

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence Governor Thomas W. Easterly Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a New Source Construction and Federally Enforceable State Operating Permit (FESOP)

For Hardwood Interior Design, LLC in Marshall County

Permit No. 099-34450-00115

The Indiana Department of Environmental Management (IDEM) has received an application from Hardwood Interior Design, LLC located at 1342 W. Plymouth Street, Bremen, IN 46506 for a new source construction and FESOP. If approved by IDEM's Office of Air Quality (OAQ), this proposed permit would allow Hardwood Interior Design, LLC to construct and operate a new miscellaneous woodworking operation.

The applicant intends to construct and operate new equipment that will emit air pollutants. IDEM has reviewed this application, and has developed preliminary findings, consisting of a draft permit and several supporting documents, that would allow the applicant to construct and operate this source.

A copy of the permit application and IDEM's preliminary findings are available at:

Bremen Public Libraray 304 N. Jackson Street Bremen, IN 46506 and IDEM Northern Regional Office 300 N. Michigan Street, Suite 450 South Bend, IN 46601-1295

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

How can you participate in this process?

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit



application, please contact IDEM at the address below. Please refer to permit number F099-34450-00115 in all correspondence.

Comments should be sent to:

Madhurima Moulik IDEM, Office of Air Quality 100 North Senate Avenue MC 61-53 IGCN 1003 Indianapolis, Indiana 46204-2251 (800) 451-6027, ask for extension 3-0868 Or dial directly: (317) 233-0868 Fax: (317) 232-6749 attn: Madhurima Moulik E-mail: mmoulik@idem.in.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor or noise. For such issues, please contact your local officials.

For additional information about air permits and how you can participate, please see IDEM's **Guide for Citizen Participation** and **Permit Guide** on the Internet at: <u>www.idem.in.gov</u>.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251 and IDEM Northern Regional Office, 300 N. Michigan Street, Suite 450, South Bend, IN 46601-1295.

If you have any questions please contact Madhurima Moulik of my staff at the above address.

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

MDM

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Governor

IDEN

Michael R. Pence

Thomas W. Easterly Commissioner

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New Source Construction and Federally Enforceable State Operating Permit **OFFICE OF AIR QUALITY**

Hardwood Interior Design, LLC 1342 W. Plymouth Street Bremen, Indiana 46506

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

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. 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 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-8-11.1, applicable to those conditions.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

Operation Permit No.: F099-34450-00115				
Issued by:				
	Issuance Date:			
Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Expiration Date:			





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SECTION A

SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary miscellaneous woodworking operation.

Source Address:	1342 W. Plymouth Street, Bremen, Indiana 46506
General Source Phone Number:	574-529-0121
SIC Code:	2511
County Location:	Marshall
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State 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 2-8-3(c)(3)] This stationary source consists of the following emission units and pollution control devices:
 - (a) Five (5) surface coating booths, identified as SB1 through SB5, approved in 2014 for construction, with a maximum capacity of 3.0 units per hour, using dry filters as PM control, and exhausting to stacks SBV1 through SB5.
 - (b) One (1) woodworking operation, approved in 2014 for construction, with a maximum capacity of 1100 pounds per hour, using fabric filters as PM control, exhausting indoors.
- A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)] This stationary source also includes the following insignificant activities:
 - (1) One (1) air make-up unit, identified as AM1, with a maximum heat input capacity of 0.3 mmBTU per hour.

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

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

SECTION B

GENERAL CONDITIONS

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

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

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

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

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4][326 IAC 2-8]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 and 326 IAC 2-8 when prior to the start of operation, the following requirements are met:

- The attached Affidavit of Construction shall be submitted to the Office of Air Quality (a) (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- The Permittee shall attach the Operation Permit Validation Letter received from the Office (c) of Air Quality (OAQ) to this permit.

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

- This permit, F099-34450-00115, is issued for a fixed term of five (5) years from the (a) issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.
- Term of Conditions [326 IAC 2-1.1-9.5] B.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.

Enforceability [326 IAC 2-8-6] [IC 13-17-12] B.6

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

B.7 Severability [326 IAC 2-8-4(4)]

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

- B.8 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]
 This permit does not convey any property rights of any sort or any exclusive privilege.
- B.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]
 - (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
 - (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.10 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
 - (1) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

- (2) The compliance status;
- (3) Whether compliance was continuous or intermittent;
- (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

The Permittee shall implement the PMPs.



- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.
- B.14 Emergency Provisions [326 IAC 2-8-12]
 - (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
 - (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ or Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch) Facsimile Number: 317-233-6865 Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

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

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

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

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

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

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

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

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

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

- (a) All terms and conditions of permits established prior to F099-34450-00115 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.
- B.16 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]
 The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.
- B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]
 - (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
 - (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
 - (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
 - (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]
- B.18 Permit Renewal [326 IAC 2-8-3(h)]
 - (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a

certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.19 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- B.20 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]
 - (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:
 - The changes are not modifications under any provision of Title I of the Clean Air Act;

- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J) 77 West Jackson Boulevard Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b)(1) and (c). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(1) and (c).

(b) Emission Trades [326 IAC 2-8-15(b)]

The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(b).

- Alternative Operating Scenarios [326 IAC 2-8-15(c)]
 The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.
- B.21
 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.22 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as

such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request.
 [326 IAC 2-8-10(b)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.



(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

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

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

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

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant, except particulate matter (PM) and greenhouse gases (GHGs), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
 - (4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO₂ equivalent (CO₂e) emissions per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.
- C.3 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

- C.5Incineration [326 IAC 4-2] [326 IAC 9-1-2]The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit.
The Permittee shall not operate a refuse incinerator or refuse burning equipment except as
provided in 326 IAC 9-1-2 or in this permit.
- C.6 Fugitive Dust Emissions [326 IAC 6-4]

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

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

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

- C.8 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).

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(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) Procedures for Asbestos Emission Control The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Demolition and Renovation The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) Indiana Licensed Asbestos Inspector The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

Testing Requirements [326 IAC 2-8-4(3)]

- C.9 Performance Testing [326 IAC 3-6]
 - (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).



(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11] The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

- C.11 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]
 - 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. 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.

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Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68] If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

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- C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5] Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:
 - (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
 - (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
 - (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
 - (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
 - (e) The Permittee shall record the reasonable response steps taken.
- C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]
 - (a) When the results of a stack test performed in conformance with Section C Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ no later than seventy-five (75) days after the date of the test.
 - (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.
 - (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

- C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]
 - (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, 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 FESOP.

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 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:

Indiana Department of Environmental Management Compliance and Enforcement Branch, Office of Air Quality 100 North Senate Avenue

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- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.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) Five (5) surface coating booths, identified as SB1 through SB5, approved in 2014 for construction, with a maximum capacity of 3.0 units per hour, using dry filters as PM control, and exhausting to stacks SBV1 through SB5.

(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 2-8-4(1)]

- D.1.1 Volatile Organic Compounds (VOC) FESOP Limitations [326 IAC 2-8] In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:
 - (1) The total VOC usage at the five (5) surface coating booths shall be limited to 99.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit, combined with the potential to emit of VOCs from all other emission units at this source, shall limit the source-wide total potential to emit of VOCs to less than 100 tons per 12 consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12, the Permittee shall apply all coating material, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) or more of the following application systems:

airless spray application system, air-assisted airless spray application system, electrostatic spray application system, electrostatic bell or disc application system, heated airless spray application system, roller coat, brush or wipe application system or dip-and-drain application system.

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.1.3 Particulate Matter [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), particulate from the paint booths SB1 through SB5 shall be controlled by dry particulate filters, waterwash, or an equivalent control device, and the Permittee shall operate each control device in accordance with manufacturer's specifications.

D.1.4 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 Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.5 Particulate

In order to comply with Condition D.1.3, the dry filters for particulate control from SB1 through SB5 shall be in operation at all times when the associated paint booth is in operation.

Compliance Monitoring Requirements

D.1.6 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks SB1 through SB5 while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. Section C Response to Excursions or Exceedances contains the Permittee's obligation with regard to the 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 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.

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

D.1.8 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.1.1.
 - (1) The usage by weight of each coating used and the usage by weight of each solvent used in SB1 through SB5. Records shall include purchase orders, invoices, and material safety data sheets (MSDS), manufacturer's certified product data sheets, and calculations necessary to verify the type, amount used, and VOC content of each coating.
 - (2) The total monthly VOC usage at the spray booths SB1 through SB5.
- (b) To document the compliance status with Condition D.1.3, the Permittee shall maintain a log of monthly overspray observations and daily inspections of the filters.
- (c) Section C General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(b) One (1) woodworking operation, approved in 2014 for construction, with a maximum capacity of 1100 pounds per hour, using fabric filters as PM control, exhausting indoors.

(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 2-8-4(1)]

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

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the woodworking operation shall not exceed 2.75 pounds per hour when operating at a process weight rate of 0.55 tons per hour. The pound per hour limitation was calculated with the following equation:

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

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

D.2.2 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 Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.2.3 Particulate Matter

In order to comply with Condition D.1.1, the dry filter for particulate control from the woodworking shall be in operation at all times when the woodworking process is in operation.



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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name:Hardwood Interior Design, LLCSource Address:1342 W. Plymouth Street, Bremen, Indiana 46506FESOP Permit No.:F099-34450-00115

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

□ Annual Compliance Certification Letter

Test Result (specify)______

- Report (specify)______
- Notification (specify)______
- Affidavit (specify)
- Other (specify)______

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:



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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) EMERGENCY OCCURRENCE REPORT

Source Name:	Hardwood Interior Design, LLC
Source Address:	1342 W. Plymouth Street, Bremen, Indiana 46506
FESOP Permit No.:	F099-34450-00115

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 Describe:	Ν
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 a imminent injury to persons, severe damage to equipment, substantial loss of 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

FESOP Quarterly Report

Source Name:	Hardwood Interior Design, LLC
Source Address:	1342 W. Plymouth Street, Bremen, Indiana 46506
FESOP Permit No.:	F099-34450-00115
Facility:	Surface coating booths SB1 through SB5
Parameter:	VOC usage
Limit:	99 tons per 12 consecutive month period, with compliance determined at the end
	of each month

YEAR:_____

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

- □ No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
 Deviation has been reported on:

Submitted by:	
Title / Position:	
Signature:	
Date:	
Phone:	



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE AND ENFORCEMENT BRANCH FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Source Address: FESOP Permit No.:	1342 W. Pl	Hardwood Interior Design, LLC 1342 W. Plymouth Street, Bremen, Indiana 46506 F099-34450-00115				
Мс	onths:	to	Year:	 Page 1 of 2		
			calendar year. Proper notic rting requirements of parag			

Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C-General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

□ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

□ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:



Page 2 of 2

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

Form Completed by:_____

Title / Position:

Date:_____

Phone: _____

DRAFT

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

Hardwood Interior Design, LLC 1342 W. Plymouth Street Bremen, Indiana 46506

Affidavit of Construction

Ι,			being duly sworn u	pon my oath, o	depose and say:	
((Name of	the Authorized Representative))		, ,	
1	1.	I live in (21) years of age, I am compet	Cc tent to give this affic	ounty, Indiana a lavit.	and being of sound mind a	and over twenty-one
2	2.	I hold the position of	(Title)	for	(Company Nar	ne)
3		By virtue of my position with knowledge of the representation these representations on beha	ons contained in this	s affidavit and a	am authorized to make	
2		I hereby certify that Hardwood completed construction of the r with the requirements and inter April 17, 2014 and as permitted Operating Permit No. F099-34-	miscellaneous wood nt of the constructio d pursuant to New S	dworking opera n permit applic Source Constru	tion on cation received by the Offic uction Permit and Federall	in conformity ce of Air Quality on
Ę		Permittee, please cross out the following statement if it does not apply: Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.				
Further Af	fiant said	not.				
I affirm un and belief.		ties of perjury that the repres				
STATE OF	F INDIAN)S	,				
COUNTY	OF)				
S	Subscribe	ed and sworn to me, a notary	public in and for		County a	nd State of Indiana
on this		day of	<u>,</u> 20	My Co	ommission expires:	<u>.</u>
				Signature		

Name_____(typed or printed)

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a New Source Construction and Federally Enforceable State Operating Permit (FESOP)

Source Description and Location					
Hardwood Interior Design, LLC					
1342 W. Plymouth Street, Bremen, IN 46506					
Marshall					
2511					
F 099-34450-00115					
Madhurima Moulik					
	Hardwood Interior Design, LLC 1342 W. Plymouth Street, Bremen, IN 46506 Marshall 2511 F 099-34450-00115				

On April 17, 2014, the Office of Air Quality (OAQ) received an application from Hardwood Interior Design, LLC related to the construction and operation of a new miscellaneous woodworking operation.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Marshall 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.					
¹ Unclassifiable	¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which					

'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_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. Marshall 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}

Marshall County has been classified as attainment for $PM_{2.5}$. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for $PM_{2.5}$

emissions. These rules became effective on July 15, 2008. On May 4, 2011, the air pollution control board issued an emergency rule establishing the direct $PM_{2.5}$ significant level at ten (10) tons per year. This rule became effective June 28, 2011. Therefore, direct $PM_{2.5}$, SO₂, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

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

Fugitive Emissions

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

Background and Description of New Source Construction

The Office of Air Quality (OAQ) has reviewed an application, submitted by Hardwood Interior Design, LLC on April 17, 2014 relating to the construction and operation of a miscellaneous woodworking operation.

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

- (a) Five (5) surface coating booths, identified as SB1 through SB5, approved in 2014 for construction, with a maximum capacity of 3.0 units per hour, using dry filters for PM control, and exhausting to stacks SBV1 through SB5.
- (b) One (1) woodworking operation, approved in 2014 for construction, with a maximum capacity of 1100 pounds per hour, using fabric filters as PM control, exhausting indoors.
- (c) Insignificant activities consisting of the following:
 - (1) One (1) air make-up unit, identified as AM1, with a maximum heat input capacity of 0.3 mmBTU per hour.

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 – FESOP

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

Pollutant	Potential To Emit (tons/year)
PM	21.51
PM10 ⁽¹⁾	21.52
PM2.5 ⁽¹⁾	21.52
SO ₂	Negligible
NO _x	0.12
VOC	182.1
СО	0.1
GHGs as CO ₂ e	148

(1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10) and particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers (PM2.5), not particulate matter (PM), are each considered as a "regulated air pollutant".

HAPs	Potential To Emit (tons/year)
Highest Single HAP	<10
TOTAL HAPs	<25

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of VOCs is greater than one hundred (100) tons per year. The PTE of all other regulated criteria pollutants are each less than one hundred (100) tons per year. The source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a New Source Construction and Federally Enforceable State Operating Permit (FESOP) (326 IAC 2-8), because the source will limit emissions to less than the Title V major source threshold levels.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) 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).
- (c) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) greenhouse gases (GHGs) is less than the Title V subject-to-regulation threshold of one hundred thousand (100,000) tons of CO_2 equivalent (CO_2e) emissions per year.

PTE of the Entire Source After Issuance of the FESOP

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

	Potential To Emit of the Entire Source After Issuance of FESOP (tons/year)									
Process/ Emission Unit	PM	PM10*	PM2.5*	SO ₂	NOx	VOC	со	GHGs as CO₂e**	Total HAPs	Worst Single HAP
Surface Coating Booths	20.89	20.89	20.89			<99			<25	<10
Air make-up unit		0.01	0.01		0.12	0.01	0.10	148		
Woodworking	0.62	0.62	0.62							

		Potentia	I To Emit	of the Er	ntire Sou	rce After	Issuan	ce of FESOP	(tons/ye	ar)
Process/ Emission Unit	PM	PM10*	PM2.5*	SO ₂	NOx	VOC	со	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Total PTE of Entire Source	21.51	21.52	21.52		0.12	<100	0.10	148	<25	<10
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	100,000	NA	NA

negl. = negligible

*Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a regulated air pollutant".

**The 100,000 CO₂e threshold represents the Title V and PSD subject-to-regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.

(a) FESOP Status

This source is not a Title V major stationary source, because the potential to emit criteria pollutants from the entire source will be limited to less than the Title V major source threshold levels. In addition, this new source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs is less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year of total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act and is subject to the provisions of 326 IAC 2-8 (FESOP).

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

(1) The total VOC usage at the five (5) surface coating booths shall be limited to 99.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit of VOCs from all other emission units at this source, shall limit the source-wide total potential to emit of VOCs to less than 100 tons per 12 consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

(a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) 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) are not included in the permit, since this source is an area source for HAPs.
- (c) The requirements of the National Emission Standards for Hazardous Air pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH (326 IAC 20), because this source does not include paint stripping operations using methylene chloride, does not perform autobody refinishing, and does not use paints containing chromium, lead, manganese, nickel, or cadmium.

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

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

- (a) 326 IAC 2-8-4 (FESOP) FESOP applicability is discussed under the PTE of the Entire Source after Issuance of the FESOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) The unrestricted potential to emit of VOCs is less than 250 tons per year. Therefore, 326 IAC 2-2 does not apply.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)) This source is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new units is 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.
- (d) 326 IAC 2-6 (Emission Reporting) Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (e) 326 IAC 5-1 (Opacity Limitations) Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
 - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (f) 326 IAC 12 (New Source Performance Standards) See Federal Rule Applicability Section of this TSD.
- (g) 326 IAC 20 (Hazardous Air Pollutants) See Federal Rule Applicability Section of this TSD.
- (h) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) The surface coating booths SB1 through SB5 shall be subject to the requirements of 326 IAC 6-3-2 as follows:

The surface coating operations SB1 through SB5 shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the source shall operate the control device in accordance with the manufacture's specifications.

 (i) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the woodworking operation shall not exceed 2.75 pounds per hour when operating at a process weight rate of 0.55 tons per hour. The pound per hour limitation was calculated with the following equation:

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

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

For P = 1100 lb per hour/2000 = 0.55 tons per hour E=2.75 lb/hr

The fabric filter shall be in operation at all times the woodworking operation is in operation, in order to comply with this limit.

- (j) 326 IAC 8-2-10 (Flat Wood Panels; Manufacturing Operations) This source does not coat any flat wood panels that are considered printed panels, natural finish hardwood plywood panels, or hardboard paneling with Class II finishes. Therefore, the requirements of 326 IAC 8-2-10 are not applicable.
- (k) 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating Surface Coating Operations) Pursuant to 326 IAC 8-2-12, the Permittee shall apply all coating material, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) or more of the following application systems:

airless spray application system, air-assisted airless spray application system, electrostatic spray application system, electrostatic bell or disc application system, heated airless spray application system, roller coat, brush or wipe application system or dip-and-drain application system.

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.

Therefore, spray booths SB1 through SB5 will utilize 326 IAC 8-2-12 compliant methods of application.

Compliance Determination, Monitoring and Testing Requirements

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

- (1) In order to comply with PM emissions limitations under 326 IAC 6-3-2, the dry filters for particulate control for spray booths SB1 through SB5 shall be in operation at all times when the associated paint booth is in operation.
- (2) The surface coating booths SB1 through SB5 are equipped with dry filters, and are subject to PM limitations under 326 IAC 6-3-2. In order to ensure proper operation of the dry filters, the following monitoring requirements are applicable:

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks SB1 through SB5 while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. Section C Response to Excursions or Exceedances contains the Permittee's obligation with regard to the 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 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.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on April 17, 2014.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and FESOP No. F099-34450-00115. The staff recommends to the Commissioner that this New Source Construction and FESOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Madhurima Moulik 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) 233-0868 or toll free at 1-800-451-6027 extension 3-0868.
- (b) A copy of the findings is available on the Internet at: <u>http://www.in.gov/ai/appfiles/idem-caats/</u>
- (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: <u>www.in.gov/idem</u>

Appendix A: Emissions Calculations Summary Emissions

Page 1 of 5 TSD App A

Company Name: Hardwood Interior Design, LLC Address: 1342 W. Plymouth Street, Bremen, IN 46506 NSR/FESOP: 099-34450-00115 Date: June 11, 2014 Permit Reviewer: Madhurima Moulik

POTENTIAL TO EMIT IN TONS PER YEAR

Emission Units	PM	PM10	PM2.5	SO ₂	NOx	VOC	CO	* Highest Single HAP	Combined HAP	CO2e
Natural Gas (AM1)	0.00	0.01	0.01	0.00	0.12	0.01	0.10		0.00	148.06
Woodworking	0.62	0.62	0.62	0.00	0.00	0.00	0.00		0.00	0.00
Surface Coating Booths (SB1-SB5)	20.89	20.89	20.89	0.00	0.00	182.05	0.00		9.47	0.00
TOTAL	21.51	21.52	21.52	0.00	0.12	182.06	0.10	8.75	9.47	148

*Xylene

LIMITED POTENTIAL TO EMIT IN TONS PER YEAR

Emission Units	PM	PM10	PM2.5	SO ₂	NOx	VOC	CO	* Highest Single HAP	Combined HAP	CO2e
Natural Gas (AM1)	0.00	0.01	0.01	0.00	0.12	0.01	0.10		0.00	148.06
Woodworking	0.62	0.62	0.62	0.00	0.00		0.00		0.00	0.00
Surface Coating Booths (SB1-SB5)	20.89	20.89	20.89	0.00	0.00	<99	0.00		9.47	0.00
TOTAL	21.51	21.52	21.52	0.00	0.12	<100	0.10	8.75	9.47	148

*Xylene

Appendix A: Emissions Calculations VOC and PM/PM10 Emissions 5 (Five) Spray Booths (SB1-SB5)

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Company Name: Hardwood Interior Design, LLC Address: 1342 W. Plymouth Street, Bremen, IN 46506 NSR/FESOP: 099-34450-00115 Date: June 11, 2014

Permit Reviewer: Madhurima Moulik

Material	Density (Ib/gal)	Weight % Volatile (H ₂ 0 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non- Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE VOC (lbs/hour)	PTE VOC (lbs/day)	PTE VOC (tons/year)	PTE Solids (Ibs/gal)	PTE PM/PM10 (tons/year)	**Transfer Efficiency	PTE PM/PM10 (lbs/hour)
Topcoat Booth (LV 40)	7.80	64.49%	0.00%	64.49%	0.00%	35.51%	0.679	3.000	5.03	5.03	10.25	245.92	44.88	14.17	6.18	75%	1.411
Glaze Booth (Vandyke Glaze)	7.18	80.00%	0.00%	80.00%	0.00%	20.00%	0.679	3.000	5.74	5.74	11.70	280.81	51.25	28.72	3.20	75%	0.73
Topcoat Booth (Ameristart)	8.06	49.62%	0.00%	49.62%	0.00%	50.38%	0.679	3.000	4.00	4.00	8.15	195.52	35.68	7.94	9.06	75%	2.07
Sealer Booth	8.10	63.00%	0.00%	63.00%	0.00%	37.00%	0.249	3.000	5.10	5.10	3.81	91.49	16.70	13.79	2.45	75%	0.56
Stain Booth	6.52	57.67%	0.00%	57.67%	0.00%	42.33%	0.679	3.000	3.76	3.76	7.66	183.82	33.55	8.88	0.00	100%	0.00
Potential Emission Rate (Add W	orst Case Coating	to All Solvents Us	ed)								41.57	997.56	182.05		20.89		4.77

** Coating applied using Air-assisted Airless guns

METHODOLOGY

METHODOLOGY Pounds of VOC per Gallon Coating less Water = (Density (Ib/gal) * Weight % Organics) / (1-Volume % water) Pounds of VOC per Gallon Coating = (Density (Ib/gal) * Weight % Organics) PTE VOC (pounds/hour) = Pounds of VOC/Gallon coating (Ib/gal) * Gal of Material (gal/unit) * Maximum (units/hr) PTE VOC (pounds/dav) = Pounds of VOC/Gallon coating (Ib/gal) * Gal of Material (gal/unit) * Maximum (units/hr) PTE VOC (tons/year) = Pounds of VOC per Gallon coating (Ib/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day) PTE VOC (tons/year) = Pounds of VOC per Gallon coating (Ib/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs) PTE PM/PM10 (tons/year) = Max. (units/hour) * Gal of Mat (gal/unit) * Density (Ib/gal) * (1 - Weight % Volatile) * (1-Transfer efficiency) * 7660 hours/year *1ton/2000 lbs PTE PM/PM10 (lbs/hour) = Max. (units/hour) * Gal of Mat (gal/unit) * Density (Ib/gal) * (1 - Weight % Volatile) * (1-Transfer efficiency)

Coatings are mutually exclusive

Appendix A: Emissions Calculations HAP Emissions Five (5) Spray Booths (SB1-SB5)

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Company Name: Hardwood Interior Design, LLC Address: 1342 W. Plymouth Street, Bremen, IN 46506 NSR/FESOP: 099-34450-00115 Date: June 11, 2014 Permit Reviewer: Madhurima Moulik

Material	Density	Gal of Mat.	Maximum	Weight %	Weight %	Weight %	Weight %	Weight %	Ethylbenzene	Methanol	MIBK	Toluene	Xylene
	(lb/gal)	(gal/unit)	(unit/hour)	Ethylbenzene	Methanol	MIBK	Toluene	Xylene		Potential To Emit (tons/year)			
Topcoat Booth (LV 40)	7.80	0.68	3.0000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Glaze Booth (Vandyke Glaze)	7.18	0.68	3.0000	0.00%	0.00%	0.00%	0.00%	2.00%	0.00	0.00	0.00	0.00	1.28
Topcoat Booth (Ameristart)	8.06	0.68	3.0000	1.00%	0.00%	0.00%	0.00%	7.00%	0.72	0.00	0.00	0.00	5.03
Sealer Booth	8.10	0.25	3.0000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Stain Booth	6.82	0.68	3.0000	0.00%	0.00%	0.00%	0.00%	4.00%	0.00	0.00	0.00	0.00	2.43
Potential Emission Rate (Add Wor	st Case Coating to	All Solvents Used							0.72	0.00	0.00	0.00	8.75

METHODOLODY

PTE HAPs (tons/year) = Density (lb/gal) * Gal of Mat. (gal/unit) * Maximum (unit/hour) * Weight % HAP * 8760 hours/year * 1 ton/2000 lbs

Appendix A: Emissions Calculations Natural Gas Combustion Only

MM BTU/HR <100

Company Name: Hardwood Interior Design, LLC Address: 1342 W. Plymouth Street, Bremen, IN 46506 NSR/FESOP: 099-34450-00115 Date: June 11, 2014

Permit Reviewer: Madhurima Moulik

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Emission L Heat Input MMBtu/hr 1 Air Make 0.28		HHV mmBtu	Potential Throughput MMCF/yr				
0.3]	1000	2.5				
				Pollutant			
Emission Factor in Ib/MMCF	PM* 1.9	PM10* 7.6	direct PM2.5* 7.6	SO2 0.6	NOx 100 **see below	VOC 5.5	CO 84
Potential Emission in	0.0	0.0	0.0	0.0	0.1	0.0	0.1

*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 B

MMCF = 1,000,000 Cubic Feet o

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 (Ib/MMCF)/2,000 lb/ton

		HAPs - Organics										
Emission Factor in Ib/	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03							
Potential Emission in	2.575E-06	1.472E-06	9.198E-05	2.208E-03	4.170E-06							

HAPs - Metals										
Emission Factor in lb/	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03					
Potential Emission in	6.132E-07	1.349E-06	1.717E-06	4.660E-07	2.575E-06					
Methodology is the same as page	1			Single HAP Total HAP	2.208E-03 2.314E-03					

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	
Emission Factor in lb/	CO2 120,000	CH4 2.3	N2O 2.2
Potential Emission in	147	0.0	0.0
Summed Potential Emissions in	tons/yr	147	
CO2e Total in tons/yr		148	

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.

Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.

Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

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

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

Appendix A: Emissions Calculations Woodworking - Particulate

Company Name: Hardwood Interior Design, LLC Address: 1342 W. Plymouth Street, Bremen, IN 46506 NSR/FESOP: 099-34450-00115 Date: June 11, 2014 Permit Reviewer: Madhurima Moulik

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			Outlet Grain		PM/PM10/PM2.5	PM/PM10/PM2.5	PM/PM10/PM2.5	PM/PM10/PM2.5
	Control	Control	Loading	Air Flow	before Controls	before Controls	after Controls	after Controls
Unit ID	Device	Efficiency	(grains/dscf)	Rate (cfm)	(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
Woodworking Operation	Baghouse	98.00%	0.003	5500	7.07	30.97	0.14	0.62

Methodology

PM10 and PM2.5 emissions assumed equal to PM emissions.

PM/PM10/PM2.5 after Integral Controls (lbs/hr) = [Outlet Grain Loading (grains/dscf)] * [Air Flow Rate (cfm)] * [60 min/hr] * [lb/7000 grains]

PM/PM10/PM2.5 after Integral Controls (tons/yr) = [PM/PM10/PM2.5 after Integral Controls (lbs/hr)] * [8760 hr/yr] * [ton/2000 lb]

PM/PM10/PM2.5 before Integral Controls (lbs/hr) = [PM/PM10/PM2.5 after Integral Controls (lbs/hr)] / [1 - control efficiency]

PM/PM10/PM2.5 before Integral Controls (tons/yr) = [PM/PM10/PM2.5 after Integral Controls (tons/yr)] / [1 - control efficiency]

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

June 11, 2014

Mr. Ed Yutzy Hardwood Interior Design 1342 W Plymouth St Bremen, IN 46506

> Re: Public Notice Hardwood Interior Design Permit Level: New Source FESOP Permit Number: 099 - 34450 - 00115

Dear Mr. Yutzy:

Enclosed is a copy of your draft New Source FESOP, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Plymouth Pilot News in Plymouth, Indiana publish the abbreviated version of the public notice no later than June 16, 2014. You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper.

OAQ has submitted the draft permit package to the Bremen Public Library, 304 N Jackson St in Bremen IN. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Madhurima Moulik, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-0868 or dial (317) 233-0868.

Sincerely,

Len Pogost

Len Pogost Permits Branch Office of Air Quality

Enclosures PN Applicant Cover letter-2014. dot 4/10/14





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Michael R. Pence Governor Thomas W. Easterly Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

June 11, 2014

Plymouth Pilot News Attn: Classifieds P.O. Box 220 Plymouth, IN 46563

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Hardwood Interior Design, LLC, Marshall County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than June 16, 2014.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

To ensure proper payment, please reference account # 100174737.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Len Pogost at 800-451-6027 and ask for extension 3-2803 or dial 317-233-2803.

Sincerely,

Len Pogost

Len Pogost Permit Branch Office of Air Quality

Permit Level: New Source FESOP Permit Number: 099 - 34450 - 00115

> Enclosure PN Newspaper.dot 6/13/2013







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Michael R. Pence Governor Thomas W. Easterly Commissioner

June 11, 2014

To: Bremen Public Library 304 N Jackson St Bremen IN

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

Subject: Important Information to Display Regarding a Public Notice for an Air Permit

Applicant Name:Hardwood Interior DesignPermit Number:099 - 34450 - 00115

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. Please make this information readily available until you receive a copy of the final package.

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. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

> Enclosures PN Library.dot 6/13/2013



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Michael R. Pence Governor Thomas W. Easterly Commissioner

Notice of Public Comment

June 11, 2014 Hardwood Interior Design 099 - 34450 - 00115

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

Please Note: If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.

Enclosure PN AAA Cover.dot 6/13/13





Mail Code 61-53

IDEM Staff	LPOGOST 6/11/	/2014		
	Hardwood Interic	or Design LLC 099 - 34450 - 00115 draft/)	AFFIX STAMP	
Name and		Indiana Department of Environmental	Type of Mail:	HERE IF
address of		Management		USED AS
Sender		Office of Air Quality – Permits Branch	CERTIFICATE OF	CERTIFICATE
		100 N. Senate	MAILING ONLY	OF MAILING
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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		Ed Yutzy Hardwood Interior Design LLC 1342 W Plymouth St Bremen IN 46506 (Sour	ce CAATS)								Remains		
2		Bremen Public Library 304 N Jackson St Bremen IN 46506-1130 (Library)											
3		Marshall County Commissioners 112 West Jefferson Street Plymouth IN 46563 (Loc	cal Official)										
4		Bremen Town Council and Town Manager 111 South Center Street Bremen IN 46506 (Local Official)											
5		Marshall County Health Department 112 W Jefferson Street, Suite 103 Plymouth IN 46563-1764 (Health Department)											
6		LaPaz Town Council PO Box 0820 LaPaz IN 46537 (Local Official)											
7		Ms. Julie Grzesiak 139 N. Michigan St. Argos IN 46501 (Affected Party)											
8		Nate Black D & B Environmental Services, Inc. 401 Lincoln Way West Osceola IN 465	61 (Consult	tant)									
9													
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			The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <i>Domestic Mail Manual</i> R900 , S913 , and S921 for limitations of coverage on inured and COD mail. See <i>International Mail Manual</i> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.