

#### INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204 (800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence Governor Thomas W. Easterly

Commissioner

TO: Interested Parties / Applicant

DATE: August 1, 2013

RE: CHaSE Manufacturing / 099 - 33067 - 00092

FROM: Matthew Stuckey, Branch Chief

Permits Branch Office of Air Quality

# Notice of Decision: Approval - Effective Immediately

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

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

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- 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.dot 6/13/13







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Michael R. Pence Governor

Thomas W. Easterly Commissioner

# FEDERALLY ENFORCEABLE STATE **OPERATING PERMIT (FESOP) RENEWAL** OFFICE OF AIR QUALITY

# CHaSE Manufacturing, LLC 1511 US Highway 6 Nappanee, Indiana 46550

(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. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. 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.

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.

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. This permit also addresses new source review requirements and is intended to fulfill the new source review procedures and permit revision requirements pursuant to 326 IAC 2-8-11.1, applicable to those conditions.

Operation Permit No.: 099-22596-00092 Issuance Date: January 9, 2007 Originally Issued/Signed by: Nisha Sizemore, Chief Expiration Date: January 9, 2017 Permits Branch Office of Air Quality

First Significant Permit Revision No.: 099-24357-00092, issued on July 16, 2007 First Administrative Amendment No.: 099-25844-00092, issued on January 29, 2008 Second Administrative Amendment No.: 099-27734-00092, issued on April 28, 2009 Second Significant Permit Revision No.: 099-30179-00092, issued on May 17, 2011

Third Significant Permit Revision No.: 099-33067-00092

Signed by:

Issuance Date:

August 1, 2013

Chrystal A. Wagner, Section Chief

Permits Branch Office of Air Quality Expiration Date: January 9, 2017





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CHaSE Manufacturing, LLC Third Significant Permit Revision No. 099-33067-00092 Revised by: Donald McQuigg

Nappanee, Indiana Permit Reviewer: ERG/SE

#### **SOURCE SUMMARY SECTION A**

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 components surface coating operation.

Source Address: 1511 US Highway 6, Nappanee, Indiana 46550

General Source Phone Number: (574) 457-1424

SIC Code: 2599 County Location: Marshall

Source Location Status: Attainment for all criteria pollutants

Source Status: Federally Enforceable State Operating Permit (FESOP)

Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act

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Not 1 of 28 Source Categories

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

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

- (a) One (1) paint booth, identified as B1, constructed in 2001, approved in 2013 for reconstruction, equipped with ten (10) HVLP spray guns, with a maximum capacity of 40 units per hour, using dry filters for overspray control, and exhausting to stacks B1SV1 through B1SV5.
- (b) One (1) paint booth, identified as B2, constructed in 2001, approved in 2013 for reconstruction, equipped with three (3) air-assisted airless (airmix) spray gun, for wood furniture coating, with a maximum capacity of 40 units per hour, using dry filters for overspray control, and exhausting to stacks B2SV1and B2SV2.
- One (1) paint booth, identified as B3, constructed in 2001, approved in 2013 for (c) reconstruction, equipped with one (1) air-assisted airless (airmix) spray gun, for wood furniture coating repair, with a maximum capacity of 20 units per hour, using dry filters for overspray control, and exhausting to stack B3SV1.
- (d) One (1) automated surface coating line, identified as PL1, constructed in 2005, approved in 2013 for reconstruction, sharing a common exhaust stack PL1SV1, for wood furniture coating, with a maximum capacity of 18,000 units per hour, using dry filters for overspray control at a volumetric flow rate of 9,200 acfm, consisting of five areas not necessarily in this order:
  - (1) One (1) spray booth, for coating application, equipped with four (4) automated spray guns; and
  - (2) One (1) automated wipe area;
- (e) One (1) paint booth, identified as B4, constructed in 2011, utilizing four (4) air-assisted airless spray guns for applying stain to wood doors, with a maximum capacity of 125 units per hour, using dry filters for overspray control, and exhausting to stack B4SV1.
- (f) One (1) paint booth, identified as B5, constructed in 2011, utilizing one (1) air-assisted airless spray gun for applying sealer to wood doors, with a maximum capacity of 125 units per hour, using dry filters for overspray control, and exhausting to stack B5SV1.

- (g) One (1) paint booth, identified as B6, constructed in 2011, utilizing air assisted airless spray for applying topcoat to wood doors, with a maximum capacity of 125 units per hour, using dry filters for overspray control, and exhausting to stack B6SV1.
- (h) One (1) "trim work" area, constructed in 2005, identified as WW1, equipped with various woodworking equipment, with a maximum capacity of 2,520 pounds of wood per hour, controlled by dust collector DC1 (installed in 2007), which is capable of exhausting inside or outside of the building.
- (i) One (1) "trim work" area, constructed in 2005 (and relocated to a different building at this source in 2007), identified as WW2, equipped with various woodworking equipment, with a maximum capacity of 1,080 pounds of wood per hour, controlled by dust collector DC2 (originally installed in 2005 and relocated to a different building at this source in 2007), which exhausts inside the building.

#### 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 which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour:
  - (1) One (1) natural gas-fired combustion unit, identified as H1 with a heat input of 0.5 MMBtu/hour;
  - (2) One (1) natural gas-fired combustion unit, identified as H2 with a heat input of 0.5 MMBtu/hour;
  - (3) One (1) natural gas-fired combustion unit, identified as H3 with a heat input of 3.0 MMBtu/hour;
  - (4) One (1) natural gas-fired combustion unit, identified as H4 with a heat input of 0.15 MMBtu/hour;
  - One (1) natural gas-fired combustion unit, identified as H5 with a heat input of 0.10 MMBtu/hour;
  - (6) One (1) natural gas-fired combustion unit, identified as H6 with a heat input of 0.975 MMBtu/hour:
  - (7) One (1) natural gas-fired combustion unit, identified as WH1 with a heat input of 0.5 MMBtu/hour;
  - (8) One (1) natural gas-fired combustion unit, identified as WH2 with a heat input of 0.033 MMBtu/hour; and
  - (9) One (1) natural gas-fired combustion unit, identified as AM1, approved in 2013 for construction, with a heat input of 3.0 MMBtu/hour.
- (b) Farm operations.

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

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

#### **SECTION B**

#### **GENERAL CONDITIONS**

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

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

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

- (a) This permit, F099-22596-00092, 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 July 1 of each year to:

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

- (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 Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,

Compliance and Enforcement Branch), or

Telephone Number: 317-233-0178 (ask for Office of Air Quality,

Compliance and Enforcement Branch) Facsimile Number: 317-233-6865

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

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

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

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

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

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

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

- (a) All terms and conditions of permits established prior to F123-45678-91011 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)(1) 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 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

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

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

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

- (a) Pursuant to 326 IAC 2-8:
  - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
  - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
  - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (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 that the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

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

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

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

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

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

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

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

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

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

#### C.7 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; and
  - (CC) Copies of all reports required by the Part 70 permit.

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; and
- (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 FACILITY OPERATION CONDITIONS

#### Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) paint booth, identified as B1, constructed in 2001, approved in 2013 for reconstruction, equipped with ten (10) HVLP spray guns, with a maximum capacity of 40 units per hour, using dry filters for overspray control, and exhausting to stacks B1SV1 through B1SV5.
- (b) One (1) paint booth, identified as B2, constructed in 2001, approved in 2013 for reconstruction, equipped with three (3) air-assisted airless (airmix) spray gun, for wood furniture coating, with a maximum capacity of 40 units per hour, using dry filters for overspray control, and exhausting to stacks B2SV1 and B2SV2.
- (c) One (1) paint booth, identified as B3, constructed in 2001, approved in 2013 for reconstruction, equipped with one (1) air-assisted airless (airmix) spray gun, for wood furniture coating repair, with a maximum capacity of 20 units per hour, using dry filters for overspray control, and exhausting to stack B3SV1.
- (d) One (1) automated surface coating line, identified as PL1, constructed in 2005, approved in 2013 for reconstruction, sharing a common exhaust stack PL1SV1, for wood furniture coating, with a maximum capacity of 18,000 units per hour, using dry filters for overspray control at a volumetric flow rate of 9,200 acfm, consisting of five areas not necessarily in this order:
  - (1) One (1) spray booth, for coating application, equipped with four (4) automated spray guns; and
  - (2) One (1) automated wipe area;
- (e) One (1) paint booth, identified as B4, constructed in 2011, utilizing four (4) air-assisted airless spray guns for applying stain to wood doors, with a maximum capacity of 125 units per hour, using dry filters for overspray control, and exhausting to stack B4SV1.
- (f) One (1) paint booth, identified as B5, constructed in 2011, utilizing one (1) air-assisted airless spray gun for applying sealer to wood doors, with a maximum capacity of 125 units per hour, using dry filters for overspray control, and exhausting to stack B5SV1.
- (g) One (1) paint booth, identified as B6, constructed in 2011, utilizing air assisted airless spray for applying topcoat to wood doors, with a maximum capacity of 125 units per hour, using dry filters for overspray control, and exhausting to stack B6SV1.

(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 Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets in B1 through B6 and the coating line (PL1) 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.1.2 PSD Minor Limit [326 IAC 2-2] and FESOP Limit [326 IAC 2-8]

Pursuant to 326 IAC 2-8-4, the VOC input to the surface coating operations including the six (6) paint booths (B1 through B6) and the coating line (PL1) shall be limited to less than 99.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This limit, combined with the VOC emissions from other emissions units at this source, this will limit source-wide VOC emissions to less than one hundred (100) tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 do not apply.

#### D.1.3 HAPs Limit [326 IAC 2-8-4][326 IAC 2-4.1]

The amount of hazardous air pollutants (HAPs) used in the surface coating operations shall be limited as follows:

- (1) The input of any single HAP, to B1 through B6 and PL1, shall be limited to less than nine and nine-tenths (9.90) tons per twelve (12) consecutive month period with compliance determined at the end of each month; and
- (2) The input of any combination of HAPs, to B1 through B6 and PL1, shall be limited to less than twenty-four and nine-tenths (24.9) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

These limits, combined the HAP emissions from the other emission units at this source, will limit the source-wide emissions of HAPs to less than ten (10) tons of a single HAP and less than twenty-five (25) tons of a combination of HAPs per twelve (12) consecutive month period. Compliance with these limitations makes the requirements of 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-4.1 (MACT) not applicable.

### D.1.4 FESOP Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, the amount of solids delivered to the surface coating operations including the six (6) paint booths (B1 through B6) and the coating line (PL1) shall be limited to less than 7,864,000 pounds per twelve (12) consecutive month period with compliance determined at the end of each month. The minimum transfer efficiency of the applicators shall be at least 65% and the minimum control efficiency of the dry filters shall be at least 95%. The combination of these limits is equivalent to total  $PM_{10}$  emissions of less than 68.8 tons per year from the paint booths and the coating line. Therefore, the requirements of 326 IAC 2-7 do not apply.

## D.1.5 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating processes, B1 through B6 and PL1, shall be controlled by dry filters at all times the surface coating is in operation and the Permittee shall operate the dry filters in accordance with manufacturer's specifications.

#### D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for B1 through B6, PL1, 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 Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

#### D.1.7 Visible Emissions Notations

- (a) Daily visible emission notations of the stack exhausts (B1SV1 through B1SV5, B2SV1, B2SV2, B3SV1, B4SV1, B5SV1, B6SV1, and PL1SV1) shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C- Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

#### D.1.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating process stacks (B1SV1 through B1SV5, B2SV1, B2SV2, B3SV1, B4SV1, B5SV1, B6SV1, and PL1SV1) while one or more of the surface coating processes 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 of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from each stack (B1SV1 through B1SV5, B2SV1, B2SV2, B3SV1, B4SV1, B5SV1, B6SV1, and PL1SV1) and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emission, or evidence of overspray emission 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 in shall be considered a deviation of this permit.

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

#### D.1.9 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.1.2, D.1.3 and D.1.4, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC, HAP, and particulate usage limits established in Conditions D.1.2, D.1.3, and D.1.4.
  - (1) The amount and VOC, HAP, and solids content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

- (2) A log of the dates of use; and
- (3) The total VOC, HAP, and solids usage for each month.
- (b) To document the compliance status with Condition D.1.7, the Permittee shall maintain a daily record of visible emission notations of the stack exhausts (B1SV1 through B1SV5, B2SV1, B2SV2, B3SV1, B4SV1, B5SV1, B6SV1 and PL1SV). The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emissions notation (e.g., the process did not operate that day).
- (c) To document the compliance status with Condition D.1.8, the Permittee shall maintain a log of weekly surface coating overspray observations, daily and monthly inspections.
- (d) Section C General Record Keeping Requirements contains the Permittee's obligation with regard to the recordkeeping requirements of this requirement.

#### D.1.10 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.2, D.1.3, and D.1.4 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

#### SECTION D.2 FACILITY OPERATION CONDITIONS

#### Facility Description [326 IAC 2-8-4(10)]:

- (h) One (1) "trim work" area, constructed in 2005, identified as WW1, equipped with various woodworking equipment, with a maximum capacity of 2,520 pounds of wood per hour, controlled by dust collector DC1 (installed in 2007), which is capable of exhausting inside or outside of the building.
- (i) One (1) "trim work" area, constructed in 2005 (and relocated to a different building at this source in 2007), identified as WW2, equipped with various woodworking equipment, with a maximum capacity of 1,080 pounds of wood per hour, controlled by dust collector DC2 (originally installed in 2005 and relocated to a different building at this source in 2007), which exhausts inside the building.

(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 [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking operation WW1 shall not exceed 4.79 pounds per hour when operating at a process weight rate of 2,520 pounds per hour and the allowable particulate emission rate from woodworking operation WW2 shall not exceed 2.71 pounds per hour when operating at a process weight rate of 1,080 pounds per hour. The pounds per hour limitations were calculated with the following equation:

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

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

#### D.2.2 FESOP and PSD Minor Limits [326 IAC 2-8][326 IAC 2-2]

In order to comply with 326 IAC 2-8-4 (FESOP), the woodworking operations shall be limited as follows:

- (a) The PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions from the woodworking operation WW1 (controlled by DC1) shall be limited to 3.42 pounds per hour; and
- (b) The PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions from the woodworking operation WW2 (controlled by DC2) shall be limited to 1.14 pounds per hour.

Compliance with these limits and the limits contained in Condition D.1.4, combined with the PM,  $PM_{10}$ , and  $PM_{2.5}$  emissions from all other emissions units at this source, will limit source-wide PM,  $PM_{10}$ , and  $PM_{2.5}$  emissions to less than 100 tons per year and render 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

#### D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for WW1, WW2, 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 Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

#### D.2.4 Particulate Control

- (a) In order to comply with Conditions D.2.1 and D.2.2, the dust collectors DC1 and DC2 for particulate control shall be in operation and control emissions from the woodworking equipment (WW1 and WW2) at all times that the woodworking equipment 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.

#### D.2.5 Visible Emissions Notations

- (a) Daily visible emission notations of the dust collector DC1 and DC2 stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable responses 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 of this permit.

#### D.2.6 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operations WW1 and WW2 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.2.7 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.

CHaSE Manufacturing, LLC Nappanee, Indiana Permit Reviewer: ERG/SE Page 27 of 35 F099-22596-00092

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

#### D.2.8 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.5, the Permittee shall maintain a daily record of visible emission notations of the dust collector DC1 and DC2 stack exhausts. 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 (e.g., the process did not operate that day).
- (b) To document the compliance status with Condition D.2.6, the Permittee shall maintain records of the baghouse inspections.
- (c) Section C General Record Keeping Requirements contains the Permittee's obligation with regard to the recordkeeping requirements of this requirement.

CHaSE Manufacturing, LLC Nappanee, Indiana Permit Reviewer: ERG/SE Page 28 of 35 F099-22596-00092

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

# FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: CHaSE Manufacturing

Source Address: 1511 US Highway 6, Nappanee, Indiana 46550

FESOP Permit No.: 099-22596-00092

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:					

CHaSE Manufacturing, LLC
Nappanee, Indiana
Permit Revised by: Donald McQuigg
Permit Reviewer: ERG/SE

Third Significant Permit Revision No. 099-33067-00092
Revised by: Donald McQuigg

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# 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: CHaSE Manufacturing

Source Address: 1511 US Highway 6, Nappanee, Indiana 46550

FESOP Permit No.: F099-22596-00092

#### This form consists of 2 pages

Page 1 of 2

This is an emergency as defined in 326 IAC 2-7-1(12)

- 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 and Enforcement Branch); 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:		

CHaSE Manufacturing, LLC Nappanee, Indiana Permit Reviewer: ERG/SE

#### Third Significant Permit Revision No. 099-33067-00092 Revised by: Donald McQuigg

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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 Describe:	e emergency? Y N
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO	CO, Pb, other:
Estimated amount of pollutant(s) emitted during emerger	су:
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 operat imminent injury to persons, severe damage to equipment of product or raw materials of substantial economic value	, substantial loss of capital investment, or loss
Form Completed By:	
Title/Position:	
Date:	
Phone:	

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

# **FESOP Quarterly Report**

1 2001 Quarterly Report					
Source Name:  Source Address: FESOP Permit No.: Fog9-22596-00092 Facility: Parameter:  Limit:  CHaSE Manufacturing 1511 US Highway 6, Nappanee, Indiana 46550 F099-22596-00092 Six (6) paint booths (B1 through B6) and the coating line (PL1) VOC Usage The VOC input to the surface coating operations including the six (6) pain booths (B1 through B6) and the coating line (PL1) shall be limited to less 99.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.  YEAR:  YEAR:					
T	0.14	0.1 0	0.1 4 . 0.1 0		
Month	Column 1 VOC Usage This Month	Column 2 VOC Usage Previous 11 Months	Column 1 + Column 2 VOC Usage 12 Month Total		
Month 1					
Month 2					
Month 3					
□ No deviation occurred in this quarter. □ Deviation/s occurred in this quarter. □ Deviation has been reported on  Submitted by: □ Title / Position: Signature: □ Date:					

Phone:

CHaSE Manufacturing, LLC Nappanee, Indiana Permit Reviewer: ERG/SE

#### Third Significant Permit Revision No. 099-33067-00092 Revised by: Donald McQuigg

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

FESOP Quarterly Report					
Source Name: Source Address: FESOP Permit No.: Facility: Parameter: Limit:	CHaSE Manufacturing 1511 US Highway 6, Nappanee, Indiana 46550 099-22596-00092 Six (6) paint booths (B1 through B6) and the coating line (PL1) Particulate Usage The amount of solids delivered to the surface coating operations including the six (6) paint booths (B1 through B6) and the coating line (PL1) shall be limited to less than 7,864,000 pounds per twelve (12) consecutive month period with compliance determined at the end of each month.				
	YEAR:	<u></u>			
	Column 1	Column 2	Column 1 + Column 2		
Month	Particulate Usage This Month	Particulate Usage Previous 11 Months	Particulate Usage 12 Month Total		
Month 1					
Month 2					
Month 3					
□ No deviation occurred in this quarter. □ Deviation/s occurred in this quarter. Deviation has been reported on  Submitted by: Title / Position: Signature: Date:					

Phone:

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

# **FESOP Quarterly Report**

Source Name: Source Address: FESOP Permit N Facility: Parameter: Limit:	1511 U o.: 099-22 Six (6) Worst of The inp through less the consec	CHaSE Manufacturing 1511 US Highway 6, Nappanee, Indiana 46550 099-22596-00092 Six (6) paint booths (B1 through B6) and the coating line (PL1) Worst case single HAP usage and total HAP usage The input of any single HAP and the input of any combination of HAPs to B1 through B6 and PL1, shall be limited to less than nine and nine-tenths (9.90) and less than twenty-four and nine-tenths (24.9) tons, respectively, per twelve (12) consecutive month period, with compliance determined at the end of each month.  YEAR:				
	Column 10	Column 1h	Column 20	Calumn 2h	Column	Column
Month	Single HAP Usage this Month	Total HAP Usage this	Column 2a Single HAP Usage Previous	Column 2b Total HAP Usage Previous	1a + 2a Single HAP Usage 12 Month Total	1b + 2b  Total HAP Usage 12
Month Month 1	WOTH	Month	11 months	11 months	Month Total	Month Total
Month 2						
WOHTH Z						
Month 3						
<ul> <li>□ No deviation occurred in this quarter.</li> <li>□ Deviation/s occurred in this quarter.</li> <li>□ Deviation has been reported on:</li></ul>						
ר ? ]	Submitted by: Title / Position: Signature: Date: Phone:					

CHaSE Manufacturing, LLC Nappanee, Indiana Permit Reviewer: ERG/SE

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# 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:						
Source Address: 1511 US Highway 6, Nappanee, Indiana 46550 ESOP Permit No.: F099-22596-00092						
1 LOOF 1 CHINE 140	1 000 22000	000002				
M	onths:	to	Year:			
				Page 1 of		
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".						
☐ NO DEVIATIONS	OCCURRED	THIS REPORTI	NG PERIOD.			
☐ THE FOLLOWIN	☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD					
Permit Requirement (specify permit condition #)						
Date of Deviation: Duration of Deviation:						
Number of Deviation	ns:					
Probable Cause of	Deviation:					
Response Steps Ta	ıken:					
Permit Requirement (specify permit condition #)						
Date of Deviation: Duration of Deviation:						
Number of Deviation	ons:					
Probable Cause of	Deviation:					
Response Steps Ta	ıken:					

CHaSE Manufacturing, LLC Nappanee, Indiana Permit Reviewer: ERG/SE

### Third Significant Permit Revision No. 099-33067-00092 Revised by: Donald McQuigg

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Page 2 of 2

Permit Requirement (specify permit condition #)				
Date of Deviation:	Duration of Deviation:			
Number of Deviations:				
Probable Cause of Deviation:				
Response Steps Taken:				
Permit Requirement (specify permit condition #)				
Date of Deviation:	Duration of Deviation:			
Number of Deviations:				
Probable Cause of Deviation:				
Response Steps Taken:				
Permit Requirement (specify permit condition #)				
Date of Deviation:	Duration of Deviation:			
Number of Deviations:				
Probable Cause of Deviation:				
Response Steps Taken:				
Form Completed By:				
Title/Position:				
Date:				
Phone:				

# Indiana Department of Environmental Management Office of Air Quality

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

# **Source Description and Location**

Source Name: CHaSE Manufacturing, LLC

Source Location: 1511 US Highway 6, Nappanee, Indiana 46550

County: Marshall SIC Code: 2599

Operation Permit No.: F099-22596-00092
Operation Permit Issuance Date: January 9, 2007
Significant Permit Revision No.: 099-33067-00092
Permit Reviewer: Donald McQuigg

On February 3, 2011, the Office of Air Quality (OAQ) received an application from CHaSE Manufacturing, LLC related to a modification to an existing wood components surface coating operation. CHaSE Manufacturing, LLC has applied to reconstruct existing spray booths B1 through B3 with eight (8) additional HVLP spray applicators, remove eight (8) automated spray guns used for sealer and topcoat operations from the existing surface coating line identified as PL1, and add one (1) natural gas-fired air make-up unit rated at three (3) MMBtu/hr.

# **Existing Approvals**

The source was issued FESOP Renewal No. F099-22596-00092 on January 09, 2007. The source has since received the following approvals:

- (a) First Significant Permit Revision No.: 099-24357-00092, issued on July 16, 2007;
- (b) First Administrative Amendment No.: 099-25844-00092, issued on January 29, 2008;
- (c) Second Administrative Amendment No.: 099-27734-00092, issued on April 28, 2009; and
- (d) Second Significant Permit Revision No.: 099-30179-00092, issued on May 17, 2011.

# **County Attainment Status**

The source is located in Marshall County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
1	

<sup>1</sup>Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.

Unclassifiable or attainment effective April 5, 2005, for PM<sub>2.5</sub>.

# (a) Ozone Standards

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

# (b) $PM_{2.5}$

Marshall County has been classified as attainment for  $PM_{2.5}$ . On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for  $PM_{2.5}$  emissions. These rules became effective on July 15, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM10 emissions as a surrogate for  $PM_{2.5}$  emissions until 326 IAC 2-2 is revised.

# (c) Other Criteria Pollutants

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

# **Fugitive Emissions**

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

### Status of the Existing Source

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

		Potential To Emit of the Entire Source Prior to Revision (tons/year)										
Process/ Emission Unit	PM	PM <sub>10</sub> *	PM <sub>2.5</sub>	SO <sub>2</sub>	NOx	VOC	СО	Total HAPs	Worst Single HAP			
Surface Coating B1, B2, B3, B4, B5, B6, PL1	68.80	68.80	68.80	-	,	99.0	1	<24.90	<9.90			
Woodworking (WW1)	14.98	14.98	14.98	-	1	-	1	-	-			
Woodworking (WW2)	4.99	4.99	4.99	-	1	-	1	-	-			
Propane Combustion H1, H2, H3, H4, WH1, WH2	0.09	0.09	0.09	negl.	3.14	0.11	0.43	negl.	negl.			
Total PTE of Entire Source	88.86	88.86	88.86	negl.	3.14	<100	0.43	<25.00	<10.00			
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10			
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA			

negl. = negligible

These emissions are based upon the limited potential to emit established in FESOP Renewal No.: F099-22596-00092 and all subsequent revisions.

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

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(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).

(b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the Permittee has accepted limits on HAPs emissions to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

# **Description of Proposed Revision**

The Office of Air Quality (OAQ) has reviewed an application, submitted by CHaSE Manufacturing, LLC on April 10, 2013, relating to:

- (a) The reconstruction and addition of six (6) new HVLP applicators to spray booth B1, of the same type as the existing applicators and subject to the same applicable requirements and permit terms and conditions as the existing spray booths;
- (b) The reconstruction and addition of two (2) new air-assisted airless (airmix) applicators to spray booth B2, of the same type as the existing applicators and subject to the same applicable requirements and permit terms and conditions as the existing spray booths;
- (c) The reconstruction of spray booth B3 for repair of wood component coatings. Spray booth B3 will retain one (1) air-assisted airless (airmix) applicator with a revised maximum capacity of 20 units per hour.;
- (d) The removal of the sealer and topcoat operations from the automated surface coating line, identified as PL-1;
- (e) The addition of one (1) insignificant natural gas-fired air make-up unit;
- (f) Conversion of all existing insignificant combustion sources from propane-fired to natural gas-fired units; and
- (g) Revision of emission unit and stack vent identification names.

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

- (a) One (1) paint room, identified as B1, approved in 2013 for reconstruction, equipped with ten (10) HVLP spray guns for wood component coating, with a maximum capacity of 40 units per hour, using dry filters for overspray control, and exhausting to stacks B1SV1 through B1SV5.
- (b) One (1) paint booth, identified as B2, approved in 2013 for reconstruction, equipped with three (3) air-assisted airless spray guns for wood component coating, with a maximum capacity of 40 units per hour, using dry filters for overspray control, and exhausting to stack B2SV1.
- (c) One (1) paint booth, identified as B3, approved in 2013 for reconstruction, equipped with one (1) air-assisted airless (airmix) spray gun for repair of wood component coating, with a maximum capacity of 20 units per hour, using dry filters for overspray control, and exhausting to stack B3SV1.

The following is a list of the new insignificant activities:

(a) Natural gas-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour:

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(1) One (1) natural gas-fired air make-up unit, identified as AM1, with a heat input rating of three (3) MMBtu/hour.

As part of this modification, the potential emissions of  $CO_2e$  for the entire source have been calculated to assess the source's status pertaining to greenhouse gas emissions. The source has the potential to emit 4,541 tons of  $CO_2e$  per year (see attached calculations, Appendix A). The addition of the one (1) natural gas-fired air make-up unit and the conversion of the existing propane-fired units to natural gas-fired units does not change the status of the entire source under 326 IAC 2-2 Prevention of Significant Deterioration (PSD)). This existing source is a minor stationary source, under PSD (326 IAC 2-2), because the potential emissions of GHG are less than one hundred thousand (100,000) tons of  $CO_2$  equivalent ( $CO_2e$ ) emissions per year.

# "Integral Part of the Process" Determination

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

#### **Enforcement Issues**

There are no pending enforcement actions related to this revision.

#### **Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

### Permit Level Determination - FESOP Revision

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

		Potential To Emit of the Proposed Revision (tons/year)											
Process/ Emission Unit	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NOx	VOC	СО	GHG as CO₂e	Total HAPs	Worst Single HAP			
B1 and B2	34.89	34.89	34.89	-	-	420.44	-	-	40.13	32.9 (xylene)			
B3, B4, B5, and B6	13.58	13.58	13.58	-	-	106.91	-	-	21.02	17.82 (xylene)			
PL1	40.38	40.38	40.38	-		457.79		-	194.22	129.39 (xylene)			
Natural gas combustion AM1	0.02	0.10	0.10	negl.	1.29	0.07	1.08	1,555	negl.	negl.			
Total PTE of Proposed Revision	88.87	88.95	88.95	negl.	1.29	985.14	1.08	1,555	255.37	180.11 (xylene)			

negl. = negligible

This FESOP is being revised through a FESOP Significant Permit Revision pursuant to 326 IAC 2-8-11.1(f)(1)(E)(i) and (iv) and 326 IAC 2-8-11.1(g), because the revision involves the reconstruction of spray booths with the potential to emit (PTE) greater than twenty-five (25) tons of PM,  $PM_{10}$ , VOC, and HAPs per year.

<sup>&</sup>quot;-" denotes emission unit does not emit the designated pollutant.

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# PTE of the Entire Source After Issuance of the FESOP Revision

The table below summarizes the potential to emit of the entire source, with updated emissions shown as **bold** values and previous emissions shown as **strikethrough** values.

		Poten	tial To En	nit of the	Entire So	urce to ac (tons/yea		date the P	roposed Re	evision
Process/ Emission Unit	PM	PM <sub>10</sub> *	PM <sub>2.5</sub>	SO <sub>2</sub>	NOx	VOC	СО	GHG as CO₂e	Total HAPs	Worst Single HAP
Surface Coating B1, B2, B3, B4, B5, B6, PL1	68.81 <sup>(1)</sup>	68.81	68.81	-	-	99.00 <sup>(2)</sup>	-	-	<24.90 <sup>(1)</sup>	<9.90 <sup>(1)</sup> (xylene)
Woodworking (WW1)	14.98 <sup>(1)</sup>	14.98	14.98	-	-	-	-	-	-	-
Woodworking (WW2)	4.99 <sup>(1)</sup>	4.99	4.99	-	-	-	-	-	-	-
Natural gas combustion H1, H2, H3, H4, H5, H6, WH1,WH2, AM1	0.11 0.07	0.11 <b>0.29</b>	0.11 0.29	negl.	3.86 3.76	0.14 <b>0.21</b>	0.52 3.16	4,541	negl.	negl.
Total PTE of Entire Source	88.89	89.07	89.07	negl.	3.86	99.21	3.16	4,451	<25.00	<10.00
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000	NA	NA

negl. = negligible

Spray Booths B1 through B6 and the automated spray line PL1 will continue to operate under the existing FESOP limits.

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

		Po	tential To	Emit of	the Entire	Source A	After Iss	uance of F	Revision (to	ns/year)
Process/								GHG as	Total	Worst
Emission Unit	PM	PM <sub>10</sub> *	$PM_{2.5}$	$SO_2$	NOx	VOC	CO	CO <sub>2</sub> e	HAPs	Single HAP
Surface Coating B1, B2, B3, B4, B5, B6, PL1	68.80 <sup>(1)</sup>	68.80	68.80	-	-	99.00	-		<24.90 <sup>(1)</sup>	<9.90 <sup>(1)</sup> (xylene)
Woodworking (WW1)	14.98 <sup>(1)</sup>	14.98	14.98	-	1	1	-	ı	ı	-
Woodworking (WW2)	4.99 <sup>(1)</sup>	4.99	4.99	-	1	1	-	ı	ı	-
Natural gas combustion H1, H2, H3, H4, H5, H6, WH1,WH2, AM1	0.07	0.29	0.29	negl.	3.76	0.21	3.16	4,451	negl.	negl.
Total PTE of Entire Source	88.84	89.06	89.06	negl.	3.76	<100	3.16	4,451	<25.00	<10.00
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000	NA	NA

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

<sup>(1)</sup> PM and HAP limitations pursuant to FESOP Renewal No. 099-22596-00092, issued on January 7, 2007.

<sup>(2)</sup> VOC limitations pursuant to SPR No.099-30179-00092, issued on May 17, 2011.

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		Potential To Emit of the Entire Source After Issuance of Revision (tons/year)											
Process/								GHG as	Total	Worst			
Emission Unit	PM	PM <sub>10</sub> *	$PM_{2.5}$	SO <sub>2</sub>	NOx	VOC	CO	CO <sub>2</sub> e	HAPs	Single HAP			

negl. = negligible

(1) PM and HAP limitations pursuant to FESOP Renewal No. 099-22596-00092 issued on January 7, 2007.

Spray Booths B1 through B6 and the automated spray line PL1 will continue to operate under the existing FESOP limits.

#### (a) FESOP Status

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

#### (b) PSD Minor Source

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

# **Federal Rule Applicability Determination**

# Compliance Assurance Monitoring (CAM)

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

#### New Source Performance Standards (NSPS)

(b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included for this proposed revision.

# National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart JJ--Wood Furniture Manufacturing Operations are not included in this permit for this source because this source is a minor source of HAP, as defined in 40 CFR 63.4. Source-wide emissions are limited to less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, Subpart HHHHHH are not included in this permit for this source. This source is an area source of HAP, as defined in 40 CFR 63.4; however, the source does not (1) perform paint stripping using strippers containing methylene chloride, (2) perform spray application of coatings to motor vehicles, or (3) perform spray application of coatings that contain target HAP, as defined by CFR 63.11180, to a plastic and/or metal substrate on a part or product.
- (e) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included for this proposed revision.

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

<sup>(2)</sup> VOC limitations pursuant to SPR 099-30179-00092 issued on May 17, 2011.

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# **State Rule Applicability Determination**

The following state rules are applicable to the proposed revision:

the FESOP Revision Section above.

# (a) 326 IAC 2-8-4 (FESOP)

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

- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD)) This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be limited to less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
  The unlimited potential to emit of HAPs from the reconstructed spray booths is greater than ten
  (10) tons per year for any single HAP and/or greater than twenty-five (25) tons per year of a
  combination of HAPs. However, the source shall limit the potential to emit of HAPs from the
  reconstructed spray booths to less than ten (10) tons per year for any single HAP and less than
  twenty-five (25) tons per year of a combination of HAPs. Therefore, the proposed revision is not
  subject to the requirements of 326 IAC 2-4.1. See PTE of the Entire Source After Issuance of the
  FESOP Revision Section above.
- (d) 326 IAC 2-6 (Emission Reporting)
  Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (e) 326 IAC 5-1 (Opacity Limitations)
  Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
  - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (f) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
  Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

# Paint Booths (B1 through B6 and PL1)

(g) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) Pursuant to 326 IAC 6-3-2(d), particulate emissions from the surface coating emission units identified as B1 through B6 and PL1 shall be controlled by dry filters. The dry filters shall be operated in accordance with manufacturer's specifications. (h) 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

The surface coating facilities, identified as B1 through B6 and PL1, are subject to 326 IAC 8-2-12, because they were constructed after 1990, have the potential to emit more than fifteen (15) pounds per day of VOC before add on controls, and are used for the surface coating of wood furniture and cabinets. Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, 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.

The paint booths, identified as B1 through B6 and PL1, utilize Air-Assisted Airless and High Volume Low Pressure (HVLP) spray application technology. Therefore, the source is able to comply with this rule.

# **Compliance Determination, Monitoring and Testing Requirements**

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

Stack ID / Control	Parameter	Frequency	Range	Excursions and Exceedances
	Visible Emissions	Daily	Normal - Abnormal	
B1SV1 through	Filter Placement, Integrity, and Loading	Daily	Normal - Abnormal	
B1SV5 / Fabric Filter	Overspray Observations	Weekly	Normal - Abnormal	
	Coating Emissions	Monthly	Normal - Abnormal	
	Visible Emissions	Daily	Normal - Abnormal	
B2SV1, B3SV1, B3SV1, B4SV1,	Filter Placement, Integrity, and Loading	Daily	Normal - Abnormal	Posponao Stona
B5SV1, B6SV1 / Fabric Filter	Overspray Observations	Weekly	Normal - Abnormal	Response Steps
	Coating Emissions	Monthly	Normal - Abnormal	
	Visible Emissions	Daily	Normal - Abnormal	
PL1SV1/ Fabric Filter	Filter Placement, Integrity, and Loading	Daily	Normal - Abnormal	
FEIGVI/ FADIIC FIILEI	Overspray Observations	Weekly	Normal - Abnormal	
	Coating Emissions	Monthly	Normal - Abnormal	

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

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The compliance requirements for existing units will not change as a result of this revision. The source shall continue to comply with the applicable requirements and permit conditions as contained in FESOP No.

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# **Proposed Changes**

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

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

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

- One (1) paint booth, identified as PB1, constructed in 2001, approved in 2013 for (a) reconstruction, equipped with three ten (3 10) HVLP spray guns and one (1) air assisted airless (airmix) spray gun for wood furniture coating, with a maximum capacity of 6250 40 units per hour, using dry filters for overspray control, and exhausting to stacks \$4 B1SV1 through B1SV5.
- (b) One (1) paint booth, identified as PB2, constructed in 2001, approved in 2013 for reconstruction, equipped with one three (4.3) air-assisted airless (airmix) spray gun, for wood furniture coating, with a maximum capacity of 6250 40 units per hour, using dry filters for overspray control, and exhausting to stacks \$2 B2SV1 and B2SV2.
- (c) One (1) paint booth, identified as PB3, constructed in 2001, approved in 2013 for reconstruction, equipped with one (1) air-assisted airless (airmix) spray gun, for wood furniture coating repair, with a maximum capacity of 6250 20 units per hour, using dry filters for overspray control, and exhausting to stack \$3 B3SV1.
- (d) One (1) automated surface coating line, identified as PL1, constructed in 2005, approved in 2013 for reconstruction, sharing a common exhaust stack PLS-1 PL1SV1, for wood furniture coating, with a maximum capacity of 18,000 units per hour, using dry filters for overspray control at a volumetric flow rate of 9,200 acfm, consisting of five areas not necessarily in this order:
  - (1) One (1) spray booth, for "stain" coating application, equipped with four (4) automated spray guns; and
  - (2) One (1) automated stain wipe area;.
  - (3)One (1) spray booth, for "sealer" application, equipped with four (4) automated spray guns;
  - <del>(4)</del> One (1) automated sealer sand application; and
  - <del>(5)</del> One (1) spray booth, for "topcoat" application, equipped with four (4) automated spray guns.
- (e) One (1) paint booth, identified as PB4, approved for constructed in 2011, utilizing two (2) air-assisted airless spray guns for applying stain to wood doors, with a maximum capacity of 125 units per hour, using dry filters for overspray control, and exhausting to stack \$4 B4SV1.
- (f) One (1) paint booth, identified as PB5, approved for constructed in 2011, utilizing one (1) air assisted airless spray **gun** for applying sealer to wood doors, with a maximum capacity

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of 125 units per hour, using dry filters for overspray control, and exhausting to stack \$5 B5SV1.

(g) One (1) paint booth, identified as PB6, approved for constructed in 2011, utilizing **one (1)** air assisted airless spray **gun** for applying topcoat to wood doors, with a maximum capacity of 125 units per hour, using dry filters for overspray control, and exhausting to stack S6 **B6SV1**.

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# 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 which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Propane or liquefied petroleum gas or butane Natural gas-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour:
  - (1) One (1) propane natural gas-fired combustion unit, identified as H1 with a heat input of 0.5 MMBtu/hour;
  - (2) One (1) propane natural gas-fired combustion unit, identified as H2 with a heat input of 0.5 MMBtu/hour;
  - (3) One (1) propane natural gas-fired combustion unit, identified as H3 with a heat input of 3.0 MMBtu/hour;
  - (4) One (1) propane natural gas-fired combustion unit, identified as H4 with a heat input of 0.15 MMBtu/hour;
  - (5) One (1) propane natural gas-fired combustion unit, identified as H5 with a heat input of 0.10 MMBtu/hour;
  - (6) One (1) propane natural gas-fired combustion unit, identified as H6 with a heat input of 0.975 MMBtu/hour;
  - (7) One (1) propane natural gas-fired combustion unit, identified as WH1 with a heat input of 0.5 MMBtu/hour; and
  - (8) One (1) propane natural gas-fired combustion unit, identified as WH2 with a heat input of 0.033 MMBtu/hour-; and
  - (9) One (1) natural gas-fired combustion unit, identified as AM1, approved in 2013 for construction, with a heat input of 3.0 MMBtu/hour.

# D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets in PB1, PB2, PB3, PB4, PB5, through PB6 and the coating line (PL1) shall utilize one of the following application methods:

# D.1.2 PSD Minor Limit [326 IAC 2-2] and FESOP Limit [326 IAC 2-8]

Pursuant to 326 IAC 2-8-4, the VOC input to the surface coating operations including the six (6) paint booths (PB1 through PB6) and the coating line (PL1) shall be limited to less than 99.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This limit, combined with the VOC emissions from other emissions units at this source, this will limit source-wide VOC emissions to less than 100 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 do not apply.

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# D.1.3 HAPs Limit [326 IAC 2-8-4][326 IAC 2-4.1]

The amount of hazardous air pollutants (HAPs) used in the surface coating operations shall be limited as follows:

- (1) The input of any single HAP, to PB1 through PB6 and PL1, shall be limited to less than nine and nine-tenths (9.90) tons per twelve (12) consecutive month period with compliance determined at the end of each month; and
- (2) The input of any combination of HAPs, to PB1 through PB6 and PL1, shall be limited to less than twenty-four and nine-tenths (24.9) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

# D.1.4 FESOP Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, the amount of solids delivered to the surface coating operations including the six (6) paint booths (PB1 through PB6) and the coating line (PL1) shall be limited to less than 7,864,000 pounds per twelve (12) consecutive month period with compliance determined at the end of each month. The minimum transfer efficiency of the applicators shall be at least 65% and the minimum control efficiency of the dry filters shall be at least 95%. The combination of these limits is equivalent to total PM10 emissions of less than 68.8 tons per year from the paint booths and the coating line. Therefore, the requirements of 326 IAC 2-7 do not apply.

# D.1.5 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating processes, PB1 through PB6 and PL1, shall be controlled by dry filters and the Permittee shall operate the dry filters in accordance with manufacturer's specifications.

# D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for PB1 through PB6, PL1, 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.1.7 Visible Emissions Notations

(a) Daily visible emission notations of the stack exhausts (\$4B1\$V1 through \$6B1\$V5, B2\$V1, B2\$V2, B3\$V1, B4\$V1, B5\$V1, B6\$V1, and PL1\$V1PL\$-1) shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

# D.1.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating process stacks (\$1, \$2, \$3, \$4, \$5, \$6 B1\$V1 through B1\$V5, B2\$V1, B2\$V2, B3\$V1, B4\$V1, B5\$V1, B6\$V1 and PL1\$V1PLS-1) while one or more of the surface coating processes 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 of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from each stack (\$1, \$2, \$3, \$4, \$5, \$6-\$B1\$V1 through B1\$V5, B2\$V1, B2\$V2, B3\$V1, B4\$V1, B5\$V1, B6\$V1 and PL1\$V1PLS-1) and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emission, or evidence of overspray emission is observed, the Permittee shall take reasonable response steps. Section C Response to Excursions or Exceedances contains the Permittee's obligation with regard to

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the reasonable response steps required by this condition. Failure to take response steps in shall be considered a deviation of this permit.

# D.1.9 Record Keeping Requirements

\*\*\*

(b) To document the compliance status with Condition D.1.7, the Permittee shall maintain a daily record of visible emission notations of the stack exhausts (\$4B1SV1 through \$6B1SV5, B2SV1, B2SV2, B3SV1, B4SV1, B5SV1, B6SV1 and PL1SV1PLS-1). The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emissions notation (e.g., the process did not operate that day).

\*\*

# **FESOP Quarterly Report**

Source Name: CHaSE Manufacturing

Source Address: 1511 US Highway 6, Nappanee, Indiana 46550

FESOP Permit No.: F099-22596-00092

Facility: Six (6) paint booths (PB1 through PB6) and the coating line (PL1)

Parameter: VOC Usage

Limit: The VOC input to the surface coating operations including the six (6) paint booths

(PB1 through PB6) and the coating line (PL1) shall be limited to less than 99.00 tons per twelve (12) consecutive month period, with compliance determined at the

end of each month.

\*\*\*

# **FESOP Quarterly Report**

Source Name: CHaSE Manufacturing

Source Address: 1511 US Highway 6, Nappanee, Indiana 46550

FESOP Permit No.: 099-22596-00092

Facility: Six (6) paint booths (PB1 through PB6) and the coating line (PL1)

Parameter: Particulate Usage

Limit: The amount of solids delivered to the surface coating operations including the six

(6) paint booths (PB1 through PB6) and the coating line (PL1) shall be limited to less than 7,864,000 pounds per twelve (12) consecutive month period with

compliance determined at the end of each month.

\*\*\*

# **FESOP Quarterly Report**

Source Name: CHaSE Manufacturing

Source Address: 1511 US Highway 6, Nappanee, Indiana 46550

FESOP Permit No.: 099-22596-00092

Facility: Six (6) paint booths (PB1 through PB6) and the coating line (PL1)

Parameter: Worst case single HAP usage and total HAP usage

Limit: The input of any single HAP and the input of any combination of HAPs to PB1

through—PB6 and PL1, shall be limited to less than nine and nine-tenths (9.90) and less than twenty-four and nine-tenths (24.9) tons, respectively, per twelve (12) consecutive month period, with compliance determined at the end of each month.

#### **Additional Changes**

IDEM, OAQ has made additional revisions to the permit as described below in order to update the language to match the most current version of the applicable rules, to eliminate redundancy within the

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permit, and to provide clarification regarding the requirements of these conditions.

- On October 27, 2010, the Indiana Air Pollution Control Board issued revisions to 326 IAC 2. These
  revisions resulted in changes to the rule citations listed in the permit. These changes are not
  changes to the underlying provisions. The change is only to the citation of these rules in Section B Operational Flexibility. IDEM, OAQ has also clarified the rule citations for the Preventive
  Maintenance Plan.
- 2. IDEM, OAQ has clarified the Permittee's responsibility with regard to recordkeeping.
- 3. IDEM, OAQ has clarified the interaction of the Quarterly Deviation and Compliance Monitoring Report and the Emergency Provisions.
- 4. IDEM has clarified throughout the permit that a certification needs to meet the requirements of 326 IAC 2-8-5(a)(1). In addition, IDEM has decided to remove the last sentence dealing with the need for certification from the forms because the conditions requiring the forms already address this issue.
- 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) **and (c)** through (d) 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) through (d) (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)(2), (c)(1), and (d) (b)(1) and (c).

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

# 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; and
  - (CC) Copies of all reports required by the Part 70 permit. Records of required monitoring information include the following:
    - (AA) The date, place, as defined in this permit, and time of sampling or measurements;

CHaSE Manufacturing, LLC Nappanee, Indiana

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- (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; and
- (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.

\*\*\*

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

Source Name: CHaSE Manufacturing

Source Address: 1511 US Highway 6, Nappanee, Indiana 46550

FESOP Permit No.: F099-22596-00092

Months:	t	0	`	Y	ear:	

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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".

\*\*\*

#### 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, and A.4 is descriptive information and does not constitute enforceable conditions. However,

CHaSE Manufacturing, LLC Nappanee, Indiana

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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.

#### **Conclusion and Recommendation**

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on April 10, 2013.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 099-33067-00092. The staff recommends to the Commissioner that this FESOP Significant Revision be approved.

#### **IDEM Contact**

- (a) Questions regarding this proposed permit can be directed to Donald McQuigg at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-4240 or toll free at 1-800-451-6027 extension 4-4240.
- (b) A copy of the findings is available on the Internet at: <a href="http://www.in.gov/ai/appfiles/idem-caats/">http://www.in.gov/ai/appfiles/idem-caats/</a>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.in.gov/idem

# Appendix A: Emission Calculations Emission Summary

Company Name: CHaSE Manufacturing, LLC

Address City IN Zip: 1511 US Highway 6, Nappanee, IN 46550

Operation Permit No.: F039-15752-00242
Operation Permit Issuance Date: January 9, 2007
Significant Permit Revision No.: 099-33067-00092
Reviewer: Donald McQuigg

**Date:** May 22, 2013

			Und	controlled/l	Jnlimited Po	otential to E	mit			
Emission Unit	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NOx	VOC	СО	GHG as CO₂e	Worst Single HAP*	Combined HAPs
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
B1 and B2	48.85	48.85	48.85	-	-	420.44	-	-	32.9 (xylene)	40.13
B3, B4, B5, and B6	19.01	19.01	19.01	-	-	106.91	-	-	17.82 (xylene)	21.02
PL1	56.53	56.53	56.53	-	-	457.79	-	-	129.39 (xylene)	194.22
Natural gas combustion	0.07	0.29	0.29	0.02	3.76	0.21	3.16	4,541	negl.	negl.
WW1	200.41	200.41	200.41	1	-		-	-		-
WW2	54.06	54.06	54.06	ı	1	1	-	-	-	-
Total	378.94	379.15	379.15	0.02	3.76	985.35	3.16	4,541	180.11	255.37

			C	Controlled/L	imited Pote	ntial to Emi	t			
Emission Unit	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NOx	VOC	СО	GHG as CO₂e	Worst Single HAP	Combined HAPs
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
B1 and B2**				-	-		-	-		
B3, B4, B5, and B6**	68.80	68.80	68.80	-	-	99 <sup>*</sup>	-	-	<9.90** (xylene)	<24.90**
PL1**				-	-		-	-		
Natural gas combustion	0.07	0.29	0.29	0.02	3.76	0.21	3.16	4,541	negl.	negl.
WW1***	14.98	14.98	14.98	-	-	-	-	-	-	-
WW2***	4.99	4.99	4.99	-	-	-	-	-	-	-
Total	88.84	89.06	89.06	0.02	3.76	<100	3.16	4,541	< 10	< 25

#### Note:

<sup>\*</sup> VOC limitations pursuant to SPR No.:099-30179-00092 issued on May 17, 2011.

<sup>\*\*</sup> PM and HAP limitations pursuant to FESOP Renewal No. F099-22596-00092 issued on January 7, 2007.

<sup>\*\*\*</sup> PM PSD minor limits pursuant to SPR 099-24357-00092 issued on July 16, 2007.

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

Company Name: CHaSE Manufacturing, LLC

Address City IN Zip: 1511 US Highway 6, Nappanee, IN 46550

Operation Permit No.: F039-15752-00242 Operation Permit Issuance Date: January 9, 2007 Significant Permit Revision No.: 099-33067-00092

Reviewer: Donald McQuigg Date: May 22, 2013

Heat Input Capacity HHV Potential Throughput

MMBtu/hr MMCF/yr mmBtu mmscf

> 75.2 1020

Unit		MMBtu/hr
H1		0.50
H2		0.50
H3		3.00
H4		0.15
H5		0.10
H6		0.98
WH1		0.50
WH2		0.03
AM1		3.00
	Total =	8.76

				Pollutant			
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons/yr	0.07	0.29	0.29	0.02	3.76	0.21	3.16

<sup>\*</sup>PM emission factor is filterable PM only. PM<sub>10</sub> emission factor is filterable and condensable PM10 combined.

#### Methodology

8.76

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

AP42 Emission Factors; Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

#### **HAPS Calculations**

		HAPs - Organics									
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobe nzene 1.2E-03	Formaldehyd e 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03	Total Organics					
Potential Emission in tons/yr	7.899E-05	4.514E-05	2.821E-03	6.771E-02	1.279E-04	7.078E-02					

		HAPs - Metals									
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	Total Metals					
Potential Emission in tons/yr	1.881E-05	4.138E-05	5.266E-05	1.429E-05	7.899E-05	2.061E-04					
					Total HAPs	7.099E-02					
Methodology is the same as above	re.				Worst HAP	6.771E-02					

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

#### **Greenhouse Gas Calculations**

	(	Greenhouse (	Gas
Emission Factor in lb/MMcf	CO2 120,000	CH4 2.3	N2O 2.2
Potential Emission in tons/yr	4,514	0.1	0.1
Summed Potential Emissions in tons/yr		4,514	
CO2e Total in tons/yr		4,541	

# 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.  $\label{eq:emission} Emission \ (tons/yr) = Throughput \ (MMCF/yr) \ x \ Emission \ Factor \ (lb/MMCF)/2,000 \ lb/ton$ 

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O

Potential Emission ton/yr x N2O GWP (310).

 $PM_{2.5}$  emission factor is filterable and condensable  $PM_{2.5}$  combined.

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

0.31

Total controlled PTE= 104.67

#### Appendix A: Emissions Calculations VOC, HAP and Particulate Emissions from B1 and B2 Surface Coating

Company Name: CHaSE Manufacturing, LLC

Address City IN Zip: 1511 US Highway 6, Nappanee, IN 46550

**Operation Permit No.:** F039-15752-00242 Operation Permit Issuance Date: January 9, 2007 Significant Permit Revision No.: 099-33067-00092 Reviewer: Donald McQuigg

Date: May 22, 2013

VOC and particulate																
Material	Emission Unit	Density (lb/gal)	Weight % Volatile (H20 & Organics)	Weight % Water & Exempt	Weight % Organics	Volume % Water	Volume % Non- Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (lb/hr)	Potential VOC (lb/day)	Potential VOC (ton/yr)	Particulate Potential (ton/yr)	Transfer Efficiency
HS510W00 stain	B1	6.94	91.00%	1.68%	89.32%	1.68%	9.00%	0.1428	40.0	6.30	6.20	35.41	849.78	155.09	5.47	65%
van dyke brown glaze	B1	7.17	80.00%	6.88%	80.00%	6.88%	18.79%	0.0060	40.0	6.16	5.74	1.38	33.04	6.03	0.53	65%
Care seal precat sealer	B1	7.48	82.00%	15.88%	82.00%	15.88%	16.00%	0.1428	40.0	7.29	6.13	35.04	840.84	153.45	11.79	65%
Acrastrip cleaner	B1	8.60	100.00%	80.00%	20.00%	80.00%	0.00%	0.0040	40.0	8.60	1.72	0.28	6.60	1.21	0.00	65%
												Total uncontr	olled PTE=	315.77	17.79	
												Total contro	olled PTE=	315.77	0.18	
Innovat clear topcoat	B2	8.22	57.00%	7.98%	49.02%	7.98%	43.00%	0.1428	40.0	4.38	4.03	23.02	552.39	100.81	30.95	65%
309 hap free catalyst	B2	7.02	92.00%	0.00%	92.00%	0.00%	8.00%	0.0033	40.0	6.46	6.46	0.85	20.46	3.73	0.11	65%
Acrastrip cleaner	B2	8.60	100.00%	80.00%	20.00%	80.00%	0.00%	0.0004	40.0	8.60	1.72	0.03	0.66	0.12	0.00	100%
Assumed PM = PM10 = PM	M2.5											Total uncontr	olled PTE=	104.67	31.06	

PM control efficiency = 99.00%

#### Methodology

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

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

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

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

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

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

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

Total = Worst Coating + Sum of all solvents used

HAPs	1									
Material	Emission Unit	Density	Gallons of Material	Maximum	Weight %	Weight % Ethylbenzene	Weight % Formaldehyde	Xylene PTE	Ethylbenzene PTE	Formaldehyde PTE
		(lb/gal)	(gal/unit)	(unit/hour)	Xylene			(ton/yr)	(ton/yr)	(ton/yr)
HS510W00 stain	B1	6.94	0.14280	40	4.00%	0.60%	0.60%	6.95	0.01	0.00
van dyke brown glaze	B1	7.17	0.00600	40	2.00%	0.30%	0.00%	0.15	0.00	0.00
Care seal precat sealer	B1	7.48	0.14280	40	0.00%	0.00%	0.00%	0.00	0.00	0.00
Acrastrip cleaner	B1	8.60	0.00040	40	0.00%	0.00%	0.00%	0.00	0.00	0.00
						Single	e HAP Totals =	7.10	0.01	0.00
								Combined	HAPs Total =	7.10
Innovat clear topcoat	B2	8.22	0.14280	40	16.00%	3.00%	0.01%	32.90	0.12	0.00
309 hap free catalyst	B2	7.02	0.00330	40	0.00%	0.00%	0.01%	0.00	0.00	0.00
Acrastrip cleaner	B2	8.60	0.00040	40	0.00%	0.00%	0.00%	0.00	0.00	0.00
·						Single	e HAP Totals =	32.9	0.12	0.00
								Combined	HAPs Total =	33.0

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

#### Appendix A: Emissions Calculations VOC, HAP and Particulate Emissions from B3, B4, B5, and B6 Surface Coating

Company Name: CHaSE Manufacturing, LLC

Address City IN Zip: 1511 US Highway 6, Nappanee, IN 46550

Operation Permit No.: F039-15752-00242

Operation Permit Issuance Date: January 9, 2007 Significant Permit Revision No.: 099-33067-00092 Reviewer: Donald McQuigg

Date: May 22, 2013

VOC and particulate	]															
Material	Emission Unit	Density (lb/gal)	Weight % Volatile (H20 & Organics)	Weight % Water & Exempt	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (lb/hr)	Potential VOC (lb/day)	Potential VOC (ton/yr)	Particulate Potential (ton/yr)	Transfer Efficiency
Care seal precat sealer	B3	7.48	82.00%	15.88%	66.12%	15.88%	16.00%	0.0182	20.0	5.88	4.95	1.80	43.21	7.89	0.75	65%
Van dyke brown glaze	B4	7.17	80.00%	6.88%	50.00%	6.88%	18.79%	0.0045	125.0	3.85	3.59	2.02	48.40	8.83	1.24	65%
Neutral wiping stain	B5	6.94	91.00%	1.68%	89.32%	1.68%	6.26%	0.0091	125.0	6.30	6.20	7.05	169.23	30.88	1.09	65%
Care seal precat sealer	B5	7.48	82.00%	15.88%	66.12%	15.88%	16.00%	0.0182	125.0	5.88	4.95	11.25	270.04	49.28	4.70	65%
Innovat post cat topcoat	B6	8.22	57.00%	7.98%	49.02%	7.98%	43.00%	0.0182	125.0	4.38	4.03	9.17	220.01	40.15	12.33	65%
and																
Pure grade lacquer cleanup	B4-B6	6.93	100.00%	50.00%	50.00%	0.0%	0.00%	0.0004	125.0	3.47	3.47	0.17	4.16	0.76	0.00	100%
Assumed PM = PM10 = PM2.5											U	ncontrolled v	vorst case =	106.91	19.01	

Assumed PM = PM10 = PM2.5

Uncontrolled worst case = 106.91 PM control efficiency =

99.00%

Controlled worst case = 106.91

0.19

Methodology:

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

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

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

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

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

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

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

Total = Worst Coating + Sum of all solvents used

HAPs	]									
	Emission	Density	Gallons of					Xylene	Formaldehyde	Ethylbenzene
Material	Unit	(lb/gal)	Material	Maximum	Weight %	Weight %	Weight %	PTE	PTE	PTE
	Offic	(ib/gai)	(gal/unit)	(unit/hour)	Xylene	Formaldehyde	Ethylbenzene	(ton/yr)	(ton/yr)	(ton/yr)
Care seal precat sealer	B3	7.48	0.01820	20	0.00%	0.00%	0.00%	0.00	0.00	0.00
Van dyke brown glaze	B4	7.17	0.00450	125	2.00%	0.00%	0.03%	0.35	0.00	0.01
Neutral wiping stain	B5	6.94	0.00910	125	4.00%	0.00%	0.60%	1.38	0.00	0.21
Care seal precat sealer	B5	7.48	0.01820	125	4.00%	0.00%	0.60%	2.98	0.00	0.45
Innovat post cat topcoat	B6	8.22	0.01820	125	16.00%	0.10%	3.00%	13.11	0.08	2.46
Pure grade lacquer cleanup	B4-B6	6.93	0.01000	125	0.00%	0.00%	0.00%	0.00	0.00	0.00
				•		Single	HAP Totals =	17.82	0.08	3.12
							•	Combine	d HAPs Total =	21.02

#### Methodology:

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

# Appendix A: Emissions Calculations VOC, HAP and Particulate Emissions from one (1) Surface Coating Spray Line (PL1)

Company Name: CHaSE Manufacturing, LLC

Address City IN Zip: 1511 US Highway 6, Nappanee, IN 46550

Operation Permit No.: F039-15752-00242
Operation Permit Issuance Date: January 9, 2007
Significant Permit Revision No.: 099-33067-00092
Reviewer: Donald McQuigg

**Date:** May 22, 2013

VOC and particulate				•											
Material	Density (lb/gal)	Weight % Volatile (H20 & Organics)	Weight % Water & Exempt	Weight % Organics	Volume % Water	Volume % Non- Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (lb/hr)	Potential VOC (lb/day)	Potential VOC (ton/yr)	Particulate Potential (ton/yr)	Transfer Efficiency
Ultra Hide Precat Primer	9.12	76.00%	17.19%	58.81%	0.00%	24.00%	0.2808	60.00	5.36	5.36	90.36	2168.73	395.79	56.53	65%
DT5406000 Thinner	6.93	100.00%	0.00%	50.00%	0.00%	0.00%	0.0661	60.00	3.47	3.47	13.74	329.81	60.19	0.00	65%
Acrastrip Cleaner	8.60	100.00%	80.00%	20.00%	80.00%	0.00%	0.0040	60.00	8.60	1.72	0.41	9.91	1.81	0.00	100%
										Totals =	104.52	2508.45	457.79	56.53	
or															
White Precat Stain	8.63	73.00%	18.99%	54.01%	0.0%	27.00%	0.1321	60.00	4.66	4.66	36.94	886.65	161.81	28.31	65%
DT5406000 Thinner	6.93	100.00%	0.00%	100.00%	0.0%	0.00%	0.0353	60.00	6.93	6.93	14.68	352.27	64.29	0.00	65%
Acrastrip Cleaner	8.60	100.00%	80.00%	20.00%	80.0%	0.00%	0.0004	60.00	8.60	1.72	0.04	0.99	0.18	0.00	100%
·	· · · · ·	•		•				-	•	Totals =	51.66	1239.90	226.28	28.31	· · · · · · · · · · · · · · · · · · ·

Uncontrolled worst case = 457.79 56.53

PM control efficiency = 99.00%

Controlled worst case = 457.79 0.57

Methodology:

Assumed PM = PM10 = PM2.5

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

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

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

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

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

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

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

Total = Worst Coating + Sum of all solvents used

HAPs									
		Gallons of				Weight %	Xylene	Toluene	Ethylbenzene
Material	Density	Material	Maximum	Weight %	Weight %	Ethyl	PTE	PTE	PTE
	(lb/gal)	(gal/unit)	(unit/hour)	Xylene	Toluene	benzene	(ton/yr)	(ton/yr)	(ton/yr)
Ultra Hide Precat Primer	9.12	0.28080	60	17.00%	0.00%	3.00%	114.41	0.00	20.19
White Precat Stain	8.63	0.13210	60	5.00%	14.00%	0.90%	14.98	41.94	2.70
DT5406000 Thinner	6.93	0.06610	60	0.00%	0.00%	0.00%	0.00	0.00	0.00
Acrastrip Cleaner	8.60	0.00400	60	0.00%	0.00%	0.00%	0.00	0.00	0.00
					Single HA	P Totals =	129.39	41.94	22.89
						Cor	nbined HA	Ps Total =	194.22

#### Methodology:

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

# Appendix A: Emission Calculations Particulate Emissions from WW1 Operations

Company Name: CHaSE Manufacturing, LLC

Address City IN Zip: 1511 US Highway 6, Nappanee, IN 46550

Operation Permit No.: F039-15752-00242
Operation Permit Issuance Date: January 9, 2007
Significant Permit Revision No.: 099-33067-00092

Reviewer: Donald McQuigg
Date: May 22, 2013

# **Dust Collector (DC1) Controlling Woodworking WW1**

# **Woodworking Process Description:**

Control Equipment: Cyclone/Baghouse
Outlet Grain Loading: 0.016 grains/scf
Air Flow Rate: 16,682 scf/min

Control Efficiency: 95%

#### **After Control Emissions:**

**Hourly PM/PM10/PM2.5 Emissions** =  $0.016 \text{ gr/scf} \times 16,682 \text{ scf/min} \times 60 \text{ min/hr} \times 1 \text{ lb/}7000 \text{ gr} =$  **2.29 lbs/hr Annual PM/PM10/PM2.5 Emissions** =  $2.29 \text{ lbs/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ ton/}2000 \text{ lbs} =$  **10.02 tons/yr** 

#### **Before Control Emissions:**

Potential PM/PM10 Emissions = 10.02 tons/yr / (1-95%) = **200.41 tons/yr** 

#### Note:

Assumed PM = PM10 = PM2.5

# Appendix A: Emission Calculations Particulate Emissions from WW2 Operations

Company Name: CHaSE Manufacturing, LLC

Address City IN Zip: 1511 US Highway 6, Nappanee, IN 46550

Operation Permit No.: F039-15752-00242
Operation Permit Issuance Date: January 9, 2007

Significant Permit Revision No.: 099-33067-00092

Reviewer: Donald McQuigg
Date: May 22, 2013

# **Dust Collector (DC2) Controlling Woodworking WW2**

# **Woodworking Process Description:**

Control Equipment: Cyclone/Baghouse
Outlet Grain Loading: 0.002 grains/scf
Air Flow Rate: 30,000 scf/min

Control Efficiency: 95%

# **After Control Emissions:**

**Hourly PM/PM10/PM2.5 Emissions** =  $0.002 \text{ gr/scf } x \ 30,000 \text{ scf/min } x \ 60 \text{ min/hr } x \ 1 \ \text{lb/7000 gr} =$  **0.62 lbs/hr Annual PM/PM10/PM2.5 Emissions** =  $0.62 \text{ lbs/hr } x \ 8760 \text{ hrs/yr } x \ 1 \text{ ton/2000 lbs} =$  **2.70 tons/yr** 

#### **Before Control Emissions:**

Potential PM/PM10 Emissions = 2.70 tons/yr / (1-95%) = 54.06 tons/yr

#### Note:

Assumed PM = PM10 = PM2.5

#### Appendix A: Emissions Calculations AM1 Natural Gas Combustion MM BTU/HR <100

Company Name: CHaSE Manufacturing, LLC

Address City IN Zip: 1511 US Highway 6, Nappanee, IN 46550

Operation Permit No.: F039-15752-00242
Operation Permit Issuance Date: January 9, 2007
Significant Permit Revision No.: 099-33067-00092

Reviewer: Donald McQuigg
Date: May 22, 2013

Heat Input Capacity HHV Potential Throughput

MMBtu/hr mmBtu MMCF/yr

mmscf 3.0 1020 25.8

				Pollutant			
Emission Factor in lb/MMCF	PM* 1.9	PM10* 7.6	direct PM2.5* 7.6	SO2 0.6	NOx 100 **see below	VOC 5.5	CO 84
Potential Emission in tons/yr	0.0	0.1	0.1	0.0	1.3	0.1	1.1

<sup>\*</sup>PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

PM2.5 emission factor is filterable and condensable PM2.5 combined.

#### Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

#### **HAPS Calculations**

	HAPs - Organics									
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total Organics				
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03					
Potential Emission in tons/yr	2.705E-05	1.546E-05	9.662E-04	2.319E-02	4.380E-05	2.424E-02				

	HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	Total Metals
Potential Emission in tons/yr	6.441E-06	1.417E-05	1.804E-05	4.895E-06	2.705E-05	7.060E-05
					Total HADs	2 421E-02

Methodology is the same as above.

 Total HAPs
 2.431E-02

 Worst HAP
 2.319E-02
 (Hexane)

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

#### **Greenhouse Gas Calculations**

	Greenhouse Gas				
Emission Factor in lb/MMcf	CO2 120,000	CH4 2.3	N2O 2.2		
Potential Emission in tons/yr	1,546	0.0	0.0		
Summed Potential Emissions in tons/yr	1,546				
CO2e Total in tons/yr	1,555				

#### 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 ton/yr x N2O GWP (310).

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



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Michael R. Pence Governor Thomas W. Easterly

Commissioner

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

TO: Toby Miller

**CHaSE Manufacturing** 

1511 US Hwy 6 Nappanee, IN 46550

DATE: August 1, 2013

FROM: Matt Stuckey, Branch Chief

Permits Branch Office of Air Quality

SUBJECT: Final Decision

FESOP - Significant Permit Revision

099 - 33067 - 00092

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: Zack Nickell, President
Doug Elliott D & B Environmental Services
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 <a href="mailto:ibrush@idem.IN.gov">ibrush@idem.IN.gov</a>.

Final Applicant Cover letter.dot 6/13/2013





# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Michael R. Pence Governor Thomas W. Easterly

Commissioner

August 1, 2013

TO: City of Nappanee Public Library 157 North Main Street Nappanee IN

From: Matthew Stuckey, Branch Chief

Permits Branch Office of Air Quality

Subject: Important Information for Display Regarding a Final Determination

Applicant Name: CHaSE Manufacturing Permit Number: 099 - 33067 - 00092

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

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

Enclosures Final Library.dot 6/13/2013





# Mail Code 61-53

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	CHaSE Manufacturing, LLC 099 - 33067 - 00092 final)			AFFIX STAMP
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											Remarks
1		Toby Miller CHaSE Manufacturing, LLC 1511 US Hwy 6 Nappanee IN 46550 (Source	CAATS) Via	confirmed deli	very						
2		Zack Nickell President CHaSE Manufacturing, LLC 1511 US Route 6 West Nappanee IN 46550 (RO CAATS)									
3		Nappanee City Council and Mayors Office P.O. Box 29 Nappanee IN 46550 (Local Official)									
4		Marshall County Commissioners 112 West Jefferson Street Plymouth IN 46563 (Local Official)									
5		Mr. Doug Elliott D & B Environmental Services, Inc. 401 Lincoln Way West Osceola IN 46561 (Consultant)									
6		Marshall County Health Department 112 W Jefferson Street, Suite 103 Plymouth IN 46563-1764 (Health Department)									
7		LaPaz Town Council PO Box 0820 LaPaz IN 46537 (Local Official)									
8		Ms. Julie Grzesiak 139 N. Michigan St. Argos IN 46501 (Affected Party)									
9		City of Nappanee Public Library 157 North Main Street Nappanee IN 46550 (Library	у)								
10											
11											
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