N. Jackson St. Auburn IN 46706 (Affected Party)										
7		Mr. Barry Fordanish R#3 1480 CR 66 Auburn IN 46706 (Affected Party)										
8		Mr. Dave Weilbaker 1423 Urban Ave Auburn IN 46706 (Affected Party)										
9		Dekalb County Health Department 220 E 7th St #110 Auburn IN 46706 (Health Department)										
10		Daniel & Sandy Trimmer 15021 Yellow River Road Columbia City IN 46725 (Affected Party)										
11		Mr. Charles L. Berger Berger & Berger, Attorneys at Law 313 Main Street Evansville IN 47700 (Affected Party)										
12		21Alive P.O. Box 2121 Fort Wayne IN 46801 (Affected Party)										
13		Brown & Sons Fuel Co. P.O. Box 665 Kendallville IN 46755 (Affected Party)										
14		Waterloo Town Council 280 N. Wayne St, P.O. Box 96 Waterloo IN 46793 (Local Official)										
15		Mr. Marty K. McCurdy 2550 County Road 27 Waterloo IN 46793 (Affected Party)										

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

IDEM Staff	CDENNY 11/23/2011 Accessory Match 033-30880-00106 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handling Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee Remarks
1		Mark 26545 CR 52 Nappanee IN 46550 (Affected Party)									
2											
3											
4											
5											
6											
7											
8											
9											
10											
11											
12											
13											
14											
15											

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