



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: October 17, 2013
RE: Wieland Designs, Inc. / 039 - 33618 - 00258
FROM: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision – Approval

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

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

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

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

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

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

Enclosures
FNPER-AM.dot 6/13/2013



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

Joe Williams
Wieland Designs, Inc.
901 E Madison Street, Suite A
Goshen, IN 46528

October 17, 2013

Re: 039-33618-00258
Administrative Amendment to
M039-30921-00258

Dear Mr. Williams:

Wieland Designs, Inc. was issued a Minor Source Operating Permit (MSOP) No. M039-30921-00258 on January 17, 2012 for a stationary fabric, foam, and wood seating manufacturing source located at 901 East Madison Street, Suite A, Goshen, Indiana 46528. On September 5, 2013, the Office of Air Quality (OAQ) received an application from the source requesting the addition of four (4) specialty single station adhesive application booths, identified as AS20 through AS23, to its existing adhesive operation, identified as EU01B.

Pursuant to 326 IAC 2-6.1-6(d)(8), this change to the permit is considered an administrative amendment because the permit is amended to incorporate a modification that adds an emissions unit or units of the same type that is already permitted or replaces an existing unit and that will comply with the same applicable requirements and permit terms and conditions as the existing emission unit, and the modification does not result in a potential to emit greater than the thresholds in 326 IAC 2-2 (PSD), 326 IAC 2-3 (Emission Offset), or 326 IAC 2-7 (Part 70 Operating Permit).

The following are the emissions units:

- (a) Three (3) specialty single station adhesive application booths, identified as AS20 through AS23, approved for construction in 2013, with a maximum throughput of 5 units per hour, grouped within adhesive line T-375.

The PTE of the emission unit is as follows:

Process/ Emission Unit	PTE of Proposed Modification (tons/year)									
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e	Total HAPs	Worst Single HAP
Adhesive Application Booths (AS20 - AS23)	-	-	-	-	-	4.984	-	-	-	-

The uncontrolled/unlimited potential to emit of the entire source after the addition of this emission unit will continue to be within the threshold levels specified in 326 IAC 2-6.1 (MSOP). (See Appendix A for the calculations).

The addition of the emission unit will not cause the source's potential to emit to be greater than the threshold levels specified in 326 IAC 2-2 (PSD), 326 IAC 2-3 (Emission Offset), or 326 IAC 2-7 (Part 70).

- (a) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The surface coating operation (AS20 to AS23) is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each unit is less than twenty-five (25) tons per year.
- (b) 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)
The surface coating operation (AS20 to AS23) is under the Standard Industrial Classification Code of major group #37; the source was constructed after July 1, 1990 and the production operation has actual VOC emissions greater than 15 pounds per day. However, the source does not coat metal surfaces, but coats a substrate of fabric and foam. Therefore, 326 IAC 8-2-9 does not apply.
- (c) 326 IAC 8-2-11 (Fabric and Vinyl Coating)
The requirements of 326 IAC 8-2-11 (Fabric and Vinyl Coating) do not apply to the surface coating operation (AS20 to AS23), because the source uses a flow applicator to apply adhesive to the surface of the fabric and foam. The adhesive does not add any additional properties to the fabric, but allows an adhesive bond to occur between the fabric and the underlying material (foam).
- (d) No new state rules are applicable to this source due to the addition of the emission unit.
- (e) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) or National Emission standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 20 and 40 CFR Part 61, 63) included in this administrative amendment.

PTE of the Entire Source After Issuance of the MSOP Administrative Amendment

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of MSOP Administrative Amendment (tons/year)									
	PM	PM10*	PM2.5*	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Surface Coating (EU-01A, EU01B)	4.26	4.26	4.26	0.00	0.00	94.349	0.00	0.00	13.82	6.91 (Toluene)
Adhesive Application Booths (AS20 - AS23)	-	-	-	-	-	4.984	-	-	-	-
Woodworking Fabrication	0.31	0.31	0.31	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Combustion	0.013	0.051	0.051	0.004	0.667	0.037	0.560	805	0.013	0.012
Fugitive Emissions	0.145	0.028	0.004	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total PTE of Entire Source	4.73	4.65	4.62	0.004	0.67	99.37	0.56	805	13.83	6.91
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10

negl. = negligible
 *Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant".
 **The 100,000 CO₂e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.

Proposed Changes

Pursuant to the provisions of 326 IAC 2-6.1-6, the permit is hereby amended as follows with the deleted language as strikeouts and new language **bolded**.

- (b) One (1) Adhesive Application Operation, identified as EU01B, using low pressure flow coat applicators to apply adhesive to a substrate of fabric and foam for seats, using dry filters for particulate control, and exhausting inside the building, consisting of the following lines:
 ...
- (5) **Three (3) specialty single station adhesive application booths, identified as AS20 through AS23, approved for construction in 2013, with a maximum throughput of 5 seats per hour.**

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Adhesive Application	
(b)	One (1) Adhesive Application Operation, identified as EU01B, using low pressure flow coat applicators to apply adhesive to a substrate of fabric and foam for seats, using dry filters for particulate control, and exhausting inside the building, consisting of the following lines: ...
(5)	Three (3) specialty single station adhesive application booths, identified as AS20 through AS23, approved for construction in 2013, with a maximum throughput of 5 seats per hour.

Additional Changes

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

IDEM clarified the following condition to indicate that the analog instrument must be capable of measuring the parameters outside the normal range.

C.11 Instrument Specifications [326 IAC 2-1.1-11]

- (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. **The analog instrument shall be capable of measuring values outside of the normal range.**
- (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.

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

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Adam Wheat of my staff at 317-233-8397 or 1-800-451-6027, and ask for extension 3-8397.

Sincerely,



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

Attachments: Updated Permit and Appendix A

NB/AW

cc: File - Elkhart County
Elkhart County Health Department
U.S. EPA, Region V
Compliance and Enforcement Branch



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

New Source Construction and Minor Source Operating Permit OFFICE OF AIR QUALITY

**Wieland Designs, Inc.
901 East Madison, Suite A
Goshen, Indiana 46528**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No. M039-30921-00258	
Originally Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: January 17, 2012 Expiration Date: January 17, 2017

First Administrative Amendment No. 039-33618-00258	
Issued by:  Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: October 17, 2013 Expiration Date: January 17, 2017

TABLE OF CONTENTS

A. SOURCE SUMMARY	4
A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]	
A.2 Emission Units and Pollution Control Equipment Summary	
B. GENERAL CONDITIONS	6
B.1 Definitions [326 IAC 2-1.1-1]	
B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]	
B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]	
B.4 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.5 Term of Conditions [326 IAC 2-1.1-9.5]	
B.6 Enforceability	
B.7 Severability	
B.8 Property Rights or Exclusive Privilege	
B.9 Duty to Provide Information	
B.10 Annual Notification [326 IAC 2-6.1-5(a)(5)]	
B.11 Preventive Maintenance Plan [326 IAC 1-6-3]	
B.12 Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.13 Termination of Right to Operate [326 IAC 2-6.1-7(a)]	
B.14 Permit Renewal [326 IAC 2-6.1-7]	
B.15 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]	
B.16 Source Modification Requirement	
B.17 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2] [IC 13-17-3-2][IC 13-30-3-1]	
B.18 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]	
B.19 Annual Fee Payment [326 IAC 2-1.1-7]	
B.20 Credible Evidence [326 IAC 1-1-6]	
C. SOURCE OPERATION CONDITIONS	11
Emission Limitations and Standards [326 IAC 2-6.1-5(a)(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]	
C.2 Permit Revocation [326 IAC 2-1.1-9]	
C.3 Opacity [326 IAC 5-1]	
C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.6 Fugitive Dust Emissions [326 IAC 6-4]	
C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
Testing Requirements [326 IAC 2-6.1-5(a)(2)]	
C.8 Performance Testing [326 IAC 3-6]	
Compliance Requirements [326 IAC 2-1.1-11]	
C.9 Compliance Requirements [326 IAC 2-1.1-11]	
Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]	
C.10 Compliance Monitoring [326 IAC 2-1.1-11]	
C.11 Instrument Specifications [326 IAC 2-1.1-11]	
Corrective Actions and Response Steps	
C.12 Response to Excursions or Exceedances	
C.13 Actions Related to Noncompliance Demonstrated by a Stack Test	

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

- C.14 Malfunctions Report [326 IAC 1-6-2]
- C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]
- C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2]
[IC 13-14-1-13]

D.1. EMISSIONS UNIT OPERATION CONDITIONS..... 17

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

- D.1.1 Particulate [326 IAC 6-3-2]
- D.1.2 Preventive Maintenance Plan [326 IAC 2-5.5-4]

Compliance Determination Requirements

- D.1.8 Testing Requirements [326 IAC 2-1.1-11]

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

- D.1.15 Transformer-Rectifier (T-R) Sets

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

- D.1.20 Record Keeping Requirement

D.2. EMISSIONS UNIT OPERATION CONDITIONS..... 19

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

- D.2.1 Particulate [326 IAC 6-3-2]
- D.2.2 Preventive Maintenance Plan [326 IAC 2-5.5-4]

Compliance Determination Requirements

- D.2.3 Particulate Control

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

- D.2.4 Dust Collector Inspections

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

- D.2.5 Record Keeping Requirement

D.3. EMISSIONS UNIT OPERATION CONDITIONS..... 21

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

- D.1.1 Particulate Matter (PM) [326 IAC 6-2]

Annual Notification 22

Malfunction Report 23

Affidavit of Construction 25

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 and A.2 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 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary medical and automotive seating manufacturer that cuts, sews and clues metal seats.

Source Address:	901 East Madison, Suite A, Goshen, Indiana 46528
General Source Phone Number:	(574) 533-2168
SIC Code:	3714 (Motor Vehicle Parts and Accessories)
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source 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

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

- (a) One (1) Adhesive Application Operation, identified as EU01A using HVLP airless spray applicators to apply adhesive to a substrate of fabric and foam for seats, with a maximum capacity of 35 metal or wooden seats per hour, using dry filters for particulate control, consisting of:
 - (1) Three (3) lines, identified as AS1 through AS3, constructed in 1994, exhausting to stacks ASSV-1 through ASSV-3; and
 - (2) Two (2) lines, identified as AS4 and AS5, approved for construction in 2011, exhausting to stack ASSV-4.

- (b) One (1) Adhesive Application Operation, identified as EU01B, using low pressure flow coat applicators to apply adhesive to a substrate of fabric and foam for seats, using dry filters for particulate control, and exhausting inside the building, consisting of the following lines:
 - (1) Two (2) Medical Lines, identified as AS6 and AS7, constructed in 1996, with a combined capacity of 16 (8 each) seats per hour.
 - (2) Eight (8) Non-medical Lines, identified as AS8 through AS15, constructed in 1996, with a combined capacity of 14 (1.75 each) metal or wooden seats per hour.
 - (3) Three (3) 604/204 Lines, identified as AS16 through AS18, constructed in 1996, with a combined capacity of 21 (10.5 each) metal or wooden seats per hour.
 - (4) One (1) T-375 Line, identified as AS19, constructed in 1996, with a maximum capacity of 7 seats metal or wooden per hour.

- (5) Three (3) specialty single station adhesive application booths, identified as AS20 through AS23, approved for construction in 2013, with a maximum throughput of 5 seats per hour.

- (c) One (1) wood cutting operation, identified as woodcutting , constructed in 1996, with a maximum capacity of 1,575 pounds of wood per hour, using a dust collector for particulate control and exhausting inside, consisting of:
 - (1) Two (2) 12" Table Saws;
 - (2) Two (2) Pin Routers;
 - (3) One (1) Band Saw;
 - (4) One (1) Chop Saw; and
 - (5) One (1) 6" Belt Sander.

- (d) One (1) Assembly Operation, identified as Fabrication, constructed in 1994, with a maximum capacity of 16.07 metal or wooden seats per hour.

- (e) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
 - (1) One (1) natural gas-fired boiler, identified as B1, constructed in 1996, with a maximum heat input capacity of 0.832 MMBtu/hr, exhausting through stack BSV1; and
 - (2) Two (2) natural gas-fired radiant heaters, identified as H1 and H2, constructed in 1996, with a maximum heat input capacity of 0.060 MMBtu/hr, each, exhausting through stacks HSV1 and HSV2.
 - (3) Two (2) natural gas-fired radiant heaters, identified as H3 and H4, constructed in 1996, with a maximum heat input capacity of 0.12 MMBtu/hr, each, exhausting through stacks HSV3 and HSV4.
 - (4) One (1) natural gas-fired radiant heater, identified as H5, constructed in 1996, with a maximum heat input capacity of 0.130 MMBtu/hr, exhausting through stack HSV5.
 - (5) One (1) natural gas-fired radiant heater, identified as H6, constructed in 1996, with a maximum heat input capacity of 0.20 MMBtu/hr, each, exhausting through stack HSV6.

SECTION B GENERAL CONDITIONS

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

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 2-1.1-1) 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 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, M039-30921-00258, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.6 Enforceability

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

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

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

B.9 Duty to Provide Information

- (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 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

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

B.11 Preventive Maintenance Plan [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 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.
- (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.12 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M039-30921-00258 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.13 Termination of Right to Operate [326 IAC 2-6.1-7(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 one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.14 Permit Renewal [326 IAC 2-6.1-7]

- (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 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least one hundred twenty (120) days 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 2-6.1 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 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.15 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 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
- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.16 Source Modification Requirement

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

B.17 Inspection and Entry

[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air

pollution control equipment), practices, or operations regulated or required under this permit;

- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.18 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 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

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.19 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.
- (b) 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.20 Credible Evidence [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 2-6.1-5(a)(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 Permit Revocation [326 IAC 2-1.1-9]

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

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

- (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 2-6.1-5(a)(2)]

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.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (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 2-6.1-5(a)(2)]

C.10 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.11 Instrument Specifications [326 IAC 2-1.1-11]

- (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. The analog instrument shall be capable of measuring values outside of the normal range.

- (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

C.12 Response to Excursions or Exceedances

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.13 Actions Related to Noncompliance Demonstrated by a Stack Test

- (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.

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

C.14 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]

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

C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of 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

- (b) 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.

- (c) 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.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Adhesive Application

- (a) One (1) Adhesive Application Operation, identified as EU01A using HVLP airless spray applicators to apply adhesive to a substrate of fabric and foam for seats, with a maximum capacity of 35 metal or wooden seats per hour, using dry filters for particulate control, consisting of:
- (1) Three (3) lines, identified as AS1 through AS3, constructed in 1994, exhausting to stacks ASSV-1 through ASSV-3; and
 - (2) Two (2) lines, identified as AS4 and AS5, approved for construction in 2011, exhausting to stack ASSV-4.
- (b) One (1) Adhesive Application Operation, identified as EU01B, using low pressure flow coat applicators to apply adhesive to a substrate of fabric and foam for seats, using dry filters for particulate control, and exhausting inside the building, consisting of the following lines:
- (1) Two (2) Medical Lines, identified as AS6 and AS7, constructed in 1996, with a combined capacity of 16 (8 each) seats per hour.
 - (2) Eight (8) Non-medical Lines, identified as AS8 through AS15, constructed in 1996, with a combined capacity of 14 (1.75 each) metal or wooden seats per hour.
 - (3) Three (3) 604/204 Lines, identified as AS16 through AS18, constructed in 1996, with a combined capacity of 21 (10.5 each) metal or wooden seats per hour.
 - (4) One (1) T-375 Line, identified as AS19, constructed in 1996, with a maximum capacity of 7 seats metal or wooden per hour.
 - (5) Three (3) specialty single station adhesive application booths, identified as AS20 through AS23, approved for construction in 2013, with a maximum throughput of 5 seats per hour.
- (d) One (1) Assembly Operation, identified as Fabrication, constructed in 1994, with a maximum capacity of 16.07 metal or wooden seats per hour.

(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 2-6.1-5(a)(1)]

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

Pursuant to 326 IAC 6-3-2(d), Adhesive Application Operation, EU01A, shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, subject to the following:

- (a) The Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

- (1) Repair control device so no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or changes in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.1.2 Preventive Maintenance Plan [326 IAC 2-5.5-4]

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

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Woodcutting

(c) One (1) wood cutting operation, identified as woodcutting, constructed in 1996, with a maximum capacity of 1,575 pounds of wood per hour, using a dust collector for particulate control and exhausting inside, consisting of:

- (1) Two (2) 12" Table Saws;
- (2) Two (2) Pin Routers;
- (3) One (1) Band Saw;
- (4) One (1) Chop Saw; and
- (5) One (1) 6" Belt Sander.

(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 2-6.1-5(a)(1)]

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking operations, identified as woodcutting, shall not exceed 3.50 pounds per hour when operating at a process weight rate of 1,575 pounds per hour.

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

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

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

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

D.2.2 Preventive Maintenance Plan [326 IAC 2-5.5-4]

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

Compliance Determination Requirements

D.2.3 Particulate Control

In order to comply with Condition D.2.1, the dust collector shall be in operation and control emissions from woodcutting operation at all times that woodcutting operation is in operation.

Compliance Monitoring Requirements [326 IAC 2 6.1 5(a)(2)]

D.2.4 Dust Collector Inspections

An inspection shall be performed each calendar quarter of all dust collector controlling the woodcutting operation. All defective dust collectors shall be replaced.

Record Keeping and Reporting Requirements [326 IAC 2 6.1 5(a)(2)]

D.2.5 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.4, the Permittee shall maintain records of the results of the inspections required under Condition D.2.4.

- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Boilers

- (e) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
 - (1) One (1) natural gas-fired boiler, identified as B1, constructed in 1996, with a maximum heat input capacity of 0.832 MMBtu/hr, exhausting through stack BSV1; and

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-2]

- (a) Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from the 0.832 MMBtu/hr shall be limited to 0.6 pounds per MMBtu heat input.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Wieland Designs, Inc.
Address:	901 East Madison, Suite A
City:	Goshen, Indiana 46528
Phone #:	(574) 533-2168
MSOP #:	M039-30921-00258

I hereby certify that Wieland Designs, Inc. is :

still in operation.

no longer in operation.

I hereby certify that Wieland Designs, Inc. is :

in compliance with the requirements of MSOP M039-30921-00258.

not in compliance with the requirements of MSOP M039-30921-00258.

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

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE AND ENFORCEMENT BRANCH FAX NUMBER: (317) 233-6865

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100 TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF "MALFUNCTION" AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

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

Wieland Designs, Inc.
901 East Madison, Suite A
Goshen, Indiana 46528

Affidavit of Construction

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

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make
these representations on behalf of _____.
(Company Name)
4. I hereby certify that Wieland Designs, Inc. 901 East Madison, Suite A, Goshen, Indiana 46528, completed construction of the medical and automotive seating manufacturer on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on September 13, 2011 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M039-30921-00258, Plant ID No. 039-00258 issued on _____.
5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

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

Signature _____
Date _____

STATE OF INDIANA)
)SS

COUNTY OF _____)

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

Signature _____
Name _____ (typed or printed)

**Appendix A: Emissions Calculations
Sourcewide Emission Summary**

Company Name: Wieland Designs, Inc.
Source Address: 901 East Madison Street, Goshen, IN 46526
Administrative Amendment: 039-33618-00258
Plt ID: 039-00258
Reviewer: Adam Wheat
Date: October 10, 2013

Emission Units	Unrestricted Potential Emissions									
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHG as CO2e	Total HAPs	Highest Single HAP (Toluene)
Surface Coating (EU01A, EU01B)	4.26	4.26	4.26	0.00	0.00	99.33	0.00	0.00	13.82	6.91 Toluene
Woodworking	0.31	0.31	0.31	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fabrication	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Combustion	0.013	0.051	0.051	0.004	0.667	0.037	0.560	805	0.013	2.3E-05 Toluene
Fugitive Dust	0.145	0.028	0.004	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total:	4.73	4.65	4.62	0.004	0.67	99.37	0.56	805	13.83	6.91 Toluene

Appendix A: Emissions Calculations
VOC and Particulate
Surface Coating Operations from 22 Adhesive Stations (EU-01A, EU-02A, EU-02B)

Company Name: Wieland Designs, Inc.
Source Address: 901 East Madison Street, Goshen, IN 46526
Administrative Amendment: 039-33618-00258
Pit ID: 039-00258
Reviewer: Adam Wheat
Date: October 10, 2013

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water & Exempt Organics	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Usage (gal/unit)	Maximum Production (units/hr)	Gal of Mat. (gal/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Five Adhesive Spray Stations contained within Four Booths (EU-01A, AS1-AS5)																	
Premium Contact Adhesive 7225	6.68	81.50%	30.00%	51.50%	0.00%	18.70%	0.0450	35.00	1.5747	3.440	3.440	5.417	130.011	23.727	2.131	N/A	75%
Acetone Premium Solvent P9800-S (Cleanup)	6.55	100.00%	100.00%	0.00%	0.00%	0.00%	0.0042	5.00	0.0210	0.000	0.000	0.000	0.000	0.000	0.000	N/A	100%
Summary												5.42	130.01	23.73	2.13		
Two (2) Medical Line Low Pressure Flowcoat Adhesive Stations (EU-01B, AS6-AS7)																	
Premium Contact Adhesive 6140	11.02	70.00%	0.00%	70.00%	0.00%	31.50%	0.0399	16.00	0.6384	7.714	7.714	4.925	118.191	21.570	0.000	N/A	100%
Acetone Premium Solvent P9800-S (Cleanup)	6.55	100.00%	100.00%	0.00%	0.00%	0.00%	0.0042	8.00	0.0336	0.000	0.000	0.000	0.000	0.000	0.000	N/A	100%
Summary												4.92	118.19	21.57	0.00		
Eight (8) Non-medical Line Low Pressure Flowcoat Adhesive Stations (EU-01B, AS8-AS15)																	
Premium Contact Adhesive 6140	11.02	70.00%	0.00%	70.00%	0.00%	31.50%	0.0399	14.00	0.5586	7.714	7.714	4.309	103.417	18.874	0.000	N/A	100%
Acetone Premium Solvent P9800-S (Cleanup)	6.55	100.00%	100.00%	0.00%	0.00%	0.00%	0.0042	6.00	0.0252	0.000	0.000	0.000	0.000	0.000	0.000	N/A	100%
Summary												4.31	103.42	18.87	0.00		
Three (3) 604/204 Line Low Pressure Flowcoat Adhesive Stations (EU-01B, AS16-AS18)																	
Premium Contact Adhesive 6140	11.02	70.00%	0.00%	70.00%	0.00%	31.50%	0.0295	21.00	0.6195	7.714	7.714	4.779	114.692	20.931	0.000	N/A	100%
Acetone Premium Solvent P9800-S (Cleanup)	6.55	100.00%	100.00%	0.00%	0.00%	0.00%	0.0042	6.00	0.0252	0.000	0.000	0.000	0.000	0.000	0.000	N/A	100%
Summary												4.78	114.69	20.93	0.00		
One (1) T-375 Low Pressure Flowcoat Adhesive Stations (EU-01B, AS19)																	
Premium Contact Adhesive 6140	11.02	70.00%	0.00%	70.00%	0.00%	31.50%	0.0295	7.00	0.2065	7.714	7.714	1.593	38.231	6.977	0.000	N/A	100%
Acetone Premium Solvent P9800-S (Cleanup)	6.55	100.00%	100.00%	0.00%	0.00%	0.00%	0.0042	6.00	0.0252	0.000	0.000	0.000	0.000	0.000	0.000	N/A	100%
Summary												1.59	38.23	6.98	0.00		
One (1) Specialty Line Consisting of Two (2) Midmark, One (1) Knoll, and One (1) Salamander Low Pressure Flowcoat Adhesive Stations (EU-01B, AS20-AS23)																	
Premium Contact Adhesive 6140	11.02	70.00%	0.00%	70.00%	0.00%	31.50%	0.0295	5.00	0.1475	7.714	7.714	1.138	27.308	4.984	0.000	N/A	100%
Acetone Premium Solvent P9800-S (Cleanup)	6.55	100.00%	100.00%	0.00%	0.00%	0.00%	0.0042	6.00	0.0252	0.000	0.000	0.000	0.000	0.000	0.000	N/A	100%
Summary												1.14	27.31	4.98	0.00		
Fabrication Area (General Ventilation)																	
Spray Rite Adhesive 7810	5.01	75.00%	10.00%	65.00%	0.00%	44.00%	0.0099	16.07	0.1591	3.257	3.257	0.518	12.436	2.270	0.000	7.401	100%
Fastbond 100 Adhesive	9.18	0.01%	0.00%	0.01%	0.00%	99.98%	0.0099	16.07	0.1591	0.001	0.001	0.000	0.004	0.001	0.000	N/A	100%
Summary												0.52	12.44	2.27	0.00		
Total Uncontrolled Potential Emissions												12.45	298.87	99.33	4.26		

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 hrs/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1-Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Capture Efficiency: 0.00% 95.00%
Control Efficiency: 0.00% 95.00%
Overall Control Efficiency: 0.00% 90.25%
99.33 0.42

Post Control Emission Rate (tpy)

Hazardous Air Pollutants

Material	Density (Lb/Gal)	Usage (gal/unit)	Maximum Production (units/hr)	Weight % Ethyl Benzene	Weight % Formaldehyde	Weight % N-Hexane	Weight % Toluene	Weight % Xylene	Ethyl Benzene Emissions (tpy)	Formaldehyde Emissions (tpy)	N-Hexane Emissions (tpy)	Toluene Emissions (tpy)	Xylene Emissions (tpy)	Total HAP (tpy)	
Premium Contact Adhesive 7225	6.68	0.0450	35.00	0.00%	0.00%	15.00%	15.00%	0.00%	0.00	0.00	6.91	6.91	0.00	13.82	
Premium Contact Adhesive 6140	11.02	0.0399	53.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	
Spray Rite Adhesive 7810	5.01	0.0099	16.07	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	
Fastbond 100 Adhesive	9.18	0.0099	16.07	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	
Acetone Premium Solvent P9800-S (Cleanup)	6.55	0.0042	19.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	
Total Potential HAP Emissions (tons/year)										0.00	0.00	6.91	6.91	0.00	13.82

METHODOLOGY

HAPs emission rate (tons/yr) = Density (lb/gal) * Usage (gal/unit) * Maximum Production (units/hr) * 8760 (hrs/yr) * 1 (ton)/2000 (lbs)

**Appendix A: Emission Calculations
Wood Cutting Operations - WC**

Company Name: Wieland Designs, Inc.
Source Address: 901 East Madison Street, Goshen, IN 46526
Administrative Amendment: 039-33618-00258
Plt ID: 039-00258
Reviewer: Adam Wheat
Date: October 10, 2013

Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	PM Emission Rate before Controls (lb/hr)	PM Emission Rate before Controls (tons/yr)	PM Emission Rate after Controls (lb/hr)	PM Emission Rate after Controls (tons/yr)
Wood Cutting Dust Collector DC1	99.0%	0.003	2,725	7.01	30.69	0.07	0.31
TOTALS				7.01	30.69	0.07	0.31

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)

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

Allowable Rate of Emissions

Process Rate (lbs/hr)	Process Weight Rate (tons/hr)	Allowable Emissions (lbs/hr)
1575.00	0.788	3.49

Methodology

Allowable Emissions = 4.10(Process Weight Rate)^0.67

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

Company Name: Wieland Designs, Inc.
Source Address: 901 East Madison Street, Goshen, IN 46526
Administrative Amendment: 039-33618-00258
Pt ID: 039-00258
Reviewer: Adam Wheat
Date: October 10, 2013

Heat Input Capacity MMBtu/hr			
0.12	Two (2) Natural Gas-fired Radiant Heaters @ 0.060 MMBtu, each (H1, H2)		
0.24	Two (2) Natural Gas-fired Radiant Heaters @ 0.120 MMBtu, each (H3, H4)		
0.13	One (1) Natural Gas-fired Radiant Heater @ 0.130 MMBtu (H5)		
0.2	One (1) Natural Gas-fired Radiant Heater @ 0.20 MMBtu (H6)		
0.832	One (1) Natural Gas-fired boiler @ 0.832 MMBtu (B1)		
1.5	Total	HHV mmBtu mmscf 1000	Potential Throughput MMCF/yr 13.3

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.013	0.051	0.051	0.004	0.667	0.037	0.560

*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/1,000 MMBtu
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Hazardous Air Pollutants (HAPs)

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.4E-05	8.0E-06	5.0E-04	0.012	2.3E-05

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	3.3E-06	7.3E-06	9.3E-06	2.5E-06	1.4E-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.

Greenhouse Gases (GHGs)

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120,000	2.3	2.2
Potential Emission in tons/yr	800	0.02	0.01
Summed Potential Emissions in tons/yr	800		
CO2e Total in tons/yr	805		

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
 Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
 Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
 CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

Appendix A: Emissions Calculations
Fugitive Dust Emissions - Paved Roads

Company Name: Wieland Designs, Inc.
Source Address: 901 East Madison Street, Goshen, IN 46526
Administrative Amendment: 039-33618-00258
Plt ID: 039-00258
Reviewer: Adam Wheat
Date: October 10, 2013

Paved Roads at Industrial Site

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (12/2003).

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	1.0	5.0	5.0	15.0	75.0	1000	0.189	0.9	345.6
Vehicle (leaving plant) (one-way trip)	1.0	5.0	5.0	15.0	75.0	1000	0.189	0.9	345.6
Total			10.0		150.0			1.9	691.3

Average Vehicle Weight Per Trip = $\frac{15.0}{1.0}$ tons/trip
Average Miles Per Trip = $\frac{0.19}{1.0}$ miles/trip

Unmitigated Emission Factor, $E_f = [k * (sL/2)^{0.65} * (W/3)^{1.5} - C]$ (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.082	0.016	0.0024	lb/mi = particle size multiplier (AP-42 Table 13.2.1-1)
W =	15.0	15.0	15.0	tons = average vehicle weight (provided by source)
C =	0.00047	0.00047	0.00047	lb/mi = emission factor for vehicle exhaust, brake wear, and tire wear (AP-42 Table 13.2.1-2)
sL =	0.6	0.6	0.6	g/m ² = Ubiquitous Baseline Silt Loading Values of paved roads (Table 13.2.1-3 for summer months)

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

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

	PM	PM10	PM2.5	
Unmitigated Emission Factor, E_f	0.419	0.081	0.012	lb/mile
Mitigated Emission Factor, E_{ext}	0.383	0.074	0.011	lb/mile
Dust Control Efficiency =	50%	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	7.2E-02	1.4E-02	2.0E-03	6.6E-02	1.3E-02	1.9E-03	3.3E-02	6.4E-03	9.3E-04
Vehicle (leaving plant) (one-way trip)	7.2E-02	1.4E-02	2.0E-03	6.6E-02	1.3E-02	1.9E-03	3.3E-02	6.4E-03	9.3E-04
Total	0.145	0.028	0.004	0.132	0.026	0.004	0.066	0.013	0.002

Abbreviations

PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PTE = Potential to Emit

Methodology

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

These calculations were submitted by the source and verified to be accurate by IDEM.



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

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

TO: Joe Williams
Wieland Designs, Inc.
901 E Madison St
Goshen, IN 46528

DATE: October 17, 2013

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

SUBJECT: Final Decision
MSOP - Administrative Amendment
039 - 33618 - 00258

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:
Steve Yoder, VP - HR
Doug Elliott D & B Environmental Services
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 6/13/2013

Mail Code 61-53

IDEM Staff	LPOGOST 10/17/2013 Wieland Designs, Inc. 039 - 33618 - 00258 final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Joe Williams Wieland Designs, Inc. 901 E Madison St Goshen IN 46528 (Source CAATS) Via confirmed delivery										
2		Steve Yoder VP - HR Wieland Designs, Inc. 901 E Madison St Goshen IN 46528 (RO CAATS)										
3		Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 (Health Department)										
4		Goshen City Council and Mayors Office 202 South 5th Street Suite 1 Goshen IN 46528 (Local Official)										
5		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 (Local Official)										
6		Mr. Doug Elliott D & B Environmental Services, Inc. 401 Lincoln Way West Osceola IN 46561 (Consultant)										
7												
8												
9												
10												
11												
12												
13												
14												
15												

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