



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a New Source Construction and
Federally Enforceable State Operating Permit (FESOP)

for Custom Wood Products, Inc. in Elkhart County

The Indiana Department of Environmental Management (IDEM) has received an application from Custom Wood Products, Inc. located at 1809 W. Hively Ave. and 1515 Leininger Ave., Elkhart for a new source construction and FESOP. If approved by IDEM's Office of Air Quality (OAQ), this proposed permit would allow Custom Wood Products, Inc. to construct and operate a new wood RV components and furniture manufacturer.

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

Elkhart Public Library
300 S. Second St.
Elkhart, IN 46516

and

Northern Regional Office
300 N. Michigan St., Suite 450
South Bend, IN 46601

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 30th 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 039-31065-00715 in all correspondence.

Comments should be sent to:

Bruce Farrar
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 4-5401
Or dial directly: (317) 234-5401
Fax: (317)-232-6749 attn: Bruce Farrar
E-mail: bfarrar@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.

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 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251 Northern Regional Office, 300 N. Michigan St., Suite 450, South Bend, Indiana 46601.

If you have any questions please contact Bruce Farrar of my staff at the above address.

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality



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DRAFT

New Source Construction and Federally Enforceable State Operating Permit OFFICE OF AIR QUALITY

**Custom Wood Products, Inc.
1809 W. Hively Ave. and 1515 Leininger Ave.
Elkhart, Indiana 46517**

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

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

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

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

Operation Permit No.: F039-31065-00715	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary wood RV components and furniture plant.

Source Address:	1809 W. Hively Ave., Elkhart, Indiana 46517 1515 Leininger Ave., Elkhart, IN 46517
General Source Phone Number:	(574) 862-2815
SIC Code:	2499 (Wood Products, Not Elsewhere Classified) and 2511 (Wood Household Furniture, Except Upholstered)
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State 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 Source Definition

This stationary wood RV components and furniture company consists of two (2) plants:

- (a) Plant 1 (Plant ID: 039-00715) is located at 1809 W. Hively Ave., Elkhart, Indiana 46517; and
- (b) Plant 2 Plant ID: 039-00693 is located at 1515 Leininger Ave, Elkhart, Indiana, 46517.

Since the two (2) plants are located on contiguous properties, belong to the similiar industrial grouping, and under common control of the same entity, they will be considered one (1) source, effective from the date of issuance of this FESOP.

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

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

Plant 1 (1809 W. Hively Ave., Elkhart)

- (a) Fourteen (14) surface coating booths, identified as SB1 through SB14, approved for construction in 2012 with a maximum capacity of 105 wood boards per hour, combined, using two (2) high volume low pressure (HVLV) spray guns per booth, using dry filters for particulate control, identified as SB1 through SB14, and exhausting to stacks SB1S through SB14S.
- (b) One (1) surface coating booth, identified as SM1, approved for construction in 2012, with a maximum capacity of 30 wood boards per hour, using eight (8) high volume low pressure (HVLV) spray guns, using dry filters for particulate control, identified as SM1, and exhausting to stack SM1S.

- (c) One (1) board bonding process, identified as BB1, approved for construction in 2012, with a maximum capacity of 130 wood boards per hour, using a flow coating, using no controls, and exhausting inside the building.
- (d) One (1) woodworking operation, identified as WW1, approved for construction in 2012, with a maximum capacity of 750 pounds of wood per hour, using a baghouse, identified as D1, for particulate control, and exhausting inside the building. WW1 consists of the following equipment:
 - (1) One (1) belt sander, identified as BS1;
 - (2) One (1) sander, identified as BS2;
 - (3) One (1) CNC machine, identified as CNC1;
 - (4) One (1) multi-head saw, identified as MHS1;
 - (5) One (1) miter saw, identified as MS1;
 - (6) One (1) planer, identified as PL1;
 - (7) Three (3) radial arm saws, identified as RS1, RS2 and RS3;
 - (8) Nine (9) routers, identified as RT6 through RT14;
 - (9) One (1) sander, identified as SS1;
 - (10) One (1) slide sander, identified as SS2;
 - (11) Four (4) table saws, identified as TS1 through TS4; and,
 - (12) Two (2) wide belt sanders, identified as WBS1 and WBS2.
- (e) One (1) woodworking operation, identified as WW2, approved for construction in 2012, with a maximum capacity of 750 pounds of wood per hour, using a baghouse, identified as D2, for particulate control, and exhausting inside the building. WW2 consists of the following equipment:
 - (1) One (1) sander, identified as BS3;
 - (2) One (1) CNC machine, identified as CNC2;
 - (3) One (1) multi-head saw, identified as MHS1;
 - (4) One (1) planer, identified as PL2;
 - (5) One (1) molder, identified as PM1;
 - (6) One (1) sander, identified as PS1;
 - (7) Four (4) radial arm saws, identified as RS6 through RS9;
 - (8) Eight (8) routers, identified as RT15 through RT22;
 - (9) three (3) slide sanders, identified as SS3 through SS5;
 - (10) Four (4) table saws, identified as ST1, TS5 through TS7; and,
 - (11) Two (2) wide belt sanders, identified as WBS3 and WBS4.
- (f) One (1) woodworking operation, identified as WW3, approved for construction in 2012, with a maximum capacity of 120 pounds of wood per hour, using a baghouse, identified as D3, for particulate control, and exhausting inside the building.
- (g) One (1) woodworking operation, identified as WW4, approved for construction in 2012, with a maximum capacity of 125 pounds of wood per hour, using a baghouse, identified as D4, for particulate control, and exhausting inside the building.
- (h) One (1) uncontrolled woodworking operation, identified as UWW, approved for construction in 2012, with a maximum capacity of 1,716 pounds of wood per hour, using no controls, and exhausting inside the building. UWW consists of the following equipment:
 - (1) One (1) drum sander, identified as DS1;
 - (2) One (1) vertical sander, identified as VS2;
 - (3) Four (4) vertical band saws, identified as BW1 through BW4;
 - (4) Six (6) chop saws, identified as CS1 through CS6;

- (5) Ten (10) drill presses, identified as DP1 through DP10; and,
- (6) Five (5) routers, identified as RT1 through RT5.

Plant 2 (1515 Leininger Ave., Elkhart)

- (i) Four (4) surface coating booths used to coat wood furniture components, identified as B1 (constructed in 2010) and B2 through B4(constructed in 2007), approved for modification in 2012, each with a maximum capacity of 25 tables or 100 chairs per hour, each, using one (1) high volume low pressure (HVLP) spray applicator, per booth, using a dry filter for particulate control, and exhausting to stacks E1 through E4, respectively.
- (j) One (1) woodworking operation, identified as CWW, constructed in 2007, approved for modification in 2012, consisting of various woodworking equipment, with a process weight rate equal to 0.631 tons of wood per hour (1,263.15 pounds of wood per hour) and particulate matter emissions controlled by individual portable dust collection systems, vented to the indoors, consisting of the following:
 - (1) One (1) Powermatic Panel Molder, PM1, with insignificant particulate emissions, controlled by one (1) dust collection system and exhausting to the indoors;
 - (2) One (1) Powermatic Router, RT1, with insignificant particulate emissions, controlled by one (1) dust collection system and exhausting to the indoors;
 - (3) One (1) Jet Router, RT2, with insignificant particulate emissions, controlled by one (1) dust collection system and exhausting to the indoors;
 - (4) One (1) Surface Router, RT3, with insignificant particulate emissions, controlled by one (1) dust collection system and exhausting to the indoors;
 - (5) One (1) Onsrud Router, RT4, with insignificant particulate emissions, controlled by one (1) dust collection system and exhausting to the indoors;
 - (6) One (1) Northwood Table Router, RT5, with insignificant particulate emissions, controlled by one (1) dust collection system and exhausting to the indoors;
 - (7) One (1) Wood Tech Belt Sander, BS1, with insignificant particulate emissions, controlled by one (1) dust collection system and exhausting to the indoors;
 - (8) One (1) Jet Belt Sander, BS2, with insignificant particulate emissions, controlled by one (1) dust collection system and exhausting to the indoors;
 - (9) One (1) Ritter Belt Sander, BS3, with insignificant particulate emissions, controlled by one (1) dust collection system and exhausting to the indoors; and,
 - (10) One (1) Timesavers Panel Sander, PS1, with insignificant particulate emissions, controlled by one (1) dust collection system and exhausting to the indoors.
 - (11) One (1) Grizzly Spindle Sander, SS1, with insignificant particulate emissions, controlled by one (1) dust collection system and exhausting to the indoors;
 - (12) One (1) Multicam Table Saw, ST1, with insignificant particulate emissions, controlled by one (1) dust collection system and exhausting to the indoors;
 - (13) One (1) Omegaon Radial Arm Saw, RS1, with insignificant particulate emissions, controlled by one (1) dust collection system and exhausting to the indoors; and,
 - (14) One (1) Powermatic Table Saw, TS1, with insignificant particulate emissions, controlled by one (1) dust collection system and exhausting to the indoors.
- (k) One (1) uncontrolled woodworking operation, identified as UCWW, constructed in 2007, approved for modification in 2012, uncontrolled and vented to the indoors, consisting of the following:
 - (1) Four (4) Jet Drill Presses, identified as DP1, through DP4, with insignificant particulate emissions, uncontrolled and exhausting to the indoors;
 - (2) One (1) Jet Bandsaw, BW1, with insignificant particulate emissions, uncontrolled and exhausting to the indoors;
 - (3) One (1) Powermatic Bandsaw, BW2, with insignificant particulate emissions, uncontrolled and exhausting to the indoors;

- (4) One (1) Powermatic Bandsaw, BW3, with insignificant particulate emissions, uncontrolled and exhausting to the indoors;
- (5) One (1) Grizzly Vertical Sander, VS1, with insignificant particulate emissions, uncontrolled and exhausting to the indoors;
- (6) One (1) Protech Chop Saw, CS1, with insignificant particulate emissions, uncontrolled and exhausting to the indoors;
- (7) One (1) Delta Chop Saw, CS2, with insignificant particulate emissions, uncontrolled and exhausting to the indoors; and,
- (8) One (1) Dewalt Chop Saw, CS3, with insignificant particulate emissions, uncontrolled and exhausting to the indoors.

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

This stationary source also includes the following insignificant activities:

Plant 1 (1809 W. Hively Ave., Elkhart)

Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour, including the following building heaters:

- (1) Eight (8) Radiant Space Heaters rated at 0.17 MMBtu, each.
- (2) Nine (9) Radiant Space Heaters rated at 0.10 MMBtu, each.
- (3) Seven (7) Radiant Space Heaters rated at 0.15 MMBtu, each.
- (4) Two (2) Radiant Space Heaters 0.1250 rated at 0.17 MMBtu, each.
- (5) Two (2) Radiant Space Heaters rated at 0.08 MMBtu, each.
- (6) One (1) Forced Air Space Heater rated at 0.30 MMBtu.
- (7) One (1) Forced Air Space Heater 0.20 rated at 0.17 MMBtu.
- (8) One (1) Forced Air Space Heater rated at 0.15 MMBtu.
- (9) One (1) Forced Air Space Heater rated at 0.06 MMBtu.
- (10) One (1) Air Makeup Unit rated at 2.00 MMBtu.
- (11) One (1) Air Makeup Unit rated at 3.80 MMBtu.

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

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

SECTION B GENERAL CONDITIONS

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

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

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

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

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4][326 IAC 2-8]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 and 326 IAC 2-8 when prior to the start of operation, the following requirements are met:

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

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

- (a) This permit, F039-31065-00715, 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.5 Term of Conditions [326 IAC 2-1.1-9.5]

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

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

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

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

B.7 Severability [326 IAC 2-8-4(4)]

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

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

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

B.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

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

B.10 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
 - (1) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

B.12 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

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

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

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

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

The Permittee shall implement the PMPs.

- (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. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, or Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

Facsimile Number: 317-233-6865

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

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

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

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

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

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

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

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

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

B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F039-31065-00715 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.16 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.18 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.19 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

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

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.20 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;

- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

- (4) The Permittee notifies the:

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

and

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

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

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

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

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

B.21 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.22 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as

such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

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

B.23 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

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

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

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

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM) and greenhouse gases (GHGs), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.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]

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 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the attached plan as in Attachment A.

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

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using ambient air quality modeling pursuant to 326 IAC 1-7-4.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

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

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

C.10 Performance Testing [326 IAC 3-6]

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

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

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

C.12 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

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

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

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

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

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

C.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

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

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

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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

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

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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

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

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

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) 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.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Surface Coating Operations

Plant 1 (1809 W. Hively Ave., Elkhart)

- (a) Fourteen (14) surface coating booths, identified as SB1 through SB14, approved for construction in 2012, with a maximum capacity of 105 wood boards per hour, combined, using two (2) high volume low pressure (HVLP) spray guns per booth, using dry filters for particulate control, identified as SB1 through SB14, and exhausting to stacks SB1S through SB14S.
- (b) One (1) surface coating booth, identified as SM1, approved for construction in 2012, with a maximum capacity of 30 wood boards per hour, using eight (8) high volume low pressure (HVLP) spray guns, using dry filters for particulate control, identified as SM1, and exhausting to stack SM1S.
- (c) One (1) board bonding process, identified as BB1, approved for construction in 2012, with a maximum capacity of 130 wood boards per hour, using a flow coating, using no controls, and exhausting inside the building.

Plant 2 (1515 Leininger Ave., Elkhart)

- (i) Four (4) surface coating booths used to coat wood furniture components, identified as B1 (constructed in 2010) and B2 through B4 (constructed in 2007), approved for modification in 2012, each with a maximum capacity of 25 tables or 100 chairs per hour, each, using one (1) high volume low pressure (HVLP) spray applicator, per booth, using a dry filter for particulate control, and exhausting to stacks E1 through E4, respectively.

(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 2-8-4(1)]

D.1.1 VOC Limit [326 IAC 2-8-4]

In order to render the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable, the Permittee shall comply with the following:

The VOC input to the surface coating booths SB1 through SB14 (Plant 1), SM1 (Plant 1) and B1 through B4 (Plant 2), including coatings, dilution solvents and cleaning solvents shall be less than 98.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limit, combined VOC emissions from other emission units at the source, shall limit VOC emissions from the entire source to less than 100 tons per twelve (12) consecutive month period and render 326 IAC 2-7 not applicable.

D.1.2 Hazardous Air Pollutant (HAP) Limits [326 IAC 2-8-4]

In order to render the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable, the Permittee shall comply with the following:

- (a) The input of any single HAP to the surface coating booths SB1 through SB14 (Plant 1), SM1 (Plant 1) and B1 through B4 (Plant 2), including coatings, dilution solvents and cleaning solvents shall be less than 9.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month; and

- (b) The input of any combination of HAPs to the surface coating booths SB1 through SB14 (Plant 1), SM1 (Plant 1) and B1 through B4 (Plant 2), including coatings, dilution solvents and cleaning solvents shall be less than 24 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limitations combined with potential to emit HAP from all other emission units, shall limit the source wide emissions of each single HAP to less than ten (10) tons per twelve (12) consecutive month period and total HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period, and render 326 IAC 2-7 (Part 70 Permit Program) not applicable.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets in surface coating booths SB1 through SB14 (Plant 1), SM1 (Plant 1) and B1 through B4 (Plant 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.

D.1.4 Particulate [326 IAC 6-3]

Pursuant to 326 IAC 6-3-2(d) (Particulate Emission Limitations for Manufacturing Processes), surface coating processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device and the source shall operate the control device in accordance with manufacturer's specifications.

D.1.5 Preventive Maintenance Plan

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

Compliance Determination Requirements

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

Compliance with the VOC and HAP input limitation contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps, shall be considered a deviation from this permit.

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

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

D.1.8 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations and daily and monthly inspections.

- (b) To document the compliance status with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below for surface coating booths B1 through B14 (Plant 1), SM1 (Plant 1) and the B1 through B4 (Plant 2). Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC input limit established in Conditions D.1.1 and D.1.2.
 - (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on a daily 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 input for each month.
 - (5) The total VOC input for each compliance period.

- (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.1.9 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.1 and D.1.2 shall be submitted using the reporting forms located at the end of this permit, or

their equivalent, no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Wood Working Operations

Plant 1 (1809 W. Hively Ave., Elkhart)

- (d) One (1) woodworking operation, identified as WW1, approved for construction in 2012, with a maximum capacity of 750 pounds of wood per hour, using a baghouse, identified as D1, for particulate control, and exhausting inside the building. WW1 consists of the following equipment:
- (1) One (1) belt sander, identified as BS1;
 - (2) One (1) sander, identified as BS2;
 - (3) One (1) CNC machine, identified as CNC1;
 - (4) One (1) multi-head saw, identified as MHS1;
 - (5) One (1) miter saw, identified as MS1;
 - (6) One (1) planer, identified as PL1;
 - (7) Three (3) radial arm saws, identified as RS1, RS2 and RS3;
 - (8) Nine (9) routers, identified as RT6 through RT14;
 - (9) One (1) sander, identified as SS1;
 - (10) One (1) slide sander, identified as SS2;
 - (11) Four (4) table saws, identified as TS1 through TS4; and,
 - (12) Two (2) wide belt sanders, identified as WBS1 and WBS2.
- (e) One (1) woodworking operation, identified as WW2, approved for construction in 2012, with a maximum capacity of 750 pounds of wood per hour, using a baghouse, identified as D2, for particulate control, and exhausting inside the building. WW2 consists of the following equipment:
- (1) One (1) sander, identified as BS3;
 - (2) One (1) CNC machine, identified as CNC2;
 - (3) One (1) multi-head saw, identified as MHS1;
 - (4) One (1) planer, identified as PL2;
 - (5) One (1) molder, identified as PM1;
 - (6) One (1) sander, identified as PS1;
 - (7) Four (4) radial arm saws, identified as RS6 through RS9;
 - (8) Eight (8) routers, identified as RT15 through RT22;
 - (9) three (3) slide sanders, identified as SS3 through SS5;
 - (10) Four (4) table saws, identified as ST1, TS5 through TS7; and,
 - (11) Two (2) wide belt sanders, identified as WBS3 and WBS4.
- (f) One (1) woodworking operation, identified as WW3, approved for construction in 2012, with a maximum capacity of 120 pounds of wood per hour, using a baghouse, identified as D3, for particulate control, and exhausting inside the building.
- (g) One (1) woodworking operation, identified as WW4, approved for construction in 2012, with a maximum capacity of 125 pounds of wood per hour, using a baghouse, identified as D4, for particulate control, and exhausting inside the building.
- (h) One (1) uncontrolled woodworking operation, identified as UWW, approved for construction in 2012, with a maximum capacity of 1,716 pounds of wood per hour, using no controls, and exhausting inside the building. UWW consists of the following equipment:
- (1) One (1) drum sander, identified as DS1;

- (2) One (1) vertical sander, identified as VS2;
- (3) Four (4) vertical band saws, identified as BW1 through BW4;
- (4) Six (6) chop saws, identified as CS1 through CS6;
- (5) Ten (10) drill presses, identified as DP1 through DP10; and,
- (6) Five (5) routers, identified as RT1 through RT5.

Plant 2 (1515 Leininger Ave., Elkhart)

- (j) One (1) woodworking operation, identified as CWW, constructed in 2007, approved for modification in 2012, consisting of various woodworking equipment, with a process weight rate equal to 0.631 tons of wood per hour (1,263.15 pounds of wood per hour) and particulate matter emissions controlled by individual portable dust collection systems, vented to the indoors, consisting of the following:

- (1) One (1) Powermatic Panel Molder, PM1, with insignificant particulate emissions, controlled by one (1) dust collection system and exhausting to the indoors;
- (2) One (1) Powermatic Router, RT1, with insignificant particulate emissions, controlled by one (1) dust collection system and exhausting to the indoors;
- (3) One (1) Jet Router, RT2, with insignificant particulate emissions, controlled by one (1) dust collection system and exhausting to the indoors;
- (4) One (1) Surface Router, RT3, with insignificant particulate emissions, controlled by one (1) dust collection system and exhausting to the indoors;
- (5) One (1) Onsrud Router, RT4, with insignificant particulate emissions, controlled by one (1) dust collection system and exhausting to the indoors;
- (6) One (1) Northwood Table Router, RT5, with insignificant particulate emissions, controlled by one (1) dust collection system and exhausting to the indoors;
- (7) One (1) Wood Tech Belt Sander, BS1, with insignificant particulate emissions, controlled by one (1) dust collection system and exhausting to the indoors;
- (8) One (1) Jet Belt Sander, BS2, with insignificant particulate emissions, controlled by one (1) dust collection system and exhausting to the indoors;
- (9) One (1) Ritter Belt Sander, BS3, with insignificant particulate emissions, controlled by one (1) dust collection system and exhausting to the indoors; and,
- (10) One (1) Timesavers Panel Sander, PS1, with insignificant particulate emissions, controlled by one (1) dust collection system and exhausting to the indoors.
- (11) One (1) Grizzly Spindle Sander, SS1, with insignificant particulate emissions, controlled by one (1) dust collection system and exhausting to the indoors;
- (12) One (1) Multicam Table Saw, ST1, with insignificant particulate emissions, controlled by one (1) dust collection system and exhausting to the indoors;
- (13) One (1) Omgaon Radial Arm Saw, RS1, with insignificant particulate emissions, controlled by one (1) dust collection system and exhausting to the indoors; and,
- (14) One (1) Powermatic Table Saw, TS1, with insignificant particulate emissions, controlled by one (1) dust collection system and exhausting to the indoors.

- (k) One (1) uncontrolled woodworking operation, identified as UCWW, constructed in 2007, approved for modification in 2012, uncontrolled and vented to the indoors, consisting of the following:

- (1) Four (4) Jet Drill Presses, identified as DP1, through DP4, with insignificant particulate emissions, uncontrolled and exhausting to the indoors;
- (2) One (1) Jet Bandsaw, BW1, with insignificant particulate emissions, uncontrolled and exhausting to the indoors;
- (3) One (1) Powermatic Bandsaw, BW2, with insignificant particulate emissions, uncontrolled and exhausting to the indoors;
- (4) One (1) Powermatic Bandsaw, BW3, with insignificant particulate emissions, uncontrolled and exhausting to the indoors;

- (5) One (1) Grizzly Vertical Sander, VS1, with insignificant particulate emissions, uncontrolled and exhausting to the indoors;
 - (6) One (1) Protech Chop Saw, CS1, with insignificant particulate emissions, uncontrolled and exhausting to the indoors;
 - (7) One (1) Delta Chop Saw, CS2, with insignificant particulate emissions, uncontrolled and exhausting to the indoors; and,
 - (8) One (1) Dewalt Chop Saw, CS3, with insignificant particulate emissions, uncontrolled and exhausting to the 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 2-8-4(1)]

D.2.1 PSD Minor Limits [326 IAC 2-2]

- (a) Particulate matter (PM) from facilities listed in the following table shall not exceed the pound per hour emission rates:

Emission Unit ID	Plant Location	PM Limit (lbs/hr)
WW1	Plant 1	0.17
WW2	Plant 1	0.17
WW3	Plant 1	0.02
WW4	Plant 1	0.02
CWW		
BS1	Plant 2	0.012
SS1	Plant 2	0.012
RT1	Plant 2	0.012
BS2	Plant 2	0.020
RS1	Plant 2	0.012
RT2	Plant 2	0.010
PM1	Plant 2	0.009
RT3	Plant 2	0.009
PS1	Plant 2	0.013
RT4	Plant 2	0.020
BS3	Plant 2	0.012
ST1	Plant 2	0.020
RT5	Plant 2	0.020
TS1	Plant 2	0.012
BS1	Plant 2	0.012

Compliance with these PM limits and potential PM emissions from other emission units at this source shall limit PM emissions to less than two hundred fifty (250) tons per year and renders the entire source minor with respect to 326 IAC 2-2 (PSD).

- (b) PM10 from facilities listed in the following table shall not exceed the pound per hour emission rates:

Emission Unit ID	Plant Location	PM10 Limit (lbs/hr)
WW1	Plant 1	0.17
WW2	Plant 1	0.17
WW3	Plant 1	0.02

Emission Unit ID	Plant Location	PM10 Limit (lbs/hr)
WW4	Plant 1	0.02
CWW		
BS1	Plant 2	0.012
SS1	Plant 2	0.012
RT1	Plant 2	0.012
BS2	Plant 2	0.020
RS1	Plant 2	0.012
RT2	Plant 2	0.010
PM1	Plant 2	0.009
RT3	Plant 2	0.009
PS1	Plant 2	0.013
RT4	Plant 2	0.020
BS3	Plant 2	0.012
ST1	Plant 2	0.020
RT5	Plant 2	0.020
TS1	Plant 2	0.012
BS1	Plant 2	0.012

Compliance with these PM10 limitations, combined with the limits and emissions from other emission units at this source will render 326 IAC 2-7, Part 70, and 326 IAC 2-2, PSD, not applicable.

- (c) PM2.5 from facilities listed in the following table shall not exceed the pound per hour emission rates:

Emission Unit ID	Plant Location	PM2.5 Limit (lbs/hr)
WW1	Plant 1	0.17
WW2	Plant 1	0.17
WW3	Plant 1	0.02
WW4	Plant 1	0.02
CWW		
BS1	Plant 2	0.012
SS1	Plant 2	0.012
RT1	Plant 2	0.012
BS2	Plant 2	0.020
RS1	Plant 2	0.012
RT2	Plant 2	0.010
PM1	Plant 2	0.009
RT3	Plant 2	0.009
PS1	Plant 2	0.013
RT4	Plant 2	0.020
BS3	Plant 2	0.012
ST1	Plant 2	0.020
RT5	Plant 2	0.020
TS1	Plant 2	0.012
BS1	Plant 2	0.012

Compliance with these PM2.5 limitations, combined with the limits and emissions from other emission units at this source will render 326 IAC 2-7, Part 70, and 326 IAC 2-2, PSD, not applicable.

D.2.2 Particulate [326 IAC 6-3]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) the particulate from the processes listed in the table below shall be limited by the following:

Emission Unit	Process Weight Rate (lbs/hr)	Allowable PM Limit (lbs/hr)
WW1	750	2.13
WW2	750	2.13
WW3	125	0.64
WW4	125	0.64
CWW	1,263.15	3.01

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:

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

D.2.3 Preventive Maintenance Plan

A Preventive Maintenance Plan is required for the woodworking operation WW1, WW2, WW3, WW4 and CWW 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

- (a) In order to comply with Conditions D.2.1 and D.2.2 the dust collection system for particulate control shall be in operation and control emissions from the woodworking operation WW1, WW2, WW3, WW4 and CWW at all times that the woodworking operation WW1, WW2, WW3, WW4 and CWW are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Custom Wood Products, Inc.
Source Address: 1809 W. Hively Ave., Elkhart, Indiana 46517
1515 Leininger Ave., Elkhart, Indiana 46517
FESOP Permit No.: F039-31065-00715

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: (317) 233-0178
Fax: (317) 233-6865**

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

Source Name: Custom Wood Products, Inc.
Source Address: 1809 W. Hively Ave., Elkhart, Indiana 46517
1515 Leininger Ave., Elkhart, Indiana 46517
FESOP Permit No.: F039-31065-00715

This form consists of 2 pages

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

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

FESOP Quarterly Report

Source Name: Custom Wood Products, Inc.
Source Address: 1809 W. Hively Ave., Elkhart, Indiana 46517
1515 Leininger Ave., Elkhart, Indiana 46517
FESOP Permit No.: F039-31065-00715
Facility: Surface Coating Booths: Plant1: SB1 through SB14 and SM1
Plant2: B1 through B4
Parameter: VOC Usage
Limit: The VOC input to the surface coating operations shall be limited to less than
98.00 tons per twelve (12) consecutive month period, with compliance
determined at the end of each month.

YEAR: _____

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

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

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

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

FESOP Quarterly Report

Source Name: Custom Wood Products, Inc.
 Source Address: 1809 W. Hively Ave., Elkhart, Indiana 46517
 1515 Leininger Ave., Elkhart, Indiana 46517
 FESOP Permit No.: F039-31065-00715
 Facility: Surface Coating Booths: Plant1: SB1 through SB14 and SM1
 Plant2: B1 through B4
 Parameter: Worst case single HAP usage and total HAP usage
 Limit: The single HAP and the input of any combination of HAPs input to the surface coating operations shall be limited to less than 9.9 tons of a single HAP and limited to less than 24 tons for a combination of HAPS per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

	Column 1a	Column 1b	Column 2a	Column 2b	Column 1a + 2a	Column 1b + 2b
Month	Single HAP Usage this Month	Total HAP Usage this Month	Single HAP Usage Previous 11 months	Total HAP Usage Previous 11 months	Single HAP Usage 12 Month Total	Total HAP Usage 12 Month Total
Month 1						
Month 2						
Month 3						

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

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Custom Wood Products, Inc.
Source Address: 1809 W. Hively Ave., Elkhart, Indiana 46517
1515 Leininger Ave., Elkhart, Indiana 46517
FESOP Permit No.: F039-31065-00715

Months: _____ to _____ Year: _____

Page 1 of 2

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

Custom Wood Products, Inc.
1809 W. Hively Ave.
1515 Leininger Ave.
Elkhart, Indiana 46517

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)
4. I hereby certify that Custom Wood Products, Inc. 1809 W. Hively Ave., Elkhart, Indiana 46517, completed construction of the Wood RV components and Furniture on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on October 25, 2011 and as permitted pursuant to New Source Construction Permit and Federally Enforceable State Operating Permit No. F039-31065-00715, Plant ID No. 039-00715 issued on _____.
5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature _____
Date _____

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana
on this _____ day of _____, 20 _____. My Commission expires: _____.

Signature _____
Name _____ (typed or printed)

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a New Source Review and Federally Enforceable State Operating Permit (FESOP)

Source Description and Location

Source Name:	Custom Wood Products, Inc.
Source Location:	1809 W. Hively Ave., Elkhart, IN 46517 1515 Leininger Ave., Elkhart, IN 46517
County:	Elkhart
SIC Code:	2499 and 2511
Operation Permit No.:	F 039-31065-00715
Permit Reviewer:	Bruce Farrar

On October 25, 2011, the Office of Air Quality (OAQ) received an application from Custom Wood Products, Inc. related to the construction and operation of a new wood RV components and furniture manufacturer.

Source Definition

This source consists of the following plants:

- (a) Plant 1 is located at 1809 W. Hively Ave., Elkhart, IN 46517, Plant ID: 039-00715; and
- (b) Plant 2 is located at 1515 Leininger Ave, Elkhart, Indiana, Plant ID: 039-00693.

In order to consider both plants as one single source, all three of the following criteria must be met:

- (1) The plants must have common ownership/control;
- (2) The plants must have the same SIC code; and
- (3) The plants must be located on contiguous or adjacent properties.

These plants are located on adjacent properties (approximately 0.4 miles apart), have the similar SIC codes of (list codes) and are under common control; therefore they will be considered one (1) source, as defined by 326 IAC 2-7-1(22).

The W. Hively Ave plant (plant 1, plant ID: 039-00715) has a SIC code of 2499 (Miscellaneous Wood Products) and the Leininger Ave plant (Plant 2, Plant ID: 039-00693) has a SIC code of (2511 Household Furniture). Currently, the Leininger Ave plant performs surface coating only. The W. Hively Ave plant will perform woodworking and surface coating. For permit administrative purposes, Plant ID 039-00715 will be used.

Existing Approvals

Plant 2 located at 1515 Leininger Ave, Elkhart, Indiana (Plant ID: 039-00693) was issued MSOP No. 000-039-27616-00693 on July 17, 2009. Plant 2 has since received Minor Permit Revision No. 039-28814-00693, issued on January 11, 2010.

County Attainment Status

The source is located in Elkhart County.

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

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

Fugitive Emissions

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, however, there is an applicable New Source Performance Standard that was in effect on August 7, 1980, therefore fugitive emissions are counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Background and Description of New Source Construction

The Office of Air Quality (OAQ) has reviewed an application, submitted by Custom Wood Products on October 25, 2011, relating to new source construction and operation of a wood RV components and furniture manufacturer.

The new Custom Wood Products permit will be in buildings 5, 6, 7 and 9 of the former Monaco Coach Corporation. In addition, the Custom Wood Product MSOP, M039-28814-00693, issued January 11, 2010 will be incorporated into this new FESOP as plant 2.

The following is a list of the new emission units and pollution control devices:

Plant 1 (1809 W. Hively Ave., Elkhart)

- (a) Fourteen (14) surface coating booths, identified as SB1 through SB14, approved for construction in 2012, with a maximum capacity of 105 wood boards per hour, combined, using two (2) high volume low pressure (HVLP) spray guns per booth, using dry filters for particulate control, identified as SB1 through SB14, and exhausting to stacks SB1S through SB14S.
- (b) One (1) surface coating booth, identified as SM1, approved for construction in 2012, with a maximum capacity of 30 wood boards per hour, using eight (8) high volume low pressure (HVLP) spray guns, using dry filters for particulate control, identified as SM1, and exhausting to stack SM1S.
- (c) One (1) board bonding process, identified as BB1, approved for construction in 2012, with a maximum capacity of 130 wood boards per hour, using a flow coating, using no controls, and exhausting inside the building.
- (d) One (1) woodworking operation, identified as WW1, approved for construction in 2012, with a maximum capacity of 750 pounds of wood per hour, using a baghouse, identified as D1, for particulate control, and exhausting inside the building. WW1 consists of the following equipment:
 - (1) One (1) belt sander, identified as BS1;
 - (2) One (1) sander, identified as BS2;
 - (3) One (1) CNC machine, identified as CNC1;
 - (4) One (1) multi-head saw, identified as MHS1;
 - (5) One (1) miter saw, identified as MS1;
 - (6) One (1) planer, identified as PL1;
 - (7) Three (3) radial arm saws, identified as RS1, RS2 and RS3;
 - (8) Nine (9) routers, identified as RT6 through RT14;
 - (9) One (1) sander, identified as SS1;
 - (10) One (1) slide sander, identified as SS2;
 - (11) Four (4) table saws, identified as TS1 through TS4; and,
 - (12) Two (2) wide belt sanders, identified as WBS1 and WBS2.
- (e) One (1) woodworking operation, identified as WW2, approved for construction in 2012, with a maximum capacity of 750 pounds of wood per hour, using a baghouse, identified as D2, for particulate control, and exhausting inside the building. WW2 consists of the following equipment:
 - (1) One (1) sander, identified as BS3;
 - (2) One (1) CNC machine, identified as CNC2;
 - (3) One (1) multi-head saw, identified as MHS1;
 - (4) One (1) planer, identified as PL2;
 - (5) One (1) molder, identified as PM1;
 - (6) One (1) sander, identified as PS1;
 - (7) Four (4) radial arm saws, identified as RS6 through RS9;
 - (8) Eight (8) routers, identified as RT15 through RT22;
 - (9) three (3) slide sanders, identified as SS3 through SS5;
 - (10) Four (4) table saws, identified as ST1, TS5 through TS7; and,
 - (11) Two (2) wide belt sanders, identified as WBS3 and WBS4.
- (f) One (1) woodworking operation, identified as WW3, approved for construction in 2012, with a maximum capacity of 120 pounds of wood per hour, using a baghouse, identified as D3, for particulate control, and exhausting inside the building.

- (g) One (1) woodworking operation, identified as WW4, approved for construction in 2012, with a maximum capacity of 125 pounds of wood per hour, using a baghouse, identified as D4, for particulate control, and exhausting inside the building.
- (h) One (1) uncontrolled woodworking operation, identified as UWW, approved for construction in 2012, with a maximum capacity of 1,716 pounds of wood per hour, using no controls, and exhausting inside the building. UWW consists of the following equipment:
 - (1) One (1) drum sander, identified as DS1;
 - (2) One (1) vertical sander, identified as VS2;
 - (3) Four (4) vertical band saws, identified as BW1 through BW4;
 - (4) Six (6) chop saws, identified as CS1 through CS6;
 - (5) Ten (10) drill presses, identified as DP1 through DP10; and,
 - (6) Five (5) routers, identified as RT1 through RT5.

Plant 2 (1515 Leininger Ave., Elkhart)

- (i) Four (4) surface coating booths used to coat wood furniture components, identified as B1 (constructed in 2010) and B2 through B4 (constructed in 2007), approved for modification in 2012, each with a maximum capacity of 25 tables or 100 chairs per hour, each, using one (1) high volume low pressure (HVLP) spray applicator, per booth, using a dry filter for particulate control, and exhausting to stacks E1 through E4, respectively.
- (j) One (1) woodworking operation, identified as CWW, constructed in 2007, approved for modification in 2012, consisting of various woodworking equipment, with a process weight rate equal to 0.631 tons of wood per hour (1,263.15 pounds of wood per hour) and particulate matter emissions controlled by individual portable dust collection systems, vented to the indoors, consisting of the following:
 - (1) One (1) Powermatic Panel Molder, PM1, with insignificant particulate emissions, controlled by one (1) dust collection system and exhausting to the indoors;
 - (2) One (1) Powermatic Router, RT1, with insignificant particulate emissions, controlled by one (1) dust collection system and exhausting to the indoors;
 - (3) One (1) Jet Router, RT2, with insignificant particulate emissions, controlled by one (1) dust collection system and exhausting to the indoors;
 - (4) One (1) Surface Router, RT3, with insignificant particulate emissions, controlled by one (1) dust collection system and exhausting to the indoors;
 - (5) One (1) Onsrud Router, RT4, with insignificant particulate emissions, controlled by one (1) dust collection system and exhausting to the indoors;
 - (6) One (1) Northwood Table Router, RT5, with insignificant particulate emissions, controlled by one (1) dust collection system and exhausting to the indoors;
 - (7) One (1) Wood Tech Belt Sander, BS1, with insignificant particulate emissions, controlled by one (1) dust collection system and exhausting to the indoors;
 - (8) One (1) Jet Belt Sander, BS2, with insignificant particulate emissions, controlled by one (1) dust collection system and exhausting to the indoors;
 - (9) One (1) Ritter Belt Sander, BS3, with insignificant particulate emissions, controlled by one (1) dust collection system and exhausting to the indoors; and,
 - (10) One (1) Timesavers Panel Sander, PS1, with insignificant particulate emissions, controlled by one (1) dust collection system and exhausting to the indoors.
 - (11) One (1) Grizzly Spindle Sander, SS1, with insignificant particulate emissions, controlled by one (1) dust collection system and exhausting to the indoors;
 - (12) One (1) Multicam Table Saw, ST1, with insignificant particulate emissions, controlled by one (1) dust collection system and exhausting to the indoors;
 - (13) One (1) Omgaon Radial Arm Saw, RS1, with insignificant particulate emissions, controlled by one (1) dust collection system and exhausting to the indoors; and,

- (14) One (1) Powermatic Table Saw, TS1, with insignificant particulate emissions, controlled by one (1) dust collection system and exhausting to the indoors.
- (k) One (1) uncontrolled woodworking operation, identified as UCWW, constructed in 2007, approved for modification in 2012, uncontrolled and vented to the indoors, consisting of the following:
 - (1) Four (4) Jet Drill Presses, identified as DP1, through DP4, with insignificant particulate emissions, uncontrolled and exhausting to the indoors;
 - (2) One (1) Jet Bandsaw, BW1, with insignificant particulate emissions, uncontrolled and exhausting to the indoors;
 - (3) One (1) Powermatic Bandsaw, BW2, with insignificant particulate emissions, uncontrolled and exhausting to the indoors;
 - (4) One (1) Powermatic Bandsaw, BW3, with insignificant particulate emissions, uncontrolled and exhausting to the indoors;
 - (5) One (1) Grizzly Vertical Sander, VS1, with insignificant particulate emissions, uncontrolled and exhausting to the indoors;
 - (6) One (1) Protech Chop Saw, CS1, with insignificant particulate emissions, uncontrolled and exhausting to the indoors;
 - (7) One (1) Delta Chop Saw, CS2, with insignificant particulate emissions, uncontrolled and exhausting to the indoors; and,
 - (8) One (1) Dewalt Chop Saw, CS3, with insignificant particulate emissions, uncontrolled and exhausting to the indoors.

Insignificant activities consisting of the following:

Plant 1 (1809 W. Hively Ave., Elkhart)

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour, including the following building heaters:
 - (1) Eight (8) Radiant Space Heaters rated at 0.17 MMBtu, each.
 - (2) Nine (9) Radiant Space Heaters rated at 0.10 MMBtu, each.
 - (3) Seven (7) Radiant Space Heaters rated at 0.15 MMBtu, each.
 - (4) Two (2) Radiant Space Heaters 0.1250 rated at 0.17 MMBtu, each.
 - (5) Two (2) Radiant Space Heaters rated at 0.08 MMBtu, each.
 - (6) One (1) Forced Air Space Heater rated at 0.30 MMBtu.
 - (7) One (1) Forced Air Space Heater 0.20 rated at 0.17 MMBtu.
 - (8) One (1) Forced Air Space Heater rated at 0.15 MMBtu.
 - (9) One (1) Forced Air Space Heater rated at 0.06 MMBtu.
 - (10) One (1) Air Makeup Unit rated at 2.00 MMBtu.
 - (11) One (1) Air Makeup Unit rated at 3.80 MMBtu.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

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

emissions should be calculated after controls. Based on this ruling, potential emissions for particulate matter were calculated after consideration of the controls.

Particulate from the woodworking operations, identified as WW1, WW2, WW3, WW4 and CWW, shall be controlled by the individual portable dust collection systems at all times that the woodworking operations, identified as CWW, is in operation, and the Permittee shall operate the individual portable dust collection systems in accordance with manufacturer's specifications.

Permit Level Determination – FESOP

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	37.38
PM10 ⁽¹⁾	37.64
PM2.5	37.64
SO ₂	0.03
NO _x	4.49
VOC	325.36
CO	3.77
GHGs as CO ₂ e	5,410

(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	12.79
Formaldehyde	4.98
Xylene	6.03
Ethyl Benzene	0.03
Hexane	0.081
TOTAL HAPs	>25

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of VOC is each greater than one hundred (100) tons per year. The PTE of all other regulated criteria pollutants are each less than one hundred (100) tons per year. The source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a New Source Construction Permit (326 IAC 2-5.1-3) and a Federally Enforceable State Operating Permit (FESOP) (326 IAC 2-8), because the source will limit emissions to less than the Title V major source threshold levels.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of any single HAP is greater than ten (10) tons per year and the PTE of a combination of HAPs is greater than twenty-five (25) tons per year. Therefore, the source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a New Source Construction Permit (326 IAC 2-5.1-3) and a FESOP (326 IAC 2-8), because the source will limit emissions of HAPs to less than the Title V major source threshold levels.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of FESOP (tons/year)									
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
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.										

(a) FESOP Status

This new source is not a Title V major stationary source, because the potential to emit criteria pollutants from the entire source will be limited to less than the Title V major source threshold levels. In addition, this new source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs is limited to less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year of total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act and is subject to the provisions of 326 IAC 2-8 (FESOP).

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

- (1) The surface coating operations from surface coating booths SB1 through SB14 and SM1 (plant 1) and surface coating booths B1 through B4 (Plant 2) shall be limited to less than 98.0 tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (2) The surface coating operations from surface coating booths SB1 through SB14 and SM1 (plant 1) and surface coating booths B1 through B4 (Plant 2) shall be limited to less than twenty-four (24.0) tons of any combination of HAPs per twelve (12) consecutive month period with compliance determined at the end of each month.
- (3) The surface coating operations from surface coating booths B1 through B14 and SM1 (plant 1) and surface coating booths B1 through B4 (Plant 2) shall be limited to less than nine and nine-tenths (9.9) tons of any single HAP per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit VOC and HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 100 tons per 12 consecutive month period, any single HAP to less than ten (10) tons per 12 consecutive month period, total HAPs to less than twenty-five (25) tons per 12 consecutive month period and shall render 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

(b) PSD Minor Source

This new source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit PM, PM10, PM2.5 and VOC is limited to less than 250 tons per year, the potential to emit all other attainment regulated criteria pollutants are less than 250 tons per year, the potential to emit greenhouse gases (GHGs) is less than the PSD subject to regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

The PTE of PM, PM10 and PM2.5 before controls is 278.41 (PM) and 278.66 (PM10 and PM2.5) tons per year. Permit level is determined after control for integral process, however, in this case,

the before control PTE is greater than 250 tons per year of particulate and would be subject to 326 IAC 2-2.

- (a) Particulate matter (PM) from facilities listed in the following table shall not exceed the pound per hour emission rates:

Emission Unit ID	Plant Location	PM Limit (lbs/hr)
WW1	Plant 1	0.17
WW2	Plant 1	0.17
WW3	Plant 1	0.02
WW4	Plant 1	0.02
CWW		
BS1	Plant 2	0.012
SS1	Plant 2	0.012
RT1	Plant 2	0.012
BS2	Plant 2	0.020
RS1	Plant 2	0.012
RT2	Plant 2	0.010
PM1	Plant 2	0.009
RT3	Plant 2	0.009
PS1	Plant 2	0.013
RT4	Plant 2	0.020
BS3	Plant 2	0.012
ST1	Plant 2	0.020
RT5	Plant 2	0.020
TS1	Plant 2	0.012
BS1	Plant 2	0.012

- (b) PM10 from facilities listed in the following table shall not exceed the pound per hour emission rates:

Emission Unit ID	Plant Location	PM10 Limit (lbs/hr)
WW1	Plant 1	0.17
WW2	Plant 1	0.17
WW3	Plant 1	0.02
WW4	Plant 1	0.02
CWW		
BS1	Plant 2	0.012
SS1	Plant 2	0.012
RT1	Plant 2	0.012
BS2	Plant 2	0.020
RS1	Plant 2	0.012
RT2	Plant 2	0.010
PM1	Plant 2	0.009
RT3	Plant 2	0.009
PS1	Plant 2	0.013
RT4	Plant 2	0.020
BS3	Plant 2	0.012
ST1	Plant 2	0.020
RT5	Plant 2	0.020
TS1	Plant 2	0.012

Emission Unit ID	Plant Location	PM10 Limit (lbs/hr)
BS1	Plant 2	0.012

(c) PM2.5 from facilities listed in the following table shall not exceed the pound per hour emission rates:

Emission Unit ID	Plant Location	PM2.5 Limit (lbs/hr)
WW1	Plant 1	0.17
WW2	Plant 1	0.17
WW3	Plant 1	0.02
WW4	Plant 1	0.02
CWW		
BS1	Plant 2	0.012
SS1	Plant 2	0.012
RT1	Plant 2	0.012
BS2	Plant 2	0.020
RS1	Plant 2	0.012
RT2	Plant 2	0.010
PM1	Plant 2	0.009
RT3	Plant 2	0.009
PS1	Plant 2	0.013
RT4	Plant 2	0.020
BS3	Plant 2	0.012
ST1	Plant 2	0.020
RT5	Plant 2	0.020
TS1	Plant 2	0.012
BS1	Plant 2	0.012

Pursuant to 326 IAC 2-2, the baghouses shall be in operation at all times that the controlled woodworking operations are in operation and shall operate within manufacturer's specifications.

Compliance with these limits, combined with the potential to emit PM, PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM, PM10 and Pm2.5 to less than 250 tons per 12 consecutive month period and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations (40 CFR 60.390 Subpart MM (2M)), are not included in this permit, since this sources is not an automobile or light-duty truck assembly plant.
- (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 National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Wood Furniture Manufacturing, 40 CFR 63.800, Subpart JJ, (326 IAC 20-14), are not included in this permit, since this source is not a major source of HAPs as defined in 40 CFR 63.2.

- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for for Surface Coating of Plastic Parts and Products, 40 CFR 63.4480, Subpart PPPP (4P) (326 IAC 20-81, are not included in the permit, since this source does not coat plastic parts and products.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Wood Building Products, 40 CFR 63.4680, Subpart QQQQ (4Q), (326 IAC 20-79), are not included in this permit, since this source is not a major source of HAPs, as defined in 40 CFR 63.2, and does include surface coating of wood building products. This source performs surface coating of wood furniture.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63.11169, Subpart HHHHHH (6H), are not included in this permit, since this area source does not perform paint stripping using chemical strippers that contain methylene chloride for the removal of dried paint, does not perform spray application of coatings to motor vehicles or mobile equipment, and does not perform spray application of coatings that contain chromium, lead manganese, nickel or cadmium to a plastic and/or metal substrates.
- (g) 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)

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

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-8-4 (FESOP)
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (c) 326 IAC 2-3 (Emission Offset)
Emission Offset applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The unlimited potential to emit of HAPs from the new units is greater than ten (10) tons per year for any single HAP and greater than twenty-five (25) tons per year of a combination of HAPs. However, the source shall limit the potential to emit of HAPs from the new units to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, the source is not subject to the requirements of 326 IAC 2-4.1. See PTE of the Entire Source After Issuance of the FESOP Section above.

- (e) 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.
- (f) 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.
- (g) 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.

Surface Coating Booths (SB1 through SB14), Plant 1

- (h) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2(d), particulate emissions from the surface coating booths (SB1 through SB14) shall be controlled by dry filters. The dry filters shall be operated in accordance with manufacturer's specifications.
- (i) 326 IAC 8-2-10 (Flat Wood Panels; Manufacturing Operations)
The requirements of 326 IAC 8-2-10 are not applicable to this source because the source does not manufacture flat wood panels
- (j) 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)
The surface coating booths (SB1 through SB14) are each subject to the requirements 326 IAC 8-2-12, since they each potentially have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls. Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), for the surface coating booths (SB1 through SB14), the Permittee shall perform surface coating of wood furniture and cabinets, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) or more of the following application systems:
 - 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.

Surface Coating booths (B1 through B4), Plant 2

- (k) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2(d), particulate emissions from the surface coating booths (B1, through B4) shall be controlled by dry filters. The dry filters shall be operated in accordance with manufacturer's specifications.
- (l) 326 IAC 8-2-10 (Flat Wood Panels; Manufacturing Operations)
The requirements of 326 IAC 8-2-10 are not applicable to this source because the source does not manufacture flat wood panels
- (m) 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)
The surface coating booths (B1, through B4) are each subject to the requirements 326 IAC 8-2-12, since they each could potentially have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls. Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), for the surface coating booths (B1, through B4), the Permittee shall perform surface coating of wood furniture and cabinets, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) or more of the following application systems:

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.

Surface Coating Machine (SM1), Plant 1

- (n) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2(d), particulate emissions from the surface coating machine (SM1) shall be controlled by dry filters. The dry filters shall be operated in accordance with manufacturer's specifications.
- (o) 326 IAC 8-2-10 (Flat Wood Panels; Manufacturing Operations)
The requirements of 326 IAC 8-2-10 are not applicable to this source because the source does not manufacture flat wood panels.
- (p) 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)
The surface coating machine (SM1) is subject to the requirements 326 IAC 8-2-12, since it could potentially have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls. Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), for surface coating booth SM1, the Permittee shall perform surface coating of wood furniture and cabinets,

with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) or more of the following application systems:

- 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.

Board Bonding BB1, Plant 1

- (q) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(a)(7), the board bonding operation BB1 is exempt from the requirements of 326 IAC 6-3-2, because it uses a flow coating to apply coatings.
- (r) 326 IAC 8-2 (Surface Coating Emission Limitations)
Pursuant to 326 IAC 8-2(4), the board bonding operation BB1 is not subject to the requirements of 326 IAC 8-2, because the board bonding operation BB1 does not have potential emissions of greater than fifteen (15) pounds of VOC per day before add on controls.

Controlled Woodworking, WW1, WW2, WW3 and WW4 (Plant 1) and CWW (Plant 2)

- (s) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) the particulate from the processes listed in the table below shall be limited by the following:

Emission Unit	Process Weight Rate (lbs/hr)	Allowable PM Limit (lbs/hr)
WW1	750	2.13
WW2	750	2.13
WW3	125	0.64
WW4	125	0.64
CWW	1,263.15	3.01

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:

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

The baghouses shall be in operation at all times the woodworking operation WW1, WW2, WW3, WW4 and CWW are in operation, in order to comply with this limit.

- (t) There are no 326 IAC 8 Rules that are applicable to these units.

Uncontrolled Woodworking, UWW (Plant 1) and UCWW(Plant 2)

- (u) The potential particulate emissions from the uncontrolled woodworking operations, identified as UWW (plant 1) and UCWW (plant 2), are less than 0.551 pound per hour. Pursuant to 326 IAC 6-3-1(b)(14), the uncontrolled woodworking operations, identified as UWW and UCWW, are exempt from 326 IAC 6-3.
- (v) There are no 326 IAC 8 Rules that are applicable to these units.

Compliance Determination, Monitoring and Testing Requirements

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

Stack ID / Control	Parameter	Frequency	Range
SB1S through SB14S / Fabric Filter	Visible Emissions	Daily	Normal - Abnormal
	Filter Placement, Integrity, and Loading	Daily	Normal - Abnormal
	Overspray Observations	Weekly	Normal - Abnormal
	Coating Emissions	Monthly	Normal - Abnormal
SM1S/ Fabric Filter	Visible Emissions	Daily	Normal - Abnormal
	Filter Placement, Integrity, and Loading	Daily	Normal - Abnormal
	Overspray Observations	Weekly	Normal - Abnormal
	Coating Emissions	Monthly	Normal - Abnormal
E1 through E4/ Fabric Filter	Visible Emissions	Daily	Normal - Abnormal
	Filter Placement, Integrity, and Loading	Daily	Normal - Abnormal
	Overspray Observations	Weekly	Normal - Abnormal
	Coating Emissions	Monthly	Normal - Abnormal

- (b) There are no testing requirements applicable to this proposed revision.

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 October 25, 2011.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and New Source Review and FESOP No. 039-31065-00715. The staff recommends to the Commissioner that this New Source Construction and New Source Review and FESOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Bruce Farrar 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) 234-5401 or toll free at 1-800-451-6027 extension 4-5401.
- (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 Calculation Summary

Company Name: Custom Wood Products, Inc.
 Address City IN Zip: 1809 W. Hively, Elkhart, Indiana 46517
 Permit Number: F039-31065-00715
 Plt ID: 039-00715
 Prepared By: Bruce Farrar
 Date: October 25, 2011

Uncontrolled Emission Rates

Emission Units	PM (tons/yr)	PM-10 (tons/yr)	PM-2.5 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	GHG as CO2e (tons/yr)	Combine HAPs (tons/yr)	Single HAP (tons/yr)	HAP Name
(B1 through B14) Plant 1	22.22	22.22	22.22	0.00	0.00	173.07	0.00	0.00	19.38	9.74	Toluene
(B2 through B4), Plant 2	6.49	6.49	6.49	0.00	0.00	93.80	0.00	0.00	0.26	0.26	Toluene
Surface Coating Machine (SM1)	1.31	1.31	1.31	0.00	0.00	58.02	0.00	0.00	5.66	2.79	Toluene
Board Bonding	0.00	0.00	0.00	0.00	0.00	0.21	0.00	0.00	0.001	0.001	Formaldehyde
Controlled Woodworking, Plant 1	1.68	1.68	1.68	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Controlled Woodworking, Plant 2	0.75	0.75	0.75	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Uncontrolled Woodworking, Plant 1	2.42	2.42	2.42	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Uncontrolled Woodworking, Plant 2	2.42	2.42	2.42	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Natural gas-fired combustion	0.09	0.34	0.34	0.03	4.48	0.25	3.76	5,410	0.085	0.081	Hexane
Total	37.38	37.64	37.64	0.03	4.49	325.36	3.77	5,410	>25	>10	

Limited Emission Rates

Emission Units	PM (tons/yr)	PM-10 (tons/yr)	PM-2.5 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	GHG as CO2e (tons/yr)	Combine HAPs (tons/yr)	Single HAP (tons/yr)	HAP Name
(B1 through B14) Plant 1	0.09	0.09	0.09	0.00	0.00	98.00	0.00	0.00	24.00	9.90	Toluene
(B2 through B4), Plant 2	6.49	6.49	6.49	0.00	0.00		0.00	0.00			Toluene
Surface Coating Machine (SM1)	0.01	0.01	0.01	0.00	0.00		0.00	0.00			Toluene
Board Bonding	0.00	0.00	0.00	0.00	0.00	0.21	0.00	0.00	0.001	0.001	Formaldehyde
Controlled Woodworking, Plant 1	1.68	1.68	1.68	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Controlled Woodworking, Plant 2	0.75	0.75	0.75	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Uncontrolled Woodworking, Plant 1	2.42	2.42	2.42	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Uncontrolled Woodworking, Plant 2	2.42	2.42	2.42	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Natural gas-fired combustion	0.09	0.34	0.34	0.03	4.48	0.25	3.76	5,410	0.08	0.08	Hexane
Total	13.94	14.20	14.20	0.03	4.48	98.46	3.76	5,410	<25	<10	

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations
Surface Coating Booths, Plant 1**

Company Name: Custom Wood Products, Inc.
Address City IN Zip: 1809 W. Hively, Elkhart, Indiana 46517
Permit Number: F039-31065-00715
Plt ID: 039-00715
Prepared By: Bruce Farrar
Date: October 25, 2011

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water & Exempt	Weight % Organics	Volume % Water & Exempt	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Material Usage (lb/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency	
Surface Coating Booths SB1 to SB14																		
53549.601 Concord Stain	6.86	97.29%	66.03%	31.26%	68.53%	1.85%	0.0304	105.00	21.90	6.81	2.14	6.85	164.29	29.99	0.65	115.92	75%	
OR																		
741050.55.601 Precat Sealer/Topcoat	7.40	77.00%	35.90%	41.10%	40.19%	18.79%	0.1135	105.00	88.19	5.09	3.04	36.25	869.91	158.76	22.22	16.19	75%	
AND																		
Pure Grade Lacquer - Cleanup	7.07	100%	0.00%	100.0%	0.00%	0.00%	0.0044	105.00	3.27	7.07	7.07	3.27	78.40	14.31	0.00	n/a	100%	
Potential Emission Rates - Add Solvents to Worst Case Coating											Uncontrolled		39.52	948.31	173.07	22.22		
											PM Control Efficiency:		99.6%					
											Controlled		39.52	948.31	173.07	0.09		

METHODOLOGY

Any booth can apply either stain or sealer - coatings are mutually exclusive, coatings applied using high volume, low pressure (HVLP) application, each booth equipped with two (2) HVLP applicators
 Maximum (units/hr) = 7.5 units/hr/booth x number of booths
 Coating Application = High Volume, Low Pressure Application, Cleaning Solvent Manually Applied
 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: Emissions Calculations
VOC, Particulate and HAPs
From Surface Coating Operations, Plant 2**

**Company Name: Custom Wood Products, Inc.
Address City IN Zip: 1515 Leininger Ave., Elkhart, IN 46517
Permit Number: F039-31065-00715
Plt ID: 039-00715
Prepared By: Bruce Farrar
Date: October 25, 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
Booth B1																
SN80 M-7728 Stain	6.6	94.42%	0.0%	94.4%	0.0%	3.37%	0.02000	25.000	6.23	6.23	3.12	74.78	13.65	0.20	184.92	75%
Booth B2																
SN80 M-7728 Stain	6.6	94.42%	0.0%	94.4%	0.0%	3.37%	0.02000	25.000	6.23	6.23	3.12	74.78	13.65	0.20	184.92	75%
Booth B3																
SN80 M-7728 Stain	6.6	94.42%	0.0%	94.4%	0.0%	3.37%	0.02000	25.000	6.23	6.23	3.12	74.78	13.65	0.20	184.92	75%
Booth B4																
NM5212-0090F Sealer/Topcoat	7.8	68.70%	0.0%	68.7%	0.0%	23.95%	0.08800	25.000	5.36	5.36	11.79	282.93	51.64	5.88	22.37	75%
Cleaner																
Best Grade Lacquer - Cleanup	7.0	100.00%	0.0%	100.0%	0.0%	0.00%	0.00160	25.000	7.00	7.00	0.28	6.72	1.23	0.00	n/a	100%

State Potential Emissions

Add worst case coating to all solvents

93.80

6.49

METHODOLOGY

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

HAPs Emissions

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Toluene	Toluene Emissions (ton/yr)
Best Grade Lacquer - Cleanup	7.00	0.001600	25.00	21.00%	0.26

Total State Potential Emissions

Stain and Sealer/Topcoat contain no HAPs

METHODOLOGY

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

Appendix A: Emission Calculations
HAP Emission Calculations from Surface Coating Operations
Surface Coating Booths (B1-B14), Plant 1

Company Name: Custom Wood Products, Inc.
Address City IN Zip: 1809 W. Hively, Elkhart, Indiana 46517
Permit Number: F039-31065-00715
Plt ID: 039-00715
Prepared By: Bruce Farrar
Date: October 25, 2011

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Ethyl Benzene	Weight % Formaldehyde	Weight % Methanol	Weight % Toluene	Weight % Xylene	Ethyl Benzene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Methanol Emissions (ton/yr)	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Total Emissions (ton/yr)
Surface Coating Booths SB1 to SB14														
53549.601 Concord Stain	6.86	0.0304	105.00	0.02%	0.00%	0.00%	0.26%	0.06%	0.02	0.00	0.00	0.25	0.06	0.33
OR														
741050.55.601 Precat Sealer/Topcoat	7.40	0.1135	105.00	0.00%	1.00%	0.00%	0.00%	1.00%	0.00	3.87	0.00	0.00	3.87	7.74
AND														
Pure Grade Lacquer - Cleanup	7.07	0.0044	105.00	0.00%	0.00%	9.38%	66.28%	5.59%	0.00	0.00	1.35	9.49	0.80	11.64
Potential Emissions - Add Solvents to Worst Case Coatings									0.02	3.87	1.35	9.74	4.67	19.38

METHODOLOGY

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

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations
Surface Coating Spray Machine, Plant 1**

Company Name: Custom Wood Products, Inc.
Address City IN Zip: 1809 W. Hively, Elkhart, Indiana 46517
Permit Number: F039-31065-00715
Plt ID: 039-00715
Prepared By: Bruce Farrar
Date: October 25, 2011

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water & Exempt	Weight % Organics	Volume % Water & Exempt	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Material Usage (lb/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency		
One (1) Multihead Spray Machine																			
53549.601 Concord Stain	6.86	97.29%	66.03%	31.26%	68.53%	1.85%	0.0304	30.00	6.26	6.81	2.14	1.96	46.94	8.57	0.04	115.92	95%		
AND																			
741050.55.601 Precat Sealer/Topcoat	7.40	77.00%	35.90%	41.10%	40.19%	18.79%	0.1135	30.00	25.20	5.09	3.04	10.36	248.55	45.36	1.27	16.19	95%		
AND																			
Pure Grade Lacquer - Cleanup	7.07	100%	0.00%	100.0%	0.00%	0.00%	0.0044	30.00	0.93	7.07	7.07	0.94	22.40	4.09	0.00	n/a	100%		
Potential Emission Rates												Uncontrolled	13.26	317.89	58.02	1.31			
												PM Control Efficiency:	99.6%						
												Controlled	13.26	317.89	58.02	0.01			

METHODOLOGY

Spray machine can apply both stain and sealer, coatings applied using fixed head high volume, low pressure (HVLP) application
 Coating Application = High Volume, Low Pressure Application, Cleaning Solvent Manually Applied
 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
HAP Emission Calculations from Surface Coating Operations
Surface Coating Spray Machine, Plant 1

Company Name: Custom Wood Products, Inc.
Address City IN Zip: 1809 W. Hively, Elkhart, Indiana 46517
Permit Number: F039-31065-00715
Plt ID: 039-00715
Prepared By: Bruce Farrar
Date: October 25, 2011

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Ethyl Benzene	Weight % Formaldehyde	Weight % Methanol	Weight % Toluene	Weight % Xylene	Ethyl Benzene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Methanol Emissions (ton/yr)	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Total Emissions (ton/yr)
One (1) Multihead Spray Machine														
53549.601 Concord Stain	6.86	0.0304	30.00	0.02%	0.00%	0.00%	0.26%	0.06%	0.01	0.00	0.00	0.08	0.02	0.11
AND														
741050.55.601 Precat Sealer/Topcoat	7.40	0.1135	30.00	0.00%	1.00%	0.00%	0.00%	1.00%	0.00	1.11	0.00	0.00	1.11	2.22
AND														
Pure Grade Lacquer - Cleanup	7.07	0.0044	30.00	0.00%	0.00%	9.38%	66.28%	5.59%	0.00	0.00	0.39	2.71	0.23	3.33
Potential Emissions - Add Solvents to Worst Case Coatings									0.01	1.11	0.39	2.79	1.36	5.66

METHODOLOGY

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

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations
Board Bonding Process, Plant 1**

Company Name: Custom Wood Products, Inc.
Address City IN Zip: 1809 W. Hively, Elkhart, Indiana 46517
Permit Number: F039-31065-00715
Plt ID: 039-00715
Prepared By: Bruce Farrar
Date: October 25, 2011

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water & Exempt	Weight % Organics	Volume % Water & Exempt	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Material Usage (lb/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Board Bonding Process																	
Titebond II Wood Glue	9.17	52.00%	51.45%	0.55%	56.57%	42.82%	0.0073	130.00	8.70	0.12	0.05	0.05	1.15	0.21	0.00	0.12	100%
Potential Emission Rates											Uncontrolled	0.05	1.15	0.21	0.00		
											PM Control Efficiency:		0.0%				
											Controlled		0.05	1.15	0.21	0.00	

METHODOLOGY

Coating Application = Manual squeeze bottle flow coating
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 hrs/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)

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Formaldehyde	Formaldehyde Emissions (ton/yr)	Total Emissions (ton/yr)
Board Bonding Process						
Titebond II Wood Glue	9.17	0.0073	21.63	0.01%	0.001	0.001
Potential Emissions					0.001	0.001

METHODOLOGY

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

**Appendix A: Emission Calculations
Controlled Woodworking Operations, Plant 1**

Company Name: Custom Wood Products, Inc.
Address City IN Zip: 1809 W. Hively, Elkhart, Indiana 46517
Permit Number: F039-31065-00715
Plt ID: 039-00715
Prepared By: Bruce Farrar
Date: October 25, 2011

Emission Unit Description	Emission Unit ID	Control Device Description	Control Device ID	Control Device Filter Area (ft2)	Air to Cloth Ratio	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)
Miscellaneous Woodworking	WW1	Baghouse	D1	2500	4	99.0%	0.002	10,000	17.14	75.09	0.17	0.75
Miscellaneous Woodworking	WW2	Baghouse	D2	2500	4	99.0%	0.002	10,000	17.14	75.09	0.17	0.75
Omega Mitre Saw	WW3	Jet DC-1200	D3	30	40	99.0%	0.002	1,200	2.06	9.01	0.02	0.09
Rip Saw	WW4	Jet DC-1200	D4	30	40	99.0%	0.002	1,200	2.06	9.01	0.02	0.09
TOTALS									38.40	168.19	0.38	1.68

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

Emission Unit ID	Process Rate (lbs/hr)	Process Weight Rate (tons/hr)	Allowable Emissions (lbs/hr)
WW1	750.00	0.375	2.13
WW2	750.00	0.375	2.13
WW3	125.00	0.063	0.64
WW4	125.00	0.063	0.64

Methodology

Allowable Emissions = 4.10(Process Weight Rate)^{0.67}

In October of 1993 a Final Order Granting Summary Judgment was signed by an Administrative Law Judge ("ALJ") resolving an appeal of an IDEM permit related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls were necessary for the facility, and therefore, potential emissions were to be calculated after controls. Based on this ruling, potential emissions for particulate matter were calculated after consideration of the controls.

**Appendix A: Emission Calculations
Controlled Woodworking Operations, Plant 2**

**Company Name: Custom Wood Products, Inc.
Address City IN Zip: 1515 Leininger Ave., Elkhart, IN 46517
Permit Number: F039-31065-00715
Plt ID: 039-00715
Prepared By: Bruce Farrar
Date: October 25, 2011**

Emission Unit Description	Emission Unit ID	Control Device Description	Control Device ID	Control Device Filter Area (ft2)	Air to Cloth Ratio	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)
Wood Tech Belt Sander	BS1	Grizzly G1028Z/G1029	DC1	31	45	99.0%	0.001	1,400	1.20	5.26	0.012	0.053
Grizzly Spindle Sander	SS1	See DC1										
Powermatic Router	RT1	Grizzly G1028Z/G1029	DC2	31	45	99.0%	0.001	1,400	1.20	5.26	0.012	0.053
Jet Belt Sander	BS2	Grizzly G1030	DC3	62	37	99.0%	0.001	2,300	1.97	8.63	0.020	0.086
Omgaon Radial Arm Saw	RS1	Grizzly G1028Z/G1029	DC4	31	45	99.0%	0.001	1,400	1.20	5.26	0.012	0.053
Jet Router	RT2	Jet DC-1200	DC5	30	40	99.0%	0.001	1,200	1.03	4.51	0.010	0.045
Powermatic Panel Molder	PM1	Jet DC-1100A	DC6	30	36	99.0%	0.001	1,100	0.94	4.13	0.009	0.041
Surface Router	RT3	See DC6										
Timesavers Panel Sander	PS1	Coral	DC7	56	27	99.0%	0.001	1,550	1.33	5.82	0.013	0.058
Onsrud Router	RT4	Grizzly G1030	DC8	62	37	99.0%	0.001	2,300	1.97	8.63	0.020	0.086
Ritter Belt Sander	BS3	Grizzly G1028Z/G1029	DC9	31	45	99.0%	0.001	1,400	1.20	5.26	0.012	0.053
Multicam Saw Table	ST1	Grizzly G1030	DC10	62	37	99.0%	0.001	2,300	1.97	8.63	0.020	0.086
Northwood Table Router	RT5	Grizzly G1030	DC11	62	37	99.0%	0.001	2,300	1.97	8.63	0.020	0.086
Powermatic Table Saw	TS1	Grizzly G1028Z/G1029	DC12	31	45	99.0%	0.001	1,400	1.20	5.26	0.012	0.053

Total 0.75

Control device is considered integral to the process. Therefore, the potential particulate emissions after the use of the control device will be used toward total, source-wide particulate emissions.

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

Process Rate (materials throughput) (lbs/hr)	Process Weight Rate (tons/hr)	Allowable PM Emissions (lbs/hr)	Allowable PM Emissions (tons/yr)
1,263.15	0.632	3.01	13.20

Methodology

Allowable Emissions (lb/hr) = 4.10(Process Weight Rate)^0.67
Allowable Emissions (tons/yr) = (Allowable Emissions (lb/hr)*8760)/2000

In October of 1993 a Final Order Granting Summary Judgment was signed by an Administrative Law Judge ("ALJ") resolving an appeal of an IDEM permit related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls were necessary for the facility, and therefore, potential emissions were to be calculated after controls. Based on this ruling, potential emissions for particulate matter were calculated after consideration of the controls.

**Appendix A: Emissions Calculations
Uncontrolled Woodworking Equipment, Plant 2**

Company Name: Custom Wood Products, Inc.
Address City IN Zip: 1515 Leininger Ave., Elkhart, IN 46517
Permit Number: F039-31065-00715
Plt ID: 039-00715
Prepared By: Bruce Farrar
Date: October 25, 2011

Shaping/Grinding/Sanding

Process/Operation	Description	ID	Surface Thickness Removed (in)	Surface Width Removed (in)	Surface Distance (in/hr)	Material Loss (in ³ /hr)	Material Density (lb/in ³)	Material Loss (lb/hr)
Grizzly Vertical Sander	Verticle Sander	VS1	0.0625	2.000	40.0	5.000	0.023	0.115
Estimated Emissions (lb/hr)								0.115
Estimated Emissions (tons/yr)								0.50

METHODOLOGY

Material Loss (in³/hr) = Surface Thickness (in) * Surface Width (in) * Surface Distance (in/hr)
Material Density (lbs/in³) = Southern Pine, (40 lb/ft³)*(ft³/(12in)³)
Estimated Emissions (lb/hr) = Material Loss (in³/hr) * Material Density (lb/in³)
Estimated Emissions (tons/yr) = Material Loss (lbs/hr) * 8,760 (hrs/yr) * (1ton/2,000lbs)

Cutting

Process/Operation	Description	ID	Material Thickness (in)	Cutting Surface Thickness (in)	Process rate (in/hr)	Material Loss (in ³ /hr)	Material Density (lb/in ³)	Material Loss (lb/hr)
Jet Bandsaw	Vertical Bandsaw	BW1	1.5	0.0625	10.0	0.938	0.023	0.022
Protech Chop Saw	Chop Saw	CS1	1.5	0.125	12.0	2.250	0.023	0.052
Delta Chop Saw	Chop Saw	CS2	1.5	0.125	12.0	2.250	0.023	0.052
Powermatic Bandsaw	Vertical Bandsaw	BW2	1.5	0.0625	10.0	0.938	0.023	0.022
Powermatic Bandsaw	Vertical Bandsaw	BW3	1.5	0.0625	10.0	0.938	0.023	0.022
Dewalt Chop Saw	Chop Saw	CS3	1.5	0.125	12.0	2.250	0.023	0.052
Estimated Emissions (lb/hr)								0.220
Estimated Emissions (tons/yr)								0.963

METHODOLOGY

Same as Shaping/Grinding/Sanding Table

Drilling

Process/Operation	Description	ID	Material Thickness (in)	Drilling Area (in ²)	Drill rate (holes/hr)	Material Loss (in ³ /hr)	Material Density (lb/in ³)	Material Loss (lb/hr)
Jet Drill Press	Drill Press	DP1	1.5	0.050	10.00	0.75	0.023	0.017
Jet Drill Press	Drill Press	DP2	1.5	0.050	10.00	0.75	0.023	0.017
Jet Drill Press	Drill Press	DP3	1.5	0.050	10.00	0.75	0.023	0.017
Jet Drill Press	Drill Press	DP4	1.5	0.050	10.00	0.75	0.023	0.017
Estimated Emissions (lb/hr)								0.069
Estimated Emissions (tons/yr)								0.302

Summary

Total Estimated Uncontrolled Emissions (lb/hr)		0.404
Total Estimated Uncontrolled Emissions (tons/yr)		1.769

METHODOLOGY

Material Loss (in³/hr) = Material Thickness (in) * Drilling Area (in²) * Process rate (holes/hr)
Other equations the same as above.

Natural Gas Combustion Only

MM BTU/HR <100

Company Name: Custom Wood Products, Inc.
 Address City IN Zip: 1809 W. Hively, Elkhart, Indiana 46517
 Permit Number: F039-31065-00715
 Pit ID: 039-00715
 Prepared By: Bruce Farrar
 Date: October 25, 2011

Unit Description	Unit ID	BTU Input Each (MMBTU/HR)	Number of Units	Total BTU Input (MMBTU/HR)
Eight (8) Radiant Space Heaters	RSH1 - RSH8	0.1700	8	1.3600
Nine (9) Radiant Space Heaters	RSH9-RSH17	0.1000	9	0.9000
Seven (7) Radiant Space Heaters	RSH18-RSH24	0.1500	7	1.0500
Two (2) Radiant Space Heaters	RSH25-RSH26	0.1250	2	0.2500
Two (2) Radiant Space Heaters	RSH27-RSH28	0.0800	2	0.1600
One (1) Forced Air Space Heater	FSH1	0.3000	1	0.3000
One (1) Forced Air Space Heater	FSH2	0.2000	1	0.2000
One (1) Forced Air Space Heater	FSH3	0.1500	1	0.1500
One (1) Forced Air Space Heater	FSH4	0.0600	1	0.0600
One (1) Air Makeup Unit	AM1	2.0000	1	2.0000
One (1) Air Makeup Unit	AM2	3.8000	1	3.8000

Total Heat Input Capacity (MMBtu/hr)

10.23

Potential Throughput (MMCF/yr)

89.6

	Pollutant						
	PM*	PM10	direct PM2.5*	SO ₂	NO _x	VOC	CO
Emission Factor (lb/MMCF)	1.90	7.60	7.6	0.60	100.00	5.50	84.00
Potential To Emit (tons/year)	0.09	0.34	0.34	0.03	4.48	0.25	3.76

* PM Factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
 PM2.5 emission factor is filterable and condensable PM2.5 combined.

METHODOLOGY

PTE (tons/year) = Potential Throughput (MMCF/yr) * Emission Factor (lb/MMCF) / 2000 lbs/ton
 Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) * 8760 hrs/yr * 1 MMCF/ 1000 Btu
 Emission Factors 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
 and 1-03-006-03

**Appendix A: Emission Calculations
Insignificant Natural Gas Combustion**

Company Name: Custom Wood Products, Inc.
Address City IN Zip: 1809 W. Hively, Elkhart, Indiana 46517
Permit Number: F039-31065-00715
Plt ID: 039-00715
Prepared By: Bruce Farrar
Date: October 25, 2011

HAPs Emissions

Organic HAPs						
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	
Emission Factor (lb/MMCF)	0.0021	0.0012	0.0750	1.8000	0.0034	
Potential To Emit (tons/year)	0.00009	0.00005	0.0034	0.0807	0.00015	

Inorganic HAPs						
	Lead	Cadmium	Chromium	Manganese	Nickel	Total
Emission Factor (lb/MMCF)	0.0005	0.0011	0.0014	0.0004	0.0021	
Potential To Emit (tons/year)	0.00002	0.00005	0.00006	0.00002	0.00009	0.085

METHODOLOGY

PTE (tons/year) = Potential Throughput (MMCF/yr) * Emission Factor (lb/MMCF) / 2000 lbs/ton

**Appendix A: Emission Calculations
Insignificant Natural Gas Combustion**

Company Name: Custom Wood Products, Inc.
Address City IN Zip: 1809 W. Hively, Elkhart, Indiana 46517
Permit Number: F039-31065-00715
Plt ID: 039-00715
Prepared By: Bruce Farrar
Date: October 25, 2011

Greenhouse Gas Emissions

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

10.23

89.6

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	5,377	0.1	0.1
Summed Potential Emissions in tons/yr	5,377		
CO2e Total in tons/yr	5,410		

METHODOLOGY

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O



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

January 13, 2012

Mr. Chris Miller
Custom Wood Products, Inc.
PO Box 925
Wakarusa, IN 46573

Re: Public Notice
Custom Wood Products, Inc.
Permit Level: FESOP
Permit Number: 039-31065-00715

Dear Mr. Miller:

Enclosed is a copy of your draft FESOP, 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 2nd Street in Elkhart, Indiana. 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, Indiana publish this notice no later than January 18, 2012.

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 Bruce Farrar, 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 4-5401 or dial (317) 234-5401.

Sincerely,

Greg Hotopp

Greg Hotopp
Permits Branch
Office of Air Quality

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



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Notice of Public Comment

January 13, 2012
Custom Wood Products, Inc.
039-31065-00715

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. 3-6875 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



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ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

January 13, 2012

Elkhart Truth
Teri Fritz-Lint
421 South Second Street
PO Box 487
Elkhart, IN 46515

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Custom 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 January 18, 2012.

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 Greg Hotopp at 800-451-6027 and ask for extension 4-3493 or dial 317-234-3493.

Sincerely,

Greg Hotopp
Greg Hotopp
Permit Branch
Office of Air Quality

cc: Pat Cuzzort: OAQ Billing, Licensing and Training Section
Permit Level: FESOP
Permit Number: 039-31065-00715

Enclosure
PN Newspaper.dot 3/27/08



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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January 13, 2012

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: Custom Wood Products, Inc.
Permit Number: 039-31065-00715

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

Mail Code 61-53

IDEM Staff	GHOTOPP 1/13/2012 Custom Wood Products 039-31065-00715 Draft		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		Chris Miller Custom Wood Products PO Box 925 Wakarusa IN 46573-0925 (Source CAATS)										
2		Raju Shah President Custom Wood Products PO Box 925 Wakarusa IN 46573-0925 (RO CAATS)										
3		Elkhart City Council and Mayors Office 229 South Second Street Elkhart IN 46516 (Local Official)										
4		Elkhart Public Library 300 S 2nd St Elkhart IN 46516-3184 (Library)										
5		Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 (Health Department)										
6		Laurence A. McHugh Barnes & Thornburg 100 North Michigan South Bend IN 46601-1632 (Affected Party)										
7		Mr. Kevin Parks D & B Environmental Services, Inc. 401 Lincoln Way West Osceola IN 46561 (Consultant)										
8		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 (Local Official)										
9		Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 (Affected Party)										
10												
11												
12												
13												
14												
15												

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