



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

Date: September 12, 2014

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

Source Name: Quality Hardwood Sales, LLC

Permit Level: Title V Operating Permit Renewal

Permit Number: 039-34097-00698

Source Location: 493 Shawnee Drive, Nappanee, Indiana

Type of Action Taken: Permit Renewal

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 matter referenced above.

The final decision is available on the IDEM website at: <http://www.in.gov/apps/idem/caats/>
To view the document, select Search option 3, then enter permit 34097.

If you would like to request a paper copy of the permit document, please contact IDEM's central file room:

Indiana Government Center North, Room 1201
100 North Senate Avenue, MC 50-07
Indianapolis, IN 46204
Phone: 1-800-451-6027 (ext. 4-0965)
Fax (317) 232-8659

Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

(continues on next page)

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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 an initial Title V operating permit, permit renewal, 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 impracticable 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.



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Part 70 Operating Permit Renewal
OFFICE OF AIR QUALITY

Quality Hardwood Sales, LLC
493 Shawnee Drive
Nappanee, Indiana 46550

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

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

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. T039-34097-00698	
Issued by:  Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: September 12, 2014 Expiration Date: September 12, 2019

TABLE OF CONTENTS

A. SOURCE SUMMARY	4
A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]	
A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(14)]	
A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)] [326 IAC 2-7-5(14)]	
A.4 Part 70 Permit Applicability [326 IAC 2-7-2]	
B. GENERAL CONDITIONS	6
B.1 Definitions [326 IAC 2-7-1]	
B.2 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)]	
B.3 Term of Conditions [326 IAC 2-1.1-9.5]	
B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]	
B.5 Severability [326 IAC 2-7-5(5)]	
B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]	
B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]	
B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]	
B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]	
B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]	
B.11 Emergency Provisions [326 IAC 2-7-16]	
B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]	
B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]	
B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]	
B.15 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]	
B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]	
B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]	
B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]	
B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]	
B.20 Source Modification Requirement [326 IAC 2-7-10.5]	
B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]	
B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]	
B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]	
B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]	
C. SOURCE OPERATION CONDITIONS	16
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]	
C.2 Opacity [326 IAC 5-1]	
C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.5 Fugitive Dust Emissions [326 IAC 6-4]	
C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
Testing Requirements [326 IAC 2-7-6(1)]	
C.7 Performance Testing [326 IAC 3-6]	
Compliance Requirements [326 IAC 2-1.1-11]	
C.8 Compliance Requirements [326 IAC 2-1.1-11]	
Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]	
C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]	

C.10 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]

- C.11 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.12 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]
- C.13 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]
- C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

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

- C.15 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]
- C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
- C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

- C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1. EMISSIONS UNIT OPERATION CONDITIONS..... 23

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

- D.1.1 Particulate [326 IAC 6-3-2]
- D.1.2 PSD Minor Limitations [326 IAC 2-2]
- D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

Compliance Determination Requirements

- D.1.4 Particulate Control

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

- D.1.5 Visible Emissions Notations [40 CFR Part 64]
- D.1.6 Parametric Monitoring [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)][40 CFR Part 64]
- D.1.7 Broken or Failed Bag Detection

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

- D.1.8 Record Keeping Requirements

D.2. EMISSIONS UNIT OPERATION CONDITIONS..... 26

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

- D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]
- D.2.2 Particulate [326 IAC 6-3-2(d)]
- D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

Compliance Determination Requirements

- D.2.4 Particulate Control

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

- D.2.5 Monitoring

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

- D.2.6 Record Keeping Requirements

Certification 28
Emergency Occurrence Report 29
Quarterly Deviation and Compliance Monitoring Report 31

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(14)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary wood cabinet door manufacturing source.

Source Address: 493 Shawnee Drive, Nappanee, Indiana 46550
 General Source Phone Number: 574-773-2505
 SIC Code: 2434 (Wood Kitchen Cabinets)
 County Location: Elkhart
 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(14)]

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

- (a) One woodworking operation, identified as Woodworking Operation, constructed in 2009, configured as follows:

Baghouse ID	Emission Unit ID	Construction Date	Maximum Throughput (lbs/hr)*
DC1	SS1, SS2, SS4, DES1, and OS4	2009	17,500
DC2	SS3	2009	4,375
DC3	JT1, CS1, SCS1, PAS1, CNC1, and BS1	2009	26,250
DC4	RS1, CPS1, CPS2, CPS3, CPS4, and OS1	2009	26,250
DC5	OS2, OS3, SD1, CM1, CM2, PL1, PAS2, PS1, TS1, CS2, and PS2	2009	48,125

*The maximum throughput of each emission unit is 4,375 pounds per hour.

- (b) One (1) roll coating line, constructed in 2009, identified as AA, with a throughput capacity of 250 units per hour and using 0.005 gallons of coating (containing no VOC) per unit, and consisting of the following equipment: AT1 (Assembly Table), MN1 (Mitre Nailer), GRC1 (Glue Roll Coater), DRP1 (Door Press) and DRP2 (Door Press).
- (c) One (1) spray coating line, constructed in 2009, consisting of coating equipment and electric dryer, identified as SCM1, with a throughput capacity of 250 units per hour, using robotic air assisted airless spray application method, venting to stacks SCM1S1 and SCM1S2, and using dry filters as control (SCM1F).

- (d) One (1) spray booth for Glazing operation, constructed in 2009, identified as GB1, with a throughput capacity of 125 units per hour and using 0.005 gallons of coating per unit, using high volume low pressure (HVLP) application method, venting to a stack GB1S1, and using dry filters as control (GB1F).
- (e) One (1) spray booth for Glazing operation, constructed in 2009, identified as GB2, with a throughput capacity of 125 units per hour and using 0.005 gallons of coating per unit, using high volume low pressure (HVLP) application method, venting to a stack GB2S2, and using dry filters as control (GB2F).

A.3 Specifically Regulated Insignificant Activities
[326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

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

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 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, T039-34097-00698, 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.3 Term of Conditions [326 IAC 2-1.1-9.5]

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

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

B.4 Enforceability [326 IAC 2-7-7] [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.5 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.6 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.7 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.8 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(35), 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(35).

B.9 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. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

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

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(35).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]

(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

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

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

B.11 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(35).

- (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)(8) 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.12 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.13 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 T039-34097-00698 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 permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 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.15 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(35).
- (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.16 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(42). 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(35).

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.17 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(35).

- (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.18 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.19 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) or (c) without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any 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)(1) and (c)(1). 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) and (c)(1).

- (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(37)) 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(35).

- (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.20 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.21 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.22 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(35).
- (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.23 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.24 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 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(35).

- (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.7 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(35).

- (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(35).
- (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.8 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.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

- (a) For new units:
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.
- (b) For existing units:
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 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, 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(35).

C.10 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. 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 [326 IAC 2-7-5][326 IAC 2-7-6]

C.11 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 maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) 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.12 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.13 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.14 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(35).

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

C.15 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(33) ("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(35).

C.16 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. Support information includes the following, where applicable:

- (AA) All calibration and maintenance records.
- (BB) All original strip chart recordings for continuous monitoring instrumentation.
- (CC) Copies of all reports required by the Part 70 permit.

Records of required monitoring information include the following, where applicable:

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

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

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

C.17 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. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

- (b) The address for report submittal is:

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

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

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

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One woodworking operation, identified as Woodworking Operation, constructed in 2009, configured as follows:

Baghouse ID	Emission Unit ID	Construction Date	Maximum Throughput (lbs/hr)*
DC1	SS1, SS2, SS4, DES1, and OS4	2009	17,500
DC2	SS3	2009	4,375
DC3	JT1, CS1, SCS1, PAS1, CNC1, and BS1	2009	26,250
DC4	RS1, CPS1, CPS2, CPS3, CPS4, and OS1	2009	26,250
DC5	OS2, OS3, SD1, CM1, CM2, PL1, PAS2, PS1, TS1, CS2, and PS2	2009	48,125

*The maximum throughput of each emission unit is 4,375 pounds 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 2-7-5(1)]

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

In order to ensure that the Woodworking Operation is exempt from the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the baghouses DC1 through DC5 shall be in operation and control emissions from the Woodworking Operation at all times the emission units are in operation.

D.1.2 PSD Minor Limitations [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the PM, PM10, and PM2.5 emissions after control from the woodworking operation shall be less than the following emission limitations:

Emission Unit Description	Control Device	PM Emission Limit (lbs/hour)	PM10 Emission Limit (lbs/hour)	PM2.5 Emission Limit (lbs/hour)
Woodworking	DC1	4.15	4.15	4.15
Woodworking	DC2	4.15	4.15	4.15
Woodworking	DC3	5.14	5.14	5.14
Woodworking	DC4	6.52	6.52	6.52
Woodworking	DC5	6.52	6.52	6.52

Compliance with these limits, combined with the potential to emit PM, PM10, and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM, PM10,

and PM2.5 to less than 250 tons per year, each, and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

The Preventive Maintenance Plan is required for woodworking operation and its associated control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.4 Particulate Control

- (a) In order to comply with Conditions D.1.1 and D.1.2, the baghouses DC1 through DC5 for particulate control shall be in operation and control emissions from the associated woodworking facilities at all times when one or more of the associated woodworking facilities 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 2-7-5(1)][326 IAC 2-7-6(1)]

D.1.5 Visible Emissions Notations [40 CFR Part 64]

- (a) Visible emission notations of baghouses DC1, DC2, DC3, DC4, and DC5 shall be performed once per day during normal daylight operations when venting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit

D.1.6 Parametric Monitoring [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)][40 CFR Part 64]

- (a) The Permittee shall record the pressure drop across the control devices used in conjunction with the woodworking operation at least once per day when the associated processes are in operation. When, for any one reading, the pressure drop across the baghouses DC1, DC2, DC3, DC4, and DC5 is outside of the normal range, the Permittee shall take a reasonable response. The normal range for these units is a pressure drop between 0.5 and 4.5 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

- (b) The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

D.1.7 Broken or Failed Bag Detection

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

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

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

D.1.8 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.5, the Permittee shall maintain daily records of the visible emission notations of the emissions from each of the baghouses (DC1, DC2, DC3, DC4, and DC5). The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (e.g., the process did not operate that day).
- (b) To document the compliance status with Condition D.1.6, the Permittee shall maintain daily records of the pressure drop across the baghouses (DC1, DC2, DC3, DC4, and DC5). The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g., the process did not operate that day).
- (c) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (c) One (1) spray coating line, constructed in 2009, consisting of coating equipment and electric dryer, identified as SCM1, with a throughput capacity of 250 units per hour, using robotic air assisted airless spray application method, venting to stacks SCM1S1 and SCM1S2, and using dry filters as control (SCM1F).
- (d) One (1) spray booth for Glazing operation, constructed in 2009, identified as GB1, with a throughput capacity of 125 units per hour and using 0.005 gallons of coating per unit, using high volume low pressure (HVLP) application method, venting to a stack GB1S1, and using dry filters as control (GB1F).
- (e) One (1) spray booth for Glazing operation, constructed in 2009, identified as GB2, with a throughput capacity of 125 units per hour and using 0.005 gallons of coating per unit, using high volume low pressure (HVLP) application method, venting to a stack GB2S2, and using dry filters as control (GB2F).

(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.2.1 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 wood cabinets by SCM1, GB1, and GB2 shall utilize one of the following application methods:

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

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.2.2 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from surface coating operations SCM1, GB1, and GB2 shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

The Preventive Maintenance Plan is required for these facility and their associated control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.2.4 Particulate Control

In order to comply with Condition D.2.2, the dry filters for particulate control shall be in operation and control emissions from the surface coating operations SCM1, GB1, and GB2 at all times that the booths are in operation.

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

D.2.5 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 stacks (SCM1S1, SCM1S2, GB1S1, and GB2S2) 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 a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.2.6 Record Keeping Requirements

- (b) To document the compliance status with Condition D.2.5, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

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

Source Name: Quality Hardwood Sales, LLC
Source Address: 493 Shawnee Drive, Nappanee, Indiana 46550
Part 70 Permit No.: T039-34097-00698

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: Quality Hardwood Sales, LLC
Source Address: 493 Shawnee Drive, Nappanee, Indiana 46550
Part 70 Permit No.: T039-34097-00698

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 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Quality Hardwood Sales, LLC
 Source Address: 493 Shawnee Drive, Nappanee, Indiana 46550
 Part 70 Permit No.: T039-34097-00698

Months: _____ **to** _____ **Year:** _____

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Background and Description
--

Source Name:	Quality Hardwood Sales, LLC
Source Location:	493 Shawnee Drive, Nappanee, IN 46550
County:	Elkhart
SIC Code:	2434 (Wood Kitchen Cabinets)
Permit Renewal No.:	T039-34097-00698
Permit Reviewer:	Dominic Williams

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Quality Hardwood Sales, LLC relating to the operation of a stationary wood cabinet door manufacturing source. On January 21, 2014, Quality Hardwood Sales, LLC submitted an application to the OAQ requesting to renew its operating permit. Quality Hardwood Sales, LLC was issued its first Part 70 Operating Permit (T039-28253-00698) on October 20, 2009.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

- (a) One woodworking operation, identified as Woodworking Operation, constructed in 2009, configured as follows:

Baghouse ID	Emission Unit ID	Construction Date	Maximum Throughput (lbs/hr)*
DC1	SS1, SS2, SS4, DES1, and OS4	2009	17,500
DC2	SS3	2009	4,375
DC3	JT1, CS1, SCS1, PAS1, CNC1, and BS1	2009	26,250
DC4	RS1, CPS1, CPS2, CPS3, CPS4, and OS1	2009	26,250
DC5	OS2, OS3, SD1, CM1, CM2, PL1, PAS2, PS1, TS1, CS2, and PS2	2009	48,125

*The maximum throughput of each emission unit is 4,375 pounds per hour.

- (b) One (1) roll coating line, constructed in 2009, identified as AA, with a throughput capacity of 250 units per hour and using 0.005 gallons of coating (containing no VOC) per unit, and consisting of the following equipment: AT1 (Assembly Table), MN1 (Mitre Nailer), GRC1 (Glue Roll Coater), DRP1 (Door Press) and DRP2 (Door Press).
- (c) One (1) spray coating line, constructed in 2009, consisting of coating equipment and electric dryer, identified as SCM1, with a throughput capacity of 250 units per hour, using robotic air assisted airless spray application method, venting to stacks SCM1S1 and SCM1S2, and using dry filters as control (SCM1F).
- (d) One (1) spray booth for Glazing operation, constructed in 2009, identified as GB1, with a throughput capacity of 125 units per hour and using 0.005 gallons of coating per unit, using high volume low pressure (HVLP) application method, venting to a stack GB1S1, and using dry filters as control (GB1F).

- (e) One (1) spray booth for Glazing operation, constructed in 2009, identified as GB2, with a throughput capacity of 125 units per hour and using 0.005 gallons of coating per unit, using high volume low pressure (HVLP) application method, venting to a stack GB2S2, and using dry filters as control (GB2F).

Insignificant Activities (Only for FESOP Renewals and Title V Renewals)

The source also consists of the following insignificant activities:

- (a) Eight (8) space heaters, constructed in 2009, identified as H1 through H8, respectively, using natural gas, with a total heat input capacity of 1.56 MMBtu/hr, and venting to stacks H1 through H8, respectively.
- (b) Two (2) direct fired air makeup units, constructed in 2009, using natural gas, with a total heat input capacity of 1 MMBtu/hr.
- (c) One (1) surface coating drying oven identified as SCDO1 and one (1) drying oven heater, identified as SCDOB1, operating with existing spray coating line SCM2, constructed in 2010, using natural gas, with a total heat input capacity of 0.29 MMBtu/hr, venting to stacks DOS1 and DOBS1, respectively.

Existing Approvals

Since the issuance of the Part 70 Operating Permit (039-28253-00698) on October 20, 2009, the source has constructed or has been operating under the following additional approvals:

- (a) Administrative Amendment No. 039-28849-00698 issued on January 29, 2010; and
- (b) Significant Source Modification No. 039-29111-00698 issued on August 5, 2010; and
- (c) Significant Permit Modification No. 039-29112-00698 issued on August 25, 2010; and
- (d) Administrative Amendment No. 039-30855-00698 issued on October 11, 2011; and
- (e) Administrative Amendment No. 039-33309-00698 issued on July 23, 2013.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Air Pollution Control Justification as an Integral Part of the Process

In October 1993 a Final Order Granting Summary Judgment was signed by Administrative Law Judge ("ALJ") Garrettson resolving an appeal filed by Kimball Hospitality Furniture Inc. (Cause Nos. 92-A-J-730 and 92-A-J-833) related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls are necessary for the facility to produce its normal product and are integral to the normal operation of the facility, and therefore, potential emissions should be calculated after controls. Based on this ruling, potential emissions for particulate matter from the woodworking operations were calculated after consideration of the controls for purposes of determining permit level and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) applicability. However, for purposes of determining the applicability of Prevention of Significant Deterioration (PSD) applicability, potential particulate matter emissions from the woodworking operations were calculated before consideration of controls.

This conclusion was initially determined under Part 70 Operating Permit (T039-28253-00698) on October 20, 2009.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. ¹
PM _{2.5}	Unclassifiable or attainment effective April 5, 2005, for the annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM _{2.5} standard.
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.

¹Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including Elkhart County, and is a maintenance area for the 1-hour National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005.

- (a) **Ozone Standards**
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) 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 NO_x emissions are considered when evaluating the rule applicability relating to ozone. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
Elkhart County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**
Elkhart 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.

Unrestricted Potential Emissions

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

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 and will be issued a Part 70 Operating Permit Renewal.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, because the source met the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any new control equipment is considered federally enforceable only after issuance of this Part 70 permit renewal, 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 Renewal (tons/year)										
	PM	PM ₁₀ *	PM _{2.5} **	SO ₂	NO _x	VOC	CO	GHGs	Total HAPs	Highest Single HAP	
Woodworking Operation***	116.02	116.02	116.02	-	-	-	-	-	-	-	
SCM1****	0.12	0.12	0.12	-	-	128.45	-	-	0.0	0.0	
GB1****				-	-	17.26	-	-	0.70	0.70	0.70 Bis(2-ethylhexyl) phthalate (DEHP)
GB2****				-	-	17.26	-	-	0.70	0.70	0.70 Bis(2-ethylhexyl) phthalate (DEHP)
AA****				-	-	0.0	-	-	0.0	0.0	0.0
Insignificant Activities	1.32	0.42	0.13	0.01	1.22	0.07	1.03	1477	0.02	0.02 Hexane	
Total PTE of Entire Source	117.45	117.45	117.45	0.01	1.22	163.04	1.03	1477	1.43	0.70 Bis(2-ethylhexyl) phthalate (DEHP)	
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000 CO ₂ e	25	10	
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA	NA	
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". **PM _{2.5} listed is direct PM _{2.5} . ***Woodworking operation PM/PM10/PM2.5 emissions are limits to render 326 IAC 2-2 (PSD) not applicable. ****Surface coating operations PM/PM10/PM2.5 emissions are after dry filter controls.											

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

- (b) The source wide GHG emissions are less than one hundred thousand (<100,000) tons of CO₂ equivalent (CO₂e) emissions per year. GHG emissions do not affect the source PSD status.
- (c) This existing source is not a major stationary source under Emission Offset (326 IAC 2-3) because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or more.
- (d) 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).

Federal Rule Applicability

Compliance Assurance Monitoring (CAM)

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing pollutant-specific emission unit that meets the following criteria:
 - (1) has a potential to emit before controls equal to or greater than the 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 following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each existing emission unit and specified pollutant subject to CAM:

Emission Unit / Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
SCM1 - PM	Dry filter	N	<100	<1	100	N	N
GB1 - PM	Dry filter	N	<100	<1	100	N	N
GB2 - PM	Dry filter	N	<100	<1	100	N	N
AA - PM	Dry filter	N	<100	<1	100	N	N
DC1 - PM	Baghouse	Y	<100	<1	100	N	N
DC2 - PM	Baghouse	Y	<100	<1	100	N	N
DC3 - PM	Baghouse	Y	<100	<1	100	N	N
DC4 - PM	Baghouse	Y	>100	<2	100	Y	N
DC5 - PM	Baghouse	Y	>100	<2	100	Y	N

All of the surface coating emission units, except SCM1, have PTE before control for each criteria pollutant of less than 100 tons per year. SCM1 has uncontrolled VOC PTE greater than 100 tons per year, however, it does not use a VOC control device.

Baghouses DC1, DC2, and DC3, each have PTE before control for each criteria pollutant of less than 100 tons per year, and each uses a control device for PM. Baghouses DC4 and DC5 each have a PTE before control for PM of greater than 100 tons per year, and each uses a control device for PM.

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are only applicable to baghouses DC4 and DC5 for PM upon issuance of the Title V Renewal. A CAM plan will be incorporated into this Part 70 permit renewal.

New Source Performance Standards (NSPS)

- (b) The requirements of the New Source Performance Standards (NSPS) for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971, 40 CFR 60, Subpart D, (326 IAC 12), are not included in the permit, because the twelve (12) natural gas-fired units are eight (8) space heaters, two (2) air make-up units, one (1) drying oven, and one (1) drying oven heater; not boilers, and each has a maximum heat input capacity of less than two hundred fifty (250) million British thermal units per hour.
- (c) The requirements of the New Source Performance Standards (NSPS) for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978, 40 CFR 60, Subpart Da, Standards of Performance (326 IAC 12), are not included in the permit, because the twelve (12) natural gas-fired units are eight (8) space heaters, two (2) air make-up units, one (1) drying oven, and one (1) drying oven heater; and each is not an electric utility steam generating unit.
- (d) The requirements of the New Source Performance Standards (NSPS) for Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Db (326 IAC 12), are not included in the permit, because the twelve (12) natural gas-fired units are eight (8) space heaters, two (2) air make-up units, one (1) drying oven, and one (1) drying oven heater; not boilers, and each has a maximum heat input capacity of less than one-hundred (100) million British thermal units per hour.
- (e) The requirements of the New Source Performance Standards (NSPS) for Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included in the permit, because the twelve (12) natural gas-fired units are eight (8) space heaters, two (2) air make-up units, one (1) drying oven, and one (1) drying oven heater; not boilers, and each has a maximum heat input capacity of less than ten (10) million British thermal units per hour.
- (f) The requirements of the New Source Performance Standards (NSPS) for Surface Coating of Metal Furniture, 40 CFR 60, Subpart EE (326 IAC 12), are not included in the permit, since this source does not coat metal furniture as described in §60.310(a).
- (g) The requirements of the New Source Performance Standards (NSPS) for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60, Subpart MM (326 IAC 12), are not included in the permit, since this source does not coat automobiles or light duty trucks as described in §60.390(a).
- (h) The requirements of the New Source Performance Standards (NSPS) for Pressure Sensitive Tape and Label Surface Coating Operations, 40 CFR 60, Subpart RR (326 IAC 12), are not included in the permit, since this source does not coat sensitive tape or label materials as described in §60.440(a).
- (i) The requirements of the New Source Performance Standards (NSPS) for Industrial Surface Coating: Large Appliances, 40 CFR 60.450, Subpart SS (326 IAC 12), are not included in the permit, since this source does not coat large appliances as described in §60.450(a).
- (j) The requirements of the New Source Performance Standards (NSPS) for Metal Coil Surface Coating, 40 CFR 60.460, Subpart TT (326 IAC 12), are not included in the permit, since this source does not coat metal coils as described in §60.460(a).
- (k) The requirements of the New Source Performance Standards (NSPS) for the Beverage Can Surface Coating Industry, 40 CFR 60.490, Subpart WW (326 IAC 12), are not included in the permit, since this source does not coat beverage cans as described in §60.490(a).

- (l) The requirements of the New Source Performance Standards (NSPS) for Magnetic Tape Coating Facilities, 40 CFR 60.710, Subpart SSS (326 IAC 12), are not included in the permit, since this source does not coat magnetic tape as defined in §60.711(a)(13).
- (m) The requirements of the New Source Performance Standards (NSPS) for Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines, 40 CFR 60.720, Subpart TTT (326 IAC 12), are not included in the permit, since this source does not coat plastic parts for business machines as defined in §60.721(a).
- (n) The requirements of the New Source Performance Standards (NSPS) for Stationary Spark Ignition Internal Combustion Engines, 40 CFR 60, Subpart JJJJ (326 IAC 12), are not included in the permit, because the twelve (12) natural gas-fired units are eight (8) space heaters, two (2) air make-up units, one (1) drying oven, and one (1) drying oven heater; not reciprocating internal combustion engines.
- (o) There are still no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (p) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Wood Furniture Manufacturing Operations, Subpart JJ (326 IAC 20-14) are not included in the permit for the woodworking operation, since this operation is not located at a plant site that is a major source of HAPs as defined in 40 CFR part 63, subpart A, §63.2.
- (q) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Plywood and Composite Wood Products, 40 CFR 63, Subpart DDDD, are not included in the permit, since this source does not perform plywood or composite wood products manufacturing and it is not a major source of HAPs. This source consists of woodworking operations and wood surface coating operations.
- (r) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Automobiles and Light-Duty Trucks, 40 CFR 63, Subpart IIII (326 IAC 20-85) are not included in the permit, since this source does not coat new automobile or new light-duty truck bodies or body parts for new automobiles or new light-duty trucks and is not located at a plant site that is a major source of HAPs as defined in 40 CFR Part 63, Subpart A, §63.2.
- (s) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Metal Cans, 40 CFR 63, Subpart KKKK (326 IAC 20-86) are not included in the permit, since this source does not coat metal cans and is not located at a plant site that is a major source of HAPs as defined in 40 CFR Part 63, Subpart A, §63.2.
- (t) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-80, 40 CFR Part 63, Subpart MMMM (Surface Coating of Miscellaneous Metal Parts and Products) are not included in the permit, since this source does not coat miscellaneous metal parts and is not a major source of HAPs as defined in 40 CFR Part 63, Subpart A, §63.2. This source consists of wood surface coating operations.
- (u) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Large Appliances, 40 CFR 63, Subpart NNNN (326 IAC 20-63) are not included in the permit, since this source does not coat large appliances and is not located at a plant site that is a major source of HAPs as defined in 40 CFR Part 63, Subpart A, §63.2.

- (v) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-81, 40 CFR 63, Subpart PPPP (Surface Coating of Plastic Parts and Products) are not included in the permit, since this source does not coat plastic parts and products and is not a major source of HAPs as defined in 40 CFR Part 63, Subpart A, §63.2. This source consists of wood surface coating operations.
- (w) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Wood Building Products, 40 CFR 63, Subpart QQQQ (326 IAC 20-79), are not included in the permit, since this source does not coat wood building products and is not located at a plant site that is a major source of HAPs as defined in 40 CFR Part 63, Subpart A, §63.2. This source manufactures kitchen cabinetry, which is not considered wood building products as defined by this rule.
- (x) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Metal Furniture, 40 CFR 63, Subpart RRRR (326 IAC 20-78), are not included in the permit, since this source does not coat metal furniture and is not located at a plant site that is a major source of HAPs as defined in 40 CFR Part 63, Subpart A, §63.2.
- (y) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Metal Coil, 40 CFR 63, Subpart SSSS (326 IAC 20-64), are not included in the permit, since this source does not coat metal coil and is not located at a plant site that is a major source of HAPs as defined in 40 CFR Part 63, Subpart A, §63.2.
- (z) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH (6H), are not included in the permit, since this source does not conduct a paint stripping operation, an automotive body refinishing operation, or use spray application coatings that contain compounds of chromium, lead, manganese, nickel, or cadmium.
- (aa) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Wood Preserving Area Sources, 40 CFR Part 63, Subpart QQQQQQ, are not included in the permit because the source is not a wood preserving operation as defined by 40 CFR 63.11433. Under 40 CFR 63.11433, "wood preserving" means the pressure or thermal impregnation of chemicals into wood to provide effective long-term resistance to attack by fungi, bacteria, insects, and marine borers. There are no wood treating processes at this source. This source consists of woodworking operations and wood surface coating operations.
- (bb) There are still no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

State Rule Applicability - Entire Source

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

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the PM, PM10, and PM2.5 emissions after control from the woodworking operation shall be less than the following emission limitations:

Emission Unit Description	Control Device	PM Emission Limit (lbs/hour)	PM10 Emission Limit (lbs/hour)	PM2.5 Emission Limit (lbs/hour)
Woodworking	DC1	4.15	4.15	4.15
Woodworking	DC2	4.15	4.15	4.15
Woodworking	DC3	5.14	5.14	5.14
Woodworking	DC4	6.52	6.52	6.52
Woodworking	DC5	6.52	6.52	6.52

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

- (b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
 The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (c) 326 IAC 2-6 (Emission Reporting)
 This source, not located in Lake, Porter, or LaPorte County, is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit pursuant to 326 IAC 2-7 (Part 70). The potential to emit of VOC and PM10 is less than 250 tons per year; and the potential to emit of CO, NOx, and SO2 is less than 2,500 tons per year. Therefore, pursuant to 326 IAC 2-6-3(a)(2), triennial reporting is required. An emission statement shall be submitted in accordance with the compliance schedule in 326 IAC 2-6-3 by July 1, 2016, and every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.
- (d) 326 IAC 5-1 (Opacity Limitations)
 This source is subject to the opacity limitations specified in 326 IAC 5-1-2(1). In accordance with 326 IAC 5-1-2(2) (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
 - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (e) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
 Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (f) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
 The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.

- (g) 326 IAC 6.5 PM Limitations Except Lake County
This source is not subject to 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.
- (h) 326 IAC 6.8-10 (Lake County: Fugitive Particulate Matter)
This source is not subject to 326 IAC 6.8 because it is not located in Lake County.

State Rule Applicability – Individual Facilities

Woodworking Operation

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b), the requirements of 326 IAC 6-3-2 are not applicable to the Woodworking Operation, since the potential to emit particulate emissions after integral woodworking controls is less than five hundred fifty-one thousandths (0.551) pound per hour.

In order to ensure that each of woodworking units is exempt from the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), each of the five (5) baghouses (DC1, DC2, DC3, DC4, DC5) shall be in operation and control particulate emissions from the Woodworking Operation at all times that each of the woodworking units is in operation.

Surface Coating Operations

- (b) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(15), the surface coating operations SCM1, GB1, and GB2 are each subject to the requirements of 326 IAC 6-3-2, since each has a potential paint usage of greater than 5 gallons per day.

Pursuant to 326 IAC 6-3-2(d) (Particulate emission limitations, work practices, and control technologies), the Permittee shall comply with the following for the surface coating booths SCM1, GB1, and GB2:

- (1) The surface coating operations shall each be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

Pursuant to 326 IAC 6-3-1(a)(6), the roll coating line AA is not subject to the requirements of 326 IAC 6-3-2, since it utilizes roll coating with no particulate emissions.

- (c) 326 IAC 8-1-6 (VOC rules: General Reduction Requirements for New Facilities)
This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, and which have potential volatile organic compound (VOC) emissions of 25 tons per year or more and are not otherwise regulated by other provisions of Article 8.
 - (1) The surface coating operations GB1, GB2, and AA are each not subject to this rule, since each has potential VOC emissions less than 25 tons per year and each is subject to the requirements of 326 IAC 8-2-12.
 - (2) The surface coating operation SCM1 is not subject to this rule, since although it has potential VOC emissions greater than 25 tons per year, it is subject to the requirements of 326 IAC 8-2-12.
- (d) 326 IAC 8-2-6 (Metal furniture coating operations)
This source is not subject to 326 IAC 8-2-6, because it does not coat metal furniture. This source coats wood cabinets.

- (e) 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)
This source is not subject to 326 IAC 8-2-9 because it does not coat metal or plastic parts. This source coats wood cabinets.
- (f) 326 IAC 8-2-10 (Flat Wood Panels; Manufacturing Operations)
This rule applies to facilities located in any county, constructed after July 1, 1990, that perform surface finishing of flat wood panels, as defined by 326 IAC 8-2-10(a), and which have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls.
- (1) The surface coating operation AA is not subject to the requirements of 326 IAC 8-2-10, since it has potential VOC emissions of less than fifteen (15) pounds of VOC per day before add-on controls and does not perform surface finishing of flat wood panels, as defined by 326 IAC 8-2-10(a).
- (2) The surface coating operations SCM1, GB1, and GB2 are each not subject to the requirements of 326 IAC 8-2-10, since although each has potential VOC emissions of greater than fifteen (15) pounds of VOC per day before add-on controls, each does not perform surface finishing of flat wood panels, as defined by 326 IAC 8-2-10(a).
- (g) 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)
Pursuant to 326 IAC 8-2-1 and 326 IAC 8-2-12, this rule applies to facilities located in any county, constructed after July 1, 1990, that perform surface coating of wood furniture (or wood furniture components), including cabinets (kitchen, bath and vanity), tables, beds, chairs, sofas (non-upholstered), art objects, and any other coated furnishings made of solid wood, wood composition or simulated wood material and which have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls.
- (1) The surface coating operation AA is not subject to the requirements of 326 IAC 8-2-12, since it has potential VOC emissions of less than fifteen (15) pounds of VOC per day before add-on controls.
- (2) The surface coating operations SCM1, GB1, and GB2 are each subject to the requirements of 326 IAC 8-2-12, since each was constructed after July 1, 1990, and each has potential VOC emissions of greater than fifteen (15) pounds of VOC per day before add-on controls.

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and wood cabinets by SCM1, GB1, and GB2 shall utilize one of the following application methods:

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

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

Each surface coating booth is able to comply with this rule because they utilize one of the approved application methods listed in 326 IAC 8-2-12(b). SCM1 uses Air Assisted Airless Spray Application. GB1 and GB2 each use High Volume Low Pressure (HVLP) spray application.

- (h) 326 IAC 8-11 (Wood Furniture Coatings)
The surface coating operations are not subject to 326 IAC 8-11 because this source is not located in Lake, Porter, Clark, or Floyd County.

Natural Gas Combustion

- (i) 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)
The twelve (12) natural gas-fired units (eight (8) space heaters, two (2) air make-up units, one (1) drying oven, and one (1) drying oven heater) are each a source of direct heating. Therefore, the requirements of 326 IAC 6-2 are not applicable.
- (j) 326 IAC 7-1.1 Sulfur Dioxide Emission Limitations
The twelve (12) natural gas-fired units (eight (8) space heaters, two (2) air make-up units, one (1) drying oven, and one (1) drying oven heater) are each not subject to 326 IAC 326 IAC 7-1.1 because its SO₂ PTE (or limited SO₂ PTE) is less than 25 tons/year or 10 pounds/hour.
- (k) 326 IAC 8-1-6 (VOC rules: General Reduction Requirements for New Facilities)
The twelve (12) natural gas-fired units (eight (8) space heaters, two (2) air make-up units, one (1) drying oven, and one (1) drying oven heater) are each not subject to 326 IAC 326 IAC 8-1-6 because each has potential VOC emissions of less than 25 tons/year.

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 requirements applicable to this source are as follows:

- (a) The baghouses (DC1, DC2, DC3, DC4, and DC5) shall be in operation and control particulate emissions at all times when one or more of the associated wood working operation is being performed.
- (b) The dry filters for particulate control shall be in operation and control emissions from the three (3) surface coating operations (SCM1, GB1, and GB2) at all times that the units are in operation.

The compliance monitoring requirements applicable to this source are as follows:

(c) The Woodworking Operation compliance monitoring requirements are as follows:

Control	Parameter	Frequency	Range	Excursions and Exceedances
Baghouses DC1, DC2, DC3, DC4, and DC5	Water Pressure Drop	Daily	0.5 to 4.5 inches	Response Steps
	Visible Emissions		Normal-Abnormal	

These monitoring conditions are necessary because the baghouses for the woodworking operation must operate properly to render the requirements of 326 IAC 6-3 (Process Operations) not applicable, to comply with 326 IAC 2-7 (Part 70), to comply with the PSD minor emission limitations for the woodworking operation, and to comply with 40 CFR 64 (CAM).

(d) The surface coating operations compliance monitoring requirements are as follows:

Control	Emission Units	Parameter	Frequency	Range	Excursions and Exceedances
Dry Filters	SCM1, GB1, and GB2	Overspray	Weekly	No Overspray – Presence of Overspray	Response Steps
			Monthly	No Change of Overspray- Noticeable Change in Overspray	
		Visual Check	Daily	Filter Placement, Integrity and Particle Loading	

These monitoring conditions are necessary because the dry filters for the surface coating operations must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Recommendation

The staff recommends to the Commissioner that the Part 70 Operating Permit Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on January 21, 2014.

Conclusion

The operation of this stationary wood cabinet door manufacturing source shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. T039-34097-00698.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Dominic Williams at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate

Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-6555 or toll free at 1-800-451-6027 extension 4-6555.

- (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 Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emissions Calculations
Emission Summary**

Company Name: Quality Hardwood Sales, LLC
 Source Address: 493 Shawnee Drive, Nappanee, IN 46550
 Permit Number: T039-34097-00698
 Reviewer: Dominic Williams

Uncontrolled Potential to Emit (tons/year) (Before Integral Woodworking Controls)

Emission Unit	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO	GHGs as CO2e	Total HAPs	Highest Single HAP
Significant Activities										
Woodworking Operation*	464.07	464.07	464.07	-	-	-	-	-	-	-
SCM1	10.93	10.93	10.93	-	-	128.45	-	-	0.00	0.00
GB1	0.45	0.45	0.45	-	-	17.26	-	-	0.70	0.70
GB2	0.45	0.45	0.45	-	-	17.26	-	-	0.70	0.70
AA	0.00	0.00	0.00	-	-	0.00	-	-	0.00	0.00
Total Significant Activities	475.90	475.90	475.90	0.00	0.00	162.97	0.00	0	1.41	1.41
Insignificant Activities										
Natural Gas Combustion	0.02	0.09	0.09	0.01	1.22	0.07	1.03	1477	0.02	0.02
Unpaved Roads	1.97	0.50	0.05	-	-	-	-	-	-	-
Total Insignificant Activities	1.99	0.59	0.14	0.01	1.22	0.07	1.03	1477.32	0.02	0.02
Totals	477.89	476.50	476.05	0.01	1.22	163.04	1.03	1477	1.43	1.41

Unlimited Potential to Emit (tons/year) (After Integral Woodworking Controls)

Emission Unit	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO	GHGs as CO2e	Total HAPs	Highest Single HAP
Significant Activities										
Woodworking Operation*	4.64	4.64	4.64	-	-	-	-	-	-	-
SCM1	10.93	10.93	10.93	-	-	128.45	-	-	0.00	0.00
GB1	0.45	0.45	0.45	-	-	17.26	-	-	0.70	0.70
GB2	0.45	0.45	0.45	-	-	17.26	-	-	0.70	0.70
AA	0.00	0.00	0.00	-	-	0.00	-	-	0.00	0.00
Total Significant Activities	16.47	16.47	16.47	0.00	0.00	162.97	0.00	0.00	1.41	1.41
Insignificant Activities										
Natural Gas Combustion	0.02	0.09	0.09	0.01	1.22	0.07	1.03	1477	0.02	0.02
Unpaved Roads	1.97	0.50	0.05	-	-	-	-	-	-	-
Total Insignificant Activities	1.99	0.59	0.14	0.01	1.22	0.07	1.03	1477.32	0.02	0.02
Totals	18.46	17.06	16.61	0.01	1.22	163.04	1.03	1477	1.43	1.43

Limited Potential to Emit (tons/year)

Emission Unit	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO	GHGs as CO2e	Total HAPs	Highest Single HAP
Significant Activities										
Woodworking Operation*	116.02	116.02	116.02	-	-	-	-	-	-	-
SCM1				-	-	128.45	-	-	0.00	0.00
GB1	0.12	0.12	0.12	-	-	17.26	-	-	0.70	0.70
GB2				-	-	17.26	-	-	0.70	0.70
AA				-	-	0.00	-	-	0.00	0.00
Total Significant Activities	116.14	116.14	116.14	0.00	0.00	162.97	0.00	0	1.41	1.41
Insignificant Activities										
Natural Gas Combustion	0.02	0.09	0.09	0.01	1.22	0.07	1.03	1477	0.02	0.02
Unpaved Roads	1.29	0.33	0.03	-	-	-	-	-	-	-
Total Insignificant Activities	1.32	0.42	0.13	0.01	1.22	0.07	1.03	1477.32	0.02	0.02
Totals	117.45	116.56	116.26	0.01	1.22	163.04	1.03	1477	1.43	1.41

Controlled Potential to Emit (tons/year)

Emission Unit	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO	GHGs as CO2e	Total HAPs	Highest Single HAP
Significant Activities										
Woodworking Operation*	4.64	4.64	4.64	-	-	-	-	-	-	-
SCM1				-	-	128.45	-	-	0.00	0.00
GB1	0.12	0.12	0.12	-	-	17.26	-	-	0.70	0.70
GB2				-	-	17.26	-	-	0.70	0.70
AA				-	-	0.00	-	-	0.00	0.00
Total Significant Activities	4.76	4.76	4.76	0.00	0.00	162.97	0.00	0	1.41	1.41
Insignificant Activities										
Natural Gas Combustion	0.02	0.09	0.09	0.01	1.22	0.07	1.03	1477	0.02	0.02
Unpaved Roads	1.29	0.33	0.03	-	-	-	-	-	-	-
Total Insignificant Activities	1.32	0.42	0.13	0.01	1.22	0.07	1.03	1477.32	0.02	0.02
Totals	6.07	5.18	4.88	0.01	1.22	163.04	1.03	1477	1.43	1.41

Notes

*In October 1993 a Final Order Granting Summary Judgment was signed by Administrative Law Judge ("ALJ") Garretson resolving an appeal filed by Kimball Hospitality Furniture Inc. (Cause Nos. 92-A-J-730 and 92-A-J-833) related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls are necessary for the facility to produce its normal product and are integral to the normal operation of the facility, and therefore, potential emissions should be calculated after controls. Based on this ruling, potential emissions for particulate matter from the woodworking operations were calculated after consideration of the controls for purposes of determining permit level and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) applicability. However, for purposes of determining the applicability of Prevention of Significant Deterioration (PSD) applicability, potential particulate matter emissions from the woodworking operations were calculated before consideration of controls.

**Appendix A: Emissions Calculations
Woodworking Operations**

Company Name: Quality Hardwood Sales, LLC
Source Address: 493 Shawnee Drive, Nappanee, IN 46550
Permit Number: T039-34097-00698
Reviewer: Dominic Williams

Baghouse ID	Manufacturer	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/ft³)	Gas or Air Flow Rate (acfm.)	Uncontrolled PM/PM10/PM2.5 Emissions (lb/hr)	Uncontrolled PM/PM10/PM2.5 Emissions (tons/year)	Controlled PM/PM10/PM2.5 Emissions (lb/hr)	Controlled PM/PM10/PM2.5 Emissions (tons/yr)	PSD Minor Limited Emissions		
									Limited Control Efficiency	Limited PM/PM10/PM2.5 Emissions (lb/hr)	Limited PM/PM10/PM2.5 Emissions (tons/yr)
DC1	Donaldson 121FT8	99.0%	0.003	6,452	16.59	72.67	0.17	0.73	75.0%	4.15	18.17
DC2	Donaldson 121FT8	99.0%	0.003	6,452	16.59	72.67	0.17	0.73	75.0%	4.15	18.17
DC3	Disa CS-2-S	99.0%	0.003	8,000	20.57	90.10	0.21	0.90	75.0%	5.14	22.53
DC4	Torit 156-RF-10	99.0%	0.003	10,150	26.10	114.32	0.26	1.14	75.0%	6.52	28.58
DC5	Torit 156-RF-10	99.0%	0.003	10,150	26.10	114.32	0.26	1.14	75.0%	6.52	28.58
TOTALS					105.95	464.07	1.06	4.64		26.49	116.02

Methodology

PM10 and PM2.5 emission assumed equal to PM emissions

Controlled PM/PM10/PM2.5 Emissions (lb/hr) = [Grain Loading per Actual Cubic foot of Outlet Air (grains/ft³)] * [Gas or Air Flow Rate (ft³/min.)] * (60 min/hr) * (lb/7000 grains)

Controlled PM/PM10/PM2.5 Emissions (tons/yr) = [Controlled PM/PM10/PM2.5 Emissions (lb/hr)] * (8760 hr/yr) * (ton/2000 lb)

Uncontrolled PM/PM10/PM2.5 Emissions (lb/hr) = [Controlled PM/PM10/PM2.5 Emissions (lb/hr)] / (1 - Control Efficiency)

Uncontrolled PM/PM10/PM2.5 Emissions (tons/yr) = [Uncontrolled PM/PM10/PM2.5 Emissions (lb/hr)] * (8760 hr/yr) * (ton/2000 lb)

Limited PM/PM10/PM2.5 Emissions (lb/hr) = [Uncontrolled PM/PM10/PM2.5 Emissions (lb/hr)] * (1 - Limited Control Efficiency)

Limited PM/PM10/PM2.5 Emissions (tons/yr) = [Limited PM/PM10/PM2.5 Emissions (lb/hr)] * (8760 hr/yr) * (ton/2000 lb)

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

**Company Name: Quality Hardwood Sales, LLC
Source Address: 493 Shawnee Drive, Nappanee, IN 46550
Permit Number: T039-34097-00698
Reviewer: Dominic Williams**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Maximum (gal/hour)	Maximum (gal/day)	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 *	Substrate
AA																			
CL-1809 Adhesive	8.84	53.0%	53.0%	0%	56.2%	43.8%	0.005	250	1.18	28.20	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%	Wood
Water	8.34	100%	100.0%	0%	100%	0%	0.0006	250	0.15	3.60	n/a	0.00	0.00	0.00	0.00	0.00	n/a	100%	Cleaner
SUBTOTAL								1.33	31.80				0.00	0.00	0.00	0.00			
SCM1																			
ARTI 402010 Con. Brown	8.15	80.00%	0%	80.0%	0%	15.03%	0.0100	250	2.50	60.00	6.52	6.52	16.30	391.20	71.39	4.46	43.38	75%	Wood
LR04038C Topcoat	7.8	75.32%	2.8%	72.5%	3.7%	24.35%	0.0208	250	5.20	124.80	5.86	5.64	29.33	703.84	128.45	10.93	23.16	75%	Wood
Akvaclean Line Flush	8.25	100%	80.50%	19.5%	79.60%	0.05%	0.0004	250	0.10	2.40	7.89	1.61	0.16	3.86	0.70	0.00	n/a	100%	Cleaner
Acetone (Cleanup)	6.61	100%	100%	0%	100%	0%	0.0004	250	0.09	2.10	n/a	0.00	0.00	0.00	0.00	0.00	n/a	100%	Cleaner
SUBTOTAL								7.89	189.30				29.33	703.84	128.45	10.93			
GB1																			
HSS103GF Glaze	6.96	90.59%	0%	90.59%	0%	7.52%	0.0050	125	0.63	15.00	6.31	6.31	3.94	94.58	17.26	0.45	83.84	75%	Wood
Acetone (Cleanup)	6.61	100%	100%	0%	100%	0%	0.0004	125	0.04	1.05	n/a	0.00	0.00	0.00	0.00	0.00	n/a	100%	Cleaner
SUBTOTAL								0.67	16.05				3.94	94.58	17.26	0.45			
GB2																			
HSS103GF Glaze	6.96	90.59%	0%	90.59%	0%	7.52%	0.0050	125	0.63	15.00	6.31	6.31	3.94	94.58	17.26	0.45	83.84	75%	Wood
Acetone (Cleanup)	6.61	100%	100%	0%	100%	0%	0.0004	125	0.04	1.05	n/a	0.00	0.00	0.00	0.00	0.00	n/a	100%	Cleaner
SUBTOTAL								0.67	16.05				3.94	94.58	17.26	0.45			
Uncontrolled													Tons/Year	162.97	11.83				

PM Control Efficiency: **99.00%**
Controlled Tons/Year 162.97 0.12

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: Emissions Calculations
HAP Emissions
Surface Coating Operations**

**Company Name: Quality Hardwood Sales, LLC
Source Address: 493 Shawnee Drive, Nappanee, IN 46550
Permit Number: T039-34097-00698
Reviewer: Dominic Williams**

HAPs

Material	Density (lb/gal)	Gallons of Material (gal/unit)	Maximum (unit/hr)	Bis(2-ethylhexyl) phthalate (DEHP) % by weight	Bis(2-ethylhexyl) phthalate (DEHP) PTE (tons/yr)	Total HAP Emissions (tons/yr)
AA						
CL-1809 Adhesive	8.84	0.005	250	0%	0.00	0.00
Water	8.34	0.0006	250	0%	0.00	0.00
				SUBTOTAL	0.00	0.00
SCM1						
ARTI 402010 Con. Brown	8.15	0.0100	250	0%	0.00	0.00
LR04038C Topcoat	7.8	0.0208	250	0%	0.00	0.00
Akvaclean Line Flush	8.25	0.0004	250	0%	0.00	0.00
Acetone (Cleanup)	6.61	0.0004	250	0%	0.00	0.00
				SUBTOTAL	0.00	0.00
GB1						
HS5103GF Glaze	6.96	0.0050	125	3.70%	0.70	0.70
Acetone (Cleanup)	6.61	0.0004	125	0%	0.00	0.00
				SUBTOTAL	0.70	0.70
GB2						
HS5103GF Glaze	6.96	0.0050	125	3.70%	0.70	0.70
Acetone (Cleanup)	6.61	0.0004	125	0%	0.00	0.00
				SUBTOTAL	0.70	0.70
				TOTAL	1.41	1.41

METHODOLOGY

Total HAP Emissions (tons/yr) = [Density (lb/gal)] * [Gallons of Material (gal/unit)] * [Maximum (unit/hr)] * [HAP % by weight] * (8760 hrs/yr) * (1 ton/2000 lbs)

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

Company Name: Quality Hardwood Sales, LLC
Source Address: 493 Shawnee Drive, Nappanee, IN 46550
Permit Number: T039-34097-00698
Reviewer: Dominic Williams

Emmision Unit/ID	Heat Input Capacity MMBtu/hr	HHV mmBtu	Potential Throughput MMCF/yr
Eight (8) space heaters, H1-H8 @ 0.195 each	1.56		
Two (2) air makeup units, AM1 and AM2 @ 0.5 each	1		
One (1) drying oven SCDO1	0.29		
Total	2.85	1020	24.5

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx 100	VOC 5.5	CO 84
Potential Emission in tons/yr	0.02	0.09	0.09	0.007	**see below 1.22	0.07	1.03

*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

HAPs Emissions Calculations

	HAPs - Organics					Total Organics
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	
Emission Factor in lb/MMcf	2.10E-03	1.20E-03	7.50E-02	1.80E+00	3.40E-03	
Potential Emission in tons/yr	2.6E-05	1.5E-05	9.2E-04	0.02	4.2E-05	0.023029

	HAPs - Metals					Total Metals
	Lead	Cadmium	Chromium	Manganese	Nickel	
Emission Factor in lb/MMcf	5.00E-04	1.10E-03	1.40E-03	3.80E-04	2.10E-03	
Potential Emission in tons/yr	6.1E-06	1.3E-05	1.7E-05	4.7E-06	2.6E-05	0.000067
						Total HAPs 0.02
						Worst HAP 0.02 Hexane

Methodology is the same 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	1,469	0.03	0.03
Summed Potential Emissions in tons/yr	1,469		
CO2e Total in tons/yr	1,477		

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 (25) + N2O Potential Emission ton/yr x N2O GWP (298).

**Appendix A: Emissions Calculations
Fugitive Dust Emissions - Unpaved Roads**

Company Name: Quality Hardwood Sales, LLC
Source Address: 493 Shawnee Drive, Nappanee, IN 46550
Permit Number: T039-34097-00698
Reviewer: Dominic Williams

Unpaved Roads at Industrial Site

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (11/2006).

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)
Tractor Trailer (entering plant) (one-way trip)	3.0	1.0	3.0	24.0	72.0	200	0.038	0.1	41.5
Tractor Trailer (leaving plant) (one-way trip)	3.0	1.0	3.0	3.0	9.0	200	0.038	0.1	41.5
Car (entering plant) (one-way trip)	25.0	1.0	25.0	2.0	50.0	200	0.038	0.9	345.6
Car (leaving plant) (one-way trip)	25.0	1.0	25.0	2.0	50.0	200	0.038	0.9	345.6
Totals			6.0		81.0			0.2	83.0

Average Vehicle Weight Per Trip = 13.5 tons/trip
 Average Miles Per Trip = 0.04 miles/trip

Unmitigated Emission Factor, $E_f = k \cdot (s/12)^a \cdot (W/3)^b$ (Equation 1a from AP-42 13.2.2)

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	4.8	4.8	4.8	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Sand/Gravel Processing Plant)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)
W =	13.5	13.5	13.5	tons = average vehicle weight (provided by source)
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E \cdot [(365 - P)/365]$ (Equation 2 from AP-42 13.2.2)

Mitigated Emission Factor, $E_{ext} = E \cdot [(365 - P)/365]$
 where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f =$	5.08	1.29	0.13	lb/mile
Mitigated Emission Factor, $E_{ext} =$	3.34	0.85	0.09	lb/mile

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)
Tractor Trailer (entering plant) (one-way trip)	1.1E-01	2.7E-02	2.7E-03	6.9E-02	1.8E-02	1.8E-03
Tractor Trailer (leaving plant) (one-way trip)	1.1E-01	2.7E-02	2.7E-03	6.9E-02	1.8E-02	1.8E-03
Car (entering plant) (one-way trip)	8.8E-01	2.2E-01	2.2E-02	5.8E-01	1.5E-01	1.5E-02
Car (leaving plant) (one-way trip)	8.8E-01	2.2E-01	2.2E-02	5.8E-01	1.5E-01	1.5E-02
Totals	2.0E+00	5.0E-01	5.0E-02	1.3E+00	3.3E-01	3.3E-02

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)

Abbreviations

PM = Particulate Matter
 PM10 = Particulate Matter (<10 um)
 PM2.5 = Particulate Matter (<2.5 um)
 PTE = Potential to Emit



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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

TO: Devon Hochstelter
Quality Hardwood Sales, LLC
PO Box 70
Nappanee, IN 46550

DATE: September 12, 2014

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

SUBJECT: Final Decision
Title V Operating Permit Renewal
039-34097-00698

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:
Erick Click, Consultant
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



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

September 12, 2014

TO: Nappanee Public Library

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

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

Applicant Name: Quality Hardwood Sales, LLC
Permit Number: 039-34097-00698

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	VHAUN 9/12/2014 Quality Hardwood Sales, LLC 039-34097-00698 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		Devon Hochstelter Quality Hardwood Sales, LLC PO Box 70 Nappanee IN 46550 (Source CAATS)		CONFIRMED DELIVERY								
2		Nappanee City Council and Mayors Office P.O. Box 29 Nappanee IN 46550 (Local Official)										
3		Elkhart City Council and Mayors Office 229 South Second Street Elkhart IN 46516 (Local Official)										
4		Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 (Health Department)										
5		Nappanee Public Library 157 N Main St Nappanee IN 46550-1956 (Library)										
6		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 (Local Official)										
7		Erick Click 55868 Pyrenees PL Middlebury IN 46540 (Consultant)										
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6			