



# 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](http://www.idem.IN.gov)

**Michael R. Pence**  
Governor

**Thomas W. Easterly**  
Commissioner

To: Interested Parties

Date: May 21, 2014

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

Source Name: Wayzata Home Products

Permit Level: Registration

Permit Number: 041-34281-00024

Source Location: 4747 Western Avenue, Connersville, Indiana

Type of Action Taken: Initial Permit

## Notice of Decision: Approval - Registration

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 34281.

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 4-21.5-3-4(d) this order is effective when it is served. When served by U.S. mail, the order is effective three (3) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

*(continues on next page)*

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

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

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

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

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.



# 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](http://www.idem.IN.gov)

Michael R. Pence  
*Governor*

Thomas W. Easterly  
*Commissioner*

## REGISTRATION OFFICE OF AIR QUALITY

**Wayzata Home Products  
4747 Western Avenue  
Connersville, IN 47331**

Pursuant to 326 IAC 2-5.1 (Construction of New Sources: Registrations) and 326 IAC 2-5.5 (Registrations), (herein known as the Registrant) is hereby authorized to construct and operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this registration.

Registration No. R041-34281-00024

Issued by:

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

Issuance Date: May 21, 2014

## SECTION A

## SOURCE SUMMARY

This registration is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Registrant 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 Registrant to obtain additional permits pursuant to 326 IAC 2.

### A.1 General Information

---

The Registrant owns and operates a stationary woodworking and cabinet manufacturing plant.

Source Address:	4747 Western Avenue, Connersville, IN 47331
General Source Phone Number:	(765) 222-1261
SIC Code:	2499 (Wood Products, Not Elsewhere Classified)
County Location:	Fayette County
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Registration

### A.2 Emission Units and Pollution Control Equipment Summary

---

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

- (a) Three (3) paint booths, identified as PB1 through PB3, approved in 2014 for construction, each with a maximum capacity of 2.0 cabinets per hour, using HVLP spray application, using dry cartridge filters as control, and exhausting to stacks PB1 through PB3, respectively.
- (b) One (1) woodworking operation, identified as WW1, approved in 2014 for construction, with a maximum capacity of 500 lbs/hr, using a dust collector, identified as DC1, as control, and exhausting to stack DC1.
- (c) Four (4) natural gas-fired air handling units, identified as AHU1 through AHU4, approved in 2014 for construction, each with a maximum heat input capacity of 2.40 MMBtu/hr, and exhausting to the atmosphere.

## **SECTION B GENERAL CONDITIONS**

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

---

Terms in this registration shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

### **B.2 Effective Date of Registration [IC 13-15-5-3]**

---

Pursuant to IC 13-15-5-3, this registration 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.

### **B.3 Registration Revocation [326 IAC 2-1.1-9]**

---

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

- (a) Violation of any conditions of this registration.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this registration.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this registration shall not require revocation of this registration.
- (d) For any cause which establishes in the judgment of IDEM the fact that continuance of this registration is not consistent with purposes of this article.

### **B.4 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

---

- (a) All terms and conditions of permits established prior to Registration No. R041-34281-00024 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this registration.

### **B.5 Annual Notification [326 IAC 2-5.1-2(f)(3)] [326 IAC 2-5.5-4(a)(3)]**

---

Pursuant to 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3):

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

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

- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

**B.6 Source Modification Requirement [326 IAC 2-5.5-6(a)]**

---

Pursuant to 326 IAC 2-5.5-6(a), an application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

**B.7 Registrations [326 IAC 2-5.1-2(i)]**

---

Pursuant to 326 IAC 2-5.1-2(i), this registration does not limit the source's potential to emit.

**B.8 Preventive Maintenance Plan [326 IAC 1-6-3]**

---

- (a) If required by specific condition(s) in Section D of this registration, the Registrant shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this registration 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 Registrant's control, the PMPs cannot be prepared and maintained within the above time frame, the Registrant may extend the date an additional ninety (90) days provided the Registrant 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 Registrant shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Registrant to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (c) To the extent the Registrant is required by 40 CFR Part 60 or 40 CFR Part 63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such OMM Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

**SECTION C**

**SOURCE OPERATION CONDITIONS**

Entire Source

**Emission Limitations and Standards [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]**

**C.1 Opacity [326 IAC 5-1]**

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

- (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.2 Fugitive Dust Emissions [326 IAC 6-4]**

The Registrant 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).

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

**C.3 General Record Keeping Requirements [326 IAC 2-5.1-3(e)(2)]**

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

## SECTION D.1

## OPERATION CONDITIONS

Facility Description [326 IAC 2-5.1-2(f)(2)] [326 IAC 2-5.5-4(a)(2)]:

- (a) Three (3) paint booths, identified as PB1 through PB3, approved in 2014 for construction, each with a maximum capacity of 2.0 cabinets per hour, using HVLP spray application, using dry cartridge filters as control, and exhausting to stacks PB1 through PB3, respectively.

(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 2-5.1-2(f)(1)] [326 IAC 2-5.5-4(a)(1)]

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

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), for the paint booths (PB1, PB2, and PB3), the Registrant shall perform surface coating of wood furniture and cabinets, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) or more of the following application systems:

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

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

#### D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

## SECTION D.2

## OPERATION CONDITIONS

Facility Description [326 IAC 2-5.1-2(f)(2)] [326 IAC 2-5.5-4(a)(2)]:

- (b) One (1) woodworking operation, identified as WW1, approved in 2014 for construction, with a maximum capacity of 500 lbs/hr, using a dust collector, identified as DC1, as control, and exhausting to stack DC1.

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

### Emission Limitations and Standards [326 IAC 2-5.1-2(f)(1)] [326 IAC 2-5.5-4(a)(1)]

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

---

In order to ensure that the woodworking operation (WW1) are each exempt from the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the integral dust collector (DC1) shall be in operation and controlling emissions from the woodworking operation (WW1) at all times the woodworking processes are in operation.

#### D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

---

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

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

**REGISTRATION  
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3).

<b>Company Name:</b>	Wayzata Home Products
<b>Address:</b>	4747 Western Avenue
<b>City:</b>	Connersville, IN 47331
<b>Phone Number:</b>	(765) 222-1261
<b>Registration No.:</b>	R041-34281-00024

I hereby certify that Wayzata Home Products is :

still in operation.

I hereby certify that Wayzata Home Products is :

no longer in operation.

in compliance with the requirements of Registration No. R041-34281-00024.

not in compliance with the requirements of Registration No. R041-34821-00024.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Phone Number:</b>
<b>Date:</b>

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

<b>Noncompliance:</b>

**Indiana Department of Environmental Management  
Office of Air Quality**

Technical Support Document (TSD) for a Registration

<b>Source Description and Location</b>
--

<b>Source Name:</b>	<b>Wayzata Home Products</b>
<b>Source Location:</b>	<b>4747 Western Avenue, Connersville, IN 47331</b>
<b>County:</b>	<b>Fayette</b>
<b>SIC Code:</b>	<b>2499 (Wood Products, Not Elsewhere Classified)</b>
<b>Registration No.:</b>	<b>R041-34281-00024</b>
<b>Permit Reviewer:</b>	<b>Adam Wheat</b>

On March 10, 2014, the Office of Air Quality (OAQ) received an application from Wayzata Home Products related to the construction and operation of a new stationary woodworking and cabinet manufacturing plant.

<b>Existing Approvals</b>
---------------------------

There have been no previous approvals issued to this source.

<b>County Attainment Status</b>
---------------------------------

The source is located in Fayette County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. <sup>1</sup>
PM <sub>2.5</sub>	Unclassifiable or attainment effective April 5, 2005, for the annual PM <sub>2.5</sub> standard.
PM <sub>2.5</sub>	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM <sub>2.5</sub> standard.
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
<sup>1</sup> Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.	

- (a) **Ozone Standards**  
Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) 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<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Fayette County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
  
- (b) **PM<sub>2.5</sub>**  
Fayette County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> emissions. These rules became effective on July 15, 2008. On May 4, 2011, the air pollution control board issued an emergency rule establishing the direct PM<sub>2.5</sub> significant level at ten (10) tons per year. This rule became effective June 28, 2011. Therefore,

direct PM<sub>2.5</sub>, SO<sub>2</sub>, and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

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

#### **Fugitive Emissions**

The fugitive emissions of criteria pollutants, hazardous air pollutants, and greenhouse gases are counted toward the determination of 326 IAC 2-5.1-2 (Registrations) applicability.

#### **Background and Description of Emission Units and Pollution Control Equipment**

The Office of Air Quality (OAQ) has reviewed an application, submitted by Wayzata Home Products on March 10, 2014, relating to the construction and operation of a stationary woodworking and cabinet manufacturing plant.

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

- (a) Three (3) paint booths, identified as PB1 through PB3, approved in 2014 for construction, each with a maximum capacity of 2.0 cabinets per hour, using HVLP spray application, using dry cartridge filters as control, and exhausting to stacks PB1 through PB3, respectively.
- (b) One (1) woodworking operation, identified as WW1, approved in 2014 for construction, with a maximum capacity of 500 lbs/hr, using a dust collector, identified as DC1, as control, and exhausting to stack DC1.
- (c) Four (4) natural gas-fired air handling units, identified as AHU1 through AHU4, approved in 2014 for construction, each with a maximum heat input capacity of 2.40 MMBtu/hr, and exhausting to the atmosphere.

#### **"Integral Part of the Process" Determination**

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

Particulate from the woodworking operation shall be controlled the dust collector at all times the woodworking operation is in operation.

#### **Enforcement Issues**

There are no pending enforcement actions related to this source.

**Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

**Permit Level Determination – Registration**

The following table reflects the unlimited potential to emit (PTE) of the entire source after integral woodworking controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	Potential To Emit of the Entire Source (tons/year)									
	PM	PM10*	PM2.5*	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs as CO <sub>2</sub> e**	Total HAPs	Worst Single HAP
Surface Coating	4.85	4.85	4.85	-	-	22.12	-	-	8.67	6.62 (Xylene)
Woodworking***	0.75	0.75	0.75	-	-	-	-	-	-	-
Natural Gas Combustion	0.08	0.31	0.31	0.02	4.12	0.23	3.46	4,976	0.08	0.07 (Hexane)
<b>Total PTE of Entire Source</b>	<b>5.68</b>	<b>5.91</b>	<b>5.91</b>	<b>0.02</b>	<b>4.12</b>	<b>22.34</b>	<b>3.46</b>	<b>4,976</b>	<b>8.75</b>	<b>6.62 (Xylene)</b>
Exemptions Levels**	< 5	< 5	< 5	< 10	< 10	< 10	< 25	< 100,000	< 25	< 10
Registration Levels**	< 25	< 25	< 25	< 25	< 25	< 25	< 100	< 100,000	< 25	< 10

negl. = negligible  
 \*Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a regulated air pollutant".  
 \*\*The 100,000 CO<sub>2</sub>e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.  
 \*\*\*PTE of the woodworking operation is after integral woodworking controls.

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of PM, PM10, PM2.5, and VOC are within the ranges listed in 326 IAC 2-5.5-1(b)(1). The PTE of all other regulated criteria pollutants are less than the ranges listed in 326 IAC 2-5.5-1(b)(1). Therefore, the source is subject to the provisions of 326 IAC 2-5.5 (Registrations). A Registration will be issued.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the PTE 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 2-7.
- (c) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

**Federal Rule Applicability Determination**

New Source Performance Standards (NSPS)

- (a) 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 registration, because the four (4) natural gas-fired air handling units (AHU1 through AHU4) are not

boilers, and each has a maximum heat input capacity of less than ten (10) million British thermal units per hour.

- (b) The requirements of the New Source Performance Standard for Surface Coating of Metal Furniture, 40 CFR 60, Subpart EE (326 IAC 12), are not included in the registration, since the source does not coat metal furniture.
- (c) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the registration for this source.

#### National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Wood Furniture Manufacturing Operations, 40 CFR 63, Subpart JJ (326 IAC 20-14), are not included for this registration, since is not located at a major source for HAPs.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Plywood and Composite Wood Products, 40 CFR 63, Subpart DDDD (63.2230 through 63.2292), are not included in this registration, because the source does not engage in the manufacturing of plywood and/or composite wood products as defined in 40 CFR 63.2292. The source manufactures wood cabinets and/or wood cabinet components.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart MMMM (326 IAC 20-80), are not included in this registration, since this source is not a major source of HAPs as defined in 40 CFR 63.2 and does not perform surface coating of miscellaneous metal parts and products.
- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for (Surface Coating of Plastic Parts and Products), 40 CFR 63, Subpart PPPP 326 IAC 20-81, are not included in the registration, 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. The source manufactures wood cabinets and/or wood cabinet components.
- (h) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Metal Furniture, 40 CFR 63, Subpart RRRR (326 IAC 20-78), are not included in the registration, 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. The source manufactures wood cabinets and/or wood cabinet components.
- (i) The requirements of the National Emissions Standards for Hazardous Air Pollutants (NESHAPs): Surface Coating of Wood Building Products, 40 CFR 63, Subpart QQQQ (326 IAC 20-79), are not included in this registration, since the facility does not surface coat wood building products is not located at a major source of HAP. The source only surface coats wood cabinets, which are not considered wood building products.
- (j) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD (326 IAC 20-95), are not included in this registration, since this source is not a major source of HAPs.
- (k) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ (40 CFR 63.11193 through 63.11237), are not included in the registration for this source as follows:

- (1) the four (4) natural gas-fired air handling units (AHU1 through AHU4) burn natural-gas; and
  - (2) the four (4) natural gas-fired air handling units (AHU1 through AHU4) are each not considered an industrial, commercial, or institutional boiler, as defined by 40 CFR 63.11237.
- (l) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations, 40 CFR 63, Subpart HHHHHH (63.11169 through 63.11180), are not included in this registration, since this source does not perform paint stripping using chemical strippers that contain methylene chloride in the removal of dried paint, does not perform spray application of coatings to motor vehicles or mobile equipment, and does not perform spray application of coating that contains chromium, lead, manganese, nickel, or cadmium to a plastic and/or metal substrates.
- (m) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the registration.

#### Compliance Assurance Monitoring (CAM)

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

<b>State Rule Applicability Determination</b>
---

The following state rules are applicable to the source:

- (a) 326 IAC 2-5.1-2 (Registrations)  
Registration applicability is discussed under the Permit Level Determination – Registration section above.
- (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)  
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (d) 326 IAC 5-1 (Opacity Limitations)  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this registration:
- (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 12 (New Source Performance Standards)  
See Federal Rule Applicability Section of this TSD.
- (h) 326 IAC 20 (Hazardous Air Pollutants)  
See Federal Rule Applicability Section of this TSD.

### **Surface Coating**

- (i) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-2(b)(15), the paint booths (PB1, PB2, and PB3) are not subject to requirements of 326 IAC 6-3, since each unit has the potential to use less than five (5) gallons per day of surface coatings.
- (j) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
Pursuant to 326 IAC 8-1-6, the paint booths (PB1, PB2, and PB3) are not subject to requirements of this rule because they are subject to the requirements of 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating).
- (k) 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)  
Pursuant to 326 IAC 8-2-1(a)(4), the paint booths (PB1, PB2, and PB3) are subject to 326 IAC 8-2-12 because each unit was constructed after July 1, 1990, the actual VOC emissions before controls for each unit are greater than fifteen (15) pounds per day, and each applies surface coating to wood furnishings as defined in 326 IAC 8-2-12(a).

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

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

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

The paint booths, identified as PB1 through PB3, are equipped with HVLP spray applicators. Therefore, the surface coating processes comply with this rule.

- (l) 326 IAC 8-11 (Wood Furniture Coatings)  
Pursuant to 326 IAC 8-11-1, this source is not subject to the requirements of 326 IAC 8-11 because the source is not located in one of the following counties: Lake Porter, Clark, or Floyd County.

### **Woodworking**

- (m) 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 each of the woodworking operation (WW1), since it has potential particulate emissions (after integral woodworking controls) of less than five hundred fifty-one thousandths (0.551) pound per hour.

In order to ensure that the woodworking operation (WW1) is exempt from the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the integral dust collector (DC1) shall be in operation and controlling emissions from the woodworking operation (WW1) at all times the woodworking processes are in operation.

### **Natural Gas Combustion**

- (n) 326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)  
The natural gas-fired building air handling units are each not subject to 326 IAC 6-2 as they are not sources of indirect heating.
- (o) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
The natural gas-fired air handling units are each not subject to the requirements of 326 IAC 6-3, since they each are not a "manufacturing process" as defined by 326 IAC 6-3-1.5.
- (p) 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)  
Pursuant to 326 IAC 7-1.1-1, the natural gas-fired air handling units each not subject to the requirements of 326 IAC 7-1, since each has unlimited sulfur dioxide (SO<sub>2</sub>) emissions less than twenty-five (25) tons per year and ten (10) pounds per hour respectively.
- (q) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
Each of the natural gas-fired air handling units is not subject to the requirements of 326 IAC 8-1-6, since each has unlimited VOC potential emissions of less than twenty-five (25) tons per year.

## **Conclusion and Recommendation**

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on March 10, 2014.

The construction and operation of this source shall be subject to the conditions of the attached proposed Registration No. R041-34281-00024. The staff recommends to the Commissioner that this Registration be approved.

## **IDEM Contact**

- (a) Questions regarding this proposed registration can be directed to Adam Wheat at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-8397 or toll free at 1-800-451-6027 extension 3-8397.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>

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

**Appendix A: Emissions Calculations  
Summary Table**

**Company Name: Wayzata Home Products  
Source Address: 4747 Western Avenue, Connversville, IN 47331  
Registration Number: R041-34281-00024  
Reviewer: Adam Wheat  
Date: March 2014**

<b>Unlimited Potential to Emit (PTE) (tons/year) Before Integral Controls*</b>											
<b>Emission Units</b>	<b>PM</b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>	<b>SO<sub>2</sub></b>	<b>NO<sub>x</sub></b>	<b>VOC</b>	<b>CO</b>	<b>GHGs as CO<sub>2</sub>e</b>	<b>Total HAPs</b>	<b>Highest Single HAP</b>	
Surface Coating	4.85	4.85	4.85	-	-	22.12	-	-	8.67	6.62	Xylene
Woodworking	15.02	15.02	15.02	-	-	-	-	-	-	-	-
Natural Gas Combustion	0.08	0.31	0.31	0.02	4.12	0.23	3.46	4,976	0.08	0.07	Hexane
<b>Total</b>	<b>19.95</b>	<b>20.18</b>	<b>20.18</b>	<b>0.02</b>	<b>4.12</b>	<b>22.34</b>	<b>3.46</b>	<b>4,976</b>	<b>8.75</b>	<b>6.62</b>	<b>Xylene</b>

<b>Unlimited Potential to Emit (PTE) (tons/year) After Integral Controls*</b>											
<b>Emission Units</b>	<b>PM</b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>	<b>SO<sub>2</sub></b>	<b>NO<sub>x</sub></b>	<b>VOC</b>	<b>CO</b>	<b>GHGs as CO<sub>2</sub>e</b>	<b>Total HAPs</b>	<b>Highest Single HAP</b>	
Surface Coating	4.85	4.85	4.85	-	-	22.12	-	-	8.67	6.62	Xylene
Woodworking	0.75	0.75	0.75	-	-	-	-	-	-	-	-
Natural Gas Combustion	0.08	0.31	0.31	0.02	4.12	0.23	3.46	4,976	0.08	0.07	Hexane
<b>Total</b>	<b>5.68</b>	<b>5.91</b>	<b>5.91</b>	<b>0.02</b>	<b>4.12</b>	<b>22.34</b>	<b>3.46</b>	<b>4,976</b>	<b>8.75</b>	<b>6.62</b>	<b>Xylene</b>

\*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 (Cause Nos. 92-A-J-730 and 92-A-J-833) related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls were necessary for the facility to produce its normal product and are integral to the normal operation of the facility, and therefore, potential emissions should be calculated after controls. Based on this ruling, potential emissions for particulate matter from the woodworking operations were calculated after consideration of the dust collector controls for purposes of determining permit level and the applicability of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes). However, for purposes of determining the applicability of Prevention of Significant Deterioration (PSD), potential particulate matter emissions from the woodworking operations were calculated before consideration of the dust collector controls.

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations (PB1, PB2, PB3, PB4)**

**Company Name: Wayzata Home Products  
Source Address: 4747 Western Avenue, Connversville, IN 47331  
Registration Number: R041-34281-00024  
Reviewer: Adam Wheat  
Date: March 2014**

Material	Product ID	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/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
Vanilla Primer	522-15039	10.2	40.02%	0.0%	40.0%	0.0%	42.75%	0.20	2.0	9.6	4.07	4.07	1.63	39.07	7.13	1.60	9.52	85%
Off White Primer	522-18174	9.9	42.33%	0.0%	42.3%	0.0%	40.31%	0.20	2.0	9.6	4.21	4.21	1.68	40.39	7.37	1.51	10.44	85%
Vanilla Enamel	117-15040	10.0	34.79%	0.0%	34.8%	0.0%	50.39%	0.182	2.0	8.7	3.47	3.47	1.26	30.30	5.53	1.55	6.89	85%
Off White Enamel	117-18173	10.1	32.88%	0.0%	32.9%	0.0%	66.56%	0.182	2.0	8.7	3.31	3.31	1.21	28.92	5.28	1.62	4.98	85%
Fast Reducer	803-1329	7.1	99.67%	0.0%	99.7%	0.0%	0.00%	0.018	2.0	0.9	7.07	7.07	0.26	6.17	1.13	0.00	0.00	85%
<b>Worst Case Enamel (as applied)*</b>											<b>3.80</b>	<b>3.80</b>	<b>1.52</b>	<b>36.47</b>	<b>6.66</b>	<b>1.62</b>	<b>6.89</b>	<b>85%</b>

\*Enamel is mixed with Fast Reducer at a maximum ratio of 10:1

**Worst Case Coating PTE (1 booth)**      **1.68**      **40.39**      **7.37**      **1.62**

**Worst Case Coating PTE (3 booths)**      **5.05**      **121.18**      **22.12**      **4.85**

**METHODOLOGY**

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

**Hazardous Air Pollutants (HAPs)**

Material	Product ID	Density (Lb/Gal)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	% Xylene	% Formaldehyde	%Ethylbenzene	%Toluene	% Naphthalene	% Methyl Alcohol	% Cumene
Vanilla Primer	522-15039	10.2	0.20	2.0	9.16%	0.07%	2.75%	0.01%	0.0016%	0%	0%
Off White Primer	522-18174	9.9	0.20	2.0	2.00%	1.00%	1.00%	1.00%	0%	1.00%	1.0%
Vanilla Enamel	117-15040	10.0	0.182	2.0	13.89%	0.10%	3.49%	0%	0%	0%	0%
Off White Enamel	117-18173	10.1	0.182	2.0	12.00%	1.00%	3.00%	1.00%	0%	0%	0%
Fast Reducer	803-1329	7.1	0.018	2.0	0%	0%	0%	10.00%	0%	0%	0%

Material	Product ID	Density (Lb/Gal)	Gal of Material (gal/unit)	Maximum Throughput (unit/hour)	Xylene Emissions (tons/year)	Formaldehyde Emissions (tons/year)	Ethylbenzene Emissions (tons/year)	Toluene Emissions (tons/year)	Naphthalene Emissions (tons/year)	Methyl Alcohol Emissions (tons/year)	Cumene Emissions (tons/year)	Total HAPs (tons/year)
Vanilla Primer	522-15039	10.2	0.20	2.0	1.63	0.01	0.49	0.00	0.00	0.00	0.00	2.14
Off White Primer	522-18174	9.9	0.20	2.0	0.35	0.17	0.17	0.17	0.00	0.17	0.17	1.22
Vanilla Enamel	117-15040	10.0	0.182	2.0	2.21	0.02	0.55	0.00	0.00	0.00	0.00	2.78
Off White Enamel	117-18173	10.1	0.182	2.0	1.93	0.16	0.48	0.16	0.00	0.00	0.00	2.73
Fast Reducer	803-1329	7.1	0.018	2.0	0.00	0.00	0.00	0.11	0.00	0.00	0.00	0.11
<b>Worst Case Enamel (as applied)*</b>												

\*Enamel is mixed with Fast Reducer at a maximum ratio of 10:1

**Worst Case Coating HAP PTE (1 booth)**      **2.21**      **0.17**      **0.55**      **0.27**      **0.00**      **0.17**      **0.17**      **2.89**

**Worst Case Coating HAP PTE (3 booths)**      **6.62**      **0.52**      **1.66**      **0.82**      **0.00**      **0.52**      **0.52**      **8.67**

**METHODOLOGY**

HAPs Emissions (tons/year) = Density (lbs/gal) \* Gal of Material (gal/unit) \* Maximum Throughput (units/hr) \* Weight % HAP \* (8760 hrs/yr) / (2000 lbs/ton)

**Appendix A: Emissions Calculations  
Particulate (PM/PM10/PM2.5)  
From Woodworking Operations**

**Company Name: Wayzata Home Products  
Source Address: 4747 Western Avenue, Connversville, IN 47331  
Registration Number: R041-34281-00024  
Reviewer: Adam Wheat  
Date: March 2014**

Process	Baghouse ID	Design Outlet Grain Loading (grains/acfm)	Flowrate (acfm)	Control Efficiency (%)	Controlled PTE (lb/hr)	Controlled PTE (ton/yr)	Uncontrolled PTE (lb/hr)	Uncontrolled PTE (ton/yr)
WW1	DC1	0.005	2,000	95.0%	0.09	0.38	1.71	7.51
WW2	DC2	0.005	2,000	95.0%	0.09	0.38	1.71	7.51
<b>Totals</b>					<b>0.17</b>	<b>0.75</b>	<b>3.43</b>	<b>15.02</b>

**Methodology**

Controlled PTE (lb/hr) = [Design Outlet Grain Loading (grains/acfm)] \* [Flowrate (acfm)] \* [60 min/hr] \* [lb/7000 grains]

Controlled PTE (tpy) = [Controlled PTE (lb/hr)] \* [8,760 hours/year] \* [ton/2000 lb]

Uncontrolled PTE (lb/hr) = [Controlled PTE (lb/hr)] / [1 - Control Efficiency %]

Uncontrolled PTE (tpy) = [Uncontrolled PTE (lb/hr)] \* [8,760 hours/year] \* [ton/2000 lb]

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 (Cause Nos. 92-A-J-730 and 92-A-J-833) related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls were necessary for the facility to produce its normal product and are integral to the normal operation of the facility, and therefore, potential emissions should be calculated after controls. Based on this ruling, potential emissions for particulate matter from the woodworking operations were calculated after consideration of the dust collector controls for purposes of determining permit level and the applicability of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes). However, for purposes of determining the applicability of Prevention of Significant Deterioration (PSD), potential particulate matter emissions from the woodworking operations were calculated before consideration of the dust collector controls.

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

**Company Name:** Wayzata Home Products  
**Source Address:** 4747 Western Avenue, Connversville, IN 47331  
**Registration Number:** R041-34281-00024  
**Reviewer:** Adam Wheat  
**Date:** March 2014

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr	
9.6	1020	82.4	Four (4) space heaters @ 2.4 MMBtu/hr each (ID: AHU1 through AHU4)

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons/yr	0.08	0.31	0.31	0.02	4.12	0.23	3.46

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

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

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

**HAPS Calculations**

Emission Factor in lb/MMcf	HAPs - Organics					Total - Organics
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	
	2.10E-03	1.20E-03	7.50E-02	1.80E+00	3.40E-03	
Potential Emission in tons/yr	8.7E-05	4.9E-05	3.1E-03	0.07	1.4E-04	<b>0.08</b>

Emission Factor in lb/MMcf	HAPs - Metals					Total - Metals
	Lead	Cadmium	Chromium	Manganese	Nickel	
	5.00E-04	1.10E-03	1.40E-03	3.80E-04	2.10E-03	
Potential Emission in tons/yr	2.1E-05	4.5E-05	5.8E-05	1.6E-05	8.7E-05	<b>2.3E-04</b>
					<b>Total HAPs</b>	<b>0.08</b>
					<b>Worst HAP</b>	<b>0.07</b>

Methodology is the same as above.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Greenhouse Gas Calculations**

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120,000	2.3	2.2
Potential Emission in tons/yr	4,947	0.1	0.1
Summed Potential Emissions in tons/yr	4,947		
CO2e Total in tons/yr based on 11/29/2013 federal GWPs	4,976		

**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) based on 11/29/2013 federal GWPs= 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).



# 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](http://www.idem.IN.gov)

**Michael R. Pence**  
*Governor*

**Thomas W. Easterly**  
*Commissioner*

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

TO: Wendy Floyd  
Wayzata Home Products  
4747 Western Avenue  
Connersville, IN 47331

DATE: May 21, 2014

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

SUBJECT: Final Decision  
Registration  
041-34281-00024

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:  
Tim Melillo – Corporate EHS Manager  
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](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 6/13/2013

# Mail Code 61-53

IDEM Staff	GHOTOPP 5/21/2014 Wayzata Home Products 041-34281-00024 Final		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Wendy Floyd Wayzata Home Products 4747 Western Ave Connersville IN 47331 (Source CAATS) via confirmed delivery										
2		Tim Melillo Corporate EHS Mngr Wayzata Home Products 4747 Western Ave Connersville IN 47331 (RO CAATS)										
3		Connersville City Council and Mayors Office 500 Central Avenue Connersville IN 47331 (Local Official)										
4		Fayette County Health Department 401 N Central Ave Ste 8 Connersville IN 47331-1901 (Health Department)										
5		Fayette County Commissioners 401 Central Ave Connersville IN 47331 (Local Official)										
6												
7												
8												
9												
10												
11												
12												
13												
14												
15												

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
<b>4</b>			