INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

To: Interested Parties

Date: October 7, 2014

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

Source Name: D & W Inc

Permit Level: MSOP - Renewal

Permit Number: 039-34552-00195

Source Location: 941 Oak Street

Type of Action Taken: Permit Renewal

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the matter referenced above.

The final decision is available on the IDEM website at: http://www.in.gov/apps/idem/caats/
To view the document, select Search option 3, then enter permit 34552.

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

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

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

(continues on next page)

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

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Michael R. Pence
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Commissioner

Minor Source Operating Permit Renewal
OFFICE OF AIR QUALITY

D & W, Inc.
941 Oak St.
Elkhart, Indiana 46514

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

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

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

Operation Permit No.: M039-34552-00195	
Issued by: Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: October 7,2014 Expiration Date: October 7, 2024

TABLE OF CONTENTS

SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary mirror glass coating source.

Source Address:	941 Oak St., Elkhart, Indiana 46514
General Source Phone Number:	574-264-9674
SIC Code:	3231
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

(a) One (1) glass coating line, identified as GC1, constructed in 1986, with a maximum capacity of 2550 square feet of glass per hour, equipped with flow coating applicators, uncontrolled and exhausting through Stack GC1.

(b) One (1) electric drying oven, identified as EDO 1, constructed in 1986, with a maximum capacity of 2550 square feet of glass per hour, uncontrolled and exhausting inside the building.

(c) One (1) cold cleaner degreaser, identified as Cold Cleaner, with a maximum usage rate of 0.0548 gallons of solvent per day, uncontrolled and exhausting inside the building.

(d) One (1) wood cutting and crating operation, identified as Wood Crating 1, constructed in 1986, with a maximum capacity of 600 pounds of wood per hour, equipped with a fabric filter and exhausting inside the building.

(e) One (1) natural gas-fired boiler, identified as Boiler, constructed in 1986, with a maximum heat input capacity of 1.23 million BTU per hour, uncontrolled and exhausting through Stack SV-1.

(f) Thirty (30) natural gas-fired space heaters, identified as Space 2 through Space 31, constructed in 1986, with a maximum heat input capacity of 0.1 million BTU per hour each, uncontrolled and exhausting through Stacks SV-2 to SV-31.

(g) Six (6) natural gas-fired space heaters, identified as Space 32 to Space 37, constructed in 1986, with a maximum heat input capacity of 0.125 million BTU per hour each, uncontrolled and exhausting through Stacks SV-32 to SV-37.

(h) Three (3) natural gas-fired space heaters, identified as Space 38 to Space 40, constructed in 1986, with a maximum heat input capacity of 0.090 million BTU per hour each, uncontrolled and exhausting through Stacks SV-38 to SV-40.

(i) Two (2) natural gas-fired space heaters, identified as Space 41 and Space 42, constructed in 1986, with a maximum heat input capacity of 0.225 million BTU per hour each, uncontrolled and exhausting through Stacks SV-41 to SV-42.

SECTION B GENERAL CONDITIONS

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

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

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, M039-34552-00195, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

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

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

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

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

B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

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

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

B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.

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

B.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to M039-34552-00195 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.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-6.1-7.

B.12 Permit Renewal [326 IAC 2-6.1-7]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

(b) A timely renewal application is one that is:

(1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and

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

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

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

B.14 Source Modification Requirement

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

B.15 Inspection and Entry
[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

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

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

B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

B.17 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.

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

B.18 Credible Evidence [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Permit Revocation [326 IAC 2-1.1-9]

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

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

C.7 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 by using ambient air quality modeling pursuant to 326 IAC 1-7-4.

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).

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

All required notifications shall be submitted to:

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

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

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

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

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

C.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.

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

C.12 Instrument Specifications [326 IAC 2-1.1-11]

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

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.13 Response to Excursions or Exceedances

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

C.15 Malfunctions Report [326 IAC 1-6-2]

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

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.16 General Record Keeping Requirements [326 IAC 2-6.1-5]

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

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

C.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) Reports required by conditions in Section D of this permit shall be submitted to:

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

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Surface Coating Operations

(a) One (1) glass coating line, identified as GC1, constructed in 1986, with a maximum capacity of 2550 square feet of glass per hour, equipped with flow coating applicators, uncontrolled and exhausting through Stack GC1.

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

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

D.1.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-1-6]

Pursuant to CP 039-3161-00195, issued on October 6, 1994, and in order to comply with the requirements of 326 IAC 8-1-6 (BACT), the Permittee shall comply with the following:

(a) The one (1) glass coating line, identified as GC1, shall utilize flow coating as the application method at all times, and

(b) The amount of VOC delivered to the flow coating applicators at the glass coating line GC1, including clean-up solvents, shall not exceed 80.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits shall satisfy the requirements of 326 IAC 8-1-6 (BACT).

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

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

Compliance Determination Requirements

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC and HAP usage limitations included in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAP data sheets. IDEM, OAQ**,** reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.4 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.1.1.

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

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

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

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

(3) The cleanup solvent usage for each month.

(4) The total VOC usage for each month.

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

D.1.5 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.1.1 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) calendar days after the end of each calendar quarter being reported. Section C - General Reporting Requirements contains the Permittee's obligation with to the reporting required by this condition. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Degreasing Operations

(c) One (1) cold cleaner degreaser, identified as Cold Cleaner, with a maximum usage rate of 0.0548 gallons of solvent per day, uncontrolled and exhausting inside the building.

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

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

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements), the Permittee shall:

(1) Equip the degreaser with a cover.

(2) Equip the degreaser with a device for draining cleaned parts.

(3) Close the degreaser cover whenever parts are not being handled in the degreaser.

(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).

(6) Store waste solvent only in closed containers.

(7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere

Pursuant to 326 IAC 8-3-2(b), the owner or operator shall:

(1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
(B) A water cover when solvent used is insoluble in, and heavier than, water.
(C) A refrigerated chiller.
(D) Carbon adsorption.
(E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.

(2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.

(3) If used, solvent spray:
(A) must be a solid, fluid stream; and
(B) shall be applied at a pressure that does not cause excessive splashing.

D.2.2 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), on and after January 1, 2015, the Permittee shall not operate a cold cleaning degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

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

D.2.3 Record Keeping Requirements

To document the compliance status with Condition D.2.2, on and after January 1, 2015, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

(a) The name and address of the solvent supplier.

(b) The date of purchase.

(c) The type of solvent purchased.

(d) The total volume of the solvent purchased.

(e) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Wood Cutting and Crating Operations

(d) One (1) wood cutting and crating operation, identified as Wood Crating 1, constructed in 1986, with a maximum capacity of 600 pounds of wood per hour, equipped with a fabric filter and exhausting inside the building.

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

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

D.3.1 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.3.2 Particulate Control

In order to ensure that, pursuant to 326 IAC 6-3-1(b)(14), the woodworking operation is exempt from the requirements of 326 IAC 6-3-2, the fabric filter for particulate control shall be in operation and control emissions from the wood cutting and crating operation at all times the wood cutting and crating equipment is in operation.

Indiana Department of Environmental Management
Office of Air Quality
Compliance and Enforcement Branch

Quarterly Report

Source Name: D & W, Inc.
Source Address: 941 Oak St., Elkhart, Indiana 46514
MSOP Permit No.: M039-34552-00195
Source/Facility: Glass Coating Line, GC1
Pollutant: VOCs
Limit: Less than eighty (80.0) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER:_____YEAR:_____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Input This Month (Tons)	VOC Input Previous 11 Months (Tons)	VOC Input 12 Month Total (Tons)

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

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

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

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

Company Name:	D & W, Inc.
Address:	941 Oak St.
City:	Elkhart, Indiana 46514
Phone #:	574-264-9674
MSOP #:	M039-34552-00195

I hereby certify that D & W, Inc. is :

□ still in operation.
□ no longer in operation.

I hereby certify that D & W, Inc. is :

□ in compliance with the requirements of MSOP M039-34552-00195.
□ not in compliance with the requirements of MSOP M039-34552-00195.

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

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____
_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____
_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE)_____
_____
_____

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

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____
*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

_____
_____

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a
Minor Source Operating Permit Renewal

Source Background and Description

Source Name:	**D & W, Inc.**
Source Location:	**941 Oak St., Elkhart, Indiana 46514**
County:	**Elkhart**
SIC Code:	**3231**
Permit Renewal No.:	**M039-34552-00195**
Permit Reviewer:	**Madhurima Moulik**

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from D & W, Inc. relating to the operation of a stationary mirror glass coating source. On May 18, 2014, D & W, Inc. submitted an application to the OAQ requesting to renew its operating permit. D & W, Inc. was issued MSOP Renewal M039-34552-00195 on September 18, 2009.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

(a) One (1) glass coating line, identified as GC1, constructed in 1986, with a maximum capacity of 2550 square feet of glass per hour, equipped with flow coating applicators, uncontrolled and exhausting through Stack GC1.
(b) One (1) electric drying oven, identified as EDO 1, constructed in 1986, with a maximum capacity of 2550 square feet of glass per hour, uncontrolled and exhausting inside the building.
(c) One (1) cold cleaner degreaser, identified as Cold Cleaner, with a maximum usage rate of 0.0548 gallons of solvent per day, uncontrolled and exhausting inside the building.
(d) One (1) wood cutting and crating operation, identified as Wood Crating 1, constructed in 1986, with a maximum capacity of 600 pounds of wood per hour, equipped with a fabric filter and exhausting inside the building.
(e) One (1) natural gas-fired boiler, identified as Boiler, constructed in 1986, with a maximum heat input capacity of 1.23 million BTU per hour, uncontrolled and exhausting through Stack SV-1.
(f) Thirty (30) natural gas-fired space heaters, identified as Space 2 through Space 31, constructed in 1986, with a maximum heat input capacity of 0.1 million BTU per hour each, uncontrolled and exhausting through Stacks SV-2 to SV-31.
(g) Six (6) natural gas-fired space heaters, identified as Space 32 to Space 37, constructed in 1986, with a maximum heat input capacity of 0.125 million BTU per hour each, uncontrolled and exhausting through Stacks SV-32 to SV-37.
(h) Three (3) natural gas-fired space heaters, identified as Space 38 to Space 40, constructed in 1986, with a maximum heat input capacity of 0.090 million BTU per hour each, uncontrolled and exhausting through Stacks SV-38 to SV-40.
(i) Two (2) natural gas-fired space heaters, identified as Space 41 and Space 42, constructed in 1986, with a maximum heat input capacity of 0.225 million BTU per hour each, uncontrolled and exhausting through Stacks SV-41 to SV-42.

Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit

The source has not constructed or operated any emission units or insignificant activities without a permit.

Emission Units and Pollution Control Equipment Removed From the Source

The source has not removed any emission units from this source.

Existing Approvals

The source has been operating under Minor Source Operating Permit (MSOP) No. M039-28137-00195, issued on September 18, 2009. There have been no subsequent approvals issued.

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

Air Pollution Control Justification as an Integral Part of the Process

In October 1993 a Final Order Granting Summary Judgment was signed by Administrative Law Judge ("ALJ") Garrettson resolving an appeal filed by Kimball Hospitality Furniture Inc. (Cause Nos. 92-A-J-730 and 92-A-J-833) related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls are necessary for the facility to produce its normal product and are integral to the normal operation of the facility, and therefore, potential emissions should be calculated after controls.

Therefore, the potential to emit for the woodworking operation shall be determined after the fabric filter. Operating conditions in the proposed permit will specify that this fabric filter shall operate at all times when the woodworking operation is in operation.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard.[1]
$PM_{2.5}$	Unclassifiable or attainment effective April 5, 2005, for the annual $PM_{2.5}$ standard.
$PM_{2.5}$	Unclassifiable or attainment effective December 13, 2009, for the 24-hour $PM_{2.5}$ standard.
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.

Pollutant	Designation
Pb	Unclassifiable or attainment effective December 31, 2011.
[1]Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including Elkhart County, and is a maintenance area for the 1-hour National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005.	

(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) $PM_{2.5}$
Elkhart County has been classified as attainment for $PM_{2.5}$. Therefore, direct $PM_{2.5}$, SO_2, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

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

Fugitive Emissions

The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.

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.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	1.87
PM_{10}	2.01
$PM_{2.5}$	2.01
SO_2	0.09
NO_x	2.45
VOC	88.36
CO	2.06

Unrestricted Potential Emissions	
Pollutant	Tons/year
GHGs as CO_2e	2954.6
Single HAP	9.83
Total HAP	15.77

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

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all regulated pollutants, excluding GHGs, is less than 100 tons per year. However, VOC is greater than twenty-five (25) tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP Renewal.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of GHGs is less than one hundred thousand (100,000) tons of CO_2 equivalent (CO_2e) emissions per year.

(c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source will be issued an MSOP Renewal.

Federal Rule Applicability

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

New Source Performance Standards (NSPS)

(a) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included in this permit, because the boiler, rated at 1.23 million BTU per hour, has a maximum design heat input capacity of less than the applicability threshold of ten (10) million BTU per hour.

(b) The requirements of the New Source Performance Standard for Industrial Surface Coating: Large Appliances, 40 CFR 60, Subpart SS (326 IAC 12), are not included in this permit, because the surface coating operation does not coat any appliances listed in 40 CFR 60.451 that meet the definition of "large appliance part" or "large appliance surface".

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

National Emission Standards for Hazardous Air Pollutants (NESHAP)

(a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning, 40 CFR 63, Subpart T (326 IAC 20-6), are not included for the cold cleaner degreaser, since this operation does not use a degreasing solvent that contains any of the halogenated compounds listed in 40 CFR 63.460(a).

(b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart JJ, Wood Furniture Manufacturing (326 IAC 20-14-1),

are not included for the wood cutting and crating operation, because this source has HAP emissions to of less than ten (10) tons per year and twenty-five (25) tons per year for single and combination HAPs, respectively, and is, therefore, not a major source of HAPs, as defined in 40 CFR 63.2, and does not manufacture wood furniture or wood furniture components.

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Wood Building Products, 40 CFR 63, Subpart QQQQ (326 IAC 20), are not included for the wood cutting and crating operations, because this source has HAP emissions of less than ten (10) tons and twenty-five (25) tons per year, respectively, and is, therefore, not a major source of HAPs, as defined in 40 CFR 63.2, and does not apply coatings to any wood building products. The source constructs unfinished wooden crates for shipping finished product (glass mirrors), only.

(d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH (326 IAC 20), are not included for the glass coating operation (GC1), because although this source is an area source of hazardous air pollutant (HAP) emissions, as defined in 40 CFR 63.11170(b), this source does not perform paint stripping, use spray application methods, coat metal or plastic parts, or use coatings containing any of the metal HAPs (cadmium (Cd), chromium (Cr), lead (Pb), manganese (Mn), or nickel (Ni)) regulated by the rule.

(e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Glass Manufacturing Area Sources, 40 CFR 63, Subpart SSSSSS (326 IAC 20), are not included for the glass coating operation, because although this source is an area source of hazardous air pollutant (HAP) emissions, the source does not operate a glass manufacturing facility as defined in §63.11448(a).

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

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)
The source is subject to 326 IAC 1-6-3.

326 IAC 1-5-2 (Emergency Reduction Plans)
The source is not subject to 326 IAC 1-5-2 since it does not have the potential to emit 100 tons or more of any pollutants.

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.

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.

326 IAC 6.5 PM Limitations Except Lake County
This source is not subject to 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

326 IAC 6.8 PM Limitations for Lake County
This source is not subject to 326 IAC 6.8 because it is not located in Lake County.

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

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
326 IAC 6-5 applies to that received preconstruction approval after December 13, 1985, are located in any county, and have potential fugitive particulate emissions after the effect of any controls equal to or greater than 25 tons per year.

This source has negligible fugitive dust emissions. It is located near main roads, and is associated with minimum truck traffic traveling very short distances on paved roads. Therefore, 326 IAC 6-5 does not apply.

State Rule Applicability – Individual Facilities

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The operation of the emission units at this source will emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

Wood Cutting and Crating Operation

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The fabric filter for the woodworking operation at this source is integral part of the process. The controlled potential PM emissions from the wood cutting and crating operation are less than 0.551 pounds per hour (0.42 pounds per hour). Therefore, pursuant to 326 IAC 6-3-1(b)(14), 326 IAC 6-3-2 does not apply.

The fabric filter shall be in operation at all times that Wood Crating 1 is in operation in order to ensure particulate emissions are less than 0.551 pound per hour and qualify for the exemption.

Surface Coating Operations

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The existing glass coating line, identified as GC1, uses flow coating to apply coating materials to glass mirrors and is specifically exempted from 326 IAC 6-3-1(b)(7). Therefore, 326 IAC 6-3 does not apply to the glass coating operations at this source.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The initial determination was conducted in CP 039-3161-00195 issued on October 6, 1994, for the one (1) glass coating line GC1, which has potential to emit VOC is greater than twenty-five (25) tons per year.

Pursuant to 326 IAC 8-1-6 BACT (Best Available Control Technology):
The BACT determination for the glass coating line GC1 was originally made in CP 039-3161-00195, issued on October 6, 1994. The potential emissions from GC1 exceed 25 tons per year.

Pursuant to 326 IAC 8-1-6:

(A) BACT for the one (1) glass coating line GC1 was determined to be the utilization of flow coating as the application method at all times.

(B) The amount of VOC delivered to the applicators in GC1, including clean-up solvents, shall not exceed eighty (80.0) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)
The one (1), existing, natural gas-fired boiler, identified as Boiler, constructed in 1986, after the rule applicability date of September 21, 1983, is subject to particulate emissions limitations under 326 IAC 6-2-4 as follows:

The emission limitations for this unit, as provided in 326 IAC 6-2-4, are based on the following equation:

$$Pt = 1.09/Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used = 1.23 MMBTU/hr

Pursuant to 326 IAC 6-2-4(a), for Q less than ten (10) MMBtu/hr, Pt shall still not exceed 0.6 lb/MMBtu. The PM emissions from the natural gas-fired boiler are 0.0019 lb/MMBTU. Therefore, the boiler can comply with this rule.

326 IAC 7-1.1 Sulfur Dioxide Emission Limitations
This emission unit is not subject to 326 IAC 326 IAC 7-1.1 because its SO_2 PTE (or limited SO_2 PTE) is less than 25 tons/year or 10 pounds/hour.

Degreasing Operations

326 IAC 8-3-2 (Organic Solvent Degreasing Operations)
The source includes cold cleaner degreasing operations without remote solvent reservoir and was constructed after July 1, 1990.

Pursuant to 326 IAC 8-3-2(a), the owner or operator shall ensure the following control equipment and operating requirements are met:

(1) Equip the degreaser with a cover.

(2) Equip the degreaser with a device for draining cleaned parts.

(3) Close the degreaser cover whenever parts are not being handled in the degreaser.

(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).

(6) Store waste solvent only in closed containers.

(7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere

In addition, 326 IAC 8-3-2(b) requires the owner or operator to ensure the following additional control equipment and operating requirements are met:

(1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
(B) A water cover when solvent used is insoluble in, and heavier than, water.
(C) A refrigerated chiller.
(D) Carbon adsorption.
(E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.

(2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.

(3) If used, solvent spray:
(A) must be a solid, fluid stream; and
(B) shall be applied at a pressure that does not cause excessive splashing.

326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers)
Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), on and after January 1, 2015, the Permittee shall not operate a cold cleaning degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

In addition, the following recordkeeeping requirements are applicable to the Permittee:
On and after January 1, 2015, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

(a) The name and address of the solvent supplier.

(b) The date of purchase.

(c) The type of solvent purchased.

(d) The total volume of the solvent purchased.

(e) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

Recommendation

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

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

An application for the purposes of this review was received on May 18, 2014. Additional information was received on July 15, 2014.

Conclusion

The operation of this mirror glass coating source shall be subject to the conditions of the attached MSOP Renewal No. M039-34552-00195.

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: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: http://www.in.gov/idem/5881.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

Appendix A: Emissions Calculations
Summary - Emissions Calculations

Company Name: D & W, Inc.
Address City IN Zip: 941 Oak St., Elkhart, IN 46514
Permit Number: M039-34552-00195
Plt ID: 039-00195
Reviewer: Madhurima Moulik
Date: 7/15/2014

Emission Unit	Potential to Emit - Uncontrolled (tons per year)									
	PM	**PM10**	**PM2.5**	**NOx**	**SO2**	**VOC**	**CO**	**CO2e**	**Single HAP**	**Total HAPs**
Surface Coating	0.00	0.00	0.00	0.00	0.00	88.15	0.00	0.00	9.83	15.73
Natural Gas Combustion	0.05	0.19	0.19	2.45	0.01	0.13	2.06	2954.63	0.04	0.05
Rollers	0.00	0.00	0.00	0.00	0.07	0.00	0.00	0.00	0.00	0.00
Degreasing	0.00	0.00	0.00	0.00	0.00	0.07	0.00	0.00	0.00	0.00
Woodworking	1.83	1.83	1.83	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	**1.87**	**2.01**	**2.01**	**2.45**	**0.09**	**88.36**	**2.06**	**2954.63**	**9.83**	**15.77**

Appendix A: Emissions Calculations
Surface Coating Operations

Company Name: **D & W, Inc.**
Address City IN Zip: **941 Oak St., Elkhart, IN 46514**
Permit Number: **M039-34552-00195**
Plt ID: **039-00195**
Reviewer: **Madhurima Moulik**
Date: **7/15/2014**

Material	Density (lbs/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non Volatiles (solids)	Gal of Mat. (gal/unit)	Maximu units/hr	Lb VOC per gal of coating less water	Pounds VOC per gallon of coating	VOC (lb per hour)	VOC (lb/day)	Potential VOC (tons per year	Transfer Efficiency
PPG D900X70	11	38.20%	0.00%	38.20%	0.00%	45.80%	0.0016	2550	4.20	4.20	17.14	411.46	75.09	100%
Butyl Acetate	7.31	100%	0.00%	100%	0.00%	0.00%	0.00016	2550	7.31	7.31	2.98	71.58	13.06	100%
									Total =		**20.13**		**88.15**	

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

Appendix A: Emissions Calculations
Surface Coating Operations
HAP Emissions
Company Name: D & W, Inc.
Address City IN Zip: 941 Oak St., Elkhart, IN 46514
Permit Number: M039-34552-00195
Plt ID: 039-00195
Reviewer: Madhurima Moulik
Date: 7/15/2014

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Cumene	Weight % Triethalamine	Weight % Lead compounds	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Lead Emissions (ton/yr)
PPG D900X702	11	0.001600	2550.00	1.00%	1.00%	1.00%	5.00%	1.97	1.97	1.97	9.83
Total Potential Emissions								**1.97**	**1.97**	**1.97**	**9.83**

METHODOLOGY **Total HAPs = 15.73**

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

Appendix A: Emissions Calculations
Degreasing- Emissions Calculations

Company Name: D & W, Inc.
Address City IN Zip: 941 Oak St., Elkhart, IN 46514
Permit Number: M039-34552-00195
Plt ID: 039-00195
Reviewer: Madhurima Moulik
Date: 7/15/2014

Material	Material Usage (gal/day)	Material Density (lb/gal)	Maximum Usage (lbs/yr)	Weight % VOC	VOC Emissions (tons/yr)	Total HAPs Emissions (tons/yr)	Solvent Brand Used
Cold Cleaner #1	0.0548	6.80	136	100%	0.068	0.00	Safety Kleen
		State Potential Emissions		**Uncontrolled (tons/yr):**	**0.068**	**0.00**	

METHODOLOGY
VOC/HAPs emission rate (tons/yr) = Material Usage (gal/day)* solvent density (lbs/gal) * Weight % VOC/HAP * 365 days/yr * 1 ton/2000 lbs

NOTES
Total emissions based on rated capacity at 8,760 hours/year.
MSDSs, submitted by the source, show the degreasers/cleaners to be HAP free.

Appendix A: Emissions Calculations
SO2 in Glass

Company Name: D & W, Inc.
Address City IN Zip: 941 Oak St., Elkhart, IN 46514
Permit Number: M039-34552-00195
Plt ID: 039-00195
Reviewer: Madhurima Moulik
Date: 7/15/2014

	Material	Maximum	Weight %	SO2
Material	Usage	Usage	SO2	Emissions
	(lbs/hr)	(lbs/yr)		(tons/yr)
SO2	0.0171	149.80	100	0.075

Methodology

SO2 (tons/yr) = usage (lb/yr)/2000 lb/ton

Appendix A: Emissions Calculations
326 IAC 6-3-2 Limits

Company Name: D & W, Inc.
Address City IN Zip: 941 Oak St., Elkhart, IN 46514
Permit Number: M039-34552-00195
Plt ID: 039-00195
Reviewer: Madhurima Moulik
Date: 7/15/2014

Production Schedule (hrs/yr)	Weight of Material Collected (lbs/yr)	Amount Collected (lbs/hr)	Potential Collected (tons/yr)	Control Efficiency	PM Emissions after controls (lbs/hr)	PM Emissions after controls (tons/yr)
2,184	3,640	1.67	7.30	80.0%	0.42	**1.83**

METHODOLOGY
Actual collected (lbs/hr) = Weight of Material Collected (lbs/yr) / Production schedule (hrs/yr)
Potential collected (tons/yr) = Amount collected (lbs/hr) x 8,760 hrs/yr / 2,000 lbs/ton
Potential generated (lbs/hr) = amount collected (lbs/hr) / control efficiency (%)
Potential generated (tons/yr) = Potential generated (lbs/hr) * (8760 hr/yr) * (ton/2000 lb)
Emissions after controls (lbs/hr) = potential generated (lbs/hr) * (1-control efficiency (%))
Emissions after controls (tons/yr) = Emissions after controls (lbs/hr) * (8760 hr/yr) * (ton/2000 lb)

NOTES
It is assumed that PM = PM10 = PM2.5
Total emissions based on rated capacity at 8,760 hours/year.
Data taken from calculations developed for FESOP #039-20619-00195.

326 IAC 6-3-2(e) Allowable Rate of Emissions

*** Process Weight Rate (total materials throughput) (lbs/hr)	Process Weight Rate (tons/hr)	Allowable PM Emissions (lbs/hr)
600	0.30	**1.83**

METHODOLOGY
***Process weight; weight rate: Total weight of all materials introduced into any source operation (326 IAC 1-2-59(a)).
Allowable Emissions (lb/hr) = 4.10(Process Weight Rate ()^0.67

In October 1993 a Final Order Granting Summary Judgment was signed by Administrative Law Judge ("ALJ") Garrettson resolving an appeal filed by Kimball Hospitality Furniture Inc. (Cause Nos. 92-A-J-730 and 92-A-J-833) related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls are necessary for the facility to produce its normal product and are integral to the normal operation of the facility, and therefore, potential emissions should be calculated after controls. Based on this ruling, potential emissions for particulate matter were calculated after consideration of the controls.

Appendix A: Emissions Calculations
Heaters, Boilers

Company Name: D & W, Inc.
Address City IN Zip: 941 Oak St., Elkhart, IN 46514
Permit Number: M039-34552-00195
Plt ID: 039-00195
Reviewer: Madhurima Moulik
Date: 7/15/2014

Combustion Source	# of units	Heat Input per unit (MMBtu/hr)	Total Heat Input (MMBtu/hr)
Boiler	1	1.23	1.23
Space Heaters	30	0.10	3.00
Space Heaters	6	0.13	0.75
Space Heaters	3	0.09	0.27
Space Heaters	2	0.23	0.45
Total	**42**	**1.77**	**5.70**

Maximum Heat Input Capacity	Potential Throughput
MMBtu/hr	MMCF/yr
1.23	10.77
4.47	39.16

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

Company Name: D & W, Inc.
Address City IN Zip: 941 Oak St., Elkhart, IN 46514
Permit Number: M039-34552-00195
Plt ID: 039-00195
Reviewer: Madhurima Moulik
Date: 6/15/2014

Heat Input Capacity MMBtu/hr	HHV mmBtu/mmscf	Potential Throughput MMCF/yr
5.7	1020	49.0

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.0	0.2	0.2	0.0	2.4	0.1	2.1

*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 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

HAPS Calculations

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	**Total - Organics**
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	5.140E-05	2.937E-05	1.836E-03	4.406E-02	8.322E-05	**4.606E-02**

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	**Total - Metals**
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	1.224E-05	2.692E-05	3.427E-05	9.301E-06	5.140E-05	**1.341E-04**
					Total HAPs	**4.619E-02**
					Worst HAP	**4.406E-02**

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

Greenhouse Gas Calculations

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	2,937	0.1	0.1
Summed Potential Emissions in tons/yr	2,937		
CO2e Total in tons/yr	2,955		

Methodology
The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (25) + N2O Potential Emission ton/yr x N2O GWP (298).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

TO: Angie Reed
D & W, Inc
941 Oak Street
Elkhart, IN 46514

DATE: October 7, 2014

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

SUBJECT: Final Decision
MSOP
039-34552-00195

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
OAQ Permits Branch Interested Parties List

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

October 7, 2014

TO: Elkhart Public Library

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

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

Applicant Name: **D & W Inc.**
Permit Number: **039-34552-00195**

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library.dot 6/13/2013

Mail Code 61-53

IDEM Staff	CDENNY 10/7/2014 D & W, Inc 039-34552-00195 (final)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee Remarks
1		Angie Reed D & W, Inc 941 Oak Street Elkhart IN 46514 (Source CAATS)									
2		Elkhart City Council and Mayors Office 229 South Second Street Elkhart IN 46516 *(Local Official)*									
3		Elkhart Public Library 300 S 2nd St Elkhart IN 46516-3184 *(Library)*									
4		Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 *(Health Department)*									
5		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 *(Local Official)*									
6		Mr. Bill MacDonald DECA Environmental & Associates, Inc. 410 1st Avenue NE Carmel IN 46032 *(Consultant)*									
7											
8											
9											
10											
11											
12											
13											
14											
15											

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

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