



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

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Governor

Thomas W. Easterly
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Significant Modification to a
Part 70 Operating Permit

Significant Source Modification No.: 087-35716-00036
Significant Permit Modification/Revision No.: 087-35769-00036

The Indiana Department of Environmental Management (IDEM) has received an application from Four Woods Laminating, Inc., located at 7640 W 500 S, Topeka, Indiana 46571, for a significant modification of its Part 70 Operating Permit No. T087-34476-00036 issued on March 15, 2015. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow Four Woods Laminating, Inc. to make certain changes at its existing source. Four Woods Laminating, Inc. has applied to construct and operate two natural gas fired generators.

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g. changes that add or modify synthetic minor emission limits). IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

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

Topeka Branch Library
105 S. Main St.
Topeka, IN 46571

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,



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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 SSM 087-35716-00036 and SPM 087-35769-00036 in all correspondence.

Comments should be sent to:

Brian Wright
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 4-6544
Or dial directly: (317) 234-6544
Fax: (317) 232-6749 attn: Brian Wright
E-mail: Bwright1@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 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>.

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, at the IDEM Northern Regional Office, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Brian Wright or my staff at the above address.



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



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Mr. Maynard Yoder
Four Woods Laminating, Inc.
7640 W. 500 S.
Topeka, IN 46571

Re: 087-35769-00036
Significant Permit Modification to
Part 70 Renewal No. T087-34476-00036

Dear Mr. Yoder:

Four Woods Laminating, Inc. was issued Part 70 Operating Permit Renewal No. T087-34476-00036 on March 18, 2015 for a stationary wood cabinet and bath door manufacturing plant located at 7640 W. 500 S, Topeka, IN 46571. An application requesting changes to this permit was received on April 15, 2015. Pursuant to the provisions of 326 IAC 2-7-12, a Significant Permit Modification to this permit is hereby approved as described in the attached Technical Support Document.

Please find attached the entire Part 70 Operating Permit as modified. The permit references the below listed attachment(s). Since these attachments have been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of these attachments with this modification:

- Attachment A: 40 CFR 63, Subpart JJJJJJ - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources
- Attachment B: 40 CFR 60, Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
- Attachment C: 40 CFR 63, Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines

Previously issued approvals for this source containing these attachments are available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

Federal rules under Title 40 of United States Code of Federal Regulations may also be found on the U.S. Government Printing Office's Electronic Code of Federal Regulations (eCFR) website, located on the Internet at: http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab_02.tpl.

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.

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If you have any questions on this matter, please contact Brian Wright, of my staff, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251 at 317-234-6544 or 1-800-451-6027, and ask for extension 4-6544.

Sincerely,

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

Attachments: Modified Permit and Technical Support Document

NB/BW

cc: File - LaGrange County
Lagrange County Health Department
U.S. EPA, Region 5
Compliance and Enforcement Branch
IDEM Northern Regional Office



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Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**Four Woods Laminating, Inc.
7640 W. 500 S.
Topeka, IN 46571**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No. T087-34476-00036	
Issued by: Original Signed Nathan Bell, Section Chief Permits Branch, Office of Air Quality	Issuance Date: March 18, 2015 Expiration Date: March 18, 2020

Significant Permit Modification No. 087-35769-00036	
Issued by: Nathan Bell, Section Chief, Permits Branch, Office of Air Quality	Issuance Date: Expiration Date: March 18, 2020

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TABLE OF CONTENTS

A. SOURCE SUMMARY	5
A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]	
A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(14)]	
A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)] [326 IAC 2-7-5(14)]	
A.4 Part 70 Permit Applicability [326 IAC 2-7-2]	
B. GENERAL CONDITIONS	8
B.1 Definitions [326 IAC 2-7-1]	
B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]	
B.3 Term of Conditions [326 IAC 2-1.1-9.5]	
B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]	
B.5 Severability [326 IAC 2-7-5(5)]	
B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]	
B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]	
B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]	
B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]	
B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]	
B.11 Emergency Provisions [326 IAC 2-7-16]	
B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]	
B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]	
B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]	
B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]	
B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]	
B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]	
B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]	
B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]	
B.20 Source Modification Requirement [326 IAC 2-7-10.5]	
B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]	
B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]	
B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]	
B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]	
C. SOURCE OPERATION CONDITIONS	19
Emission Limitations and Standards [326 IAC 2-7-5(1)]	
C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2 Opacity [326 IAC 5-1]	
C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.5 Fugitive Dust Emissions [326 IAC 6-4]	
C.6 Stack Height [326 IAC 1-7]	
C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
Testing Requirements [326 IAC 2-7-6(1)]	
C.8 Performance Testing [326 IAC 3-6]	

DRAFT

Compliance Requirements [326 IAC 2-1.1-11]

- C.9 Compliance Requirements [326 IAC 2-1.1-11]

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

- C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)][40 CFR 64]
[326 IAC 3-8]
C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)]
[326 IAC 2-7-6(1)]

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

- C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]
C.14 Response to Excursions or Exceedances [40 CFR 64][326 IAC 3-8][326 IAC 2-7-5]
[326 IAC 2-7-6]
C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

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

- C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)]
[326 IAC 2-6]
C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [40 CFR 64]
[326 IAC 3-8]

Stratospheric Ozone Protection

- C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1. EMISSIONS UNIT OPERATION CONDITIONS..... 28

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

- D.1.1 PSD Minor Limit [326 IAC 2-2]
D.1.2 Hazardous Air Pollutants (HAPs) Limit [40 CFR 63, Subpart JJ]
D.1.3 Volatile Organic Compound (VOC) Limitations [326 IAC 8-2-12]
D.1.4 Particulate [326 IAC 6-3-2(d)]
D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

Compliance Determination Requirements

- D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]
D.1.7 Hazardous Air Pollutants (HAPs)

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

- D.1.8 Monitoring

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

- D.1.9 Record Keeping Requirements
D.1.10 Reporting Requirements

D.2. EMISSIONS UNIT OPERATION CONDITIONS..... 33

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

- D.2.1 Opacity [326 IAC 2-7-1(21)(G)(xxx)]
D.2.2 Dust Collection System Limitations [326 IAC 2-7-1(21)(G)(xxx)]
D.2.3 PSD Minor Limit [326 IAC 2-2]
D.2.4 Particulate [326 IAC 6-3-2]
D.2.5 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

DRAFT

Compliance Determination Requirements

D.2.6 Particulate Control

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

D.2.7 Visible Emissions Notations [326 IAC 2-7-1(21)(G)(xxx)][40 CFR 64]

D.2.8 Baghouse Inspections [326 IAC 2-7-1(21)(G)(xxx)][40 CFR 64]

D.2.9 Broken or Failed Bag Detection

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

D.2.10 Record Keeping Requirements

D.3. EMISSIONS UNIT OPERATION CONDITIONS 36

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

D.3.1 Particulate Limitations [326 IAC 6-2-4]

E.1. EMISSIONS UNIT OPERATION CONDITIONS 37

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

E.1.1 General Provisions Relating to NESHAP [40 CFR Part 63, Subpart A] [326 IAC 20-1]

E.1.2 NESHAP for Area Sources: Industrial, Commercial, and Institutional Boilers [40 CFR Part 63, Subpart JJJJJJ]

E.2. EMISSIONS UNIT OPERATION CONDITIONS 39

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

E.2.1 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR Part 63, Subpart A]

E.2.2 Standards of Performance for Stationary Compression Ignition Internal Combustion Engines [40 CFR Part 60, Subpart IIII] [326 IAC 12]

E.3. EMISSIONS UNIT OPERATION CONDITIONS 40

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

E.3.1 National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Reciprocating Internal Combustion Engines [40 CFR Part 63, Subpart ZZZZ] [326 IAC 20-82]

Certification	42
Emergency Occurrence Report	43
Quarterly Reports	45
Quarterly Deviation and Compliance Monitoring Report	50

- Attachment A: 40 CFR 63, Subpart JJJJJJ - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources
- Attachment B: 40 CFR 60, Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
- Attachment C: 40 CFR 63, Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines

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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 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]

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

Source Address:	7640 W 500 S, Topeka, Indiana 46571
General Source Phone Number:	260-593-2246
SIC Code:	2499
County Location:	Lagrange
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program
	Minor Source, under PSD and Emission Offset Rules
	Minor Source, Section 112 of the Clean Air Act
	Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

- (a) One (1) surface coating booth, identified as Booth 1, constructed in 1985, with a maximum capacity of 37.5 doors per hour, equipped with airless spray guns and dry filters as overspray control, and exhausting through stack 1.
- (b) One (1) surface coating booth, identified as Booth 2, constructed in 1994, with a maximum capacity of 37.5 doors per hour, equipped with airless spray guns and dry filters as overspray control, and exhausting through stack 2.
- (c) One (1) surface coating booth, identified as Booth 4, constructed in 1998, with a maximum capacity of 62.5 doors per hour, equipped with airless spray guns and dry filters as overspray control, and exhausting through stack 4.
- (d) One (1) surface coating booth, identified as Booth 5, constructed in 1998, with a maximum capacity of 62.5 doors per hour, equipped with airless spray guns and dry filters as overspray control, and exhausting through stack 5.
- (e) One (1) surface coating booth, identified as Booth 6, constructed in 1998, with a maximum capacity of 62.5 doors per hour, equipped with airless spray guns and dry filters as overspray control, and exhausting through stack 6.
- (f) One (1) stain machine, identified as S11, constructed in 2012, with a maximum capacity of 945 doors per hour, equipped with airless spray guns and dry filters as overspray control, and exhausting through stack S11.
- (g) One (1) stain machine, identified as S1, constructed in 2013, equipped with airless spray guns, with a maximum capacity of 945 units per hour, using dry filters as control, and exhausting to stack S1.

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- (h) One (1) stain machine, identified as S2, constructed in 2013, equipped with airless spray guns, with a maximum capacity of 945 units per hour, using dry filters as control, and exhausting to stack S2.
- (i) One (1) stain machine, identified as S3, constructed in 2013, equipped with airless spray guns, with a maximum capacity of 945 units per hour, using dry filters as control, and exhausting to stack S3.
- (j) One (1) natural gas-fired generator, approved in 2015 for installation, manufactured in 1992, identified as NGG1, with a maximum capacity of 670 HP, and exhausting to stack NGG1.

The generator is an existing affected unit under the provisions of 40 CFR 63, Subpart ZZZZ.

- (k) One (1) natural gas-fired generator, approved in 2015 for installation, manufactured in 1992, identified as NGG2, with a maximum capacity of 536 HP, and exhausting to stack NGG2.

The generator is an existing affected unit under the provisions of 40 CFR 63, Subpart ZZZZ.

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

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) One (1) waste wood-fired boiler, identified as Wood 1, constructed in 1998, with a maximum heat input capacity of 0.04 MMBtu/hr, and exhausting through stack 10.

Under 40 CFR 63, Subpart JJJJJJ, this unit is considered an existing affected unit.

Note: The Permittee will only combust clean wood in the wood-fired boiler (Wood 1). Clean wood consists of uncoated, unpainted, and untreated wood scrap, sawdust, chips, millings or shavings, and natural growth wood materials. Clean wood does not include wood products that have been painted, pigment-stained, or pressure treated by compounds such as chromate copper arsenate, pentachlorophenol, and creosote, or manufactured wood products that contain adhesives or resins (e.g., plywood, particle board, flake board, and oriented strand board).

- (b) Two (2) diesel generators, identified as Engine 1 and Engine 2, installed in 2012, each with a maximum output rating of 725 hp, each using no controls, and exhausting through stacks 7 and 8.

Under 40 CFR 60, Subpart IIII, and 40 CFR 63, Subpart ZZZZ these units are affected sources.

- (c) Woodworking equipment, constructed in 1998, controlled by a baghouse with a design grain loading of less than or equal to 0.01 grains per dry standard cubic foot and a gas flow rate less than or equal to 40,000 actual cubic feet per minute:

Woodworking equipment including table saws, coping, and sanding operations, located in the Mill Room, equipped with a dust collection system for particulate control, with

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particulate collected in an enclosed container, and exhaust air re-circulated back to the woodworking operation, capacity: 937 pounds of wood per hour. [326 IAC 6-3-2]

- (d) One (1) UV drying apparatus (oven) for the stain machines, constructed in 2013, with a maximum capacity of 945 units per hour, powered by the one (1) existing diesel generator, identified as Engine 2.
- (e) One (1) propane-fired air makeup unit, identified as Boiler 2, constructed prior to 2010, with a maximum heat input capacity of 2.33 MMBtu/hr.

Under 40 CFR 63, Subpart JJJJJJ, this unit is considered an existing affected unit.

- (f) Two (2) propane-fired boilers, identified as Boiler 3 and Boiler 4, constructed in 2014, with a maximum heat input capacity of 0.4 MMBtu/hr each, and operated in conjunction with the UV drying apparatus.

Under 40 CFR 63, Subpart JJJJJJ, these units are considered new affected units.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

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SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

- (a) This permit, T087-34476-00036, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]

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

B.5 Severability [326 IAC 2-7-5(5)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:
 - (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(35).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590
- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

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- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

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

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance

DRAFT

causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

B.11 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ or Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or

Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)

Facsimile Number: 317-233-6865

Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

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

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

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable

DRAFT

requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T087-34476-00036 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

DRAFT

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the

DRAFT

document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.18 Permit Revision Under Economic Incentives and Other Programs
[326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]**

- (a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (c) without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

DRAFT

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

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

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

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b)(1) and (c)(1). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1) and (c)(1).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(37)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

DRAFT

- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

DRAFT

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

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

DRAFT

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

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

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 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. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least

DRAFT

thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

DRAFT

thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:
- Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)][40 CFR 64][326 IAC 3-8]

- (a) For new units:
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.
- (b) For existing units:
Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance to begin such monitoring. If, due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

DRAFT

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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (c) For monitoring required by CAM, at all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
- (d) For monitoring required by CAM, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the Permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

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

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

DRAFT

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.14 Response to Excursions or Exceedances [40 CFR 64][326 IAC 3-8][326 IAC 2-7-5]
[326 IAC 2-7-6]

- (I) Upon detecting an excursion where a response step is required by the D Section, or an exceedance of a limitation, not subject to CAM, 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.
- (II)
 - (a) *CAM Response to excursions or exceedances.*
 - (1) Upon detecting an excursion or exceedance, subject to CAM, the Permittee shall restore operation of the pollutant-specific emissions unit (including the 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 emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized

DRAFT

distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

- (2) 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, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.
- (b) If the Permittee identifies a failure to achieve compliance with an emission limitation, subject to CAM, or standard, subject to CAM, for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the Permittee shall promptly notify the IDEM, OAQ and, if necessary, submit a proposed significant permit modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.
- (c) Based on the results of a determination made under paragraph (II)(a)(2) of this condition, the EPA or IDEM, OAQ may require the Permittee to develop and implement a QIP. The Permittee shall develop and implement a QIP if notified to in writing by the EPA or IDEM, OAQ.
- (d) Elements of a QIP:
The Permittee shall maintain a written QIP, if required, and have it available for inspection. The plan shall conform to 40 CFR 64.8 b (2).
- (e) If a QIP is required, the Permittee shall develop and implement a QIP as expeditiously as practicable and shall notify the IDEM, OAQ if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.
- (f) Following implementation of a QIP, upon any subsequent determination pursuant to paragraph (II)(a)(2) of this condition the EPA or the IDEM, OAQ may require that the Permittee make reasonable changes to the QIP if the QIP is found to have:
 - (1) Failed to address the cause of the control device performance problems;
or
 - (2) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (g) Implementation of a QIP shall not excuse the Permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.
- (h) *CAM recordkeeping requirements.*
 - (1) The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality

DRAFT

improvement plan required pursuant to paragraph (II)(a)(2) of this condition and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this condition (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

- (2) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(33) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

DRAFT

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:

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

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

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

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

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

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]
[40 CFR 64][326 IAC 3-8]

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

On and after the date by which the Permittee must use monitoring that meets the requirements of 40 CFR Part 64 and 326 IAC 3-8, the Permittee shall submit CAM reports to the IDEM, OAQ.

DRAFT

A report for monitoring under 40 CFR Part 64 and 326 IAC 3-8 shall include, at a minimum, the information required under paragraph (a) of this condition and the following information, as applicable:

- (1) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
- (2) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
- (3) A description of the actions taken to implement a QIP during the reporting period as specified in Section C-Response to Excursions or Exceedances. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

The Permittee may combine the Quarterly Deviation and Compliance Monitoring Report and a report pursuant to 40 CFR 64 and 326 IAC 3-8.

- (b) The address for report submittal is:

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

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

Stratospheric Ozone Protection

C.19 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.

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SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) surface coating booth, identified as Booth 1, constructed in 1985, with a maximum capacity of 37.5 doors per hour, equipped with airless spray guns and dry filters as overspray control, and exhausting through stack 1.
- (b) One (1) surface coating booth, identified as Booth 2, constructed in 1994, with a maximum capacity of 37.5 doors per hour, equipped with airless spray guns and dry filters as overspray control, and exhausting through stack 2.
- (c) One (1) surface coating booth, identified as Booth 4, constructed in 1998, with a maximum capacity of 62.5 doors per hour, equipped with airless spray guns and dry filters as overspray control, and exhausting through stack 4.
- (d) One (1) surface coating booth, identified as Booth 5, constructed in 1998, with a maximum capacity of 62.5 doors per hour, equipped with airless spray guns and dry filters as overspray control, and exhausting through stack 5.
- (e) One (1) surface coating booth, identified as Booth 6, constructed in 1998, with a maximum capacity of 62.5 doors per hour, equipped with airless spray guns and dry filters as overspray control, and exhausting through stack 6..
- (f) One (1) stain machine, identified as S11, constructed in 2012, with a maximum capacity of 945 doors per hour, equipped with airless spray guns and dry filters as overspray control, and exhausting through stack S11.
- (g) One (1) stain machine, identified as S1, constructed in 2013, equipped with airless spray guns, with a maximum capacity of 945 units per hour, using dry filters as control, and exhausting to stack S1.
- (h) One (1) stain machine, identified as S2, constructed in 2013, equipped with airless spray guns, with a maximum capacity of 945 units per hour, using dry filters as control, and exhausting to stack S2.
- (i) One (1) stain machine, identified as S3, constructed in 2013, equipped with airless spray guns, with a maximum capacity of 945 units per hour, using dry filters as control, and exhausting to stack S3.

Insignificant Activities:

- (b) Two (2) diesel generators, identified as Engine 1 and Engine 2, installed in 2012, each with a maximum output rating of 725 hp, each using no controls, and exhausting through stacks 7 and 8.

Under 40 CFR 60, Subpart IIII, and 40 CFR 63, Subpart ZZZZ these units are affected sources.

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

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

D.1.1 PSD Minor Limit [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

- (a) The total input of VOC, including coatings, dilution solvents, and cleaning solvents, delivered to the coating applicators at the five (5) surface coating booths (Booth 1, 2, 4, 5, and 6) and the four (4) stain machines (S11, S1, S2, and S3) shall not exceed 233 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The operating hours of each of the diesel generators (Engine 1 and Engine 2) shall not exceed 500 hours per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (c) NOx emissions from each of the diesel generators (Engine 1 and Engine 2) shall each not exceed 3.20 lb/MMBtu heat input.

Compliance with these limits, combined with the unrestricted potential to emit VOC and NOx from all other facilities at the source, including insignificant activities, shall limit VOC and NOx emissions from the entire source to less than 250 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.2 Hazardous Air Pollutants (HAPs) Limit [40 CFR 63, Subpart JJ]

In order to render the requirements of 40 CFR Part 63, Subpart JJ not applicable, the Permittee shall comply with the following:

- (a) The input of any single HAP delivered to the coating applicators in the five (5) surface coating booths (Booths 1, 2, 4, 5, and 6) and the four (4) stain machines (S11, S1, S2, and S3) shall not exceed 9.50 tons per twelve (12) consecutive month period, including coatings, dilution solvents, and cleaning solvents, with compliance determined at the end of each month.
- (b) The input of any combination of HAPs delivered to the coating applicators in the five (5) surface coating booths (Booths 1, 2, 4, 5, and 6) and the four (4) stain machines (S11, S1, S2, and S3) shall not exceed 22.04 tons per twelve (12) consecutive month period, including coatings, dilution solvents, and cleaning solvents, with compliance determined at the end of each month.

Compliance with these limits, combined with the unrestricted potential to emit HAPs from all other facilities at the source, including insignificant activities, shall limit HAP emissions from the entire source to less than 10 tons per twelve (12) consecutive month period for each single HAP and less than 25 tons per twelve (12) consecutive month period for Total HAPs and shall render the requirements of 40 CFR Part 63, Subpart JJ not applicable.

D.1.3 Volatile Organic Compound (VOC) Limitations [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), for Booths 2, 4, 5, and 6 and Stain Machines S11, S1, S2, and S3 and pursuant to 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) and F087-8992-00036, issued on January 12, 1999, for Booth 1, the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

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

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

D.1.4 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the five (5) surface coating booths and four (4) stain machines shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

Compliance with the VOC input limitations contained 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 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.

D.1.7 Hazardous Air Pollutants (HAPs)

Compliance with the HAPs input limitation contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

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

D.1.8 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 stacks exhausting from Booths 1, 2, 4, 5, and 6 and Stain Machines S11, S1, S2, and S3 while one or more of the units are in operation. If a condition exists which should result in a response step, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take a reasonable response. Section C - Response to Excursions or

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Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.9 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.1.1(a), 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 input limits established in Condition D.1.1(a). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The amount of coating material and solvent less water used on daily 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.
 - (2) The cleanup solvent usage for each month;
 - (3) The total VOC input for each month; and
 - (4) The VOCs input for each compliance period.
- (b) To document the compliance status with Condition D.1.1(b), the Permittee shall keep records of the hours of operation for each of the diesel generators (Engine 1 and Engine 2) for each month and each compliance period. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.
- (c) To document the compliance status with Condition D.1.2, 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 HAP input limits established in Condition D.1.2.
 - (1) The amount and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) The cleanup solvent usage for each month;
 - (3) The total single and combined HAPs input for each month; and
 - (4) The total single and combined HAPs input for each compliance period.
- (d) To document the compliance status with Condition D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.

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

D.1.10 Reporting Requirements

Quarterly summaries of the information to document the compliance status with Conditions D.1.1(a), D.1.1(b), and D.1.2 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The reports submitted by the Permittee do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 3826 IAC 2-7-1(35).

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SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities

- (c) Woodworking equipment, constructed in 1998, controlled by a baghouse with a design grain loading of less than or equal to 0.01 grains per dry standard cubic foot and a gas flow rate less than or equal to 40,000 actual cubic feet per minute:

Woodworking equipment including table saws, coping, and sanding operations, located in the Mill Room, equipped with a dust collection system for particulate control, with particulate collected in an enclosed container, and exhaust air re-circulated back to the woodworking operation, capacity: 937 pounds of wood per hour. [326 IAC 6-3-2]

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

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

D.2.1 Opacity [326 IAC 2-7-1(21)(G)(xxx)]

Pursuant to 326 IAC 2-7-1(21)(G)(xxx), in order for the woodworking operations to be classified as an insignificant activity, the opacity from the woodworking operations shall not exceed ten percent (10%) when vented to the atmosphere.

D.2.2 Dust Collection System Limitations [326 IAC 2-7-1(21)(G)(xxx)]

Pursuant to 326 IAC 2-7-1(21)(G)(xxx), in order for the woodworking operations to be classified as an insignificant activity, the dust collection system shall not exhaust to the atmosphere greater than forty thousand (40,000) cubic feet of outlet air per minute and shall not emit particulate matter with a diameter less than ten (10) microns in excess of one-hundredth (0.01) grain per dry standard cubic feet of outlet air.

D.2.3 PSD Minor Limit [326 IAC 2-2]

The PM, PM₁₀, and PM_{2.5} emissions from the woodworking area shall be limited to less than 3.42 pounds per hour, equivalent to 15.0 tons per year, each. Compliance with these limits, combined with the unrestricted potential to emit PM, PM₁₀, and PM_{2.5} from all other facilities at the source, including insignificant activities, shall limit PM, PM₁₀, and PM_{2.5} emissions from the entire source to less than 250 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-2 not applicable.

D.2.4 Particulate [326 IAC 6-3-2]

In order to ensure that the woodworking equipment is exempt from the requirements of 326 IAC 6-3-2, the dust collection system controlling emissions from the woodworking equipment shall be in operation and controlling emissions at all times the woodworking equipment is in operation.

D.2.5 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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.

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Compliance Determination Requirements

D.2.6 Particulate Control

- (a) In order to comply with Conditions D.2.1, D.2.2, D.2.3, and D.2.4, the dust collection system for particulate control shall be in operation and control emissions from the woodworking operation at all times that the woodworking operation is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.2.7 Visible Emissions Notations [326 IAC 2-7-1(21)(G)(xxx)][40 CFR 64]

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

D.2.8 Baghouse Inspections [326 IAC 2-7-1(21)(G)(xxx)][40 CFR 64]

Pursuant to 326 IAC 2-7-1(21)(G)(xxx), an inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.2.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or

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replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the aggregate dryer/burner. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Bag failure can be indicated by a significant drop in the baghouse pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces, or triboflows.

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

D.2.10 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.7, the Permittee shall maintain a daily record of visible emission notations of woodworking stack exhaust(s). The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the woodworking did not operate that day).
- (b) To document the compliance status with Condition D.2.8, the Permittee shall maintain records of the results of the inspections required under Condition D.2.8.
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

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SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities

- (a) One (1) waste wood-fired boiler, identified as Wood 1, constructed in 1998, with a maximum heat input capacity of 0.04 MMBtu/hr, and exhausting through stack 10.

Under NESHAP Subpart JJJJJJ, this unit is an affected source.

Note: The Permittee will only combust clean wood in the wood-fired boiler (Wood 1). Clean wood consists of uncoated, unpainted, and untreated wood scrap, sawdust, chips, millings or shavings, and natural growth wood materials. Clean wood does not include wood products that have been painted, pigment-stained, or pressure treated by compounds such as chromate copper arsenate, pentachlorophenol, and creosote, or manufactured wood products that contain adhesives or resins (e.g., plywood, particle board, flake board, and oriented strand board).

- (e) One (1) propane-fired air makeup unit, identified as Boiler 2, constructed prior to 2010, with a maximum heat input capacity of 2.33 MMBtu/hr.

Under 40 CFR 63, Subpart JJJJJJ, this unit is considered an existing affected unit.

- (f) Two (2) propane-fired boilers, identified as Boiler 3 and Boiler 4, constructed in 2014, with a maximum heat input capacity of 0.4 MMBtu/hr each, and operated in conjunction with the UV drying apparatus.

Under 40 CFR 63, Subpart JJJJJJ, these units are considered new affected units.

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

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

D.3.1 Particulate Limitations [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a), the particulate emissions from the waste wood-fired boiler, Wood 1, and the propane-fired boilers, Boilers 2 through Boiler 4, shall not exceed six-tenths (0.6) pound per million Btu heat input (lb/MMBtu), each.

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SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities

- (a) One (1) waste wood-fired boiler, identified as Wood 1, constructed in 1998, with a maximum heat input capacity of 0.04 MMBtu/hr, and exhausting through stack 10.

Under NESHAP Subpart JJJJJJ, this unit is an affected source.

Note: The Permittee will only combust clean wood in the wood-fired boiler (Wood 1). Clean wood consists of uncoated, unpainted, and untreated wood scrap, sawdust, chips, millings or shavings, and natural growth wood materials. Clean wood does not include wood products that have been painted, pigment-stained, or pressure treated by compounds such as chromate copper arsenate, pentachlorophenol, and creosote, or manufactured wood products that contain adhesives or resins (e.g., plywood, particle board, flake board, and oriented strand board).

- (e) One (1) propane-fired air makeup unit, identified as Boiler 2, constructed prior to 2010, with a maximum heat input capacity of 2.33 MMBtu/hr.

Under 40 CFR 63, Subpart JJJJJJ, this unit is considered an existing affected unit.

- (f) Two (2) propane-fired boilers, identified as Boiler 3 and Boiler 4, constructed in 2014, with a maximum heat input capacity of 0.4 MMBtu/hr each, and operated in conjunction with the UV drying apparatus.

Under 40 CFR 63, Subpart JJJJJJ, these units are considered new affected units.

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

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

E.1.1 General Provisions Relating to NESHAP [40 CFR Part 63, Subpart A] [326 IAC 20-1]

Pursuant to 40 CFR 63, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1, except as otherwise specified in 40 CFR 63, Subpart JJJJJJ.

E.1.2 NESHAP for Area Sources: Industrial, Commercial, and Institutional Boilers [40 CFR Part 63, Subpart JJJJJJ]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart JJJJJJ (included as Attachment A of this permit) for the waste wood-fired boiler and the propane-fired boilers:

- (1) 40 CFR 63.11193
- (2) 40 CFR 63.11194(a), (b), and (f)
- (3) 40 CFR 63.11196(a), (b), and (c)
- (4) 40 CFR 63.11200(b) and (c)
- (5) 40 CFR 63.11201(b) and (d)
- (6) 40 CFR 63.11205(a)
- (7) 40 CFR 63.11210(c), (f), and (h)
- (8) 40 CFR 63.11214(b)

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- (9) 40 CFR 63.11223(a), (b), and (e)
- (10) 40 CFR 63.11225(a)(1), (a)(2), (a)(4)(i), (ii), (iii), (vi), (b), (c), (d), and (g)
- (11) 40 CFR 63.11235
- (12) 40 CFR 63.11236
- (13) 40 CFR 63.11237
- (14) Table 2
- (15) Table 5

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SECTION E.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities

- (b) Two (2) diesel generators, identified as Engine 1 and Engine 2, installed in 2012, each with a maximum output rating of 725 hp, each using no controls, and exhausting through stacks 7 and 8.

Under 40 CFR 60, Subpart IIII, and 40 CFR 63, Subpart ZZZZ these units are affected sources.

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

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

E.2.1 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated as 326 IAC 12-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 60, Subpart IIII.

E.2.2 Standards of Performance for Stationary Compression Ignition Internal Combustion Engines [40 CFR Part 60, Subpart IIII] [326 IAC 12]

The Permittee shall comply with the following provisions of 40 CFR Part 60, Subpart IIII (included as Attachment B of this permit), which are incorporated by reference as 326 IAC 12, for Engine 1 and Engine 2:

- (1) 40 CFR 60.4200(a)(2)(i)
- (2) 40 CFR 60.4204(b)
- (3) 40 CFR 60.4206
- (4) 40 CFR 60.4207(b)
- (5) 40 CFR 60.4208
- (6) 40 CFR 60.4211(c)
- (7) 40 CFR 60.4212(a)
- (8) 40 CFR 60.4218
- (9) 40 CFR 60.4219
- (10) Table 8

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SECTION E.3

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (j) One (1) natural gas-fired generator, approved in 2015 for installation, manufactured in 1992, identified as NGG1, with a maximum capacity of 670 HP, and exhausting to stack NGG1.

The generator is an existing affected unit under the provisions of 40 CFR 63, Subpart ZZZZ.

- (k) One (1) natural gas-fired generator, approved in 2015 for installation, manufactured in 1992, identified as NGG2, with a maximum capacity of 536 HP, and exhausting to stack NGG2.

The generator is an existing affected unit under the provisions of 40 CFR 63, Subpart ZZZZ.

Insignificant Activities

- (b) Two (2) diesel generators, identified as Engine 1 and Engine 2, installed in 2012, each with a maximum output rating of 725 hp, each using no controls, and exhausting through stacks 7 and 8.

Under 40 CFR 60, Subpart IIII, and 40 CFR 63, Subpart ZZZZ these units are affected sources.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements: Industrial, Commercial, and Institutional Boilers

E.3.1 General Provisions Relating to NESHAP [40 CFR 63, Subpart A] [326 IAC 20-1]

- (a) Pursuant to 40 CFR 63.6580, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1, except as otherwise specified in 40 CFR 63, Subpart ZZZZ for the two (2) natural gas-fired generators (NGG1 and NGG2).
- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports 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

E.3.2 National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Reciprocating Internal Combustion Engines [40 CFR Part 63, Subpart ZZZZ] [326 IAC 20-82]

- (a) The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart ZZZZ (included as Attachment C of this permit), which are incorporated by reference as 326 IAC 20-82, except as otherwise specified in 40 CFR Part 63, Subpart ZZZZ, for the two diesel-fired generators (Engine 1 and Engine 2):

- (1) 40 CFR 63.6580
- (2) 40 CFR 63.6585
- (3) 40 CFR 63.6590(a)(2)(iii) and (c)(1)

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- (4) 40 CFR 63.6595(a)(7)
- (5) 40 CFR 63.6665
- (6) 40 CFR 63.6670
- (7) 40 CFR 63.6675

- (b) The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart ZZZZ (included as Attachment C of this permit), which are incorporated by reference as 326 IAC 20-82, except as otherwise specified in 40 CFR Part 63, Subpart ZZZZ, for the two natural gas-fired generators (NGG1 and NGG2):

- (1) 40 CFR 63.6580
- (2) 40 CFR 63.6585
- (3) 40 CFR 63.6590(a)(1)(iii) and (iv)
- (4) 40 CFR 63.6595(a)(1), (b), and (c)
- (5) 40 CFR 63.6603(a) and (f)
- (6) 40 CFR 63.6605
- (7) 40 CFR 63.6612
- (8) 40 CFR 63.6620(a), (d), (e), (f), (g), (h), and (i)
- (9) 40 CFR 63.6625(e)(9), (h), and (j)
- (10) 40 CFR 63.6630 (a), (b), (c), and (e)
- (11) 40 CFR 63.6635
- (12) 40 CFR 63.6640(a), (b), (c), and (e)
- (13) 40 CFR 63.6645(a)(2), (g), and (h)
- (14) 40 CFR 63.6650
- (15) 40 CFR 63.6655
- (16) 40 CFR 63.6660
- (17) 40 CFR 63.6665
- (18) 40 CFR 63.6670
- (19) 40 CFR 63.6675
- (20) Table 2d (item 5) and (items 8 and 9)
- (21) Table 4
- (22) Table 5 (item 13)
- (23) Table 6 (items 9, 14 and 15)
- (24) Table 7 (item 3)
- (25) Table 8
- (26) Appendix A

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

Source Name: Four Woods Laminating, Inc.
Source Address: 7640 W 500 S, Topeka, Indiana 46571
Part 70 Permit No.: T087-34476-00036

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

Please check what document is being certified:

- ☐ Annual Compliance Certification Letter
- ☐ Test Result (specify) _____.
- ☐ Report (specify) _____.
- ☐ Notification (specify) _____.
- ☐ Affidavit (specify) _____.
- ☐ Other (specify) _____.

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Four Woods Laminating, Inc.
Source Address: 7640 W 500 S, Topeka, Indiana 46571
Part 70 Permit No.: T087-34476-00036

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) daytime 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:

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If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

Part 70 Quarterly Report

Source Name: Four Woods Laminating, Inc.
Source Address: 7640 W 500 S, Topeka, Indiana 46571
Part 70 Permit No.: T087-34476-00036
Facility: The five (5) surface coating booths (Booths 1, 2, 4, 5, and 6), and the four (4) stain machines (S11, S1, S2, and S3).
Parameter: Total VOC Input
Limit: The total input of VOC, including coatings, dilution solvents, and cleaning solvents, delivered to the coating applicators at the five (5) surface coating booths (Booth 1, 2, 4, 5, and 6) and the four (4) stain machines (S11, S1, S2, and S3) shall not exceed 233 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
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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

Part 70 Quarterly Report

Source Name: Four Woods Laminating, Inc.
Source Address: 7640 W 500 S, Topeka, Indiana 46571
Part 70 Permit No.: T087-34476-00036
Facility: The five (5) surface coating booths (Booths 1, 2, 4, 5, and 6), and the four (4) stain machines (S11, S1, S2, and S3).
Parameter: Highest Single HAP Input
Limit: The input of any single HAP delivered to the coating applicators in the five (5) surface coating booths (Booths 1, 2, 4, 5, and 6) and the four (4) stain machines (S11, S1, S2, and S3) shall not exceed 9.50 tons per twelve (12) consecutive month period, including coatings, dilution solvents, and cleaning solvents, with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

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

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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

Part 70 Quarterly Report

Source Name: Four Woods Laminating, Inc.
Source Address: 7640 W 500 S, Topeka, Indiana 46571
Part 70 Permit No.: T087-34476-00036
Facility: The five (5) surface coating booths (Booths 1, 2, 4, 5, and 6), and the four (4) stain machines (S11, S1, S2, and S3).
Parameter: Total HAP Input
Limit: The input of any combination of HAPs delivered to the coating applicators in the five (5) surface coating booths (Booths 1, 2, 4, 5, and 6) and the four (4) stain machines (S11, S1, S2, and S3) shall not exceed 22.04 tons per twelve (12) consecutive month period, including coatings, dilution solvents, and cleaning solvents, with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

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

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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

Part 70 Quarterly Report

Source Name: Four Woods Laminating, Inc.
Source Address: 7640 W 500 S, Topeka, Indiana 46571
Part 70 Permit No.: T087-34476-00036
Facility: Diesel Generator (Engine 1)
Parameter: Hours of Operation
Limit: The operating hours of diesel generator (Engine 1) shall not exceed 500 hours 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
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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

Part 70 Quarterly Report

Source Name: Four Woods Laminating, Inc.
Source Address: 7640 W 500 S, Topeka, Indiana 46571
Part 70 Permit No.: T087-34476-00036
Facility: Diesel Generator (Engine 2)
Parameter: Hours of Operation
Limit: The operating hours of diesel generator (Engine 2) shall not exceed 500 hours 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
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Four Woods Laminating, Inc.
Source Address: 7640 W 500 S, Topeka, Indiana 46571
Part 70 Permit No.: T087-34476-00036

Months: _____ to _____ Year: _____

Page 1 of 2

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

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

DRAFT

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: _____

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

**Technical Support Document (TSD) for a Part 70 Significant Source and
Significant Permit Modification**

Source Description and Location

Source Name:	Four Woods Laminating, Inc.
Source Location:	7640 W 500 S, Topeka, Indiana 46571
County:	LaGrange
SIC Code:	2499 (Wood Products)
Operation Permit No.:	T 087-34476-00036
Operation Permit Issuance Date:	March 18, 2015
Significant Source Modification No.:	087-35716-00036
Significant Permit Modification No.:	087-35769-00036
Permit Reviewer:	Brian Wright

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. 087-34476-00036 on March 18, 2015. There have been no subsequent approvals issued.

County Attainment Status

The source is located in LaGrange 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 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. LaGrange 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}**
LaGrange County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (c) Other Criteria Pollutants
LaGrange 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.

Source Status - Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

Pollutant	Emissions (ton/yr)
PM	<35.4
PM ₁₀	<35.5
PM _{2.5}	<35.5
SO ₂	13.05
NO _x	198.9
VOC	<249.1
CO	43.65
HAPs	
Xylene	<9.91
Total	<24.80

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHGs emissions to determine operating permit applicability or PSD applicability to a source or modification.

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant, excluding GHGs, is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) These emissions are based upon the TSD for permit No. T087-35716-00036.

- (c) This existing source is not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Four Woods Laminating, Inc. on April 15, 2015, relating to the construction and operation of two natural-gas fired generators. The two existing diesel fired engines will be used as emergency backup generators for the two new generators. The following is a list of the proposed emission units:

- (a) One (1) natural gas-fired generator, approved in 2015 for installation, manufactured in 1992, identified as NGG1, with a maximum capacity of 670 HP, and exhausting to stack NGG1.

The generator is an existing affected unit under the provisions of 40 CFR 63, Subpart ZZZZ.

- (b) One (1) natural gas-fired generator, approved in 2015 for installation, manufactured in 1992, identified as NGG2, with a maximum capacity of 536 HP, and exhausting to stack NGG2.

The generator is an existing affected unit under the provisions of 40 CFR 63, Subpart ZZZZ.

Enforcement Issues

There are no pending enforcement actions.

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

Permit Level Determination – Part 70 Modification to an Existing Source

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit. If the control equipment has been determined to be integral, the table reflects the PTE after consideration of the integral control device.

Increase in PTE Before Controls of the Modification	
Pollutant	Potential To Emit (ton/yr)
PM	0.003
PM ₁₀	0.40
PM _{2.5}	0.40
SO ₂	0.02
NO _x	161.64
VOC	4.67
CO	12.56
Single HAPs	2.09 (Formaldehyde)
Total HAPs	2.84

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

This source modification is subject to 326 IAC 2-7-10.5(g)(4) because the potential to emit nitrogen oxides (NO_x) is greater than twenty-five (25) tons per year before control. Additionally, the modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d), because the modification requires significant changes in existing Part 70 monitoring permit terms and conditions.

Additionally, the modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d)(1), because the modification incorporates applicable portions of the National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ) under Title I of the Clean Air Act (CAA).

Permit Level Determination – PSD or Emission Offset or Nonattainment NSR

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 source and permit modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process / Emission Unit	Project Emissions (ton/yr)						
	PM	PM₁₀	PM_{2.5}*	SO₂	NO_x	VOC	CO
NGG1	0.002	0.22	0.22	0.01	89.80	2.60	6.98
NGG2	0.001	0.18	0.18	0.01	71.84	2.08	5.58
Total for Modification	0.003	0.40	0.40	0.02	161.64	4.67	12.56
PSD Major Source Thresholds	250	250	250	250	250	250	250

*PM_{2.5} listed is direct PM_{2.5}.

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's

decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHGs emissions to determine operating permit applicability or PSD applicability to a source or modification.

This modification to an existing minor PSD stationary source is not major because the emissions increase of each PSD regulated pollutant are less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

The following federal rules are applicable to the source due to this modification:

NSPS:

- (a) The requirements of the New Source Performance Standard for Stationary Spark Ignition Internal Combustion Engines, 40 CFR 60.4230, Subpart JJJJ, are not included in this modification for the two (2) natural gas-fired generators (NGG1 and NGG2), because each engine was manufactured before July 1, 2007. The generators were manufactured in 1992.
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12, 40 CFR 60) included in this modification.

NESHAP:

- (c) The two (2) natural gas-fired generators (NGG1 and NGG2) (670 and 536 HP) are subject the requirements of the 40 CFR 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (326 IAC 20-82), because each are considered an existing stationary reciprocating internal combustion engine (RICE) (construction commenced before June 12, 2006) at an area source of hazardous air pollutants (HAP). Construction of the two (2) natural gas-fired generators (NGG1 and NGG2) commenced in 1992.

The two (2) natural gas-fired generators (NGG1 and NGG2) are each subject to the following applicable portions of the NESHAP for existing non-emergency stationary RICE (construction commenced before June 12, 2006) at an area source of HAP:

- (1) 40 CFR 63.6580
- (2) 40 CFR 63.6585
- (3) 40 CFR 63.6590(a)(1)(iii) and (iv)
- (4) 40 CFR 63.6595(a)(1), (b), and (c)
- (5) 40 CFR 63.6603(a) and (f)
- (6) 40 CFR 63.6605
- (7) 40 CFR 63.6612
- (8) 40 CFR 63.6620(a), (d), (e), (f), (g), (h), and (i)
- (9) 40 CFR 63.6625(e)(9), (h), and (j)
- (10) 40 CFR 63.6630 (a), (b), (c), and (e)
- (11) 40 CFR 63.6635
- (12) 40 CFR 63.6640(a), (b), (c), and (e)

- (13) 40 CFR 63.6645(a)(2), (g), and (h)
- (14) 40 CFR 63.6650
- (15) 40 CFR 63.6655
- (16) 40 CFR 63.6660
- (17) 40 CFR 63.6665
- (18) 40 CFR 63.6670
- (19) 40 CFR 63.6675
- (20) Table 2d (item 5) and (items 8 and 9)
- (21) Table 4
- (22) Table 5 (item 13)
- (23) Table 6 (items 9, 14 and 15)
- (24) Table 7 (item 3)
- (25) Table 8
- (26) Appendix A

Note: Existing non-emergency spark ignition (SI) 4SLB/4SRB stationary RICE that have a site rating greater than 500 brake horsepower (HP), operate 24 hours or less per calendar year, and are located at an area source of HAP are not subject to numerical CO or formaldehyde emission limitations, but are only subject to work and management practices under Table 2d and Table 6.

The requirements of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the source except as otherwise specified in 40 CFR 63, Subpart ZZZZ.

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

CAM:

- (e) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified emission units that involve a pollutant-specific emission unit and meet the following criteria:
 - (1) has a potential to emit before controls equal to or greater than the Part 70 major source threshold for the pollutant involved;
 - (2) is subject to an emission limitation or standard for that pollutant; and
 - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each new or modified emission unit involved:

CAM Applicability Analysis							
Emission Unit	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (ton/yr)	Controlled PTE (ton/yr)	Part 70 Major Source Threshold (ton/yr)	CAM Applicable (Y/N)	Large Unit (Y/N)
NGG1	N	N	89.80	NA	100	N	N
NGG2	N	N	71.84	NA	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to any of the new units as part of this modification.

State Rule Applicability Determination

The following state rules are applicable to the source due to the modification:

326 IAC 2-1.1-5 (Nonattainment New Source Review)

Nonattainment New Source Review applicability is discussed under the Permit Level Determination – PSD and Emission Offset section.

326 IAC 2-2 and 2-3 (PSD and Emission Offset)

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

- (1) The operating hours of each of the diesel generators (Engine 1 and Engine 2) shall not exceed 500 hours per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (2) NOx emissions from each of the diesel generators (Engine 1 and Engine 2) shall each not exceed 3.20 lb/MMBtu heat input.

Compliance with these limits, combined with the potential NOx emissions from all other emission units at this source, shall limit the source-wide NOx emissions to less than 250 tons per 12 consecutive month period, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of each of the two natural gas-fired generators (NGG1 and NGG2) will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially. The first report is due no later than July 1, 2016, and subsequent reports are due every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 2-7-6(5) (Annual Compliance Certification)

The U.S. EPA Federal Register 79 FR 54978 notice does not exempt Title V Permittees from the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D), but the submittal of the Title V annual compliance certification to IDEM satisfies the requirement to submit the Title V annual compliance certifications to EPA. IDEM does not intend to revise any permits since the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D) still apply, but Permittees can note on their Title V annual compliance certification that submission to IDEM has satisfied reporting to EPA per Federal Register 79 FR 54978. This only applies to Title V Permittees and Title V compliance certifications.

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-1, the natural gas-fired generators (NGG1 and NGG2) are each not subject to the requirements of 326 IAC 6-2, because the generators are not sources of indirect heating.

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

The two (2) natural gas-fired generators (NGG1 and NGG2) are each not subject to the requirements of 326 IAC 6-3, since they each are not a "manufacturing process" as defined by 326 IAC 6-3-1.5.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

Pursuant to 326 IAC 7-1.1-1, the two (2) natural gas-fired generators (NGG1 and NGG2) are each not subject to the requirements of 326 IAC 7-1, since each has unlimited sulfur dioxide (SO₂) emissions less than twenty-five (25) tons per year and ten (10) pounds per hour respectively.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

The two (2) natural gas-fired generators (NGG1 and NGG2) are each not subject to the requirements of 326 IAC 8-1-6, since each has unlimited VOC potential emissions of less than twenty-five (25) tons per year.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There are no new compliance determination and monitoring requirements applicable to this modification.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T087-34476-00036
Deleted language appears as ~~strike throughs~~ and new language appears in **bold**:

Modification No. 1:

Section A.2 has been amended as follows in order to incorporate the new units:

A.2 Emission Units and Pollution Control Equipment Summary
 [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

- (j) **One (1) natural gas-fired generator, approved in 2015 for installation, manufactured in 1992, identified as NGG1, with a maximum capacity of 670 HP, and exhausting to stack NGG1.**

The generator is an existing affected unit under the provisions of 40 CFR 63, Subpart ZZZZ.

- (k) **One (1) natural gas-fired generator, approved in 2015 for installation, manufactured in 1992, identified as NGG2, with a maximum capacity of 536 HP, and exhausting to stack NGG2.**

The generator is an existing affected unit under the provisions of 40 CFR 63, Subpart ZZZZ.

Modification No. 2:

Section D.1.1 has been amended as follows in order to incorporate a new PSD limit:

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities:

- (b) **Two (2) diesel generators, identified as Engine 1 and Engine 2, installed in 2012, each with a maximum output rating of 725 hp, each using no controls, and exhausting through stacks 7 and 8.**

Under 40 CFR 60, Subpart IIII, and 40 CFR 63, Subpart ZZZZ these units are affected sources.

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

D.1.1 PSD Minor Limit [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

- (a) The total input of VOC, including coatings, dilution solvents, and cleaning solvents, delivered to the coating applicators at the five (5) surface coating booths (Booth 1, 2, 4, 5, and 6) and the four (4) stain machines (S11, S1, S2, and S3) shall not exceed 233 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) **The operating hours of each of the diesel generators (Engine 1 and Engine 2) shall not exceed 500 hours per twelve (12) consecutive month period, with compliance determined at the end of each month.**
- (c) **NO_x emissions from each of the diesel generators (Engine 1 and Engine 2) shall each not exceed 3.20 lb/MMBtu heat input.**

Compliance with ~~this~~ **these** limits, combined with the unrestricted potential to emit VOC and NO_x from all other facilities at the source, including insignificant activities, shall limit VOC and NO_x emissions from the entire source to less than 250 tons per twelve (12) consecutive month period,

each, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.9 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.1.1(a), 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 input limits established in Condition D.1.1(a). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (b) **To document the compliance status with Condition D.1.1(b), the Permittee shall keep records of the hours of operation for each of the diesel generators (Engine 1 and Engine 2) for each month and each compliance period. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.**
- (bc) To document the compliance status with Condition D.1.2, 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 HAP input limits established in Condition D.1.2.

- (ed) To document the compliance status with Condition D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.
- (de) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligation with regard to the records required by this condition.

D.1.10 Reporting Requirements

Quarterly summaries of the information to document the compliance status with Conditions D.1.1(a), D.1.1(b), and D.1.2 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The reports submitted by the Permittee do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 3826 IAC 2-7-1(35).

Modification No. 3:

Section D.1.2 and the associated reporting forms have been amended as follows in order to revise the single HAP and Total HAP input limits in order to account for HAP emissions from the new units:

D.1.2 Hazardous Air Pollutants (HAPs) Limit [40 CFR 63, Subpart JJ]

In order to render the requirements of 40 CFR Part 63, Subpart JJ not applicable, the Permittee shall comply with the following:

- (a) The input of any single HAP delivered to the coating applicators in the five (5) surface coating booths (Booths 1, 2, 4, 5, and 6) and the four (4) stain machines (S11, S1, S2, and S3) shall not exceed ~~9.90~~ **9.50** tons per twelve (12) consecutive month period, including coatings, dilution solvents, and cleaning solvents, with compliance determined at the end of each month

- (b) The input of any combination of HAPs delivered to the coating applicators in the five (5) surface coating booths (Booths 1, 2, 4, 5, and 6) and the four (4) stain machines (S11, S1, S2, and S3) shall not exceed ~~24.80~~ **22.04** tons per twelve (12) consecutive month period, including coatings, dilution solvents, and cleaning solvents, with compliance determined at the end of each month.

Part 70 Quarterly Report

Facility: The five (5) surface coating booths (Booths 1, 2, 4, 5, and 6), and the four (4) stain machines (S11, S1, S2, and S3).
Parameter: Highest Single HAP Input
Limit: The input of any single HAP delivered to the coating applicators in the five (5) surface coating booths (Booths 1, 2, 4, 5, and 6) and the four (4) stain machines (S11, S1, S2, and S3) shall not exceed ~~9.90~~ **9.50** tons per twelve (12) consecutive month period, including coatings, dilution solvents, and cleaning solvents, with compliance determined at the end of each month.

Part 70 Quarterly Report

Facility: The five (5) surface coating booths (Booths 1, 2, 4, 5, and 6), and the four (4) stain machines (S11, S1, S2, and S3).
Parameter: Total HAP Input
Limit: The input of any combination of HAPs delivered to the coating applicators in the five (5) surface coating booths (Booths 1, 2, 4, 5, and 6) and the four (4) stain machines (S11, S1, S2, and S3) shall not exceed ~~24.80~~ **22.04** tons per twelve (12) consecutive month period, including coatings, dilution solvents, and cleaning solvents, with compliance determined at the end of each month.

Modification No. 4:

Section E.3 has been modified as follows in order to incorporate the new units:

SECTION E.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (j) One (1) natural gas-fired generator, approved in 2015 for installation, manufactured in 1992, identified as NGG1, with a maximum capacity of 670 HP, and exhausting to stack NGG1.

The generator is an existing affected unit under the provisions of 40 CFR 63, Subpart ZZZZ.

- (k) One (1) natural gas-fired generator, approved in 2015 for installation, manufactured in 1992, identified as NGG2, with a maximum capacity of 536 HP, and exhausting to stack NGG2.

The generator is an existing affected unit under the provisions of 40 CFR 63, Subpart ZZZZ.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements: Industrial, Commercial, and Institutional Boilers

E.3.1 General Provisions Relating to NESHAP [40 CFR 63, Subpart A] [326 IAC 20-1]

- (a) Pursuant to 40 CFR 63.6580, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1, except as otherwise specified in 40 CFR 63, Subpart ZZZZ for the two (2) natural gas-fired generators (NGG1 and NGG2).
- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports 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**

E.3.42 National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Reciprocating Internal Combustion Engines [40 CFR Part 63, Subpart ZZZZ] [326 IAC 20-82]

- (a) The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart ZZZZ (included as Attachment C of this permit), which are incorporated by reference as 326 IAC 20-82, except as otherwise specified in 40 CFR Part 63, Subpart ZZZZ, for the two diesel-fired generators (Engine 1 and Engine 2):

- (b) The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart ZZZZ (included as Attachment C of this permit), which are incorporated by reference as 326 IAC 20-82, except as otherwise specified in 40 CFR Part 63, Subpart ZZZZ, for the two natural gas-fired generators (NGG1 and NGG2):

- (1) 40 CFR 63.6580
- (2) 40 CFR 63.6585
- (3) 40 CFR 63.6590(a)(1)(iii) and (iv)
- (4) 40 CFR 63.6595(a)(1), (b), and (c)
- (5) 40 CFR 63.6603(a) and (f)
- (6) 40 CFR 63.6605
- (7) 40 CFR 63.6612
- (8) 40 CFR 63.6620(a), (d), (e), (f), (g), (h), and (i)
- (9) 40 CFR 63.6625(e)(9), (h), and (j)
- (10) 40 CFR 63.6630 (a), (b), (c), and (e)
- (11) 40 CFR 63.6635
- (12) 40 CFR 63.6640(a), (b), (c), and (e)
- (13) 40 CFR 63.6645(a)(2), (g), and (h)
- (14) 40 CFR 63.6650
- (15) 40 CFR 63.6655
- (16) 40 CFR 63.6660
- (17) 40 CFR 63.6665
- (18) 40 CFR 63.6670
- (19) 40 CFR 63.6675
- (20) Table 2d (item 5) and (items 8 and 9)
- (21) Table 4
- (22) Table 5 (item 13)
- (23) Table 6 (items 9, 14 and 15)

- (24) Table 7 (item 3)
(25) Table 8
(26) Appendix A

Modification No. 5:

The following reporting forms have been added in order to document compliance with Condition D.1.1(b);

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY COMPLIANCE AND ENFORCEMENT BRANCH
Part 70 Quarterly Report

Source Name: Four Woods Laminating, Inc.
Source Address: 7640 W 500 S, Topeka, Indiana 46571
Part 70 Permit No.: T087-34476-00036
Facility: Diesel Generator (Engine 1)
Parameter: Hours of Operation
Limit: The operating hours of diesel generator (Engine 1) shall not exceed 500 hours 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
	This Month	Previous 11 Months	12 Month Total

- ☐ 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**

Source Name: Four Woods Laminating, Inc.
Source Address: 7640 W 500 S, Topeka, Indiana 46571
Part 70 Permit No.: T087-34476-00036
Facility: Diesel Generator (Engine 2)
Parameter: Hours of Operation
Limit: The operating hours of diesel generator (Engine 2) shall not exceed 500 hours 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
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Conclusion and Recommendation

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 087-35716-00036 and Significant Permit Modification No. 087-35769-00036. The staff recommend to the Commissioner that this Part 70 Significant Source and Significant Permit Modification be approved.

IDEM Contact

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

Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-6544 or toll free at 1-800-451-6027 extension 4-6544.

- (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: Emission Calculations
Emissions Summary**

Page 1 of 10 TSD App A

Company Name: Four Woods Laminating, Inc.
Source Address: 7640 W. 500 South, Topeka, IN 46571
TV SSM No.: 087-35716-00036
TV SPM No.: 087-35769-00036
Reviewer: Brian Wright

Unlimited Potential to Emit Before Integral Woodworking Controls (tons/yr)*										
Emission Unit/ID	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP (Xylene)	
Surface Coating	127.0	127.0	127.0	0.00	0.00	9,160	0.00	48.34	44.30	Xylene
Diesel Generators	13.97	13.97	13.97	13.02	196.88	15.97	42.42	0.17	5.25E-02	Formaldehyde
Woodworking	19,034	19,034	19,034	0.00	0.00	0.00	0.00	0.00	0.00	---
Wood-Fired Boiler	0.10	0.09	0.08	4.38E-03	0.04	0.002	0.11	5.87E-03	3.33E-03	HCl
Propane Boilers	0.03	0.10	0.10	0.02	1.95	0.15	1.12	--	--	---
NG Generators	0.003	0.40	0.40	0.02	161.64	4.67	12.56	2.84	2.09	Formaldehyde
Total	19,175	19,176	19,176	13.07	361	9,181	56	48.52	44.35	Xylene

Unlimited Potential to Emit After Integral Woodworking Controls (tons/yr)*										
Emission Unit/ID	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP (Xylene)	
Surface Coating	127.0	127.0	127.0	0.00	0.00	9,160	0.00	48.34	44.30	Xylene
Diesel Generators	13.97	13.97	13.97	13.02	196.88	15.97	42.42	0.17	5.25E-02	Formaldehyde
Woodworking	1.90	1.90	1.90	0.00	0.00	0.00	0.00	0.00	--	---
Wood-Fired Boiler	0.10	0.09	0.08	4.38E-03	0.04	0.002	0.11	5.87E-03	3.33E-03	HCl
Propane Boilers	0.03	0.10	0.10	0.02	1.95	0.15	1.12	--	--	---
NG Generators	0.003	0.40	0.40	0.02	161.64	4.67	12.56	2.84	2.09	Formaldehyde
Total	142.97	143.43	143.42	13.07	360.51	9181.00	56.21	51.36	44.35	Xylene

Limited Potential to Emit (tons/yr)										
Emission Unit/ID	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x **	VOC***	CO	Total HAPs****	Worst Single HAP (Xylene)****	
Surface Coating	126.96	126.96	126.96	0.00	0.00	<233	0.00	<22.04	<9.5	Xylene
Diesel Generators	0.80	0.80	0.80	0.74	11.24	0.91	2.42	0.01	2.99E-03	Formaldehyde
Woodworking	<15	15	<15	0.00	0.00	0.00	0.00	0.00	0.00	---
Wood-Fired Boiler	0.10	0.09	0.08	0.004	0.04	0.002	0.11	5.87E-03	3.33E-03	HCl
Propane Boilers	0.03	0.10	0.10	0.02	1.95	0.15	1.12	0.00	0.00	---
NG Generators	0.003	0.40	0.40	0.02	161.64	4.67	12.56	2.84	2.09	Formaldehyde
Total	<156.07	<156.53	<156.53	0.79	174.86	<238.7	16.21	<24.9	<9.5	Xylene

Limited/Controlled Potential to Emit (tons/yr)										
Emission Unit/ID	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP (Xylene)	
Surface Coating	6.35	6.35	6.35	0.00	0.00	<233	0.00	<22.04	<9.5	Xylene
Diesel Generators	0.80	0.80	0.80	0.74	11.24	0.91	2.42	0.01	2.99E-03	Formaldehyde
Woodworking	<15	<15	<15	0.00	0.00	0.00	0.00	0.00	0.00	---
Wood-Fired Boiler	0.10	0.09	0.08	0.004	0.04	0.002	0.11	5.87E-03	3.33E-03	HCl
Propane Boilers	0.03	0.10	0.10	0.02	1.95	0.15	1.12	0.00	0.00	---
NG Generators	0.003	0.40	0.40	0.02	161.64	4.67	12.56	2.84	2.09	Formaldehyde
Total	<22.28	<22.74	<22.73	0.79	174.86	<238.7	16.21	<24.9	<9.5	Xylene

In order to render the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) not applicable, the total VOC input to the surface coating booths shall not exceed 233 tons per twelve (12) consecutive month period.

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 for purposes of determining operating permit level and for determining the applicability of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes). However, for purposes of determining the applicability of Prevention of Significant Deterioration (PSD), potential particulate matter emissions from the woodworking operations were calculated before

**In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the operating hours the diesel fired generators (Engine 1 and Engine 2) shall each not exceed 500 hours per twelve (12) consecutive month period.

*** In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the total VOC input to the surface coating booths shall not exceed 233 tons per twelve (12) consecutive month period.

**** In order to render the requirements of 40 CFR 63, Subpart JJ not applicable, total input of total HAPs to the surface coating booths shall be limited to less than 24

**Appendix A: Emission Calculations
Modification**

Page 2 of 10 TSD App A

Company Name: Four Woods Laminating, Inc.
Source Address: 7640 W. 500 South, Topeka, IN 46571
TV SSM No.: 087-35716-00036
TV SPM No.: 087-35769-00036
Reviewer: Brian Wright

		Uncontrolled Potential to Emit (US tons/year)									
Process/emission unit		PM	PM ₁₀	PM _{2.5}	SO ₂	NOx	VOC	CO	Single HAP ID	Single HAP	HAPs combined
New Units	NGG1	0.002	0.22	0.22	0.01	89.80	2.60	6.98	Formaldehyde	1.16	1.58
	NGG2	0.001	0.18	0.18	0.01	71.84	2.08	5.58	Formaldehyde	0.93	1.26
Total PTE of Revision		0.003	0.40	0.40	0.02	161.64	4.67	12.56		2.09	2.84

**Appendix A: Federal Potential Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Page 3 of 10 TSD App A

Company Name: Four Woods Laminating, Inc.
Source Address: 7640 W. 500 South, Topeka, IN 46571
TV SSM No.: 087-35716-00036
TV SPM No.: 087-35769-00036
Reviewer: Brian Wright

Unit	Material	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Maximum (gal/day)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Uncontrolled Particulate Potential tons per year	lb VOC /gal solids	Transfer Efficiency	Particulate Control Efficiency	Controlled Particulate Potential tons per year
Booth 1	Facett 50	7.78	66.69%	0.00	0.67	0.00	0.15	0.13	37.5	117	5.19	5.19	25.29	607.05	110.8	13.8	35.78	75%	95%	0.69
Booth 2	Dutch Sunset	9.84	8.60%	0.00	0.09	0.00	0.25	0.05	37.5	45	0.85	0.85	1.59	38.08	6.95	18.5	3.38	75%	95%	0.92
Booth 4	Facett 50	7.78	66.69%	0.00	0.67	0.00	0.15	0.13	62.5	195	5.19	5.19	42.16	1,011.75	184.6	23.1	35.78	75%	95%	1.15
Booth 5	Oak Light	7.42	96.70%	0.00	0.97	0.00	0.01	0.05	62.5	75	7.18	7.18	22.42	538.14	98.2	0.84	512.51	75%	95%	0.04
Booth 6	Fruitwood	7.47	94.20%	0.00	0.94	0.00	0.03	0.05	62.5	75	7.04	7.04	21.99	527.76	96.3	1.48	213.23	75%	95%	0.07
Stain Machine S11	NS5162078	6.8	96.90%	0.00	0.97	0.00	0.02	0.08	945	1,814	6.54	6.54	494.48	11,867.54	2,166	17.3	384.75	75%	95%	0.87
Stain Machine S1	NS5162078	6.8	96.90%	0.00	0.97	0.00	0.02	0.08	945	1,814	6.54	6.54	494.48	11,867.54	2,166	17.3	384.75	75%	95%	0.87
Stain Machine S2	NS5162078	6.8	96.90%	0.00	0.97	0.00	0.02	0.08	945	1,814	6.54	6.54	494.48	11,867.54	2,166	17.3	384.75	75%	95%	0.87
Stain Machine S3	NS5162078	6.8	96.90%	0.00	0.97	0.00	0.02	0.08	945	1,814	6.54	6.54	494.48	11,867.54	2,166	17.3	384.75	75%	95%	0.87

Totals

2,091.37	50,192.93	9,160.21	126.96	6.35
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METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

Hazardous Air Pollutants (HAPs)

Unit	Material	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Ethylene Glycol	Xylene Emissions (tons/yr)	Ethylene Glycol Emissions (tons/yr)	Total HAP Emissions (tons/yr)
Booth 1	Facett 50	7.78	0.13	37.5	10.00%	0.00%	16.61	0.00	16.61
Booth 2	Dutch Sunset	9.84	0.05	37.5	0.00%	5.00%	0.00	4.04	4.04
Booth 4	Facett 50	7.78	0.13	62.5	10.00%	0.00%	27.69	0.00	27.69
Booth 5	Oak Light	7.42	0.05	62.5	0.00%	0.00%	0.00	0.00	0.00
Booth 6	Fruitwood	7.47	0.05	62.5	0.00%	0.00%	0.00	0.00	0.00

*Stain Machine S11, S1, and S2, do not contain any HAPs

TOTALS:	(tons/yr):	44.30	4.04	48.34
	(lb/hr):	10.114	0.923	11.037

METHODOLOGY

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: Emission Calculations
Reciprocating Internal Combustion Engines - Diesel Fuel
Output Rating (<=600 HP)
Maximum Input Rate (<=4.2 MMBtu/hr)
Diesel Generators

Page 4 of 10 TSD App A

Company Name: Four Woods Laminating, Inc.
Source Address: 7640 W. 500 South, Topeka, IN 46571
TV SSM No.: 087-35716-00036
TV SPM No.: 087-35769-00036
Reviewer: Brian Wright

Emission Unit	hp
Engine 1	725
Engine 2	725
Total	1450

B. Emissions calculated based on output rating (hp)

Output Horsepower Rating (hp)	1450.0
Maximum Hours Operated per Year	8760
Potential Throughput (hp-hr/yr)	12,702,000

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/hp-hr	0.0022	0.0022	0.0022	0.0021	0.0310	0.0025	0.0067
Potential Emission in tons/yr	13.97	13.97	13.97	13.02	196.88	15.97	42.42

*PM and PM2.5 emission factors are assumed to be equivalent to PM10 emission factors. No information was given regarding which method was used to determine the factor or the fraction of PM10 which is condensable.

Hazardous Air Pollutants (HAPs)

	Pollutant						
	Benzene	Toluene	Xylene	1,3-Butadiene	Formaldehyde	Acetaldehyde	Acrolein
Emission Factor in lb/hp-hr****	6.53E-06	2.86E-06	2.00E-06	2.74E-07	8.26E-06	5.37E-06	6.48E-07
Potential Emission in tons/yr	4.15E-02	1.82E-02	1.27E-02	1.74E-03	5.25E-02	3.41E-02	4.11E-03

***PAH = Polyaromatic Hydrocarbon (PAHs are considered HAPs, since they are considered Polycyclic Organic Matter)

****Emission factors in lb/hp-hr were calculated using emission factors in lb/MMBtu and a brake specific fuel consumption of 10,000 Btu / hp-hr (AP-42 Table 3.3-1).

Potential Emission of Total HAPs (tons/yr)	1.72E-01
---	-----------------

Green House Gas Emissions (GHG)

	Pollutant		
	CO2	CH4	N2O
Emission Factor in lb/hp-hr	#####	4.63E-05	9.26E-06
Potential Emission in tons/yr	#####	2.94E-01	5.88E-02

Summed Potential Emissions in tons/yr	7.30E+03
CO2e Total in tons/yr	7.33E+03

Methodology

Emission Factors are from AP42 (Supplement B 10/96), Tables 3.3-1 and 3.3-2

CH4 and N2O Emission Factor from 40 CFR 98 Subpart C Table C-2.

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

Potential Throughput (hp-hr/yr) = [Output Horsepower Rating (hp)] * [Maximum Hours Operated per Year]

Potential Emission (tons/yr) = [Potential Throughput (hp-hr/yr)] * [Emission Factor (lb/hp-hr)] / [2,000 lb/ton]

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

Potential Emission ton/yr x N2O GWP (310).

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updated 10/2012

Appendix A: Emission Calculations
Reciprocating Internal Combustion Engines - Diesel Fuel
Output Rating (<=600 HP)
Maximum Input Rate (<=4.2 MMBtu/hr)
Diesel Generators

Page 5 of 10 TSD App A

Company Name: Four Woods Laminating, Inc.
Source Address: 7640 W. 500 South, Topeka, IN 46571
TV SSM No.: 087-35716-00036
TV SPM No.: 087-35769-00036
Reviewer: Brian Wright

Emission Unit	hp
Engine 1	725
Engine 2	725
Total	1450

B. Emissions calculated based on output rating (hp)

Output Horsepower Rating (hp)	1450.0
Maximum Hours Operated per Year	500
Potential Throughput (hp-hr/yr)	725,000

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/hp-hr	0.0022	0.0022	0.0022	0.0021	0.0310	0.0025	0.0067
Potential Emission in tons/yr	0.80	0.80	0.80	0.74	11.24	0.91	2.42

*PM and PM2.5 emission factors are assumed to be equivalent to PM10 emission factors. No information was given regarding which method was used to determine the factor or the fraction of PM10 which is condensable.

Hazardous Air Pollutants (HAPs)

	Pollutant						
	Benzene	Toluene	Xylene	1,3-Butadiene	Formaldehyde	Acetaldehyde	Acrolein
Emission Factor in lb/hp-hr****	6.53E-06	2.86E-06	2.00E-06	2.74E-07	8.26E-06	5.37E-06	6.48E-07
Potential Emission in tons/yr	2.37E-03	1.04E-03	7.23E-04	9.92E-05	2.99E-03	1.95E-03	2.35E-04

***PAH = Polyaromatic Hydrocarbon (PAHs are considered HAPs, since they are considered Polycyclic Organic Matter)

****Emission factors in lb/hp-hr were calculated using emission factors in lb/MMBtu and a brake specific fuel consumption of 10,000 Btu / hp-hr (AP-42 Table 3.3-1).

Potential Emission of Total HAPs (tons/yr)	9.83E-03
---	-----------------

Green House Gas Emissions (GHG)

	Pollutant		
	CO2	CH4	N2O
Emission Factor in lb/hp-hr	#####	4.63E-05	9.26E-06
Potential Emission in tons/yr	#####	1.68E-02	3.36E-03

Summed Potential Emissions in tons/yr	4.17E+02
CO2e Total in tons/yr	4.18E+02

Methodology

Emission Factors are from AP42 (Supplement B 10/96), Tables 3.3-1 and 3.3-2

CH4 and N2O Emission Factor from 40 CFR 98 Subpart C Table C-2.

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

Potential Throughput (hp-hr/yr) = [Output Horsepower Rating (hp)] * [Maximum Hours Operated per Year]

Potential Emission (tons/yr) = [Potential Throughput (hp-hr/yr)] * [Emission Factor (lb/hp-hr)] / [2,000 lb/ton]

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

Potential Emission ton/yr x N2O GWP (310).

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updated 10/2012

**Appendix A: Emission Calculations
Woodworking Operations**

Page 6 of 10 TSD App A

Company Name: Four Woods Laminating, Inc.
Source Address: 7640 W. 500 South, Topeka, IN 46571
TV SSM No.: 087-35716-00036
TV SPM No.: 087-35769-00036
Reviewer: Brian Wright

Woodworking Operations

Control Efficiency

99.99%

Pollutant	Inlet Grain Loading per Actual Cubic foot of Outlet Air (grains/acfm)	Flow Rate (acfm)	Emission Rate before Controls (lb/hr)	Emission Rate before Controls (tons/yr)	Emission Rate after Controls (lb/hr)	Emission Rate after Controls (tons/yr)
PM	0.004	12,675	4,346	19,034	0.435	1.90
PM10	0.004	12,675	4,346	19,034	0.435	1.90

Methodology

Emission Rate in lbs/hr (after controls) = (grains/acfm) (acfm) (60 min/hr) (lb/7000 grains)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

In October 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 for purposes of determining operating permit level and for determining the applicability of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes). However, for purposes of determining the applicability of Prevention of Significant Deterioration (PSD), potential particulate matter emissions from the woodworking operations were calculated before consideration of the controls.

Appendix A: Emissions Calculations
External Combustion Boiler
Wood Waste Combustion (uncontrolled)
Bark/Bark and Wet Wood
Waste Wood-Fired Boiler (Wood 1)

Page 7 of 10 TSD App A

Company Name: Four Woods Laminating, Inc.
Source Address: 7640 W. 500 South, Topeka, IN 46571
TV SSM No.: 087-35716-00036
TV SPM No.: 087-35769-00036
Reviewer: Brian Wright

Capacity (MMBtu/hr) 0.04

	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO**
Emission Factor in lb/MMBtu	0.56	0.517	0.447	0.025	0.22	0.013	0.6
Potential Emissions in tons/yr	0.10	0.09	0.08	0.004	0.04	0.002	0.11

Wet wood is considered to be greater than or equal to 20% moisture content. Dry wood is considered to be less than 20% moisture content.

*The PM10 and PM2.5 emission factors include the condensable PM emission factor of 0.017 lb/MMBtu, measured by EPA Method 202 (or equivalent) and the appropriate filterable PM emission factor, measured by EPA Method 5 (or equivalent). The PM emission factor is filterable PM measured by EPA Method 5 (or equivalent).

**The CO emission factor is for stokers and dutch ovens/fuel cells. Change the emission factor to 0.17 lb/MMBtu if the calculations are for a fluidized bed combustor.

Methodology

To convert from tons/hr capacity to MMBtu/hr capacity:

Heat Input Capacity (MMBtu/hr) = Capacity (tons/hr) x Higher Heating Value of wood fuel (Btu/lb) x (1 MMBtu/10⁶ Btu) x 2000 lbs/1 ton

Emission Factors are from AP-42 Chapter 1.6 (revised 3/02), SCCs #1-0X-009-YY where X = 1 for utilities, 2 for industrial, and 3 for commercial/institutional; Y = 01 for bark-fired boilers, 02 for bark and wet wood-fired boilers, 03 for wet wood-fired boilers, and 08 for dry wood-fired boilers

Emissions (tons/yr) = Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8760hrs/yr x 1ton/2000lbs

Capacity (MMBtu/hr) 0.04

	Selected Hazardous Air Pollutants				
	Acrolein	Benzene	Formaldehyde	Hydrogen Chloride	Styrene
Emission Factor in lb/MMBtu	4.0E-03	4.2E-03	4.4E-03	1.9E-02	1.9E-03
Potential Emissions in tons/yr	7.0E-04	7.4E-04	7.7E-04	3.3E-03	3.3E-04

Methodology

To convert from tons/hr capacity to MMBtu/hr capacity:

Heat Input Capacity (MMBtu/hr) = Capacity (tons/hr) x Higher Heating Value of wood fuel (Btu/lb) x (1 MMBtu/10⁶ Btu) x 2000 lbs/1 ton

Emission Factors are from AP-42 Chapter 1.6 (revised 3/02), SCCs #1-0X-009-YY where X = 1 for utilities, 2 for industrial, and 3 for commercial/institutional; Y = 01 for bark-fired boilers, 02 for bark and wet wood-fired boilers, 03 for wet wood-fired boilers, and 08 for dry wood-fired boilers

Emissions (tons/yr) = Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8760hrs/yr x 1ton/2000lbs

These factors include the five HAPs with the highest AP-42 emission factors.

Capacity (MMBtu/hr) 0.04

	Greenhouse Gases		
	CO2	CH4	N2O
Emission Factor in kg/mmBtu from 40 CFR 98	**	0.032	
Emission Factor in lb/mmBtu from AP-42			0.013
Potential Emission in tons/yr	**	0.012	0.002
Summed Potential Emissions in tons/yr	0.015 **		
CO2e Total in tons/yr	0.97 **		

Methodology

To convert from tons/hr capacity to MMBtu/hr capacity:

Heat Input Capacity (MMBtu/hr) = Capacity (tons/hr) x Higher Heating Value of wood fuel (Btu/lb) x (1 MMBtu/10⁶ Btu) x 2000 lbs/1 ton

CO2 and CH4 Emission Factors from Tables C-1 and 2 of 40 CFR Part 98 Subpart C. N2O emission factor from AP-43 Chapter 1.6 (revised 3/02).

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

Potential Emission (tons/yr) = Heat Input Capacity mmBtu/hr x Emission Factor (kg/mmBtu) x 2.20462 lb/kg x 8760 hrs/yr /2,000 lb/ton

Potential Emission (tons/yr) = Heat Input Capacity mmBtu/hr x Emission Factor (lb/mmBtu) x 8760 hrs/yr /2,000 lb/ton

CO2e (tons/yr) = CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310). **

** On July 1, 2011 EPA stayed the counting of CO2 emissions from Bioenergy and other Biogenic Sources.

Appendix A: Emission Calculations
LPG-Propane - Industrial Boilers
(Heat input capacity: > 10 MMBtu/hr and < 100 MMBtu/hr)

Page 8 of 10 TSD App A

Company Name: Four Woods Laminating, Inc.
Source Address: 7640 W. 500 South, Topeka, IN 46571
TV SSM No.: 087-35716-00036
TV SPM No.: 087-35769-00036
Reviewer: Brian Wright

	Heat Input Capacity MMBtu/hr
Boiler 2	2.33
Boiler 3	0.4
Boiler 4	0.4
Total	3.13

Potential Throughput
kgals/year
299.66

SO₂ Emission factor = 0.10 x S
S = Sulfur Content = 1.50 grains/100ft³

	Pollutant						
	PM*	PM10*	direct PM2.5**	SO ₂	NO _x	VOC	CO
Emission Factor in lb/kgal	0.2	0.7	0.7	0.2 (0.10S)	13.0	1.0 **TOC value	7.5
Potential Emission in tons/yr	0.03	0.10	0.10	0.02	1.95	0.15	1.12

*PM emission factor is filterable PM only. PM emissions are stated to be all less than 10 microns in aerodynamic equivalent diameter, footnote in Table 1.5-1, therefore PM10 is based on the filterable and condensable PM emission factors.

** No direct PM2.5 emission factor was given. Direct PM2.5 is a subset of PM10. If one assumes all PM10 to be all direct PM2.5, then a worst case assumption of direct PM2.5 can be made.

**The VOC value given is TOC. The methane emission factor is 0.2 lb/kgal.

Methodology

1 gallon of LPG has a heating value of 94,000 Btu

1 gallon of propane has a heating value of 91,500 Btu (use this to convert emission factors to an energy basis for propane)

(Source - AP-42 (Supplement B 10/96) page 1.5-1)

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 kgal per 1000 gallon x 1 gal per 0.0915 MMBtu

Emission Factors are from AP42 (7/08), Table 1.5-1 (SCC #1-02-010-02)

Propane Emission Factors shown. Please see AP-42 for butane.

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

	Greenhouse Gases		
	CO ₂	CH ₄	N ₂ O
Emission Factor in lb/kgal	12,500	0.2	0.9
Potential Emission in tons/yr	1,873	0.03	0.13
Summed Potential Emissions in tons/yr	1,873		
CO ₂ e Total in tons/yr	1,915		

Methodology

The CO₂ Emission Factor for Propane is 12500. The CO₂ Emission Factor for Butane is 14300.

Emission Factors are from AP 42 (7/08), Table 1.5-1 (SCC #1-02-010-02)

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

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

CO₂e (tons/yr) = CO₂ Potential Emission ton/yr x CO₂ GWP (1) + CH₄ Potential Emission ton/yr x CH₄ GWP (21) + N₂O Potential Emission ton/yr x N₂O GWP (310).

Appendix A: Emission Calculations
Reciprocating Internal Combustion Engines - Natural Gas
4-Stroke Lean-Burn (4SLB) Engines
Generator NGG1

Page 9 of 10 TSD App A

Company Name: Four Woods Laminating, Inc.
Source Address: 7640 W. 500 South, Topeka, IN 46571
TV SSM No.: 087-35716-00036
TV SPM No.: 087-35769-00036
Reviewer: Brian Wright

Maximum Output Horsepower Rating (hp)	670
Brake Specific Fuel Consumption (BSFC) (Btu/hp-hr)	7500
Maximum Hours Operated per Year (hr/yr)	8760
Potential Fuel Usage (MMBtu/yr)	44019
High Heat Value (MMBtu/MMscf)	1020
Potential Fuel Usage (MMcf/yr)	43.16

Criteria Pollutants	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO
Emission Factor (lb/MMBtu)	7.71E-05	9.99E-03	9.99E-03	5.88E-04	4.08E+00	1.18E-01	3.17E-01
Potential Emissions (tons/yr)	0.0017	0.22	0.22	0.013	89.80	2.60	6.98

*PM emission factor is for filterable PM-10. PM10 emission factor is filterable PM10 + condensable PM.

PM2.5 emission factor is filterable PM2.5 + condensable PM.

Hazardous Air Pollutants (HAPs)

Pollutant	Emission Factor (lb/MMBtu)	Potential Emissions (tons/yr)
Acetaldehyde	8.36E-03	0.184
Acrolein	5.14E-03	0.113
Benzene	4.40E-04	0.010
Biphenyl	2.12E-04	0.005
1,3-Butadiene	2.67E-04	0.006
Formaldehyde	5.28E-02	1.162
Methanol	2.50E-03	0.055
Hexane	1.10E-03	0.024
Toluene	4.08E-04	0.009
2,2,4-Trimethylpentane	2.50E-04	0.006
Xylene	1.84E-04	0.004
Total		1.58

HAP pollutants consist of the eleven highest HAPs included in AP-42 Table 3.2-2.

Methodology

Emission Factors are from AP-42 (Supplement F, July 2000), Table 3.2-2

Potential Fuel Usage (MMBtu/yr) = [Maximum Output Horsepower Rating (hp)] * [Brake Specific Fuel Consumption (Btu/hp-hr)] * [Maximum Hours Operated per Year (hr/yr)] / [1000000 Btu/MMBtu]

Potential Emissions (tons/yr) = [Potential Fuel Usage (MMBtu/yr)] * [Emission Factor (lb/MMBtu)] / [2000 lb/ton]

Appendix A: Emission Calculations
Reciprocating Internal Combustion Engines - Natural Gas
4-Stroke Lean-Burn (4SLB) Engines
Generator NGG2

Page 10 of 10 TSD App A

Company Name: Four Woods Laminating, Inc.
Source Address: 7640 W. 500 South, Topeka, IN 46571
TV SSM No.: 087-35716-00036
TV SPM No.: 087-35769-00036
Reviewer: Brian Wright

Maximum Output Horsepower Rating (hp)	536
Brake Specific Fuel Consumption (BSFC) (Btu/hp-hr)	7500
Maximum Hours Operated per Year (hr/yr)	8760
Potential Fuel Usage (MMBtu/yr)	35215
High Heat Value (MMBtu/MMscf)	1020
Potential Fuel Usage (MMcf/yr)	34.52

Criteria Pollutants	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO
Emission Factor (lb/MMBtu)	7.71E-05	9.99E-03	9.99E-03	5.88E-04	4.08E+00	1.18E-01	3.17E-01
Potential Emissions (tons/yr)	0.0014	0.18	0.18	0.010	71.84	2.08	5.58

*PM emission factor is for filterable PM-10. PM10 emission factor is filterable PM10 + condensable PM.

PM2.5 emission factor is filterable PM2.5 + condensable PM.

Hazardous Air Pollutants (HAPs)

Pollutant	Emission Factor (lb/MMBtu)	Potential Emissions (tons/yr)
Acetaldehyde	8.36E-03	0.147
Acrolein	5.14E-03	0.091
Benzene	4.40E-04	0.008
Biphenyl	2.12E-04	0.004
1,3-Butadiene	2.67E-04	0.005
Formaldehyde	5.28E-02	0.930
Methanol	2.50E-03	0.044
Hexane	1.10E-03	0.019
Toluene	4.08E-04	0.007
2,2,4-Trimethylpentane	2.50E-04	0.004
Xylene	1.84E-04	0.003
Total		1.26

HAP pollutants consist of the eleven highest HAPs included in AP-42 Table 3.2-2.

Methodology

Emission Factors are from AP-42 (Supplement F, July 2000), Table 3.2-2

Potential Fuel Usage (MMBtu/yr) = [Maximum Output Horsepower Rating (hp)] * [Brake Specific Fuel Consumption (Btu/hp-hr)]

* [Maximum Hours Operated per Year (hr/yr)] / [1000000 Btu/MMBtu]

Potential Emissions (tons/yr) = [Potential Fuel Usage (MMBtu/yr)] * [Emission Factor (lb/MMBtu)] / [2000 lb/ton]



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

May 26, 2015

Mr. Maynard Yoder
Four Woods Laminating, Inc.
7640 W 500 S
Topeka, IN 46571

Re: Public Notice
Four Woods Laminating, Inc.
Permit Level: Significant Source Modification and
Significant Permit Modification to a Part 70
Operating Permit
Permit Number: 087-35716-00036 and
087-35769-00036

Dear Mr. Yoder:

Enclosed is a copy of your draft Significant Source Modification and Significant Permit Modification to a Part 70 Operating Permit, 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 the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the LaGrange Standard in LaGrange, Indiana publish the abbreviated version of the public notice no later than June 1, 2015. 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 Topeka Branch Library, 105 South Main Street in Topeka, Indiana. 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 Brian Wright, 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 4-6544 or dial (317) 234-6544.

Sincerely,

Vivian Haun

Vivian Haun
Permits Branch
Office of Air Quality

Enclosures

PN Applicant Cover letter-2014. Dot4/10/14





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Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

May 21, 2015

LaGrange Standard
PO Box 148
LaGrange, IN 46761

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Four Woods Laminating, Inc., LaGrange 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 1, 2015.

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 Vivian Haun at 800-451-6027 and ask for extension 3-6878 or dial 317-233-6878.

Sincerely,

Vivian Haun

Vivian Haun
Permit Branch
Office of Air Quality

Permit Level: Significant Source Modification and Significant Permit Modification
To a Part 70 Operating Permit

Permit Number: 087-35716-00036 and 087-35769-00036

Enclosure

PN Newspaper.dot 6/13/2013



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Governor

Thomas W. Easterly
Commissioner

May 26, 2015

To: Topeka Branch Library

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: Four Woods Laminating, Inc.
Permit Number: 087-35716-00036 and 087-35769-00036

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

May 26, 2015

Four Woods Laminating, Inc.

087-35716-00036 and 087-35769-00036

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



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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD DRAFT INDIANA AIR PERMIT

May 26, 2015

A 30-day public comment period has been initiated for:

Permit Number: 087-35716-00036 and 087-35769-00036

Applicant Name: Four Woods Laminating, Inc.

Location: Topeka, LaGrange County, Indiana

The public notice, draft permit and technical support documents can be accessed via the **IDEM Air Permits Online** site at:

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


Questions or comments on this draft permit should be directed to the person identified in the public notice by telephone or in writing to:

Indiana Department of Environmental Management
Office of Air Quality, Permits Branch
100 North Senate Avenue
Indianapolis, IN 46204

Questions or comments regarding this email notification or access to this information from the EPA Internet site can be directed to Chris Hammack at chammack@idem.IN.gov or (317) 233-2414.

Affected States Notification.dot 3/13/2013

Mail Code 61-53

IDEM Staff	VHAUN 5/26/2015 Four Woods Laminating, Inc. 087-35716 and 35769-00036 DRAFT			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	Handling 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		Maynard Yoder Four Woods Laminating, Inc. 7550 W 500 S Topeka IN 46571 (Source CAATS)									
2		Mr. Steve Christman NISWMD 2320 W 800 S, P.O. Box 370 Ashley IN 46705 (Affected Party)									
3		Topeka Town Council P.O. Box 127 Topeka IN 46571 (Local Official)									
4		LaGrange County Health Dept. 304 B Townline Road Lagrange IN 46761 (Health Department)									
5		LaGrange County Commissioners 114 W. Michigan St. LaGrange IN 46761 (Local Official)									
6		LaGrange County Public Library - Topeka Branch 105 South Main St. Topeka IN 46571 (Library)									
7		Polly Mishler D & B Environmental Services, Inc. 401 Lincoln Way West Osceola IN 46561 (Consultant)									
8											
9											
10											
11											
12											
13											
14											
15											

Total number of pieces Listed by Sender 7	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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