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: September 20, 2013

RE: Creative Wood Designs, Inc./113-33208-00085

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 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, 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 4-21.5-3-7 and IC 13-15-7-3 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 Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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
FNTV-PMOD.doc 6/13/2013

IDEM

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LaVern Hochstetler
Creative Wood Designs, Inc.
710 Gerber Street
Ligonier, Indiana 46767

September 20, 2013

Re: 113-33208-00085
Significant Permit Modification to
Part 70 No.: T113-29975-00085

Dear LaVern Hochstetler:

Creative Wood Designs, Inc. was issued a Part 70 Operating Permit No. 037-29975-00085 on April 14, 2011 for a stationary recreation vehicle (RV) wood furniture manufacturing and surface coating company located at 710 Gerber Street and 1494 Gerber Street, Ligonier, Indiana. An application requesting changes to this permit was received on May 15, 2013. Pursuant to the provisions of 326 IAC 2-7-12, a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

For your convenience, the entire Part 70 Operating Permit as modified is attached.

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Jack Harmon, of my staff, at 317-233-4228 or 1-800-451-6027, and ask for extension 3-4228.

Sincerely,

Chrystal A. Wagner, Section Chief
Permits Branch
Office of Air Quality

Attachment(s): Updated Permit, Technical Support Document and Appendix A

CAW/jh

cc: File - Noble County
Noble County Health Department
U.S. EPA, Region V
Compliance and Enforcement Branch
Billing, Licensing and Training Section
IDEM Northern Regional Office

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Commissioner

Part 70 Operating Permit

OFFICE OF AIR QUALITY

Creative Designs, Inc.
710 Gerber Street and 1494 Gerber Street
Ligonier, Indiana 46767

(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.

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 2-7 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.

Operation Permit No.: T113-29975-00085	
Issued by: Original Signed Chrystal Wagner, Section Chief Permits Branch, Office of Air Quality	Issuance Date: April 14, 2011 Expiration Date: April 14, 2016

First Administrative Amendment No. 113-32274-00085, issued on September 24, 2012.

First Significant Permit Modification No.: 113-33208-00085	
Issued by: Chrystal Wagner, Section Chief, Permits Branch Office of Air Quality	Issuance Date: September 20, 2013 Expiration Date: April 14, 2016

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SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary recreational vehicle (RV) wood furniture manufacturing and surface coating operation.

Source Address:	710 Gerber Street and 1494 Gerber Street, Ligonier, Indiana 46767
General Source Phone Number:	260-894-4533
SIC Code:	2511 (Wood Household Furniture)
County Location:	Noble
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

(a) Five (5) spray booths, identified as SCB1 through SCB5, constructed in 2006, equipped with high-volume, low-pressure (HVLP) spray applicators and dry filters for particulate control, exhausting to Stack SCB1-SCB3 and Stack SCB4-SCB5, capacity: 30 units of wood RV product per hour, total.

(b) Six (6) surface coating booths, identified as PBSCB1 through PBSCB6, approved in 2013 for construction, each with a maximum capacity of 25 units per hour, each using a fabric filter system, identified as FF1 through FF6, for particulate control, and exhausting through stacks PBSCS1 through PBSCS6;

(c) One (1) spray station, identified as SS1, constructed in 2006, equipped with high-volume, low-pressure (HVLP) applicators and dry filters for particulate control, exhausting to Stack SS1, capacity: 10 units of wood RV product per hour.

(d) One (1) adhesive applicator, identified as WA1, constructed in 2006, equipped with flow coat applicators, exhausting to the plant interior, capacity: 10 units of wood RV product per hour.

(e) One (1) UV-A Vacuum Coater, identified as UV1, constructed in 2006, equipped with flow coat applicators, exhausting to Stack UV1, capacity: 5 units of wood RV product per hour.

(f) One (1) woodworking area, identified as WW1, constructed in 2006, equipped with a baghouse for particulate control, exhausting to the plant interior, capacity: 500 pounds of wood per hour.

(g) Eleven (11) natural gas-fired furnaces, identified as UH-1 through UH11, constructed in 2006, exhausting to Stack UH-1 through UH11, rated at 0.1 million British thermal units (MMBtu) per hour, each.

(h) Two (2) natural gas-fired space heaters, identified as TC1 and TC2, constructed in 2006, exhausting to Stack TC1 and TC2, rated at 0.5 million British thermal units (MMBtu) per hour, each.

(i) Two (2) natural gas-fired air make-up units, identified as AM1 and AM2, constructed in 2006, exhausting to the plant interior, rated at 0.75 and 0.1 million British thermal units (MMBtu) per hour, respectively.

(j) One (1) natural gas-fired air make up unit, identified as PBAM1, approved in 2013 for construction, with a maximum heat input capacity of 3.00 MMBtu/hr, using no controls, and exhausting to atmosphere;

(k) Three (3) natural gas-fired office heaters and thermocyclers, described as follows:

(1) One (1) office heater, identified as H1, approved in 2013 for construction, with a maximum heat input capacity of 0.06 MMBtu/hr, using no controls, and exhausting to atmosphere;

(2) One (1) thermocycler, identified as H2, approved in 2013 for construction, with a maximum heat input capacity of 0.40 MMBtu/hr, using no controls, and exhausting to atmosphere;

(3) One (1) thermocycler, identified as H3, approved in 2013 for construction, with a maximum heat input capacity of 0.40 MMBtu/hr, using no controls, and exhausting to atmosphere;

(l) One (1) Flat Wood Coating Line, identified as Flat line, approved for construction in 2008, equipped with:

(1) One (1) spray coating station containing four (4) high-volume, low-pressure (HVLP) stain guns, identified as FL-S and eight (8) air assisted airless top coat guns, identified as FL-T and exhausting to FLSV1, with particulate matter controlled with dry filters, capacity: 375 units of wood RV product per hour.

(2) Two (2) natural gas-fired unit dryers, identified as FL-H1 and FL-H2, exhausting to FLSV2 through FLSV4, rated at 0.4 million British thermal units (MMBtu) per hour, each.

(m) Clean-up operations utilizing non-halogenated organic solvent and venting to the indoors.

(n) Two (2) CNC routers using 500 pounds per hour of wood, equipped with a baghouse, exhausting to the plant interior. (The baghouse is an existing baghouse controlling the permitted woodworking area identified as WW1).

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

Creative Wood Designs, Inc. also consists of the following insignificant activities as defined in 326 IAC 2-7-1(21).

(a) Combustion emissions from propulsion of mobile sources.

(b) Air vents from air compressors.

(c) Lubrication, including hand-held spray can lubrication, dipping metal parts into lubrication oil, and manual or automated addition of cutting oil in machining operations.

(d) Portable containers used for the collection, storage, or disposal of materials provided the containers capacity is equal to or less than 0.46 cubic meters and the container is closed except when the material is added or removed.

(e) Application equipment for adhesives with no VOC in the adhesive formulation.

(f) Air compressors and pneumatically operated equipment, including hand tools.

(g) Portable dust collectors.

(h) Fugitive emissions related to movement of passenger vehicles, provided the emissions are not counted for applicability purposes under 326 IAC 2-7-1(21)(B), and any required fugitive dust control plan or its equivalent is submitted.

(i) Natural gas-fired combustion sources (space heaters) with heat input equal to or less than ten million (10,000,000) Btu per hour.

(j) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

(k) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3-2]

(l) One (1) cold cleaner parts washing tank, installed in 2010, identified as PCT1, to be used for cleaning metal racks used in the surface coating operations. [326 IAC 8-3-2]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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

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

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

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

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

(a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.

(b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.

(c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

B.4 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

(a) This permit, T113-29975-00085, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

B.5 Term of Conditions [326 IAC 2-1.1-9.5]

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.6 Enforceability [326 IAC 2-7-7] [IC 13-17-12]

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

B.7 Severability [326 IAC 2-7-5(5)]

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

B.8 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

B.9 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.10 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:

(1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(34), 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) A "responsible official" is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(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 2-7-5(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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)][326 IAC 2-7-6(1) and (6)][326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

Indianapolis, Indiana 46204-2251

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

The Permittee shall implement the PMPs.

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.13 Emergency Provisions [326 IAC 2-7-16]

(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.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a 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 2-7-5(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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(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 2-7-4(c)(9) 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 2-7 and any other applicable rules.

(g) 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.

B.14 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit

under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

(a) All terms and conditions of permits established prior to T113-29975-00085 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised under 326 IAC 2-7-10.5, or

(3) deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this combined permit, all previous registrations and permits are superseded by this combined new source review and part 70 operating permit.

B.16 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

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 2-7-3 and 326 IAC 2-7-4(a).

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 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 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(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 2-7-9(a)(3)]

(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 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(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 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

(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 2-7-4. 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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 2-7 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 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.19 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

(a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are

explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) 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 preconstruction approval required by 326 IAC 2-7-10.5 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 2-7-20(b),(c), or (e). 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 2-7-20(b)(1), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(e) 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.22 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.23 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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 Part 70 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 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 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 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.24 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within 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) Except as provided in 326 IAC 2-7-19(e), 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.26 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][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 2-7-5(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 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.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

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

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to

thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(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 2-7-5(1)][326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(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 2-7-5][326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval 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 180 days from the date on which this source commences operation.

The ERP does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [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.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

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.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

(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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

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

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by

326 IAC 2-7-1(34). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(b) The address for report submittal is:

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

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

(d) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) Five (5) spray booths, identified as SCB1 through SCB5, constructed in 2006, equipped with high-volume, low-pressure (HVLP) spray applicators and dry filters for particulate control, exhausting to Stack SCB1-SCB3 and Stack SCB4-SCB5, capacity: 30 units of wood RV product per hour, total.

(b) Six (6) surface coating booths, identified as PBSCB1 through PBSCB6, approved in 2013 for construction, each with a maximum capacity of 25 units per hour, each using a fabric filter system, identified as FF1 through FF6, for particulate control, and exhausting through stacks PBSCS1 through PBSCS6;

(c) One (1) spray station, identified as SS1, constructed in 2006, equipped with high-volume, low-pressure (HVLP) applicators and dry filters for particulate control, exhausting to Stack SS1, capacity: 10 units of wood RV product per hour.

(d) One (1) adhesive applicator, identified as WA1, constructed in 2006, equipped with flow coat applicators, exhausting to the plant interior, capacity: 10 units of wood RV product per hour.

(e) One (1) UV-A Vacuum Coater, identified as UV1, constructed in 2006, equipped with flow coat applicators, exhausting to Stack UV1, capacity: 5 units of wood RV product per hour.

(l) One (1) Flat Wood Coating Line, identified as (Flat line), approved for construction in 2008, equipped with:

(1) One (1) spray coating station containing four (4) high-volume, low-pressure (HVLP) stain guns, identified as FL-S and eight (8) air assisted airless top coat guns, identified as FL-T and exhausting to FLSV1, with particulate matter controlled with dry filters, capacity: 375 units of wood RV product per hour.

(m) Clean-up operations utilizing non-halogenated organic solvent and venting to the indoors.

(n) One (1) cold cleaner parts washing tank, identified as PCT1, to be used for cleaning metal racks used in the surface coating operations.[326 IAC 8-3-2]

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

Emission Limitations and Standards [326 IAC 2-7-5(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 at the five (5) spray booths (SCB1 through SCB5), six (6) surface coating booths PBSCB1 through PBSCB6, the one (1) spray station (SS1) and the one (1) spray coating station (Flat line), with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, shall utilize one (1) or more 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 Volatile Organic Compound (VOC) Limitation [326 IAC 2-2]

The VOC input to the five (5) spray booths (SCB1 through SCB5), six (6) surface coating booths PBSCB1 through PBSCB6, the one (1) spray station (SS1), the one (1) adhesive applicator, the one (1) UV-A vacuum coater (UV-1) and the one (1) flat wood coating line (Flat line), including adhesives, thinner and clean-up solvents shall be less than 249.0 tons per twelve (12) consecutive month period, with compliance to be determined at the end of each month.

Compliance with this limitation shall ensure that 326 IAC 2-2 (Prevention of Significant Deterioration) is not applicable.

D.1.3 Volatile Organic Compound (VOC) Limitation [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2, the owner or operator of the cold cleaner parts washer, identified as PCT1, shall:

(1) equip the cleaner with a cover;
(2) equip the cleaner with a facility for draining cleaned parts;
(3) close the degreaser cover whenever parts are not being handled in the cleaner;
(4) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
(5) provide a permanent, conspicuous label summarizing the operating requirements;
(6) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.1.4 HAP Limitation

The single and combination HAP input to the five (5) spray booths (SCB1 through SCB5), the six (6) surface coating booths PBSCB1 through PBSCB6, the one (1) spray station (SS1), the one (1) adhesive applicator, the one (1) UV-A vacuum coater (UV-1) and the one (1) flat wood coating line (Flat line), including adhesives, thinner and clean-up solvents shall be less than 9.9 tons and 24.9 tons per twelve (12) consecutive month period, respectively, with compliance to be determined at the end of each month.

Compliance with this limitation, in conjunction with the HAP emissions from other emission units at this source, shall ensure that the single and combined HAP emissions from the entire source is less than ten (10) and twenty-five (25) tons per twelve consecutive month period, making the source a minor source for HAPs under 326 IAC 2-4.1 and 40 CFR 63.

D.1.5 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), particulate from the five (5) spray booths (SCB1 through SCB5), the six (6) surface coating booths PBSCB1 through PBSCB6, the one (1) spray station (SS1),

and the one (1) spray coating station (Flat line) shall be controlled by dry filters and the Permittee shall operate the control devices at all times that the surface coating booths are operating.

D.1.6 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and all 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 2-7-5(1)][326 IAC 2-7-6(1)]

D.1.7 Volatile Organic Compounds (VOC) and HAP [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC and HAP input limitations contained in Conditions D.1.2 and D.1.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAP data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.8 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (SCB1 through SCB5, PBSCS1 through PBSCS6, SM1, and FLSV1) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.9 Record Keeping Requirement

(a) To document the compliance status with Conditions D.1.2 and D.1.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP content and usage limits established in Conditions D.1.2 and D.1.4.

(1) The VOC and HAP content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The cleanup solvent usage for each month.

(4) The total VOC and HAP usage for each month.

(5) The total VOC and HAP usage for each compliance period.

(b) To document the compliance status with Condition D.1.8, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.

(c) Section C - General Record Keeping Requirements, of this permit, contains the Permittee's obligation with regard to the record keeping required by his condition.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.2 and D.1.4 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Woodworking

(e) One (1) woodworking area, identified as WW1, constructed in 2006, equipped with a baghouse for particulate control, exhausting to the plant interior, capacity: 500 pounds of wood per hour.

Insignificant Activities

(k) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3-2]

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

Emissions Limitations and Standards

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

(a) Pursuant to 326 IAC 6-3-2(e) (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the woodworking area, identified as WW1, shall not exceed 1.62 pounds per hour when operating at a process weight rate of 500 pounds per hour (0.25 tons per hour). The pound per hour limitation was calculated with the following equation:

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

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

(b) Pursuant to 326 IAC 6-3-2(e) (Particulate Emission Limitations for Manufacturing Processes), the particulate matter from the grinding and machining operation shall not exceed 0.551 pound per hour when operating at a process weight rate of less than 100 pounds per hour.

Compliance Determination Requirements

D.2.2 Particulate Control

(a) In order to comply with Condition D.2.1, the baghouse for particulate control shall be in operation and control emissions from the woodworking area, identified as WW1, at all times that the woodworking area is in operation.

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

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.2.3 Visible Emissions Notations

(a) Daily visible emission notations of the woodworking area (WW1) exhaust 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, eight percent (80%) of the time the process is in operation, not counting startup or shut downtime.

(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 response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.2.4 Broken or Failed Bag Detections

(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. Operation 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 pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.2.5 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.3, the Permittee shall maintain records of daily visible emission notations of the woodworking operation stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(b) Section C - General Record Keeping Requirements, of this permit, contains the Permittee's obligation with regard to the record keeping required by this condition.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Creative Wood Designs, Inc.
Source Address: 710 Gerber Street and 1494 Gerber Street, Ligonier, Indiana 46767
Part 70 Permit No.: T113-29975-00085

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:
Phone:
Date:

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

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Creative Wood Designs, Inc.
Source Address: 710 Gerber Street and 1494 Gerber Street, Ligonier, Indiana 46767
Part 70 Permit No.: T113-29975-00085

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 Section); and • The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

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

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:_____

Title / Position: _____

Date:_____

Phone: _____

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

Part 70 Usage Report

(Submit Report Quarterly)

Source Name:	Creative Wood Designs, Inc.
Source Address:	710 Gerber Street and 1494 Gerber Street, Ligonier, Indiana 46767
Part 70 Permit No.:	T113-29975-00085
Facility:	Five (5) spray booths (SCB1 through SCB5), six (6) surface coating booths PBSCB1 through PBSCB6, one (1) spray station (SS1), one (1) adhesive applicator, one (1) UV-A vacuum coater (UV-1), one (1) flat wood coating line (Flat line), including adhesives, thinner and clean-up solvents
Parameter:	VOC usage
Limit:	249.0 tons per 12 consecutive month period with compliance demonstrated at the end of each month

QUARTER : YEAR:

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

☐ No deviation occurred in this month.

☐ Deviation/s occurred in this month.
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

Part 70 Usage Report

(Submit Report Quarterly)

Source Name:	Creative Wood Designs, Inc.
Source Address:	710 Gerber Street and 1494 Gerber Street, Logonier, Indiana 46767
Part 70 Permit No.:	T113-29975-00085
Facility:	Five (5) spray booths (SCB1 through SCB5), six (6) surface coating booths PBSCB1 through PBSCB6, one (1) spray station (SS1), one (1) adhesive applicator, one (1) UV-A vacuum coater (UV-1), one (1) flat wood coating line (Flat line), including adhesives, thinner and clean-up solvents
Parameter:	Single HAP usage
Limit:	9.9 tons per 12 consecutive month period with compliance demonstrated at the end of each month

QUARTER : YEAR:

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

☐ No deviation occurred in this month.

☐ Deviation/s occurred in this month.
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

Part 70 Usage Report

(Submit Report Quarterly)

Source Name: Creative Wood Designs, Inc.
Source Address: 710 Gerber Street and 1494 Gerber Street, Logonier, Indiana 46767
Part 70 Permit No.: T113-29975-00085
Facility: Five (5) spray booths (SCB1 through SCB5), six (6) surface coating booths PBSCB1 through PBSCB6, one (1) spray station (SS1), one (1) adhesive applicator, one (1) UV-A vacuum coater (UV-1), one (1) flat wood coating line (Flat line), including adhesives, thinner and clean-up solvents
Parameter: Combination HAP usage
Limit: 24.9 tons per 12 consecutive month period with compliance demonstrated at the end of each month

QUARTER : YEAR:

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

☐ No deviation occurred in this month.

☐ Deviation/s occurred in this month.
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
PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Creative Wood Designs, Inc.
Source Address: 710 Gerber Street and 1494 Gerber Street, Ligonier, Indiana 46767
Part 70 Permit No.: T113-29975-00085

Months: _____ to _____ Year: _____

Page 1 of 2

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

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

Form Completed by:_____

Title / Position: _____

Date:_____

Phone: _____

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document (ATSD) for a Part 70 Significant Permit Modification

Source Background and Description

Source Name:	Creative Wood Designs, Inc.
Source Location:	710 Gerber Street, Ligonier, Indiana 46767 and 1494 Gerber Street, Ligonier, Indiana 46767
County:	Noble
SIC Code:	2511
Operation Permit No.:	T 113-29975-00085
Operation Permit Issuance Date:	April 4, 2011
Significant Source Modification No.:	113-33210-00085
Significant Permit Modification No.:	113-33208-00085
Permit Reviewer:	Jack Harmon

On August 2, 2013, the Office of Air Quality (OAQ) had a notice published in the News-Sun, Ligonier, Indiana, stating that Creative Wood Designs, Inc. had applied for a Part 70 Significant Permit Modification to add a new facility with new emission units. The source has also requested to change the description of an emission unit in its existing facility. The notice also stated that the OAQ proposed to issue a Part 70 Significant Permit Modification for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments and Responses

No comments were received during the public notice period.

Additional Changes

IDEM, OAQ has decided to make additional revisions to the permit as described below, with deleted language as ~~strikeouts~~ and new language **bolded**.

The Technical Support Document (TSD) is used by IDEM, OAQ for historical purposes. IDEM, OAQ does not make any changes to the original TSD, but the Permit will have the updated changes. The comments and revised permit language are provided below with deleted language as ~~strikeouts~~ and new language

(a) to make clerical changes to clarify the descriptions of emission units and to add an emission unit that has been at the source, that has been included in the calculations and the Technical Support Document (TSD), but was inadvertently omitted from the emission unit listing in the permit. Correction of these emission unit descriptions will not change the permit level, nor change the potential emissions of the source. There are no current applicable requirements for these units. Section A.2 of the permit has been changed, as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

(k) Three (3) natural gas-fired office heaters and thermocyclers, described as follows:

(1) One (1) office heater, identified as ~~PB~~H1, approved in 2013 for construction, with a maximum heat input capacity of 0.06 MMBtu/hr, using no controls, and exhausting to atmosphere;

(2) One (1) thermocycler, identified as ~~PB~~H2, approved in 2013 for construction, with a maximum heat input capacity of 0.40 MMBtu/hr, using no controls, and exhausting to atmosphere;

(3) One (1) thermocycler, identified as H3, approved in 2013 for construction, with a maximum heat input capacity of 0.40 MMBtu/hr, using no controls, and exhausting to atmosphere.

(n) ~~One~~ **Two**(~~1~~**2**) CNC router**s** using 500 pounds per hour of wood, equipped with a baghouse, exhausting to the plant interior. (The baghouse is an existing baghouse controlling the permitted woodworking area identified as WW1).

IDEM Contact

(a) Questions regarding this proposed Part 70 Significant Permit Modification can be directed to Jack Harmon 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) 233-4228 or toll free at 1-800-451-6027 extension 3-4228.

(b) A copy of the permit is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Significant Source Modification and a Significant Permit Modification

Source Description and Location

Source Name:	Creative Wood Designs, Inc.
Source Location:	710 Gerber Street, Ligonier, Indiana 46767 and 1494 Gerber Street, Ligonier, Indiana 46767
County:	Noble
SIC Code:	2511
Operation Permit No.:	T 113-29975-00085
Operation Permit Issuance Date:	April 4, 2011
Significant Source Modification No.:	113-33210-00085
Significant Permit Modification No.:	113-33208-00085
Permit Reviewer:	Jack Harmon

Source Definition

This stationary recreational vehicle (RV) wood furniture manufacturing and surface coating company consists of two (2) plants:

(a) Plant 1 is located at 710 Gerber Street, Ligonier, Indiana 46767; and

(b) Plant 2 is located at 1494 Gerber Street, Ligonier, Indiana 46767.

The source has acquired Plant 2 with this permit modification, and has submitted documentation, requesting that the two plants be considered as one source. These plants are located on adjacent properties, have the same SIC codes and are under common control. IDEM has reviewed the documentation and agrees that they should be considered one (1) major source, as defined by 326 IAC 2-7-1(22). Therefore, one (1) Part 70 permit will be issued.

Existing Approvals

The source was issued Part 70 Operating Permit No. T113-29975-00085 on April 4, 2011. The source has since received the following approvals:

(a) Administrative Amendment No. 113-32274-0085, issued on September 24, 2012.

County Attainment Status

The source is located in Noble County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard.[1]
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.

[1]Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.

(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Noble 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) $PM_{2.5}$
Noble County has been classified as attainment for $PM_{2.5}$. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for $PM_{2.5}$ emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct $PM_{2.5}$ significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct $PM_{2.5}$, SO_2, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

(c) Other Criteria Pollutants
Noble 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.

Source Status

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

Pollutant	**Emissions** (ton/yr)
PM	5.38
PM_{10}	1.75
$PM_{2.5}$	1.75
SO_2	0.01
VOC	229.49
CO	1.38
GHG*	1983.00
NO_X	1.64
Single HAP	<10
Combination HAPs	<25

* Effective July 1, 2011, U.S. EPA has required that all sources be evaluated for greenhouse gas (GHG). Therefore, GHG emissions have been calculated for the existing source prior to the modification, and is shown above. All other emissions shown above are from Part 70 Permit No. T113-29975-00085, issued April 4, 2011.

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no regulated pollutant, excluding GHGs, is emitted at a rate of two hundred fifty (250) tons per year or more, emissions of GHGs are less than one hundred thousand (100,000) tons of CO_2 equivalent (CO_2e) emissions per year, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

(b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions are 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).

(c) These emissions are based upon Part 70 Operating Permit No. T113-29975-00085, issued April 4, 2011.

Description of the Proposed Modification and Proposed New Construction

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Creative Wood Designs, Inc. on May 15, 2013, relating to the modification of its Part 70 permit to add a new facility with new emission units. The source has also requested to change the description of an emission unit in its existing facility. The following is a list of the proposed emission units and pollution control devices:

(a) Six (6) surface coating booths, identified as PBSCB1 through PBSCB6, approved in 2013 for construction, each with a maximum capacity of 25 units per hour, each using a fabric filter system, identified as FF1 through FF6, for particulate control, and exhausting through stacks PBSCS1 through PBSCS6;

(b) One (1) natural gas-fired air make up unit, identified as PBAM1, approved in 2013 for construction, with a maximum heat input capacity of 3.00 MMBtu/hr, using no controls, and exhausting to atmosphere;

(c) Three (3) natural gas-fired office heaters and thermocyclers, described as follows:

(1) One (1) office heater, identified as PBH1, approved in 2013 for construction, with a maximum heat input capacity of 0.06 MMBtu/hr, using no controls, and exhausting to atmosphere;

(2) One (1) thermocycler, identified as PBH2, approved in 2013 for construction, with a maximum heat input capacity of 0.40 MMBtu/hr, using no controls, and exhausting to atmosphere;

(3) One (1) thermocycler, identified as PBH3, approved in 2013 for construction, with a maximum heat input capacity of 0.53 MMBtu/hr, using no controls, and exhausting to atmosphere.

(d) Paved/Unpaved Roads.

Enforcement Issues

IDEM is aware that there is a pending enforcement action for a violation of 326 IAC 6-3-2 due to improperly installed filters. IDEM is reviewing this matter and will take the appropriate action.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (^{0}F)
PBSCS1	Booth PBSCB1	26.0	3.0	13000	75.0
PBSCS2	Booth PBSCB2	26.0	3.0	13000	75.0
PBSCS3	Booth PBSCB3	26.0	3.0	13000	75.0
PBSCS4	Booth PBSCB4	26.0	2.5	8360	75.0
PBSCS5	Booth PBSCB5	26.0	2.5	15000	75.0

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (^{0}F)
PBSCS6	Booth PBSCB6	26.0	3.0	17150	75.0

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

Permit Level Determination – Part 70

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency."

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Increase in PTE Before Controls of the Modification	
Pollutant	**Potential To Emit** (ton/yr)
PM	11.37
PM_{10}	10.37
$PM_{2.5}$	10.37
SO_2	0.01
NO_X	1.71
VOC	126.89
CO	1.44
CO2e, as GHG	2068.54
Single HAPs	<10
Total HAPs	<25

Appendix A of this TSD reflects the unrestricted potential emissions of the modification.

This source modification is subject to 326 IAC 2-7-10.5(g)(4)(D) because the potential to emit VOC is greater than 25 tons per year. Additionally, the modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d)(1), because the proposed changes do not qualify for a minor permit modification, nor for an administrative amendment.

(a) HAPs emissions from the surface coating booths PBSCB1 through PBSCB6, when combined with HAPs emissions from all HAPs from the entire source shall be not exceed 9.9 tons per year of any single HAP, with compliance determined at the end of each month, and shall not exceed 24.9 tons per year of any combination of HAPs, with compliance determined at the end of each month.

Permit Level Determination – PSD

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 source modification and permit modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

	Potential to Emit (tons per year) of the Modification								
Process / Emission Unit	**PM**	**PM_{10}**	**$PM_{2.5}$**	**SO_2**	**NO_x**	**VOC**	**CO**	**GHGs**	**Worst HAP**
Surface Coating Operations	0.50	0.50	0.50	0.01	0.00	126.80	0.00	0.00	7.24 (Toluene)
Natural Gas Combustion	0.03	0.13	0.13	0.01	1.71	0.09	1.44	2068.54	0.03 (Hexane)
Paved/Unpaved Roads	1.38	0.28	0.28	0.00	0.00	0.00	0.00	0.00	0.00
Total for Entire Source	**1.91**	**0.91**	**0.91**	**0.01**	**1.71**	**126.89**	**1.44**	**2068.54**	**<10**
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000	NA

This modification to an existing minor stationary source is not major because the emissions are less than the PSD major source thresholds. The source will continue to limit source-wide emissions to remain minor under PSD. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

(a) The VOC emissions from the surface coating booths PBSCB1 through PBSCB6, when combined with all other VOC emissions from all other surface coating operations, shall not exceed 249.0 tons per year, with compliance determined at the end of each month.

Compliance with this limit will ensure that the potential to emit from the entire source is less than 250 tons per year, and therefore, will render the requirements of 326 IAC 2-2 not applicable.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS):

(a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this operation.

National Emissions Standards for Hazardous Air Pollutants (NESHAP):

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

(c) The requirements of NESHAP for Paint Stripping and Miscellaneous Surface Coating Operations for Area Sources, 40 CFR 63, Subpart HHHHHH, are not included in this modification, since this source does not use methylene chloride for paint stripping, and does not use coatings that include chromium, lead, manganese, nickel, or cadmium.

(d) The requirements of NESHAPs for Wood Furniture Manufacturing Operations, 40 CFR 63.800, Subpart JJ (326 IAC 20-14), are not included in the modification, since this source is not a major source of Hazardous Air Pollutants (HAPs) as defined in 40 CFR 63.2.

Compliance Assurance Monitoring (CAM)

(e) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each new or modified pollutant-specific emission unit that meets the following criteria:

(1) has a potential to emit before controls equal to or greater than the Part 70 major source threshold for the pollutant involved;

(2) is subject to an emission limitation or standard for that pollutant; and

(3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The potential to emit of VOCs from the surface coating operation identified as PBSCB1 through PBSCB6, exceeds 100 tons per year. However, this emission unit does not use a control device for VOCs.

The surface coating operation is subject to an emission limitation for PM, and the operation uses a control device; however, the potential to emit PM, PM10, and PM2.5 from the surface coating operation are each less than 100 tons per year.

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to any of the emissions units of this modification.

State Rule Applicability Determination

326 IAC 2-2 (PSD)
PSD applicability is discussed under the Permit Level Determination – PSD section.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants)
The operation of the surface coating booths PBSCB1 through PBSCB6 will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)
Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6-3(a)(2) (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3(b)(1), an emission statement must be submitted triennially. The first report is due no later than July 1, 2013, and subsequent reports are due every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2(d), particulate from the six (6) surface coating booths (PBSCB1 through PBSCB6) shall be controlled by dry particulate filters at all times that the surface coating booths are in operation.

326 IAC 6-4 (Fugitive Dust Emissions)
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).

326 IAC 6-2-4 (Particulate Emissions Limitations for Sources of Indirect Process Heaters)
The natural gas-fired combustion units (1 natural gas-fired air make-up unit PBAM1, 3 natural gas-fired space heater and thermocyclers PBH1, PBH2, and PBH3) are not subject to the requirements of 326 IAC 6-2-4 because the units do not engage in the combustion of fuel for indirect heating.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)
The six (6) spray booths (PBSCB1 through PBSCB6), are used for coating recreational vehicle (RV) wood furniture, and are regulated by 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating). Therefore, the requirements of 326 IAC 8-1-6 are not applicable to this source.

326 IAC 8-11 (Wood Furniture Coatings)
326 IAC 8-11 (Wood Furniture Coatings) is not applicable to this source, because this rule pertains to wood furniture coating in Lake, Porter, Clark and Floyd Counties. This source is in Noble County.

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)
This rule applies to surface coating of wood furnishings, including cabinets (kitchen, bath, and vanity), tables, beds, chairs, sofas (non-upholstered), art objects, and any other coating furnishings made of solid wood, wood composition, or simulated wood material. Therefore, the six (6) spray booths (PBSCB1 through PBSCB6) are subject to 326 IAC 8-2-12.

(a) The source shall apply all coating material, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) or more of the following application systems: airless spray application system, air-assisted airless spray application system, electrostatic spray application system, electrostatic bell or disc application system, heated airless spray application system, roller coat, brush or wipe application system or dip-and-drain application system.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source’s failure to take the appropriate corrective actions within a specific time period.

The Compliance Determination and Monitoring Requirements applicable to this modification are as follows:

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

(b) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks PBSCB1 through PBSCB6, while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances of this permit contains the Permittee's obligation with regard to the reasonable response steps required in the permit. Failure to take response steps shall be considered a deviation from the permit.

(c) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is

observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by the permit. Failure to take reasonable response steps shall be considered a deviation from this permit.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. 113-29975-00085. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

Modification No. 1:

The source has requested to add a new facility with new emission units, including six surface coating booths, one air make-up unit, one office space heater, and two thermocyclers. The source also requested to change the description of an emission unit in its existing facility. The permit has been changed to reflect these changes. Changed were made to the permit in Sections A.1 and A.2, Section D.1 and corresponding permit Conditions, Certification Report, Emergency Occurrence Report, Part 70 Quarterly Usage Reports, and the Quarterly Deviation and Compliance Report. In some instances, subsequent sequential lettering and numbering were changed. Additionally, the SIC Code has been changed to show the correct SIC Code. The current SIC Code of 2500 shown in the permit does not exist.

Modification #2:

IDEM has modified language in several conditions, including Response to Excursions or Exceedances and Recordkeeping Requirements. These changes have been incorporated into the permit with this modification, which resulted in changes to Section D.1 conditions and Section D.2 conditions.

Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**.

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary recreational vehicle (RV) wood furniture manufacturing and surface coating operation.

Source Address:	710 Gerber Street **and 1494 Gerber Street**, Ligonier, Indiana 46767
General Source Phone Number:	260-894-4533
SIC Code:	~~2500~~ **2511 (Wood Household Furniture)**
County Location:	Noble
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

(a) Five (5) spray booths, identified as SCB1 through SCB5, constructed in 2006, equipped with high-volume, low-pressure (HVLP) spray applicators and dry filters for particulate control, exhausting to Stack SCB1-SCB3 and Stack SCB4-SCB5, capacity: 30 units of wood RV product per hour, total.

(b) Six (6) surface coating booths, identified as PBSCB1 through PBSCB6, approved in 2013 for construction, each with a maximum capacity of 25 units per hour, each using a fabric filter system, identified as FF1 through FF6, for particulate control, and exhausting through stacks PBSCS1 through PBSCS6;

(~~b~~ **c**) One (1) spray ~~machine~~ **station**, identified as **S~~M~~S1**, constructed in 2006, equipped with high-volume, low-pressure (HVLP) applicators and dry filters for particulate control, exhausting to Stack **S~~M~~S1**, capacity: 10 units of wood RV product per hour.

(~~c~~ **d**) ---

(~~d~~ **e**) ---

(~~e~~ **f**) ---

(~~f~~ **g**) ---

(~~g~~ **h**) ---

(~~h~~ **i**) ---

(j) One (1) natural gas-fired air make up unit, identified as PBAM1, approved in 2013 for construction, with a maximum heat input capacity of 3.00 MMBtu/hr, using no controls, and exhausting to atmosphere;

(k) Three (3) natural gas-fired office heaters and thermocyclers, described as follows:

(1) One (1) office heater, identified as PBH1, approved in 2013 for construction, with a maximum heat input capacity of 0.06 MMBtu/hr, using no controls, and exhausting to atmosphere;

(2) One (1) thermocycler, identified as PBH2, approved in 2013 for construction, with a maximum heat input capacity of 0.40 MMBtu/hr, using no controls, and exhausting to atmosphere;

(3) One (1) thermocycler, identified as PBH3, approved in 2013 for construction, with a maximum heat input capacity of 0.53 MMBtu/hr, using no controls, and exhausting to atmosphere.

(~~i~~ **l**) ---

(~~j~~ **m**) ---

(~~k~~ **n**) ---

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

(a) Five (5) spray booths, identified as SCB1 through SCB5, constructed in 2006, equipped with high-volume, low-pressure (HVLP) spray applicators and dry filters for particulate control, exhausting to Stack SCB1-SCB3 and Stack SCB4-SCB5, capacity: 30 units of wood RV product per hour, total.

(b) Six (6) surface coating booths, identified as PBSCB1 through PBSCB6, approved in 2013 for construction, each with a maximum capacity of 25 units per hour, each using a fabric filter system, identified as FF1 through FF6, for particulate control, and exhausting through stacks PBSCS1 through PBSCS6;

(~~b~~ **c**) One (1) spray ~~machine~~ **station**, identified as **S~~M~~S1**, constructed in 2006, equipped with high-volume, low-pressure (HVLP) applicators and dry filters for particulate control, exhausting to Stack **S~~M~~S1**, capacity: 10 units of wood RV product per hour.

(~~c~~ **d**) ---

(~~d~~ **e**) ---

(~~i~~ **l**) ---

(~~j~~ **m**) ---

(~~k~~ **n**) ---

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 at the five (5) spray booths (SCB1 through SCB5), **six (6) surface coating booths PBSCB1 through PBSCB6,** the one (1) spray machine **station** (S~~M~~**S**1) and the one (1) spray coating station (Flat line), with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, shall utilize one (1) or more of the following application methods.

D.1.2 Volatile Organic Compound (VOC) Limitation [326 IAC 2-2]

The VOC input to the five (5) spray booths (SCB1 through SCB5), **the six (6) surface coating booths PBSCB1 through PBSCB6,** the one (1) spray ~~machine~~ **station** (**S~~M~~S1**), the one (1) adhesive applicator, the one (1) UV-A vacuum coater (UV-1) and the one (1) flat wood coating line (Flat line), including adhesives, thinner and clean-up solvents shall be less than 249.0 tons per twelve (12) consecutive month period, with compliance to be determined at the end of each month.

Compliance with this limitation shall ensure that 326 IAC 2-2 (Prevention of Significant Deterioration) is not applicable.

D.1.4 HAP Limitation

The single and combination HAP input to the five (5) spray booths (SCB1 through SCB5), **the six (6) surface coating booths PBSCB1 through PBSCB6,** the one (1) spray ~~machine~~ **station** (**S~~M~~S1**), the one (1) adhesive applicator, the one (1) UV-A vacuum coater (UV-1) and the one (1) flat wood coating line (Flat line), including adhesives, thinner and clean-up solvents shall be less than 9.9 tons and 24.9 tons per twelve (12) consecutive month period, respectively, with compliance to be determined at the end of each month.

D.1.5 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), particulate from the five (5) spray booths (SCB1 through SCB5), **the six (6) surface coating booths PBSCB1 through PBSCB6,** the one (1) spray ~~machine~~ **station** (**S~~M~~S1**), and the one (1) spray coating station (Flat line) shall be controlled by dry filters and the Permittee shall operate the control devices **at all times that the surface coating booths are operating** ~~in accordance with manufacturer's specifications~~.

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 booth stacks (SCB1 through SCB5, **PBSCS1 through PBSCS6,** SM1, and FLSV1) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall

take reasonable response steps**.** ~~in accordance with~~ Section C - Response to Excursions or Exceedances **contains the Permittee's obligation with regard to the response steps required by this condition.** Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances,~~ shall be considered a deviation from this permit.

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

D.1.9 Record Keeping Requirement

(c) ~~All records shall be maintained in accordance with~~ Section C - General Record Keeping Requirements, of this permit **contains the Permittee's obligation with regard to the record keeping required by this condition**.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

D.2.3 Visible Emissions Notations

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps**.** ~~in accordance with~~ Section C - Response to Excursions or Exceedances **contains the Permittee's obligation with regard to the response steps required by this condition**. Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances~~ shall be considered a deviation from this permit.

D.2.5 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.3, the Permittee shall maintain records of daily visible emission notations of the woodworking operation stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(b) ~~All records shall be maintained in accordance with~~ Section C - General Record Keeping Requirements, of this permit **contains the Permittee's obligation with regard to the record keeping required by this condition**.

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Creative Wood Designs, Inc.
Source Address: 710 Gerber Street **and 1494 Gerber Street**, Ligonier, Indiana 46767
Part 70 Permit No.: T113-29975-00085

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name:	Creative Wood Designs, Inc.
Source Address:	710 Gerber Street **and 1494 Gerber Street**, Ligonier, Indiana 46767
Part 70 Permit No.:	T113-29975-00085

Part 70 Usage Report

(Submit Report Quarterly)

Source Name:	Creative Wood Designs, Inc.
Source Address:	710 Gerber Street **and 1494 Gerber Street**, Ligonier, Indiana 46767
Part 70 Permit No.:	T113-29975-00085
Facility:	Five (5) spray booths (SCB1 through SCB5), **six (6) surface coating booths PBSCB1 through PBSCB6,** one (1) spray ~~machine~~ station (~~SM~~**S**1), one (1) adhesive applicator, one (1) UV-A vacuum coater (UV-1), one (1) flat wood coating line (Flat line), including adhesives, thinner and clean-up solvents
Parameter:	VOC usage
Limit:	249.0 tons per 12 consecutive month period with compliance demonstrated at the end of each month

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Part 70 Usage Report

(Submit Report Quarterly)

Source Name:	Creative Wood Designs, Inc.
Source Address:	710 Gerber Street **and 1494 Gerber Street**, Logonier, Indiana 46767
Part 70 Permit No.:	T113-29975-00085
Facility:	Five (5) spray booths (SCB1 through SCB5), **six (6) surface coating booths PBSCB1 through PBSCB6,** one (1) spray ~~machine~~ station (~~SM~~**S**1), one (1) adhesive applicator, one (1) UV-A vacuum coater (UV-1), one (1) flat wood coating line (Flat line), including adhesives, thinner and clean-up solvents
Parameter:	Single HAP usage
Limit:	9.9 tons per 12 consecutive month period with compliance demonstrated at the end of each month.

Part 70 Usage Report

(Submit Report Quarterly)

Source Name:	Creative Wood Designs, Inc.
Source Address:	710 Gerber Street **and 1494 Gerber Street**, Logonier, Indiana 46767
Part 70 Permit No.:	T113-29975-00085
Facility:	Five (5) spray booths (SCB1 through SCB5), **six (6) surface coating booths PBSCB1 through PBSCB6,** one (1) spray ~~machine~~ station (~~SM~~**S**1), one (1) adhesive applicator, one (1) UV-A vacuum coater (UV-1), one (1) flat wood coating line (Flat line), including adhesives, thinner and clean-up solvents
Parameter:	Combination HAP usage
Limit:	24.9 tons per 12 consecutive month period with compliance demonstrated at the end of each month.

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Creative Wood Designs, Inc.
Source Address: 710 Gerber Street **and 1494 Gerber Street**, Ligonier, Indiana 46767
Part 70 Permit No.: T113-29975-00085

Conclusion and Recommendation

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 113-33210-00085 and Significant Permit Modification No. 113-33208-00085. The staff recommends to the Commissioner that this Part 70 Significant Source Modification and Significant Permit Modification be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Jack Harmon 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) 233-4228 or toll free at 1-800-451-6027 extension 3-4228.

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Appendix A: Emission Summary After Modification 33210

Company Name: Creative Wood Designs, Inc.
Address City Zip: 710 Gerber Street and 1494 Gerber Street, Ligonier, Indiana 46767
Permit No: T113-29975-00085
Significant Source Modification No. 113-33210-00085
Significant Permit Modification No.: 113-33208-00085
Date: July, 2013
Permit Reviewer: Jack Harmon

Uncontrolled Emissions

Emission Units	PM	PM10	PM2.5	SO2	VOC	CO	NOx	GHG, as CO2e	Single HAP*	Total HAPs	Worst HAP
Surface Coating Operations	27.85	27.85	27.85	0.01	355.92	0.00	0.00	0.00	18.20	35.99	Toluene
Natural Gas-fired combustion sources	0.06	0.26	0.26	0.02	0.18	2.82	3.36	4,051.53	0.06	0.06	Hexane
Woodworking Area	7.29	7.29	7.29	0.00	0.00	0.00	0.00	0.00	0.00	0.00	N/A
Paved/Unpaved Roads	6.04	1.22	1.22	0.00	0.00	0.00	0.00	0.00	0.00	0.00	N/A
CNC Routing Machine	4.75	4.75	4.75	0.00	0.00	0.00	0.00	0.00	0.00	0.00	N/A
Parts Cleaning Tank	0.00	0.00	0.00	0.00	0.28	0.00	0.00	0.00	0.00	0.00	N/A
Total	46.00	41.37	41.37	0.03	356.39	2.82	3.36	4,051.53	18.26	36.05	Toluene

Controlled / Limited Emissions

Emission Units	PM	PM10	PM2.5	SO2	VOC	CO	NOx	GHG, as CO2e	Single HAP*	Total HAPs	Worst HAP
Surface Coating Operations	0.36	0.36	0.36	0.01	229.02	0.00	0.00	0.00	9.90	24.90	Toluene
Natural Gas-fired Combustion sources	0.06	0.26	0.26	0.02	0.18	2.82	3.36	4,051.53	0.06	0.06	Hexane
Woodworking Area	0.33	0.33	0.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00	N/A
Paved/Unpaved Roads	4.66	0.94	0.94	0.00	0.00	0.00	0.00	0.00	0.00	0.00	N/A
CNC Routing Machine	**	**	**	0.00	0.00	0.00	0.00	0.00	0.00	0.00	N/A
Parts Cleaning Tank	0.00	0.00	0.00	0.00	0.28	0.00	0.00	0.00	0.00	0.00	N/A
Total	5.41	1.88	1.88	0.03	229.49	2.82	3.36	4,051.53	<10	<25	Toluene

*Toluene is highest HAP, and is limited to less than 10 tons per year, source-wide
**Controlled Emission Rate for the CNC Routing Machine is a Part of the Post-Control Emission Rate

VOC emissions are limited emissions source-wide to remain less than 250 tons per year.

Appendix A: Existing Emission Summary

Company Name: Creative Wood Designs, Inc.
Address City Zip: 710 Gerber Street and 1494 Gerber Street, Ligonier, Indiana 46767
Permit No: T113-29975-00085
Significant Source Modification No. 113-33210-00085
Significant Permit Modification No.: 113-33208-00085
Date: July, 2013
Permit Reviewer: Jack Harmon

Uncontrolled Emissions

Emission Units	PM	PM10	SO2	VOC	CO	NOx	GHG, as CO2e***	Single HAP*	Total HAPs	
Surface Coating Operations	17.89	17.89	0.00	229.12	0.00	0.00	0.00	10.96	24.83	Toluene
Natural Gas-fired combustion sources	0.03	0.12	0.01	0.09	1.38	1.64	1,983.00	0.03	0.03	Hexane
Woodworking Area	7.29	7.29	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Paved/Unpaved Roads	4.66	0.94	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
CNC Routing Machine	4.75	4.75	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Parts Cleaning Tank	0.00	0.00	0.00	0.28	0.00	0.00	0.00	0.00	0.00	
Total	34.63	31.00	0.01	229.49	1.38	1.64	1,983.00	10.96	24.86	

Controlled Emissions

Emission Units	PM	PM10	SO2	VOC	CO	NOx	GHG, as CO2e***	Single HAP*	TotaL HAPs	
Surface Coating Operations	0.36	0.36	0.00	229.12	0.00	0.00	0.00	see footnote	24.83	Toluene
Natural Gas-fired Combustion sources	0.03	0.12	0.01	0.09	1.38	1.64	1,983.00	see footnote	0.03	Hexane
Woodworking Area	0.33	0.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Paved/Unpaved Roads	4.66	0.94	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
CNC Routing Machine	**	**	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Parts Cleaning Tank	0.00	0.00	0.00	0.28	0.00	0.00	0.00	0.00	0.00	
Total	5.38	1.75	0.01	229.49	1.38	1.64	1,983.00	<10	<25	

*Toluene is highest HAP, limited to less than 10 tons per year, source-wide

**Controlled Emission Rate for the CNC Routing Machine is a Part of the Post-Control Emission Rate

*** Effective July 1, 2011, EPA required each source to be evaluated for greenhouse gas emissions (GHG). Therefore, the GHG emissions were calculated for the existing units with this modifica

Appendix A: Emission Summary of Modification 33210

Company Name: Creative Wood Designs, Inc.
Address City Zip: 710 Gerber Street and 1494 Gerber Street, Ligonier, Indiana 46767
Permit No: T113-29975-00085
Significant Source Modification No. 113-33210-00085
Significant Permit Modification No.: 113-33208-00085
Date: July, 2013
Permit Reviewer: Jack Harmon

	Uncontrolled Potential to Emit (tons/yr)										
Emission Units	**PM**	**PM10**	**PM2.5**	**SO2**	**VOC**	**CO**	**NOx**	**CO2e**	**Single HAP***	**Total HAPs**	**Worst HAP**
Surface Coating Operations	9.96	9.96	9.96	0.00	126.80	0.00	0.00	0.00	7.24	11.16	Toluene
Natural Gas-fired combustion sources	0.03	0.13	0.13	0.01	0.09	1.44	1.71	2,068.54	0.03	0.03	Hexane
Paved/Unpaved Roads	1.38	0.28	0.28	0.00	0.00	0.00	0.00	0.00	0.00	0.00	N/A
Total	11.37	10.37	10.37	0.01	126.89	1.44	1.71	2,068.54	7.27	11.19	Toluene

	Controlled Potential to Emit (tons/yr)										
Emission Units	**PM**	**PM10**	**PM2.5**	**SO2**	**VOC**	**CO**	**NOx**	**CO2e**	**Single HAP***	**Total HAPs**	**Worst HAP**
Surface Coating Operations	0.50	0.50	0.50	0.00	126.80	0.00	0.00	0.00	7.24	11.16	Toluene
Natural Gas-fired combustion sources	0.03	0.13	0.13	0.01	0.09	1.44	1.71	2,068.54	0.03	0.03	Hexane
Paved/Unpaved Roads	1.38	0.28	0.28	0.00	0.00	0.00	0.00	0.00	0.00	0.00	N/A
Total	1.91	0.91	0.91	0.01	126.89	1.44	1.71	2,068.54	7.27	11.19	Toluene

* Note: Toluene emissions are limited to less than 10 tons per year source-wide, and will continue to be limited under this modification

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

Company Name: Creative Wood Designs, Inc.
Address City IN Zip: 710 Gerber Street and 1494 Gerber Street, Ligonier, Indiana 46767
Permit Number: T113-29975-00085
Significant Source Modification No. 113-33210-00085
Significant Permit Modification No.: 113-33208-00085
Date: July, 2013
Permit Reviewer: Jack Harmon

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
WA																
4-0606 Latex Adhesive	9.20	46.10%	46.00%	0.10%	50.74%	49.36%	0.0050	10.0000	0.02	0.01	0.01	0.02	0.01	0.00	0.02	100%
SCB1 - SCB5																
Stain Cougar 112	6.99	87.91%	48.00%	39.91%	50.03%	1.57%	0.0125	30.0000	5.58	2.79	1.05	25.11	4.59	0.35	177.69	75%
Topcoat HC60	7.81	72.15%	0.00%	72.15%	0.00%	20.52%	0.0500	30.0000	5.63	5.63	8.46	202.86	37.03	3.58	27.46	75%
Thinner 4-XLT	6.80	100.00%	2.00%	98.00%	2.04%	0.00%	0.0063	30.0000	6.80	6.66	1.26	30.23	5.52	0.00	N/A	75%
SS1																
Stain Cougar 112	6.99	87.91%	48.00%	39.91%	50.03%	1.57%	0.0125	10.0000	5.58	2.79	0.35	8.37	1.53	0.12	177.69	75%
Topcoat HC60	7.81	72.15%	0.00%	72.15%	0.00%	20.52%	0.0500	10.0000	5.63	5.63	2.82	67.62	12.35	1.20	27.46	75%
Thinner 4-XLT	6.80	100.00%	2.00%	98.00%	2.04%	0.00%	0.0063	10.0000	6.80	6.66	0.42	10.08	1.84	0.00	N/A	75%
UV-A Vacuum Coater																
IS249/00 Acrylic Topcoat	8.74	0.00%	0.00%	0.00%	0.00%	100.00%	2.4270	5.0000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
Laquer Thinner (clean-up)	6.78	100.00%	0.00%	100.00%	0.00%	0.00%	0.0000	5.0000	6.78	6.78	0.01	0.01	0.01	0.00	N/A	100%
Flat Line																
HC Dual Cure UV40	7.66	75.34%	0.00%	75.34%	0.00%	17.85%	0.0112	375.00	5.77	5.77	24.23	581.41	106.11	8.69	32.31	75%
3090 HAP Free Cleaner	6.43	100.00%	0.00%	100.00%	0.00%	0.00%	0.0004	375.00	6.43	6.43	0.97	23.15	4.23	0.00	N/A	100%
FC 4002 Stain	6.96	76.60%	0.00%	76.60%	0.00%	23.40%	0.0059	375.00	5.33	5.33	11.80	283.10	51.67	3.95	22.78	75%
3090 HAP Free Cleaner	6.43	100.00%	0.00%	100.00%	0.00%	0.00%	0.0004	375.00	6.43	6.43	0.97	23.15	4.23	0.00	N/A	100%

PM Control Efficiency 98.00%

Potential Emissions	**Worst case coating added to all solvents**					
		Uncontrolled	**52.35**	**1,255.11**	**229.12**	**17.89**
		Controlled	**52.35**	**1,255.11**	**229.12**	**0.36**

METHODOLOGY

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

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Creative Wood Designs, Inc.
Address City IN Zip: 710 Gerber Street and 1494 Gerber Street, Ligonier, Indiana 46767
Permit Number: T113-29975-00085
Significant Source Modification No.: 113-33210-00085
Significant Permit Modification No.: 113-33208-00085
Permit Reviewer: Jack Harmon
Date: November 23, 2010

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MIBK	Weight % Ethylbenzene	Weight % Formaldehyde	Weight % Methanol	Xylene Emissions (ton/yr)	Toluene Emis** (ton/yr)	MIBK Emmisions (ton/yr)	Ethylbenzen Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Methanol Emissions (ton/yr)	Total Emissions (ton/yr)
SCB1-5																
Stain Cougar 112	6.99	0.01250	30.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Topcoat HC60	7.81	0.05000	30.00	2.22%	5.29%	0.00%	0.46%	0.17%	0.00%	1.14	2.72	0.00	0.24	0.09	0.00	4.19
Thinner 4-XLT	6.80	0.00630	30.00	0.00%	32.02%	9.82%	0.00%	0.00%	0.00%	0.00	1.81	0.56	0.00	0.00	0.00	2.37
SS1																
Stain Cougar 112	6.99	0.01250	10.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Topcoat HC60	7.81	0.05000	10.00	2.22%	5.29%	0.00%	0.46%	0.17%	0.00%	0.38	0.91	0.00	0.08	0.03	0.00	1.40
Thinner 4-XLT	6.80	0.00630	10.00	0.00%	32.02%	9.82%	0.00%	0.00%	0.00%	0.00	0.61	0.19	0.00	0.00	0.00	0.80
UV-A Vacuum Coater																
IS249/00 Acrylic Topcoat	8.74	2.42700	5.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Laquer Thinner (clean-up)	6.78	0.00001	5.00	0.00%	30.00%	10.00%	0.00%	0.00%	0.00%	0.00	0.01	0.01	0.00	0.00	0.00	0.02
Flat Line																
HC Dual Cure UV40	7.66	0.01120	375.00	1.46%	3.48%	6.03%	0.30%	0.11%	0.00%	2.06	4.90	8.50	0.43	0.16	0.00	16.05
3090 HAP Free Cleaner	6.43	0.00040	375.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
FC 4002 Stain	6.96	0.00590	375.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3090 HAP Free Cleaner	6.43	0.00040	375.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Potential Emissions										**3.58**	**10.96**	**9.26**	**0.75**	**0.28**	**0.00**	**24.83**

** Single HAP (toluene) emissions are limited to less than 10 tons per year source-wide

METHODOLOGY

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

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Natural Gas-Fired Heaters

Company Name: Creative Wood Designs, Inc.
Address City IN Zip: 710 Gerber Street and 1494 Gerber Street, Ligonier, Indiana 46767
Permit Number: T113-29975-00085
Significant Source Modification No. 113-33210-00085
Significant Permit Modification No.: 113-33208-00085
Date: July, 2013
Permit Reviewer: Jack Harmon

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
3.75	32.9

UNIT	CAPACITY
UH1 through UH11	1.10
TC1 and TC2	1.00
AM1 and AM2	0.85
FLH1 and FLH2	0.80
TOTAL	3.75

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.03	0.12	0.01	1.64	0.09	1.38

*PM and PM_{10} emission factor is filterable and condensable PM_{10} combined.
**Emission Factors for NOx: Uncontrolled = 100

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MME
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

HAPs

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	
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	3.449E-05	1.971E-05	1.232E-03	2.957E-02	5.585E-05	3.091E-02

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	8.213E-06	1.807E-05	2.300E-05	6.242E-06	3.449E-05	9.001E-05

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

Total HAPs	3.100E-02

Methodology
Same as above

Greenhouse Gas Calculations

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMc	120,000	2.3	2.2
Potential Emission in tons/	1,971	0.0	0.0
Summed Potential Emissions in tons/yr	1,971		
CO2e Total in tons/yr	1,983		

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) +

Appendix A: Emission From Woodworking Operations

Company Name: Creative Wood Designs, Inc.
Address City Zip: 710 Gerber Street and 1494 Gerber Street, Ligonier, Indiana 46767
Permit No: T113-29975-00085
Significant Source Modification No. 113-33210-00085
Significant Permit Modification No.: 113-33208-00085
Date: July, 2013
Permit Reviewer: Jack Harmon

	Air Flow Rate (acfm)	Outlet Grain Loating (gr/acf)	Control Efficiency (%)	PM/PM_{10} Uncontrolled Emissions (lbs/hr)	PM/PM_{10} Uncontrolled Emissions (tons/yr)	PM/PM_{10} Controlled Emissions (lbs/hr)	PM/PM_{10} Controlled Emissions (tons/yr)
WW1	20,000	0.000437	95.50%	1.6648	7.29	0.0749	0.33

Methodology

Emission Rate in lbs/hr (after controls) = (grains/cub.ft.) (cub. ft./min.) (60 min/hr) (lb/7000 grains)
Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)
Emission rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Allowable Rate of Emission

Process Rate (lbs/hr)	Process Weight Weight Rate (tons/hr)	Allowable Emissions (lbs/hr)
500	0.25	1.62

Methodology

Allowable Emissions = 4.10 (Process Weight Rate)^0.67

Appendix A: Emissions Calculations
Unpaved Roads

Company Name: Creative Wood Designs, Inc.
Address City IN Zip: 710 Gerber Street and 1494 Gerber Street, Ligonier, I
Permit Number: T113-29975-00085
Significant Source Modification No.: 113-33210-00085
Significant Permit Modification No.: 113-33208-00085
Permit Reviewer: Jack Harmon
Date: July, 2013

1.000	trips/hr x
0.095	miles/roundtrip x

829.55 miles per year

Constants			
where:	**For PM**	**For PM-10**	
k =	10	2.6	(particle size multiplier for PM-10) (k=10 for PM-30 or TSP)
s =	4.8	4.8	mean % silt content of unpaved roads
b =	0.5	0.4	Constant for PM-10 (b = 0.5 for PM-30 or TSP)
c =	0.4	0.3	Constant for PM-10 (c = 0.4 for PM-30 or TSP)
W =	38	38	tons average vehicle weight
Mdry =	0.2	0.2	surface material moisture content, % (default is 0.2 for dry conditions)
p =	125	125	number of days with at least 0.254mm of precipitation (See Figure 13.2.2-1)
Particulate Emission Factor			
Ef =	11.24	2.27	Ef = {k*[(s/12)^0.8]*[(W/3)^b]/[(Mdry/0.2)^c]}*[(365-p)/365] (lb/mile)

PM Emissions = $\frac{11.24 \text{ lb/mi} \times 829.55 \text{ mi/yr}}{2000 \text{ lb/ton}} =$ **4.66 tons/yr**

PM-10 Emissions = $\frac{2.27 \text{ lb/mi} \times 829.55 \text{ mi/yr}}{2000 \text{ lb/ton}} =$ **0.94 tons/yr**

The following calculations determine the amount of emissions created by vehicle traffic on unpaved roads, based on 8760 hours of use and AP-42, Ch 11.2.1.

Appendix A: Emissions Calculations

Pre-Control Emissions Associated with CNC Machine CNC1

Company Name: Creative Wood Designs, Inc.
Address City IN Zip: 710 Gerber Street and 1494 Gerber Street, Ligonier, Indiana 4
Permit Number: T113-29975-00085
Significant Source Modification No.: 113-33210-00085
Significant Source Modification No.: 113-33208-00085
Permit Reviewer: Jack Harmon
Date: November 23, 2010

Routing

Process/Operation	Description	ID	Material Thickness (in)	Area (in^2)	Rate (inches/hr)	Material Loss (in^3/hr)	Material Density (lb/in^3)	Material Loss (lb/hr)
Routing	CNC Machine	CNC1	0.375	0.250	500.00	46.875	0.023	1.09
Estimated Emissions (lb/hr) - Uncontrolled								**1.09**
Estimated Emissions (tons/yr) - Uncontrolled								**4.75**
Control Efficiency (Existing Control Device for WW1)								**95.50%**
Estimated Emissions (lb/hr) - Controlled								**0.05**
Estimated Emissions (tons/yr) - Controlled								**0.21**

METHODOLOGY

Material Loss (in^3/hr) = Material Thickness (in) X Area (in^2) X Process Rate (inches/hr)
Material Density (lbs/in^3) = Based Upon Pine (40 lb/ft3) = 0.02
Estimated Emissions (lb/hr) = Material Loss (in^3/hr) X Material Density (lb/in^3)
Estimated Emissions (tons/yr) = Material Loss (in^3/hr) X 8,760 (hrs/yr) X 1/2,000 (lbs/ton)
Controlled Emissions - Equipment Connected to Woodworking Control Device for WW1
Controlled Emissions = Uncontrolled Emissions (lb/hr or tons/yr) x (1 - Control Efficiency %)

Appendix A: Emissions Calculations
VOC Emissions from One (1) Parts Cleaning Tank PCT1

Company Name: Creative Wood Designs, Inc.
Address City IN Zip: 710 Gerber Street and 1494 Gerber Street, Ligonier, Indiana 46767
Permit Number: T113-29975-00085
Significant Source Modification No.: 113-33210-00085
Significant PermitModification No.: 113-33208-00085
Permit Reviewer: Jack Harmon
Date: July, 2013

Parts Washer Identification	Solvent Name	Solvent Density (lb/gal)	Annual Solvent Throughput (gal)	Weight Percent VOC	Annual Emission Rate TPY
PCT1	Polychem Acrstrip 600	8.60	110.00	60.16%	0.28

Total Potential Emission Rate (tons/yr) **0.28**

METHODOLOGY

Total Potential Emission Rate (tons/yr) = [(Solvent Density (lb/gal) x Annual Throughput (gal) x Weight % VOC)] / 2,000 (lb/ton)

TPY - Tons per Year

Hazardous Air Pollutants

The material used does not contain hazardous air pollutants.

Appendix A: Surface Coating Emissions of Modification 33210
Company Name: Creative Wood Designs, Inc.
Address City Zip: 710 Gerber Street and 1494 Gerber Street, Ligonier, Indiana 46767
Permit No: T113-29975-00085
Significant Source Modification No. 113-33210-00085
Significant Permit Modification No.: 113-33208-00085
Date: July, 2013
Permit Reviewer: Jack Harmon

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	**Potential VOC tons per year**	**Particulate Potential (ton/yr)**	lb VOC/gal solids	Transfer Efficiency
PBSCB1-PBSCB5																
Stain Redwood Cherry	6.91	92.70%	0.00%	92.70%	0.00%	3.64%	0.0400	25.0000	6.41	6.41	6.41	153.74	**28.06**	**0.56**	175.98	75%
*Topcoat HC60	7.81	72.55%	0.40%	72.15%	0.37%	20.52%	0.0800	25.0000	5.66	5.63	11.27	270.48	**49.37**	**4.70**	27.46	75%
PBSCB6																
Topcoat HC60	7.81	72.55%	0.40%	72.15%	0.37%	20.52%	0.0800	25.0000	5.66	5.63	11.27	270.48	**49.37**	**4.70**	27.46	75%

PM Control Efficiency 95.00%

Potential Emissions	Uncontrolled	**28.95**	**694.70**	**126.80**	**9.96**
	Controlled	**28.95**	**694.70**	**126.80**	**0.50**

METHODOLOGY

* Acetone is used as a cleanup solvent
Topcoat HC60 serves as both topcoat and sealer
PM10 and PM2.5 presumed to be equal to PM emissions
Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Creative Wood Designs, Inc.
Address City IN Zip: 710 Gerber Street and 1494 Gerber Street, Ligonier, Indiana 46767
Permit Number: T113-29975-00085
Significant Source Modification No.: 113-33210-00085
Significant Permit Modification No.: 113-33208-00085
Permit Reviewer: Jack Harmon
Date: November 23, 2010

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MIBK	Weight % Ethylbenzene	Weight % Formaldehyde	Weight % Methanol	Xylene Emissions ** (ton/yr)	Toluene Emis (ton/yr)	MIBK Emmisions (ton/yr)	Ethylbenzen Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Methanol Emissions (ton/yr)	Total Emissions (ton/yr)
PBSCB1-PBSCB5																
Stain Redwood Cherry	6.91	0.04000	25.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
*Topcoat HC60	7.81	0.08000	25.00	2.22%	5.29%	0.00%	0.46%	0.17%	0.00%	1.52	3.62	0.00	0.32	0.12	0.00	5.58
PBSCB6																
Topcoat HC60	7.81	0.08000	25.00	2.22%	5.29%	0.00%	0.46%	0.17%	0.00%	1.52	3.62	0.00	0.32	0.12	0.00	5.58
							Total Potential Emissions			**3.04**	**7.24**	**0.00**	**0.64**	**0.24**	**0.00**	**11.16**

** Single HAP (toluene) emissions are limited to less than 10 tons per year source-wide

METHODOLOGY

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

Appendix A: Emissions Calculations
Natural Gas Combustion Emissions of the Modification 33210
MM BTU/HR <100

Company Name: Creative Wood Designs, Inc.
Address City IN Zip: 710 Gerber Street and 1494 Gerber Street, Ligonier, Indiana 46767
Permit Number: T113-29975-00085
Significant Source Modification No. 113-33210-00085
Significant Permit Modification No.: 113-33208-00085
Date: July, 2013
Permit Reviewer: Jack Harmon

Emission Units	MMBtu/hr
Air Make Up PBAM1	3.00
Office Heater PBH1	0.06
Thermocycler PBH2	0.40
Thermocycler PBH3	0.53
Total Modification	**3.99**

Heat Input Capacity MMBtu/hr	HHV mmBtu/mmscf	Potential Throughput MMCF/yr
3.99	1020	34.27

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.0	0.1	0.1	0.0	1.7	0.1	1.4

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

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
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	3.598E-05	2.056E-05	1.285E-03	3.084E-02	5.825E-05	**3.224E-02**

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	**Total - Metals**
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	8.567E-06	1.885E-05	2.399E-05	6.511E-06	3.598E-05	**9.389E-05**
					Total HAPs	**3.233E-02**
					Worst HAP	**3.084E-02** **(Hexane)**

Methodology is the same as above.

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		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	2,056	0.0	0.0
Summed Potential Emissions in tons/yr	2,056		
CO2e Total in tons/yr	2,069		

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).

Appendix A: Emissions Calculations
Unpaved Roads

Company Name: Creative Wood Designs, Inc.
Address City IN Zip: 710 Gerber Street and 1494 Gerber Street, Ligonier, Indiana 467
Permit Number: T113-29975-00085
Significant Source Modification No.: 113-33210-00085
Significant Permit Modification No.: 113-33208-00085
Permit Reviewer: Jack Harmon
Date: July, 2013

1.000	trips/hr x
0.028	miles/roundtrip x

245.28 miles per year

Constants			
where:	**For PM**	**For PM-10**	
k =	10	2.6	(particle size multiplier for PM-10) (k=10 for PM-30 or TSP)
s =	4.8	4.8	mean % silt content of unpaved roads
b =	0.5	0.4	Constant for PM-10 (b = 0.5 for PM-30 or TSP)
c =	0.4	0.3	Constant for PM-10 (c = 0.4 for PM-30 or TSP)
W =	38	38	tons average vehicle weight
Mdry =	0.2	0.2	surface material moisture content, % (default is 0.2 for dry conditions)
p =	125	125	number of days with at least 0.254mm of precipitation (See Figure 13.2.2-1)
Particulate Emission Factor			
Ef =	11.24	2.27	Ef = {k*[(s/12)^0.8]*[(W/3)^b]/[(Mdry/0.2)^c]}*[(365-p)/365] (lb/mile)

PM Emissions = $\frac{11.24 \text{ lb/mi} \times 245.28 \text{ mi/yr}}{2000 \text{ lb/ton}} =$ **1.38 tons/yr**

PM-10/2.5 Emissions = $\frac{2.27 \text{ lb/mi} \times 245.28 \text{ mi/yr}}{2000 \text{ lb/ton}} =$ **0.28 tons/yr**

The following calculations determine the amount of emissions created by vehicle traffic on unpaved roads, based on 8760 hours of use and AP-42, Ch 11.2.1.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

TO: LaVern Hochstetler
Creative Wood Designs, Inc.
710 Gerber Street
Ligonier, Indiana 46767

DATE: September 20, 2013

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

SUBJECT: Final Decision
Significant Permit Modification to Part 70
113-33208-00085

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:
Doug Elliott, D & B Environmental Services, Inc.
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 6/13/2013

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

September 20, 2013

TO: Ligonier Public Library

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

Subject: **Important Information for Display Regarding a Final Determination**

Applicant Name: Creative Wood Designs, Inc.
Permit Number: 113-33208-00085

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

IDEM Staff	PWAY 9/20/2013 Creative Wood Designs, Inc. 113-33208-00085 (final)			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee Remarks
1		LaVern Hochstetler Creative Wood Designs, Inc. 710 Gerber St Ligonier IN 46767 (Source CAATS)									
2		Noble County Board of Commissioners 101 North Orange Street Albion IN 46701 *(Local Official)*									
3		Noble County Health Department 2090 N. State Rd 9, Suite C Albion IN 46701-9566 *(Health Department)*									
4		Mr. Steve Christman NISWMD 2320 W 800 S, P.O. Box 370 Ashley IN 46705 *(Affected Party)*									
5		Frederick & Iva Moore 6019 W 650 N Ligonier IN 46767 *(Affected Party)*									
6		Ligonier Public Library 300 S Main St Ligonier IN 46767-1812 *(Library)*									
7		Mr. Doug Elliott D & B Environmental Services, Inc. 401 Lincoln Way West Osceola IN 46561 *(Consultant)*									
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