



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: June 7, 2012

RE: Saco Industries, Inc. / 089-31698-00443

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

Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

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

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

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

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

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

Enclosures
FNPER-AM.dot12/3/07



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

June 7, 2012

Re: 089-31698-00443
First Administrative Amendment to
F089-19460-00443

Dear Ms. Purkey:

Saco Industries, Inc. was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F089-19460-00443 on February 21, 2007 for a stationary wood and particle board surface coating and manufacturing operation for bathroom and kitchen cabinets located at 17151 Morse Street, Lowell, Indiana. On April 3, 2012, the Office of Air Quality (OAQ) received an application from the source relating to construction and operation of a manufacturing and laminating booth of the same type and that will comply with the same applicable requirements and permit terms and conditions as the existing surface coating booths. This new manufacturing and laminating booth will replace the existing water-based surface coating booth, identified as EU-5. The uncontrolled potential to emit of the new unit is 8.14 tons per twelve (12) consecutive month period. The addition of these units to the permit is considered an administrative amendment pursuant to 326 IAC 2-8-10(a)(10). The entire source will continue to limit VOC and PM10 emissions to less than one hundred (100) tons per twelve (12) consecutive month period, each, rendering the requirements of 326 IAC 2-7 not applicable (see attached updated calculations). The addition of these units will not cause the source's potential to emit to be greater than the threshold levels specified in 326 IAC 2-2 or 326 IAC 2-3.

Pursuant to the provisions of 326 IAC 2-8-10, the permit is hereby administratively amended as follows with the deleted language as strikeouts and new language **bolded**:

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

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

...

- (e) **One (1) manufacturing and laminating booth, identified as ML-01, approved for construction in 2012, with a maximum capacity of 1.485 gallons of water-based adhesive per hour, utilizing HVLP method of application, using dry filters and portable dust collectors as particulate control, and exhausting through stack S-8.**

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

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

This stationary source also includes the following insignificant activities:

...

- ~~(j) One (1) water based spray booth, identified as EU-5, using aqueous materials containing less than or equal to one percent (1%) by weight of VOCs that contain no HAPs.~~

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

...

- (e) **One (1) manufacturing and laminating booth, identified as ML-01, approved for construction in 2012, with a maximum capacity of 1.485 gallons of water-based adhesive per hour, utilizing HVLP method of application, using dry filters and portable dust collectors as particulate control, and exhausting through stack S-8.**

...

...

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

Pursuant to 326 IAC 6-3-2(d) (Particulate Emission Limitations for Manufacturing Processes), particulate matter from surface coating operations, identified as EU 03, **and the manufacturing and laminating booth, identified as ML-01**, shall be controlled by a dry filter, and the Permittee shall operate the control devices in accordance with manufacturer's specifications.

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

A Preventive Maintenance Plan is required for the surface coating operations, identified as EU 03 and EU FL-1, **the manufacturing and laminating booth, identified as ML-01**, 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.

...

D.1.8 Particulate Matter (PM) Control

The dry filter for particulate matter (PM) control shall be in operation and control emissions from the surface coating operations, identified as EU 03, **and the manufacturing and laminating booth, identified as ML-01**, at all times that the spray booths ~~is~~ are in operation.

...

D.1.11 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filter. To monitor the performance of the dry filter, weekly observations shall be made of the overspray from the surface coating booth stacks (**S3 and S-8**) while any one of the spray booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

...

Pursuant to 326 IAC 2-7-1(39), starting July 1, 2011, greenhouse gases (GHGs) emissions are subject to regulation at a source with a potential to emit (PTE) 100,000 tons per year or more of CO₂ equivalent emissions (CO₂e). Therefore, CO₂e emissions have been calculated for this source. Based on the calculations, the unlimited PTE GHGs from the entire source is less than 100,000 tons of CO₂e per year (see TSD Appendix A for detailed calculations). This did not require any changes to the permit.

IDEM, OAQ has decided to make additional revisions to the permit as described below in order to update the language to match the most current version of the applicable rule, to eliminate redundancy within the permit, and to provide clarification regarding the requirements of these conditions.

1. On October 27, 2010, the Indiana Air Pollution Control Board issued revisions to 326 IAC 2. These revisions resulted in changes to the rule sites listed in the permit. These changes are not

changes to the underlining provisions. The change is only to site of these rules in Section B - Operational Flexibility. IDEM, OAQ has clarified the rule sites for the Preventive Maintenance Plan.

2. IDEM, OAQ has clarified the Permittee's responsibility with regards to record keeping.
3. IDEM, OAQ has clarified the interaction of the Quarterly Deviation and Compliance Monitoring Report and the Emergency Provisions.

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

...

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

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

...

- (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) ~~(1) through (d)~~ **and (c)**. 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)(1), (c)(1), and (d)~~ **and (c)**.

- (b) Emission Trades [326 IAC 2-8-15(~~b~~)]
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(~~b~~).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(~~bc~~)]
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.

...

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

...

- (h) Material processing facilities shall include the following:
 - (1) There shall be a zero (0) percent frequency of visible emission observations from a building enclosing all or part of the material processing equipment, except from a vent in the building.
 - (2) The PM₁₀ emissions from building vents shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.
 - (3) The PM₁₀ stack emissions from a material processing facility shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.

- (4A) The opacity of fugitive particulate emissions from the material processing facilities, except a crusher at which a capture system is not used, shall not exceed ten percent (10%) opacity.
- (5B) The opacity of fugitive particulate emissions from a crusher at which a capture system is not used shall not exceed fifteen percent (15%).

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

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. **Support information includes the following:**

- (AA) All calibration and maintenance records.
- (BB) All original strip chart recordings for continuous monitoring instrumentation.
- (CC) Copies of all reports required by the FESOP.

Records of required monitoring information include the following:

- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
- (BB) The dates analyses were performed.
- (CC) The company or entity that performed the analyses.
- (DD) The analytical techniques or methods used.
- (EE) The results of such analyses.
- (FF) The operating conditions as existing at the time of sampling or measurement.

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.

...

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

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. **Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph.** 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.

...

FESOP QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT FORM:

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

All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Summer Keown, of my staff, at 317-234-5175 or 1-800-451-6027, and ask for extension 4-5175.

Sincerely,



Nathan C. Bell, Section Chief
Permits Branch
Office of Air Quality

Attachments: Updated Permit and Calculations

NB/SK

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



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Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

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

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

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

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

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

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

First Minor Permit Revision No. 089-24054-00434, issued on April 23, 2007
First Significant Permit Revision No. 089-25570-00434, issued on April 8, 2008
Second Significant Permit Revision No. 089-29986-00443, issued on May 10, 2011

First Administrative Amendment No. F089-31698-00443	
Issued by:  Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: June 7, 2012 Expiration Date: February 21, 2017

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SECTION A SOURCE SUMMARY

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

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

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

Source Address:	17151 More Street, Lowell, Indiana 46356
General Source Phone Number:	(219) 696-2800
SIC Code:	2434
County Location:	Lake
Source Location Status:	Nonattainment for PM2.5 standard Attainment for all other 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 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

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

- (2) One (1) rough milling unit, one (1) ripper unit, one (1) door shaper unit, one (1) lamination booth, one (1) dado machine, and two (2) panel saws, each with a maximum capacity of 43.75 units per hour, utilizing one (1) baghouse (D-7) for particulate control with a grain loading outlet of 0.003 grains/scf and 70,000 CFM, and exhausting to stack S-7.
- (e) One (1) manufacturing and laminating booth, identified as ML-01, approved for construction in 2012, with a maximum capacity of 1.485 gallons of water-based adhesive per hour, utilizing HVLP method of application, using dry filters and portable dust collectors as particulate control, and exhausting through stack S-8.

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:

- (a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.003 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking areas;
- (b) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (1) Fifteen (15) space heaters each with a maximum heat input rate of 0.05 mmBtu/hr;
- (c) Application of oils, greases, lubricants or other nonvolatile material applied as temporary protective coatings;
- (d) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs;
- (e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
- (f) Paved and unpaved roads and parking lots with public access;
- (g) One (1) welding department utilizing one (1) baghouse for particulate control (D-7), using E7018 welding material, constructing 43.75 units per hour;
- (h) One (1) lamination booth adhesive applicator, with a maximum capacity of 43.75 units per hour;
- (i) One (1) end panel adhesive applicator, with a maximum capacity of 3.38 pounds per hour of adhesive;

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, F089-19460-00443, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

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

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

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

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

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

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

(C) Corrective actions taken.

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

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

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

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

- (a) All terms and conditions of permits established prior to F089-19460-00443 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
- (2) revised, or

(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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

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

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

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

- (1) That this permit contains a material mistake.
- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

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

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

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

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

Request for renewal shall be submitted to:

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

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

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

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

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

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

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

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) 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)(1) and (c). 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)(1) and (c).

- (b) Emission Trades [326 IAC 2-8-15(b)]
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(b).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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

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

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

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

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

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

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

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

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

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

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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

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

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

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

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

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

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

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

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

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

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

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

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

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

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

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

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

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

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following:
 - (AA) All calibration and maintenance records.
 - (BB) All original strip chart recordings for continuous monitoring instrumentation.
 - (CC) Copies of all reports required by the FESOP.Records of required monitoring information include the following:
 - (AA) The date, place, as defined in this permit, and time of sampling or measurements.
 - (BB) The dates analyses were performed.
 - (CC) The company or entity that performed the analyses.
 - (DD) The analytical techniques or methods used.
 - (EE) The results of such analyses.
 - (FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

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

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

- (b) The address for report submittal is:

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) spray booth (EU 03), which began operations in March 1999, with a maximum capacity of 43.75 wood pieces per hour, utilizing an HVLP application system and a dry filter for particulate control, and exhausting through stack S3. VOC emissions are controlled by one (1) natural gas-fired regenerative thermal oxidizer, identified as RTO-2, approved for construction in 2011, with a maximum heat input capacity of 4.0 MMBtu/hr, and exhausting to stack S12.
- (b) One (1) flat surface coating line (EU FL-1), constructed in 2007 and approved for modification in 2008, with a maximum capacity of 4.21 gallons of coating per hour, utilizing a Low Pressure Air Atomization application system, with emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer (RTO-1), rated at 1.16 MMBtu/hr, and exhausting through stack S10.
- (c) One (1) ultraviolet drying oven for the flat surface coating line (EU FL-1), with emissions controlled by one (1) natural gas-fired regenerative thermal oxidizer (RTO-1), rated at 1.16 MMBtu/hr, and exhausting through stack S10.
- (e) One (1) manufacturing and laminating booth, identified as ML-01, approved for construction in 2012, with a maximum capacity of 1.485 gallons of water-based adhesive per hour, utilizing HVLP method of application, using dry filters and portable dust collectors as particulate control, and exhausting through stack S-8.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Pursuant to 326 IAC 6-3-2(d) (Particulate Emission Limitations for Manufacturing Processes), particulate matter from surface coating operations, identified as EU 03, and the manufacturing and laminating booth, identified as ML-01, shall be controlled by a dry filter, and the Permittee shall operate the control devices in accordance with manufacturer's specifications.

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

A Preventive Maintenance Plan is required for the surface coating operations, identified as EU 03 and EU FL-1, and the manufacturing and laminating booth, identified as ML-01, and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.6 VOC and HAPs Emissions

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

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

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

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

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

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

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

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

D.1.8 Particulate Matter (PM) Control

The dry filter for particulate matter (PM) control shall be in operation and control emissions from the surface coating operations, identified as EU 03, and the manufacturing and laminating booth, identified as ML-01, at all times that the spray booths are in operation.

D.1.9 VOC and HAP Control

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

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

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

- (a) In order to demonstrate compliance with Condition D.1.1 and D.1.3, the Permittee shall perform VOC/HAP testing of thermal oxidizer RTO-1 utilizing methods as approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

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

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

D.1.11 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filter. To monitor the performance of the dry filter, weekly observations shall be made of the overspray from the surface coating booth stacks (S3 and S-8) while any one of the spray booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.
- (c) Annual inspections of the primary heat exchanges and associated inlet and outlet valves for the thermal oxidizer and associated airflow dampers shall be performed. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.1.12 Thermal Oxidizer Temperature

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

D.1.13 Parametric Monitoring

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

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

D.1.14 Record Keeping Requirements

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

D.1.15 Reporting Requirements

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

SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

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

Insignificant Activities:

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

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

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

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

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

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

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

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

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

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

Compliance Determination Requirements

D.2.3 Particulate Control

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

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

D.2.4 Visible Emissions Notations

The Permittee shall comply with the following:

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

D.2.5 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the molding/sanding/shaping operations, the sawing/cutting/rough milling operations, and the grinding and machining operations, when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

D.2.6 Broken or Failed Bag Detection

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

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

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

D.2.7 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.5 the Permittee shall maintain records of the results of the inspections required under Condition D.2.5, and the dates the vents are redirected.
- (b) To document the compliance status with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the baghouse exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (i.e. the process did not operate that day).
- (c) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

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

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

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

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

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

This form consists of 2 pages

Page 1 of 2

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

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

YEAR: _____

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

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

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

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

FESOP Quarterly Report

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

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

YEAR: _____

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

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

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

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

FESOP Quarterly Report

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

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

YEAR: _____

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

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

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

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

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

Months: _____ to _____ Year: _____

Page 1 of 2

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Potential to Emit Summary

Company Name: Saco Industries, Inc.
 Source Address: 17151 Morse Street, Lowell, IN 46356
 Administrative Amendment No.: 089-31698-00443
 Reviewer: Summer Keown
 Date: April 25, 2012

Uncontrolled Potential to Emit (tons/year)

	Emission Unit	PM	PM ₁₀	PM _{2.5}	SOx	NOx	VOC	CO	GHGs as CO ₂ e	Total HAPs	Highest Single HAP	
Existing Units	Spray Booth (EU)	104.60	104.60	104.60	0.00	0.00	153.09	0.00	0.00	45.80	44.78	Xylene
	Flat Surface Coating Line (FL-1)	0.00	0.00	0.00	0.00	0.00	101.54	0.00	0.00	1.24	1.24	Toluene
	RTO-1	0.01	0.04	0.04	0.003	0.51	0.03	0.43	613	9.59E-03	9.15E-03	Hexane
	Woodworking Area	9.24	9.24	9.24	0.00	0.00	0.00	0.00	0.00	0.00	0.00	--
	Grinding & Machining Operations	22.53	22.53	22.53	0.00	0.00	0.00	0.00	0.00	0.00	0.00	--
	Space Heaters	0.01	0.02	0.02	0.002	0.33	0.02	0.28	397	0.006	0.006	Hexane
	Welding	0.002	0.002	0.002	0.00	0.00	0.00	0.00	0.00	7.07E-05	7.07E-05	Manganese
	Lamination Booth Adhesive Applicator	0.07	0.07	0.07	0.00	0.00	0.12	0.00	0.00	negl.	negl.	--
	RTO-2	0.03	0.13	0.13	0.01	1.75	0.10	1.47	2115	0.03	0.03	Hexane
New Unit	Manufacturing and Laminating Booth ML-01	8.14	8.14	8.14	0.00	0.00	0.00	0.00	0.00	0.00	0.00	--
Total		144.62	144.77	144.77	0.02	2.59	254.89	2.17	3125	47.09	44.78	Xylene
Increase in Potential Emissions		8.14	8.14	8.14	0.00	0.00	0.00	0.00	0.00	0.00	0.00	--

Limited/Controlled Potential to Emit (tons/year)

	Emission Unit	PM	PM ₁₀	PM _{2.5}	SOx	NOx	VOC	CO	GHGs as CO ₂ e	Total HAPs	Highest Single HAP	
Existing Units	Spray Booth (EU)	15.69	15.69	15.69	0.00	0.00	< 24.73	0.00	0.00	< 24.95	<9.99	Xylene
	Flat Surface Coating Line (FL-1)	0.00	0.00	0.00	0.00	0.00		0.00	0.00			
	RTO-1	0.01	0.04	0.04	0.00	0.51	0.03	0.43	613	9.59E-03	9.15E-03	Hexane
	Woodworking Area	9.24	9.24	9.24	0.00	0.00	0.00	0.00	0.00	0.00	0.00	--
	Grinding & Machining Operations	22.53	22.53	22.53	0.00	0.00	0.00	0.00	0.00	0.00	0.00	--
	Space Heaters	0.01	0.02	0.02	0.00	0.33	0.02	0.28	397	0.01	0.01	Hexane
	Welding	0.002	0.002	0.002	0.00	0.00	0.00	0.00	0.00	7.07E-05	7.07E-05	Manganese
	Lamination Booth Adhesive Applicator	0.07	0.07	0.07	0.00	0.00	0.12	0.00	0.00	negl.	negl.	--
	RTO-2	0.03	0.13	0.13	0.01	1.75	0.10	1.47	2115	0.03	0.03	Hexane
New Unit	Manufacturing and Laminating Booth ML-01	0.81	0.81	0.81	0.00	0.00	0.00	0.00	0.00	0.00	0.00	--
Total		48.39	48.53	48.53	0.02	2.59	< 24.99	2.17	3125	<25.00	<9.99	Xylene
Increase in Potential Emissions		0.81	0.81	0.81	0.00	0.00	0.00	0.00	0.00	0.00	0.00	--

Note: Potential emissions for the removed insignificant surface coating booth EU-5 were not included in the calculations for the previous permit. Therefore, the reduction in potential emissions for this unit was not calculated for this administrative amendment.

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

**Company Name: Saco Industries, Inc.
Source Address: 17151 Morse Street, Lowell, IN 46356
Administrative Amendment No.: 089-31698-00443
Reviewer: Summer Keown
Date: April 25, 2012**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Maximum (gallons/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**
Helmibond 776	9.1	45.00%	45.0%	0.0%	50.0%	50.00%	1.485	0.00	0.00	0.00	0.00	0.00	8.14	0.00	75%

State Potential Emissions

0.00 0.00 0.00 8.14

METHODOLOGY

Potential Emissions After Controls (Dry Filters) = **0.81**

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) * (lb/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

*PM is assumed to be equal to PM10 and PM2.5.

**HVLP coating is assumed to have a transfer efficiency of 75%

Note: The MSDS for Helmibond 776 states that the VOC and HAP content of the material is 0.00 lbs/gal. Therefore, potential HAP calculations are not necessary for this unit.

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: Saco Industries, Inc.
Source Address: 17151 Morse Street, Lowell, IN 46356
Administrative Amendment No.: 089-31698-00443
Reviewer: Summer Keown
Date: April 25, 2012

Surface Coating: Spray Booth (EU 03)

VOC and Particulate (PM)

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

Methodology

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

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

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

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

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

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

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

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

**Appendix A: Emissions Calculations
 Hazardous Air Pollutants (HAPs)
 From Surface Coating Operations
 Spray Booth EU03**

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**Company Name: Saco Industries, Inc.
 Source Address: 17151 Morse Street, Lowell, IN 46356
 Administrative Amendment No.: 089-31698-00443
 Reviewer: Summer Keown
 Date: April 25, 2012**

HAPs

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

Methodology

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

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

**Company Name: Saco Industries, Inc.
Source Address: 17151 Morse Street, Lowell, IN 46356
Administrative Amendment No.: 089-31698-00443
Reviewer: Summer Keown
Date: April 25, 2012**

One (1) Natural Gas-fired Regenerative Thermal Oxidizer (RTO-2)

Natural Gas Combustion (MMBtu/Hr <100)

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

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

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

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

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

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

Total HAPs (tons/yr) = 0.03

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

10⁶ scf = MMCF

Heating Value = 1000 MMBtu/10⁶ scf

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

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

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

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

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Greenhouse Gas Emissions
Regenerative Thermal Oxidizer RTO-2

Company Name: Saco Industries, Inc.
Source Address: 17151 Morse Street, Lowell, IN 46356
Administrative Amendment No.: 089-31698-00443
Reviewer: Summer Keown
Date: April 25, 2012

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
120,000	2.3	2.2	
Potential Emission in tons/yr	2,102	0.04	0.04
Summed Potential Emissions in tons/yr	2,102		
CO2e Total in tons/yr	2,115		

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.

Global 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

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

**Company Name: Saco Industries, Inc.
Source Address: 17151 Morse Street, Lowell, IN 46356
Administrative Amendment No.: 089-31698-00443
Reviewer: Summer Keown
Date: April 25, 2012**

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

VOC and Particulate (PM)

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

Methodology

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

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

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

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

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

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

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

HAPs

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

Methodology

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

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

**Company Name: Saco Industries, Inc.
Source Address: 17151 Morse Street, Lowell, IN 46356
Administrative Amendment No.: 089-31698-00443
Reviewer: Summer Keown
Date: April 25, 2012**

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

Natural Gas Combustion (MMBtu/Hr <100)

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

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

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

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

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

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

10⁶ scf = MMCF

Heating Value = 1000 MMBtu/10⁶ scf

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

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

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

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

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Greenhouse Gas Emissions
Regenerative Thermal Oxidizer RTO-1

Company Name: Saco Industries, Inc.
Source Address: 17151 Morse Street, Lowell, IN 46356
Administrative Amendment No.: 089-31698-00443
Reviewer: Summer Keown
Date: April 25, 2012

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	610	0.01	0.01
Summed Potential Emissions in tons/yr	610		
CO2e Total in tons/yr	613		

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.
 Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
 $Emission (tons/yr) = Throughput (MMCF/yr) \times Emission Factor (lb/MMCF) / 2,000 lb/ton$
 $CO_2e (tons/yr) = CO_2 Potential Emission ton/yr \times CO_2 GWP (1) + CH_4 Potential Emission ton/yr \times CH_4 GWP (21) + N_2O Potential$

**Appendix A: Emissions Calculations
Woodworking Operations**

**Company Name: Saco Industries, Inc.
Source Address: 17151 Morse Street, Lowell, IN 46356
Administrative Amendment No.: 089-31698-00443
Reviewer: Summer Keown
Date: April 25, 2012**

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

Methodology

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

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

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

**Appendix A: Emissions Calculations
Grinding and Machining Operations**

**Company Name: Saco Industries, Inc.
Source Address: 17151 Morse Street, Lowell, IN 46356
Administrative Amendment No.: 089-31698-00443
Reviewer: Summer Keown
Date: April 25, 2012**

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

Methodology

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

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

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

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

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Space Heaters

Company Name: Saco Industries, Inc.
Source Address: 17151 Morse Street, Lowell, IN 46356
Administrative Amendment No.: 089-31698-00443
Reviewer: Summer Keown
Date: April 25, 2012

Natural Gas Combustion (MMBtu/Hr <100)

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

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

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

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

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

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

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

10⁶ scf = MMCF

Heating Value = 1000 MMBtu/10⁶ scf

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

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

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

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

Appendix A: Emissions Calculations

**Natural Gas Combustion Only
MM BTU/HR <100**

Greenhouse Gas Emissions

**Company Name: Saco Industries, Inc.
Source Address: 17151 Morse Street, Lowell, IN 46356
Administrative Amendment No.: 089-31698-00443
Reviewer: Summer Keown
Date: April 25, 2012**

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	394	0.01	0.01
Summed Potential Emissions in tons/yr	394		
CO2e Total in tons/yr	397		

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.
Global 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

**Appendix A: Emissions Calculations
Welding Department**

**Company Name: Saco Industries, Inc.
Source Address: 17151 Morse Street, Lowell, IN 46356
Administrative Amendment No.: 089-31698-00443
Reviewer: Summer Keown
Date: April 25, 2012**

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

Methodology

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

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

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

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

**Appendix A: Emissions Calculations
Lamination Booth Adhesive Applicator**

Company Name: Saco Industries, Inc.
Source Address: 17151 Morse Street, Lowell, IN 46356
Administrative Amendment No.: 089-31698-00443
Reviewer: Summer Keown
Date: April 25, 2012

<i>Material (as applied)</i>	<i>Density (lbs/gal)</i>	<i>Weight % Volatile (H₂O & Organics)</i>	<i>Weight % Water</i>	<i>Weight % Organics</i>	<i>Volume % Water</i>	<i>Volume % Non-Vol (solids)</i>	<i>Maximum Usage (gal/unit)</i>	<i>Maximum Throughput (units/hr)</i>	<i>Pounds VOC per gallon of coating less water</i>	<i>Pounds VOC per gallon of coating</i>	<i>Transfer Efficiency</i>	<i>Potential VOC (lbs/hr)</i>	<i>Potential VOC (lbs/day)</i>	<i>Potential VOC (tons/yr)</i>	<i>Potential Particulate (tons/yr)</i>
Quick Stick Panel & Construction Adhesive	10.25	27.9%	0.00%	27.90%	0.00%	45.00%	0.0002	43.75	2.9	2.86	75%	0.03	0.60	0.11	0.07
Titebond Extend Wood Glue	9.66	57.7%	57.68%	0.02%	66.91%	32.93%	0.0090	43.75	0.0	0.00	100%	0.00	0.02	0.00	0.00
Titebond Extend White Glue	9.08	54.5%	54.45%	0.05%	59.35%	40.60%	0.0010	43.75	0.0	0.00	100%	0.00	0.00	0.00	0.00
Titebond Extend White Glue	9.08	54.5%	54.45%	0.05%	59.35%	40.60%	0.0010	43.75	0.0	0.00	100%	0.00	0.00	0.00	0.00
Titebond Extend White Glue	9.08	54.5%	54.45%	0.05%	59.35%	40.60%	0.0010	43.75	0.0	0.00	100%	0.00	0.00	0.00	0.00
Total												0.03	0.64	0.12	0.07

Methodology

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

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

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

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

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

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

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

TO: Denise Purkey
Saco Industries, Inc.
PO Box 342
Lowell, IN 46356

DATE: June 7, 2012

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

SUBJECT: Final Decision
FESOP
089-31698-00443

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

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

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

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

Final Applicant Cover letter.dot 11/30/07

Mail Code 61-53

IDEM Staff	CDENNY 06/07/2012 Saco Industries, Inc. 089-31698-00443 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Denise Purkey Saco Industries, Inc. PO Box 342 Lowell IN 46356 (Source CAATS)										
2		East Chicago City Council 4525 Indianapolis Blvd East Chicago IN 46312 (Local Official)										
3		Gary - Hobart Water Corp 650 Madison St, P.O. Box M486 Gary IN 46401-0486 (Affected Party)										
4		Lake County Health Department-Gary 1145 W. 5th Ave Gary IN 46402-1795 (Health Department)										
5		WJOB / WZVN Radio 6405 Olcott Ave Hammond IN 46320 (Affected Party)										
6		Lowell Town Council and Town Manager PO Box 157, 501 East Main Street Lowell IN 46356 (Local Official)										
7		Shawn Sobocinski 3229 E. Atlanta Court Portage IN 46368 (Affected Party)										
8		Ms. Carolyn Marsh Lake Michigan Calumet Advisory Council 1804 Oliver St Whiting IN 46394-1725 (Affected Party)										
9		Mark Coleman 107 Diana Road Portage IN 46368 (Affected Party)										
10		Mr. Chris Hernandez Pipefitters Association, Local Union 597 8762 Louisiana St., Suite G Merrillville IN 46410 (Affected Party)										
11		Craig Hogarth 7901 West Morris Street Indianapolis IN 46231 (Affected Party)										
12		Lake County Commissioners 2293 N. Main St, Building A 3rd Floor Crown Point IN 46307 (Local Official)										
13		Anthony Copeland 2006 E. 140th Street East Chicago IN 46312 (Affected Party)										
14		Barbara G. Perez 506 Lilac Street East Chicago IN 46312 (Affected Party)										
15		Mr. Robert Garcia 3733 Parrish Avenue East Chicago IN 46312 (Affected Party)										

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

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1		Karen 8212 Madison Ave Munster IN 46321-1627 (Affected Party)										
2		Joseph Hero 11723 S Oakridge Drive St. John IN 46373 (Affected Party)										
3		Fred Krikau Fred Krikau & Associates 1056 Killarney Dr. Dyer IN 46311 (Consultant)										
4		Gary City Council 401 Broadway # 209 Gary IN 46402 (Local Official)										
5		Mr. Larry Davis 268 South, 600 West Hebron IN 46341 (Affected Party)										
6		Gitte Laasby Post Tribune 1433 E. 83rd Ave Merrillville IN 46410 (Affected Party)										
7		Susan Severtson City of Gary Law Dept. 401 Broadway 4th Floor Gary IN 46402 (Local Official)										
8												
9												
10												
11												
12												
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15												

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