



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Governor

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NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

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

for MasterBrand Cabinets, Inc. in Dubois County

Significant Source Modification No.: 037-35863-00051

Significant Permit Modification No.: 037-35873-00051

The Indiana Department of Environmental Management (IDEM) has received an application from MasterBrand Cabinets, Inc., located at 614 W 3rd Street, Ferdinand, Indiana 47532, for a significant modification of its Part 70 Operating Permit issued on February 25, 2015. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow MasterBrand Cabinets, Inc. to make certain changes at its existing source. MasterBrand Cabinets, Inc. has applied to construct and operate an off-line parts booth.

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:

Ferdinand Public Library
112 E. 16th St.
Ferdinand, IN 47532

and

IDEM Southwest Regional Office
1120 N. Vincennes Avenue
P.O. Box 128
Petersburg, IN 47567-0128

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,



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you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SSM 037-35863-00051 and SPM 037-35873-00051 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 Regional Office indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

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



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



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Ms. Sally Gaines
MasterBrand Cabinets, Inc.
614 West Third St.
Ferdinand, IN 47532

Re: 037-35873-00051
Significant Permit Modification to
Part 70 Renewal No.: T037-33447-00051

Dear Ms. Gaines:

MasterBrand Cabinets, Inc. was issued Part 70 Operating Permit Renewal No. T037-33447-00051 on February 25, 2015 for a stationary wood kitchen, bath, and entertainment center cabinet manufacturing plant located at 614 W 3rd Street, Ferdinand, Indiana 47532. An application requesting changes to this permit was received on May 26, 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. Since this attachment has been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of this attachment with this modification:

Attachment A: 40 CFR 63, Subpart JJ, NESHAPs for Wood Furniture Manufacturing Operations

Previously issued approvals for this source containing this attachment 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.

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

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



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Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**MasterBrand Cabinets, Inc.
614 W 3rd Street
Ferdinand, Indiana 47532**

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

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

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

Operation Permit No. T037-33447-00051	
Issued by:	Issuance Date: February 25, 2015
Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Expiration Date: February 25, 2020

Significant Permit Modification No.: 037-35873-00051	
Issued by:	Issuance Date:
Nathan Bell, Section Chief Permits Branch Office of Air Quality	Expiration Date: February 25, 2020

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Attachment A: 40 CFR 63, Subpart JJ

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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 kitchen, bath, and entertainment center cabinet manufacturing plant.

Source Address:	614 W 3rd Street, Ferdinand, Indiana 47532
General Source Phone Number:	812-367-3348
SIC Code:	2434
County Location:	Dubois
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program
	Major Source, under PSD Rules
	Minor Source, under Emission Offset Rules
	Major 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) conventional surface coating line, constructed in 1973. Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components. The conventional surface coating line is comprised of the following surface coating facilities:
 - (1) One (1) toner booth, identified as CLB-1, with a maximum capacity of 225 units per hour, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, with particulate emissions controlled by a dry filter, and exhausting through stack CLS-1;
 - (2) One (1) stain booth, identified as CLB-2, with a maximum capacity of 225 units per hour, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, with particulate emissions controlled by a dry filter, and exhausting through stack CLS-2;
 - (3) One (1) sealer booth, identified as CLB-3, with a maximum capacity of 225 units per hour, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, with particulate emissions controlled by a dry filter, and exhausting through stacks CLS-3 and CLS-4;
 - (4) One (1) top coat booth, identified as CLB-4, with a maximum capacity of 225 units per hour, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, with particulate emissions controlled by a dry filter, and exhausting through stacks CLS-5 and CLS-6;

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- (5) One (1) parts booth, identified as CLB-5, with a maximum capacity of 225 units per hour, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, with particulate emissions controlled by a dry filter, and exhausting through stacks CLS-7 and CLS-8;
 - (6) One (1) parts booth, identified as CLB-6, with a maximum capacity of 225 units per hour, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, with particulate emissions controlled by a dry filter, and exhausting through stack CLS-9; and
 - (7) One (1) natural gas-fired oven identified as OV-1, constructed in 1973, with a maximum heat input capacity of 1 MMBtu per hour, and exhausting to stack OVS-1.
- (b) One (1) finishing line, identified as Line A, constructed in 2008. Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components. The Line A finishing line consists of the following facilities:
- (1) Two (2) toner spray booths, identified as LAB-1 and LAB-2, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOS-1.
 - (2) Two (2) stain spray booths, identified as LAB-3 and LAB-4, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOS-1.
 - (3) Two (2) sealer booths, identified as LAB-5 and LAB-6, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, using UV curable coatings and dry filters for particulate control, and exhausting through stacks LAS-5 and LAS-6, respectively.
 - (4) Two (2) topcoat booths, identified as LAB-7 and LAB-8, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, using UV curable coatings and dry filters for particulate control, and exhausting through stacks LAS-7 and LAS-8, respectively.
 - (5) Two (2) sanding operations (associated with Line A) , controlled by a cartridge filter type dust collector DC-1, and exhausting 22,500 cubic feet per minute through stack DCS-1A and 22,500 cubic feet per minute through stack DCS-1B.
- (c) One (1) finishing line, identified as Line B, constructed in 2008. Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components. The Line B finishing line consists of the following facilities:
- (1) One (1) color match spray booth, identified as LBB-1, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOS-1.
 - (2) One (1) toner spray booth, identified as LBB-2, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOS-1.

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- (3) Two (2) sealer spray booths, identified as LBB-3 and LBB-4, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOS-1.
- (4) Two (2) sealer booths, identified as LBB-5 and LBB-6, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, using UV curable coatings and dry filters for particulate control, and exhausting through stacks LBS-5 and LBS-6, respectively.
- (5) Two (2) topcoat booths, identified as LBB-7 and LBB-8, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, using UV curable coatings and dry filters for particulate control, and exhausting through stacks LBS-7 and LBS-8, respectively.
- (6) Two (2) sanding operations (associated with Line B), controlled by a cartridge filter type dust collector DC-1, and exhausting 22,500 cubic feet per minute through stack DCS-1A and 22,500 cubic feet per minute through stack DCS-1B.
- (d) Woodworking equipment controlled by baghouses, including:
 - (1) One (1) woodworking cell, identified as WW-1, constructed in 1968, controlled by a 61,000 cubic feet per minute baghouse, identified as BH-1, and exhausting either internally or to stack BHS-1;
 - (2) One (1) woodworking cell, identified as WW-2, constructed in 1998, controlled by a 61,000 cubic feet per minute baghouse, identified as BH-2, and exhausting either internally or to stack BHS-2;
 - (3) One (1) woodworking cell, identified as WW-3, constructed in 1968, controlled by a 35,000 cubic feet per minute baghouse, identified as BH-3, and exhausting either internally or to stack BHS-3.
 - (4) One (1) woodworking cell, identified as WW-4, constructed in 1997, controlled by a 61,000 cubic feet per minute baghouse, identified as BH-4, and exhausting either internally or to stack BHS-4;
 - (5) One (1) woodworking cell, identified as WW-5, constructed in 1986, controlled by a 61,000 cubic feet per minute baghouse, identified as BH-5, and exhausting either internally or to stack BHS-5;
 - (6) One (1) woodworking cell, identified as WW-6, constructed in 1986, controlled by a 48,000 cubic feet per minute baghouse, identified as BH-6, and exhausting either internally or to stack BHS-6.
 - (7) One (1) woodworking cell, identified as WW-7, to be constructed in 2005, controlled by a 61,000 cubic feet per minute baghouse, identified as BH-7, and exhausting either internally or to stack BHS-7.
 - (8) One (1) woodworking cell, identified as WW-8, constructed in 2011, controlled by one (1) 35,000 cubic feet per minute baghouse, identified as BH-8, and exhausting either internally or to stack BHS-8.
 - (9) One (1) woodworking cell, identified as POD-4, approved in 2015 for construction, controlled by one (1) 61,000 cubic feet per minute baghouse, identified as BH-9, and exhausting either internally or to stack BHS-9.

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- (e) One (1) off-line parts booth with an electric convection oven, approved in 2015 for construction, identified as OLB-1, with a maximum capacity of 100 units per hour, using dry filters as control, utilizing high volume low pressure (HVLP) and air assisted airless applicators, and exhausting to stack OLS-1.

The booth is part of an existing affected source under the provisions of 40 CFR 63, Subpart JJ.

A.3 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, as defined in 326 IAC 2-7-1(21):

- (a) The following equipment related to maintenance activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6.5]
- (b) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (c) Emission units with PM and PM₁₀ emissions less than five (5) tons per year, SO₂, NO_x, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and a half (2.5) tons per year:

- (1) One (1) natural gas-fired oven, identified as OV-2, with a maximum heat input capacity of 1 MMBtu per hour, and exhausting at stack OVS-2. [326 IAC 6.5]

- (d) One (1) manual spray booth, identified as STB-19 constructed in 2003, with a maximum capacity of 220 units per hour, utilizing high volume low pressure (HVLP) spray guns, with particulate emissions controlled by a dry filter, and exhausting through stack STS-5.

This unit is an affected source under 40 CFR 63 Subpart JJ.

- (e) One (1) automated spray booth, identified as STB-20, constructed in 2011, with a maximum capacity of 378 units per hour, utilizing high volume low pressure (HVLP) spray guns, with particulate emissions controlled by a dry filter, and exhausting through stack STS-6.

This unit is an affected source under 40 CFR 63 Subpart JJ.

- (f) One (1) Regenerative thermal oxidizer utilized for VOC control, constructed in 2008, with a maximum heat input capacity of 8.576 MMBtu/hr and a maximum flow rate of 30,000 acfm.
 - (g) One (1) end coat booth, identified as UVPB-1, constructed in 1994, utilizing high volume low pressure (HVLP) spray guns, with particulate emissions controlled by a dry filter, and exhausting through stack UVPS-1.

This unit is an affected source under 40 CFR 63 Subpart JJ.

- (h) One (1) UV Stickline, identified as UVC-2, constructed in 1994, utilizing roll coating application, and exhausting internally.

This unit is an affected source under 40 CFR 63 Subpart JJ.

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- (i) One (1) UV Flatline, identified as UVC-3, constructed in 1994, utilizing roll coating application, and exhausting internally.

This unit is an affected source under 40 CFR 63 Subpart JJ.

- (j) One (1) UV Stickline, identified as UVC-4, constructed in 1999, utilizing roll coating application, and exhausting internally.

This unit is an affected source under 40 CFR 63 Subpart JJ.

- (k) One (1) UV-cured mist coater booth, identified as UVMC-1, constructed in 2010, with a maximum capacity of 378 wood moldings per hour, and exhausting to stack UVS-1.

This unit is an affected source under 40 CFR 63 Subpart JJ.

- (l) One (1) UV oven, identified as OV-41, approved in 2015 for construction, equipped in conjunction with UV Flatline UVC-3.

- (m) Two (2) halogen ovens, identified as Line A Stain Oven and Line B Stain Oven.

- (n) One (1) infrared oven on the conventional line, identified as DriQuick Infrared Oven.

- (o) One (1) UV oven, identified as Moulding Cell UV Oven.

- (p) One (1) electric oven, identified as Moulding Cell Electric Oven.

LINE A Associated Insignificant Activities

- (q) One (1) halogen oven, identified as OV-3, equipped in conjunction with Line A, controlled by the existing RTO, and exhausting through stack RTOS-1.

- (r) Four (4) UV ovens, identified as OV-5, OV-7, OV-9, and OV-12, equipped in conjunction with Line A.

- (s) One (1) halogen oven, identified as OV-11, equipped in conjunction with Line A.

- (t) One (1) infrared oven, identified as OV-14, equipped in conjunction with Line A.

- (u) One (1) UV oven, identified as OV-40, constructed in 2012, equipped in conjunction with Finishing Line A.

LINE B Associated Insignificant Activities

- (v) One (1) halogen oven, identified as OV-13, equipped in conjunction with Line B, controlled by the existing RTO, and exhausting through stack RTOS-1.

- (w) Four (4) UV ovens, identified as OV-15, OV-17, OV-19, and OV-22, equipped in conjunction with Line B.

- (x) One (1) halogen oven, identified as OV-21 ("Flash Tunnel"), equipped in conjunction with Line B.

For each UV, halogen, electric, and infrared oven listed in units (l) through (x), any potential emissions of VOC and/or HAP from the drying of surface coatings in the oven are accounted for at the associated surface coating booth/line for that oven.

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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, T037-33447-00051, 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
 - (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.

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

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

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

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

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

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

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

The Permittee shall implement the PMPs.

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

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- (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 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

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

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

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

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

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

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

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

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

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

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to

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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 T037-33447-00051 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

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

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

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

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

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

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

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (c) without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

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

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

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

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

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

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

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

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to

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assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

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

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

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

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

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

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

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

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

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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.

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SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 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 thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.2 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.3 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.4 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.5 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.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

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- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

C.7 Performance Testing [326 IAC 3-6]

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

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

C.11 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

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

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

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

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C.13 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 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.

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- (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 improvement plan required pursuant to paragraph (II)(a)(2) of this condition and any activities undertaken to implement a quality

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

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

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

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

C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

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

The statement must be submitted to:

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

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

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C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

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

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

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

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

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

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

C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]
[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.

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

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

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

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SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) conventional surface coating line, constructed in 1973. Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components. The conventional surface coating line is comprised of the following surface coating facilities:
 - (1) One (1) toner booth, identified as CLB-1, with a maximum capacity of 225 units per hour, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, with particulate emissions controlled by a dry filter, and exhausting through stack CLS-1;
 - (2) One (1) stain booth, identified as CLB-2, with a maximum capacity of 225 units per hour, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, with particulate emissions controlled by a dry filter, and exhausting through stack CLS-2;
 - (3) One (1) sealer booth, identified as CLB-3, with a maximum capacity of 225 units per hour, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, with particulate emissions controlled by a dry filter, and exhausting through stacks CLS-3 and CLS-4;
 - (4) One (1) top coat booth, identified as CLB-4, with a maximum capacity of 225 units per hour, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, with particulate emissions controlled by a dry filter, and exhausting through stacks CLS-5 and CLS-6;
 - (5) One (1) parts booth, identified as CLB-5, with a maximum capacity of 225 units per hour, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, with particulate emissions controlled by a dry filter, and exhausting through stacks CLS-7 and CLS-8;
 - (6) One (1) parts booth, identified as CLB-6, with a maximum capacity of 225 units per hour, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, with particulate emissions controlled by a dry filter, and exhausting through stack CLS-9; and
- (b) One (1) finishing line, identified as Line A, constructed in 2008. Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components. The Line A finishing line consists of the following facilities:
 - (1) Two (2) toner spray booths, identified as LAB-1 and LAB-2, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOS-1.
 - (2) Two (2) stain spray booths, identified as LAB-3 and LAB-4, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOS-1.

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- (3) Two (2) sealer booths, identified as LAB-5 and LAB-6, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, using UV curable coatings and dry filters for particulate control, and exhausting through stacks LAS-5 and LAS-6, respectively.
- (4) Two (2) topcoat booths, identified as LAB-7 and LAB-8, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, using UV curable coatings and dry filters for particulate control, and exhausting through stacks LAS-7 and LAS-8, respectively.
- (c) One (1) finishing line, identified as Line B, constructed in 2008. Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components. The Line B finishing line consists of the following facilities:
 - (1) One (1) color match spray booth, identified as LBB-1, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOS-1.
 - (2) One (1) toner spray booth, identified as LBB-2, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOS-1.
 - (3) Two (2) sealer spray booths, identified as LBB-3 and LBB-4, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOS-1.
 - (4) Two (2) sealer booths, identified as LBB-5 and LBB-6, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, using UV curable coatings and dry filters for particulate control, and exhausting through stacks LBS-5 and LBS-6, respectively.
 - (5) Two (2) topcoat booths, identified as LBB-7 and LBB-8, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, using UV curable coatings and dry filters for particulate control, and exhausting through stacks LBS-7 and LBS-8, respectively.
- (e) One (1) off-line parts booth with an electric convection oven, approved in 2015 for construction, identified as OLB-1, with a maximum capacity of 100 units per hour, using dry filters as control, utilizing high volume low pressure (HVLP) and air assisted airless applicators, and exhausting to stack OLS-1.

The booth is part of an existing affected source under the provisions of 40 CFR 63, Subpart JJ.

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- (d) One (1) manual spray booth, identified as STB-19 constructed in 2003, with a maximum capacity of 220 units per hour, utilizing high volume low pressure (HVLP) spray guns, with particulate emissions controlled by a dry filter, and exhausting through stack STS-5.

This unit is an affected source under 40 CFR 63 Subpart JJ.

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- (e) One (1) automated spray booth, identified as STB-20, approved in 2010 for construction, with a maximum capacity of 378 units per hour, utilizing high volume low pressure (HVLP) spray guns, with particulate emissions controlled by a dry filter, and exhausting through stack STS-6.

This unit is an affected source under 40 CFR 63 Subpart JJ.

- (f) One (1) Regenerative thermal oxidizer utilized for VOC control, constructed in 2008, with a maximum heat input capacity of 8.576 MMBtu/hr and a maximum flow rate of 30,000 acfm.

- (g) One (1) end coat booth, identified as UVPB-1, constructed in 1994, utilizing high volume low pressure (HVLP) spray guns, with particulate emissions controlled by a dry filter, and exhausting through stack UVPS-1.

This unit is an affected source under 40 CFR 63 Subpart JJ.

- (h) One (1) UV Stickline, identified as UVC-2, constructed in 1994, utilizing roll coating application, and exhausting internally.

This unit is an affected source under 40 CFR 63 Subpart JJ.

- (i) One (1) UV Flatline, identified as UVC-3, constructed in 1994, utilizing roll coating application, and exhausting internally.

This unit is an affected source under 40 CFR 63 Subpart JJ.

- (j) One (1) UV Stickline, identified as UVC-4, constructed in 1999, utilizing roll coating application, and exhausting internally.

This unit is an affected source under 40 CFR 63 Subpart JJ.

- (k) One (1) UV-cured mist coater booth, identified as UVMC-1, constructed in 2010, with a maximum capacity of 378 wood moldings per hour, and exhausting to stack UVS-1.

This unit is an affected source under 40 CFR 63 Subpart JJ.

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

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

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

- (a) Pursuant to Significant Source Modification No. 037-20223-00051 (issued August 26, 2005) and Significant Permit Modification No. 037-20407-00051 (issued September 15, 2005) the VOC and particulate matter emissions from the two (2) finishing lines (Lines A and B) have been limited in order to render the requirements of 326 IAC 2-2 (PSD) not applicable. In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the Permittee shall comply with the following:

- (1) The input of VOC to Line A (LAB-1 through LAB-8) and Line B (LBB-1 through LBB- 8) shall be limited such that the VOC emissions shall be less than three hundred thirty-one (331) tons per twelve (12) consecutive month period with compliance determined at the end of each month. When using the RTO to comply with this limitation, the following formula shall be used to determine compliance:

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$$i \text{ (VOC Emissions (tons/month))} = [(1 - (\text{DRE} \times \text{Ecap})) X] + Y$$

Where: i = VOC emissions for month in tons per month.

Ecap = Averaged Capture Efficiency for Spray Booths LAB-1 through LAB-4 and LBB-1 through LBB-4, which will be determined by Condition D.1.6.

DRE = Averaged Destruction Removal Efficiency for Spray Booth LAB1 through LAB-4 and LBB-1 through LBB-4, which will be determined by Condition D.1.6.

X = Total monthly VOC Input to Spray Booths LAB-1 through LAB-4 and LBB-1 through LBB-4.

Y = Total monthly VOC Input to Spray Booths LAB-5 through LAB-8 and LBB-5 through LBB-8.

- (2) The PM/PM₁₀ emissions from Line A (LAB-1 through LAB-8) and Line B (LBB-1 through LBB-8) shall not exceed 2.43 tons/yr. The Permittee will show compliance with this limit by using dry filters for each booth and vent the emissions from booths LAB-1 through LAB-4 and LBB-1 through LBB-4 to the existing RTO. The cartridge/dry filters, shall be in operation at all times when these emission units are in operation.

Compliance with the above limits shall ensure that the emissions increase from the modification permitted in Significant Source Modification No. 037-20223-00051 (issued August 26, 2005) and Significant Permit Modification No. 037-20407-00051 (issued September 15, 2005), is less than forty (40) tons per year of VOC, twenty-five (25) tons per year of PM, and fifteen (15) tons per year of PM₁₀, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

- (b) Pursuant to Significant Source Modification No. 037-35863-00051 and Significant Permit Modification No. 037-35873-00051 and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the VOC input to the booth (OLB-1), including coatings, dilution solvents, and cleaning solvents, shall not exceed 39 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with the above limit shall limit VOC emissions from the modification permitted in Significant Source Modification No. 037-35863-00051 and Significant Permit Modification No. 037-35873-00051 to less than forty (40) tons per twelve (12) month consecutive period, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.2 Particulate Matter (PM) Limitations [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(h), the one (1) conventional surface coating line, two (2) finishing lines (Lines A and B), one (1) automated spray booth (STB-20), one (1) UV-cured mist coater booth (UVMC-1), and one (1) off-line parts booth (OLB-1) shall be controlled by a dry particulate filter, water wash, or an equivalent control device and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), when applying surface coatings to wood furniture and cabinets in the two (2) finishing lines (Lines A and B), one (1) automated spray booth (STB-20), one (1) end coating booth (UVPB-1), two (2) UV sticklines (UVC-2 and UVC-4), one (1) UV flatline (UVC-3), and one (1) off-line parts booth (OLB-1), the Permittee shall apply all coating material, with the exception of no more than ten (10) gallons of

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coating per day used for touch-up and repair operations, using one (1) or more of the following application methods:

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

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

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B – Preventive Maintenance Plan contains the Permittee's obligation with regard to the plans required by this condition.

Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC input limitation contained in Conditions D.1.1(a) and (b) 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.1.6 Testing Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]

(a) In order to demonstrate compliance with Condition D.1.1(a), the Permittee shall perform VOC destruction efficiency testing for the existing RTO not later than five (5) years from the date of this the most recent valid compliance demonstration, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

(b) In order to demonstrate compliance with Condition D.1.1(a), the Permittee shall perform VOC capture efficiency testing for spray booths LAB-1 through LAB-4, not later than five (5) years from the date of this the most recent valid compliance demonstration, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

After a valid compliance test required under Condition D.1.6(c) has been performed, testing required under Condition D.1.6(b) is no longer required.

(c) In order to demonstrate compliance with Condition D.1.1(a), the Permittee shall perform VOC capture efficiency testing for spray booths LAB-1 through LAB-4 and LBB-1 through LBB-4, not later than 180 days after initial startup of Line B, utilizing methods as

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approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

D.1.7 VOC Control

- (a) In order to comply with Condition D.1.1(a), the existing thermal oxidizer shall be in operation and control emissions from the spray booths LAB-1 through LAB-4 and LBB-1 through LBB-4 at all times that the source is using the RTO to comply with the VOC emission limitation established in D.1.1(a).
- (b) When using the RTO to comply with Condition D.1.1(a), the emissions from spray booths LAB-1 through LAB-4 and LBB-1 through LBB-4 shall be controlled by a RTO with a destruction efficiency determined by Condition D.1.6.

D.1.8 Particulate Matter

In order to comply with Condition D.1.1 and D.1.2, the dry filters shall be operating at all times when the one (1) conventional surface coating line, two (2) finishing lines (Lines A and B), one (1) automated spray booth (STB-20), one (1) UV-cured mist coater booth (UVMC-1), and one (1) off-line parts booth (OLB-1) are in operation.

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

D.1.9 Regenerative Thermal Oxidizer (RTO) Temperature [40 CFR 64.2 (CAM)]

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer (RTO) for measuring operating temperature. For the purpose of this condition, continuous means no less than once per minute. The output of this system shall be recorded as a 3-hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature of 1,400°F.
- (b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Condition D.1.1(a), as approved by IDEM.
- (c) On and after the date the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature as observed during the compliant stack test. When, for any one reading, the 3-hour average temperature falls below the temperature listed above or the average temperature established during the latest stack test, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A 3-hour temperature that falls below the above mentioned temperature is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

D.1.10 Parametric Monitoring [40 CFR 64.2 (CAM)]

- (a) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with limits in Condition D.1.1(a), as approved by IDEM.
- (b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.

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D.1.11 Dry Filter Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry particulate filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (CLS-1 through CLS-9, RTOS-1, LAS-5 through LAS-8, LBS-5 through LBS-8, STS-6, and UVS-1) while the one (1) conventional surface coating line, two (2) finishing lines (Lines A and B), one (1) automated spray booth (STB-20), one (1) UV-cured mist coater booth (UVMC-1), and one (1) off-line parts booth (OLB-1) are in operation. 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, weather permitting. If a noticeable change in overspray emission, or evidence of overspray emission is observed at any stack exhaust, 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.

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

D.1.12 Record Keeping Requirement

- (a) To document the compliance status with Conditions D.1.1(a) and (b), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limitations established Condition D.1.1(a) and (b):
 - (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The total VOC input and VOC emissions for spray booths LAB-1 through LAB-4 and LBB-1 through LBB-4 for each month and each compliance period.
 - (4) The total VOC input and VOC emissions for spray booths LAB-5 through LAB-8 and LBB-5 through LBB-8 for each month and each compliance period.
 - (5) The total VOC input for off-line parts booth (OLB-1) for each month and each compliance period.
- (b) To document the compliance status with Condition D.1.9, the Permittee shall maintain continuous temperature records for the thermal oxidizer and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.
- (c) To document the compliance status with Condition D.1.10, the Permittee shall maintain daily records of the duct pressure or fan amperage for the thermal oxidizer.
- (d) To document compliance with Condition D.1.11, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.

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

D.1.13 Reporting Requirements

Quarterly reports of VOC emissions to document the compliance status with Conditions D.1.1(a) and (b) 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 326 IAC 2-7-1(35).

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SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (b) One (1) finishing line, identified as Line A, approved for construction in 2005 and completed in 2008. Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components. The Line A finishing line consists of the following facilities:
 - (5) Two (2) sanding operations (associated with Line A) , controlled by a cartridge filter type dust collector DC-1, and exhausting 22,500 cubic feet per minute through stack DCS-1A and 22,500 cubic feet per minute through stack DCS-1B.
- (c) One (1) finishing line, identified as Line B, approved for construction in 2005. Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components. The Line B finishing line consists of the following facilities:
 - (6) Two (2) sanding operations (associated with Line B), controlled by a cartridge filter type dust collector DC-1, and exhausting 22,500 cubic feet per minute through stack DCS-1A and 22,500 cubic feet per minute through stack DCS-1B.
- (d) Woodworking equipment controlled by baghouses, including:
 - (1) One (1) woodworking cell, identified as WW-1, constructed in 1968, controlled by a 61,000 cubic feet per minute baghouse, identified as BH-1, and exhausting either internally or to stack BHS-1;
 - (2) One (1) woodworking cell, identified as WW-2, constructed in 1998, controlled by a 61,000 cubic feet per minute baghouse, identified as BH-2, and exhausting either internally or to stack BHS-2;
 - (3) One (1) woodworking cell, identified as WW-3, constructed in 1968, controlled by a 35,000 cubic feet per minute baghouse, identified as BH-3, and exhausting either internally or to stack BHS-3.
 - (4) One (1) woodworking cell, identified as WW-4, constructed in 1997, controlled by a 61,000 cubic feet per minute baghouse, identified as BH-4, and exhausting either internally or to stack BHS-4;
 - (5) One (1) woodworking cell, identified as WW-5, constructed in 1986, controlled by a 61,000 cubic feet per minute baghouse, identified as BH-5, and exhausting either internally or to stack BHS-5;
 - (6) One (1) woodworking cell, identified as WW-6, constructed in 1986, controlled by a 48,000 cubic feet per minute baghouse, identified as BH-6, and exhausting either internally or to stack BHS-6.
 - (7) One (1) woodworking cell, identified as WW-7, to be constructed in 2005, controlled by a 61,000 cubic feet per minute baghouse, identified as BH-7, and exhausting either internally or to stack BHS-7.
 - (8) One (1) woodworking cell, identified as WW-8, constructed in 2011, controlled by one (1) 35,000 cubic feet per minute baghouse, identified as BH-8, and exhausting either internally or to stack BHS-8.

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- (9) One (1) woodworking cell, identified as POD-4, approved in 2015 for construction, controlled by one (1) 61,000 cubic feet per minute baghouse, identified as BH-9, and exhausting internally or to stack BHS-9.

(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 PSD Minor Limit [326 IAC 2-2]

Pursuant to Significant Source Modification No. 037-20223-00051 (issued August 26, 2005), Significant Permit Modification No. 037-20407-00051 (issued September 15, 2005), Renewal No. T037-26606-00051 (issued April 23, 2009), and Renewal No. T037-33447-00051, in order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the Permittee shall comply with the following:

The facilities identified as WW-2 WW-4, WW-5, WW-6, WW-7, WW-8, POD-4 and the four (4) sanding operations associated with Lines A and B, shall not exceed the following pound per hour limitations:

Emission Unit	Baghouse ID	PM Emission Limit (lbs/hr)	PM10 Emission Limit (lbs/hr)	PM2.5 Emission Limit (lbs/hr)
WW-2	BH-2	5.68	3.40	-
WW-4	BH-4	5.68	3.40	-
WW-5 and WW-6	BH-5 and BH-6 (combined)	5.68	-	-
WW-7	BH-7	2.60	1.60	-
WW-8	BH-8	5.00	2.80	1.66
POD-4	BH-9	5.70	3.42	2.28
Four (4) sanding operations	DC-1	2.50	1.20	-

Compliance with the above emission limits shall ensure that the emissions increase from the construction and operation of WW-2 in 1998, WW-4 in 1997, and WW-5 and WW-6 in 1986, is less than twenty-five (25) tons per year of PM, and fifteen (15) tons per year of PM10, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

Compliance with the above emission limits shall ensure that the emissions increase from the modification permitted in Significant Source Modification No. 037-20223-00051, issued August 26, 2005, and Significant Permit Modification No. 037-20407-00051, issued September 15, 2005, consisting of the construction and operation of WW-7, is less than twenty-five (25) tons per year of PM, and fifteen (15) tons per year of PM10, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

Compliance with the above emission limits shall ensure that the emissions increase from the modification permitted in Minor Source Modification No. 037-29721-00051, issued November 12, 2010, and Significant Permit Modification No. 037-29730-00051, issued December 29, 2010, is less than twenty-five (25) tons per year of PM, fifteen (15) tons per year of PM10, and ten (10) tons per year of PM2.5, consisting of the construction and operation of WW-8 (combined with the emissions from STB-20 and UVMC-1) and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

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Compliance with the above emission limits shall ensure that the emissions increase from the modification permitted in this Part 70 Permit Renewal No. T037-33447-00051, is less than twenty-five (25) tons per year of PM, fifteen (15) tons per year of PM₁₀, and ten (10) tons per year of PM_{2.5}, consisting of the construction and operation of POD-4, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.2.2 Particulate Matter Emission Limitations [326 IAC 6.5-1]

Pursuant to 326 IAC 6.5-1 (Particulate Matter Limitations Except Lake County), the particulate matter emissions from the woodworking operations (WW-1, WW-2, WW-3, WW-4, WW-5, WW-6, WW-7, WW-8, and POD-4) and the four (4) sanding operations (two (2) associated with Line A and two (2) associated with Line B) shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf) of exhaust air.

D.2.3 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 obligations with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]

D.2.4 Particulate Matter Control (PM and PM₁₀)

In order to comply with Conditions D.2.1, and D.2.2, the baghouses and cartridge/dry filters for PM, PM₁₀, and PM_{2.5} control shall be in operation and control emissions from the woodworking facilities (WW-1, WW-2, WW-3, WW-4, WW-5, WW-6, WW-7, WW-8, and POD-4) and the four (4) sanding operations associated with Lines A and B at all times that the facilities are in operation.

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

D.2.5 Visible Emissions Notations [40 CFR 64.2 (CAM)]

- (a) Visible emission notations of the baghouse stack exhaust from stacks BHS-1 through BHS-9 and stacks DCS-1A and DCS-1B shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response. 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.

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D.2.6 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 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 Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.7 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the baghouse exhausts when venting to the atmosphere. . 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 process did not operate that day or the process was venting indoors).
- (b) 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:

- (a) One (1) conventional surface coating line, constructed in 1973. Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components. The conventional surface coating line is comprised of the following surface coating facilities:
 - (7) One (1) natural gas-fired oven identified as OV-1, constructed in 1973, with a maximum heat input capacity of 1 MMBtu per hour, and exhausting to stack OVS-1.

Insignificant Activities:

- (c) Emission units with PM and PM₁₀ emissions less than five (5) tons per year, SO₂, NO_x, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and a half (2.5) tons per year:
 - (1) One (1) natural gas-fired oven, identified as OV-2, with a maximum heat input capacity of 1 MMBtu per hour, and exhausting at stack OVS-2. [326 IAC 6.5]
- (f) One (1) Regenerative thermal oxidizer utilized for VOC control, constructed in 2008, with a maximum heat input capacity of 8.576 MMBtu/hr and a maximum flow rate of 30,000 acfm.

(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 Matter (PM) Limitations [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations Except Lake County), particulate matter (PM) emissions from each of the natural gas combustion units shall not exceed 0.03 grains per dry standard cubic foot (gr/dscf).

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SECTION E.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) conventional surface coating line, constructed in 1973. Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components. The conventional surface coating line is comprised of the following surface coating facilities:
 - (1) One (1) toner booth, identified as CLB-1, with a maximum capacity of 225 units per hour, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, with particulate emissions controlled by a dry filter, and exhausting through stack CLS-1;
 - (2) One (1) stain booth, identified as CLB-2, with a maximum capacity of 225 units per hour, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, with particulate emissions controlled by a dry filter, and exhausting through stack CLS-2;
 - (3) One (1) sealer booth, identified as CLB-3, with a maximum capacity of 225 units per hour, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, with particulate emissions controlled by a dry filter, and exhausting through stacks CLS-3 and CLS-4;
 - (4) One (1) top coat booth, identified as CLB-4, with a maximum capacity of 225 units per hour, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, with particulate emissions controlled by a dry filter, and exhausting through stacks CLS-5 and CLS-6;
 - (5) One (1) parts booth, identified as CLB-5, with a maximum capacity of 225 units per hour, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, with particulate emissions controlled by a dry filter, and exhausting through stacks CLS-7 and CLS-8;
 - (6) One (1) parts booth, identified as CLB-6, with a maximum capacity of 225 units per hour, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, with particulate emissions controlled by a dry filter, and exhausting through stack CLS-9; and
- (b) One (1) finishing line, identified as Line A, constructed in 2008. Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components. The Line A finishing line consists of the following facilities:
 - (1) Two (2) toner spray booths, identified as LAB-1 and LAB-2, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOS-1.
 - (2) Two (2) stain spray booths, identified as LAB-3 and LAB-4, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOS-1.

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- (3) Two (2) sealer booths, identified as LAB-5 and LAB-6, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, using UV curable coatings and dry filters for particulate control, and exhausting through stacks LAS-5 and LAS-6, respectively.
- (4) Two (2) topcoat booths, identified as LAB-7 and LAB-8, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, using UV curable coatings and dry filters for particulate control, and exhausting through stacks LAS-7 and LAS-8, respectively.
- (c) One (1) finishing line, identified as Line B, constructed in 2008. Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components. The Line B finishing line consists of the following facilities:
 - (1) One (1) color match spray booth, identified as LBB-1, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOS-1.
 - (2) One (1) toner spray booth, identified as LBB-2, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOS-1.
 - (3) Two (2) sealer spray booths, identified as LBB-3 and LBB-4, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOS-1.
 - (4) Two (2) sealer booths, identified as LBB-5 and LBB-6, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, using UV curable coatings and dry filters for particulate control, and exhausting through stacks LBS-5 and LBS-6, respectively.
 - (5) Two (2) topcoat booths, identified as LBB-7 and LBB-8, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, using UV curable coatings and dry filters for particulate control, and exhausting through stacks LBS-7 and LBS-8, respectively.
- (e) One (1) off-line parts booth with an electric convection oven, approved in 2015 for construction, identified as OLB-1, with a maximum capacity of 100 units per hour, using dry filters as control, utilizing high volume low pressure (HVLP) and air assisted airless applicators, and exhausting to stack OLS-1.

The booth is part of an existing affected source under the provisions of 40 CFR 63, Subpart JJ.

Insignificant Activities:

- (d) One (1) manual spray booth, identified as STB-19 constructed in 2003, with a maximum capacity of 220 units per hour, utilizing high volume low pressure (HVLP) spray guns, with particulate emissions controlled by a dry filter, and exhausting through stack STS-5.

This unit is an affected source under 40 CFR 63 Subpart JJ.

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- (e) One (1) automated spray booth, identified as STB-20, approved in 2010 for construction, with a maximum capacity of 378 units per hour, utilizing high volume low pressure (HVLP) spray guns, with particulate emissions controlled by a dry filter, and exhausting through stack STS-6.

This unit is an affected source under 40 CFR 63 Subpart JJ.

- (g) One (1) end coat booth, identified as UVPB-1, constructed in 1994, utilizing high volume low pressure (HVLP) spray guns, with particulate emissions controlled by a dry filter, and exhausting through stack UVPS-1.

This unit is an affected source under 40 CFR 63 Subpart JJ.

- (h) One (1) UV Stickline, identified as UVC-2, constructed in 1994, utilizing roll coating application, and exhausting internally.

This unit is an affected source under 40 CFR 63 Subpart JJ.

- (i) One (1) UV Flatline, identified as UVC-3, constructed in 1994, utilizing roll coating application, and exhausting internally.

This unit is an affected source under 40 CFR 63 Subpart JJ.

- (j) One (1) UV Stickline, identified as UVC-4, constructed in 1999, utilizing roll coating application, and exhausting internally.

This unit is an affected source under 40 CFR 63 Subpart JJ.

- (k) One (1) UV-cured mist coater booth, identified as UVMC-1, constructed in 2010, with a maximum capacity of 378 wood moldings per hour, and exhausting to stack UVS-1.

This unit is an affected source under 40 CFR 63 Subpart JJ.

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

National Emissions Standards for Hazardous Air Pollutants (NESHAP) Requirements:

E.1.1 General Provisions Relating to National Emissions Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR 63.800, 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, unless otherwise specified in 40 CFR 63, Subpart JJ (National Emission Standards for Wood Furniture Manufacturing Operations), for the conventional line surface coating operation, the two (2) finishing lines (Lines A and B), the one manual spray booth (STB-19), the one (1) automated spray booth (STB-20), the one (1) end coat booth (UVPB-1), UV Sticklines (UVC-4 and UVC-2), UV Flatline (UVC-3), the one (1) UV cured mist coater (UVMC-1), and one (1) off-line parts booth (OLB-1).
- (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

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E.1.2 National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations [40 CFR 63, Subpart JJ] [326 IAC 20-14]

Pursuant to 40 CFR Part 63, Subpart JJ, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart JJ (included as Attachment A to the permit), which are incorporated by reference as 326 IAC 20-14, for the conventional line surface coating operation, the two (2) finishing lines (Lines A and B), the one manual spray booth (STB-19), the one (1) automated spray booth (STB-20), the one (1) end coat booth (UVPB-1), UV Sticklines (UVC-4 and UVC-2), UV Flatline (UVC-3), the one (1) UV cured mist coater (UVMC-1), and one (1) off-line parts booth (OLB-1) and all other activities associated with the wood furniture manufacturing operations as specified in 40 CFR Part 63, Subpart JJ. All of the wood furniture coating operations and emission units listed above must comply with the following provisions of 40 CFR Part 63, Subpart JJ:

- (1) 40 CFR 63.800 (a), (e), (g), (h), (i), and (j)
- (2) 40 CFR 63.801
- (3) 40 CFR 63.802
- (4) 40 CFR 63.803
- (5) 40 CFR 63.804
- (6) 40 CFR 63.805
- (7) 40 CFR 63.806
- (8) 40 CFR 63.807
- (9) 40 CFR 63.808
- (10) Tables 1 through 6

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

Source Name: MasterBrand Cabinets, Inc.
Source Address: 614 W 3rd Street, Ferdinand, Indiana 47532
Part 70 Permit No.: T037-33447-00051

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: MasterBrand Cabinets, Inc.
Source Address: 614 W 3rd Street, Ferdinand, Indiana 47532
Part 70 Permit No.: T037-33447-00051

This form consists of 2 pages

Page 1 of 2

- ☐ This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

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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: MasterBrand Cabinets, Inc.
Source Address: 614 W 3rd Street, Ferdinand, Indiana 47532
Part 70 Permit No.: T037-33447-00051
Facility: Finishing Lines (Lines A and B)
Parameter: VOC Emissions
Limit: The input of VOC to spray booths LAB-1 through LAB-8 and LBB-1 through LBB 8 shall be limited such that the VOC emissions shall be less than three hundred thirty-one (331) tons per twelve (12) consecutive month period with compliance determined at the end of each month. When using the RTO to comply with this limitation, the following formula shall be used to determine compliance:

$$i (\text{VOC Emissions (tons/month)}) = [(1 - (\text{DRE} \times \text{Ecap})) X] + Y$$

Where: i = VOC emissions for month in tons per month.
Ecap = Averaged Capture Efficiency for Spray Booths LAB-1 through LAB-4 and LBB-1 through LBB-4, which will be determined by Condition D.1.6.
DRE = Averaged Destruction Removal Efficiency for Spray Booth LAB1 through LAB-4 and LBB-1 through LBB-4, which will be determined by Condition D.1.6.
X = Total monthly VOC Input to Spray Booths LAB-1 through LAB-4 and LBB-1 through LBB-4.
Y = Total monthly VOC Input to Spray Booths LAB-5 through LAB-8 and LBB-5 through LBB-8.

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: MasterBrand Cabinets, Inc.
Source Address: 614 W 3rd Street, Ferdinand, Indiana 47532
Part 70 Permit No.: T037-33447-00051
Facility: Off-line Parts Booth (OLB-1)
Parameter: VOC Emissions
Limit: The VOC input to the booth (OLB-1) , including coatings, dilution solvents, and cleaning solvents, shall not exceed 39 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 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: MasterBrand Cabinets, Inc.
Source Address: 614 W 3rd Street, Ferdinand, Indiana 47532
Part 70 Permit No.: T037-33447-00051

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:

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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
Modification and Significant Permit Modification**

Source Description and Location

Source Name:	MasterBrand Cabinets, Inc.
Source Location:	614 W 3rd St., Ferdinand, IN 47532
County:	Dubois
SIC Code:	2434 (Wood Kitchen Cabinets)
Operation Permit No.:	T037-33447-00051
Operation Permit Issuance Date:	February 25, 2015
Significant Source Modification No.:	037-35863-00051
Significant Permit Modification No.:	037-35873-00051
Permit Reviewer:	Brian Wright

Existing Approvals

The source was issued Part 70 Operating Permit No. T037-33447-00051 on February 25, 2015. There have been no subsequent approvals issued.

County Attainment Status

The source is located in Dubois 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.

¹Unclassifiable 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. Dubois 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}**
Dubois 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
Dubois 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	75.72
PM ₁₀	70.28
PM _{2.5}	72.32
SO ₂	0.03
NO _x	4.54
VOC	<959.4
CO	3.81
HAPs	
Xylene	103.7
Glycol Ethers	1.86
Hexane	0.08
Total	231.8

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 a major stationary source, under PSD (326 IAC 2-2), because a PSD regulated pollutant, excluding GHGs, is emitted at a rate of 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 TSD Appendix A of permit No. T037-33447-00051.

- (c) This existing source is a major source of HAPs, as defined in 40 CFR 63.2, because HAP emissions are greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major 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 MasterBrand Cabinets, Inc. on May 26, 2015, relating to the construction and operation of an off-line parts booth. The following is a list of the proposed emission unit and pollution control device(s):

- (a) One (1) off-line parts booth with an electric convection oven, approved in 2015 for construction, identified as OLB-1, with a maximum capacity of 100 units per hour, using dry filters as control, utilizing high volume low pressure (HVLP) and air assisted airless applicators, and exhausting to stack OLS-1.

The booth is part of an existing affected source under the provisions of 40 CFR 63, Subpart JJ.

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	8.60
PM ₁₀	8.60
PM _{2.5}	8.60
SO ₂	0
VOC	57.52
CO	0
NO _x	0
Single HAPs	13.30 (xylene)
Total HAPs	16.95

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) and (6) because the potential to emit of VOC is greater than twenty-five (25) tons per year before control and the PTE of a single HAP is greater than ten (10) 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.

Permit Level Determination – PSD

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	PM ₁₀	PM _{2.5} *	SO ₂	NO _x	VOC	CO	GHGs	(Other) (Pb, Be, Hg, etc.)
Off-Line Parts Booth	8.6	8.6	8.6	0	0	39	0	0	0
Total for Modification	8.6	8.6	8.6	0	0	39	0	0	0
PSD Major Source Thresholds	250	250	250	250	250	250	250	---	250
Significant Thresholds	25	15	10	40	40	40	100	75,000 CO ₂ e	--

*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.

Since this source is considered a major PSD source and the unrestricted potential to emit of this modification is greater than forty (40) tons of VOC per year, this source has elected to limit the potential to emit of this modification as follows:

Pursuant to Significant Source Modification No. 037-35863-00051 and Significant Permit Modification No. 037-35873-00051 and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the VOC input to the booth (OLB-1), including coatings, dilution solvents, and cleaning solvents, shall not exceed 39 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with the above limit shall limit VOC emissions from the modification permitted in Significant Source Modification No. 037-35863-00051 and Significant Permit Modification No. 037-35873-00051 to less than forty (40) tons per twelve (12) month consecutive period, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

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 Surface Coating of Metal Furniture, 40 CFR 60, Subpart EE (326 IAC 12), are not included in this modification since the off-line parts booth (OLB-1) does not coat metal furniture.
- (b) There are no New Source Performance Standards (326 IAC 12 and 40 CFR Part 60) included in this modification.

NESHAP:

- (c) The off-line parts booth (OLB-1) is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Wood Furniture Manufacturing Operations, 40 CFR 63, Subpart JJ (326 IAC 20-14), since this unit is engaged in the manufacture of wood furniture and is located at a major source of HAPs. This unit is located at an existing affected facility under NESHAP Subpart JJ.

Nonapplicable portions of the NESHAP will not be included in the permit. The surface coating operations at this source are associated with the manufacture of wood furniture or components and are subject to the following portions of 40 CFR 63, Subpart JJ:

- (1) 40 CFR 63.800 (except (f) and (g))
- (2) 40 CFR 63.801
- (3) 40 CFR 63.802 (except (b))
- (4) 40 CFR 63.803
- (5) 40 CFR 63.804 (except (d) and (e))
- (6) 40 CFR 63.805 (except (d)(7), (d)(9), (e)(4), and (e)(6))
- (7) 40 CFR 63.806
- (8) 40 CFR 63.807
- (9) 40 CFR 63.808
- (10) Table 1
- (11) Table 2
- (12) Table 3
- (13) Table 4
- (14) Table 5
- (15) Table 6
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products, 40 CFR 63, Subpart QQQQ (326 IAC 20-79), are not included in this modification because the off-line parts booth (OLB-1) does not coat wood building products as defined under 40 CFR 63.4781.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Furniture, 40 CFR 63, Subpart RRRR (326 IAC 20-78), are not included in this modification because the off-line parts booth (OLB-1) does not manufacture metal furniture.

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

CAM:

- (g) 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)
Booth OLB-1 - VOC	None	Y	57.52	NA	100	N	N
Spray Booth OLB-1 - PM/PM10/PM2.5	Dry Filters	N	8.60	0.43	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 2-2 (PSD)

PSD applicability is discussed under the Permit Level Determination – PSD section.

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

The operation of the off-line parts booth (OLB-1) will emit greater than ten (10) tons per year for a single HAP. Therefore, 326 IAC 2-4.1 would apply to the unit, however, pursuant to 326 IAC 2-4.1-1(b)(2), because this unit is specifically regulated by NESHAP 40 CFR 63, Subpart JJ, which was issued pursuant to Section 112(d) of the CAA, this unit is exempt from the requirements of 326 2-4.1.

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, 2018, 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 6-3 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(c)(3), this source is exempt from the requirements of 326 IAC 6-3 since it is subject to a more stringent particulate limitation under 326 IAC 6.5.

326 IAC 6.5 (Particulate Emission Limitations Except Lake County)

Pursuant to 326 IAC 6.5-1(a)(2), the off-line parts booth (OLB-1) is subject to the requirements of 326 IAC 6.5-1-2 because the source is located in Dubois county and it has the potential to emit greater than 100 tons per year of particulate matter, but it is not specifically listed in 326 IAC 6.5-2.

Pursuant to 326 IAC 6.5-1-2(h), the particulate emissions from the off-line parts booth (OLB-1) shall be controlled by a dry particulate filter, waterwash, or an equivalent control device and the source shall operate the control device in accordance with manufacturer's specifications.

The dry filters for particulate control shall be in operation at all times that the off-line parts booth (OLB-1) is in operation, in order to comply with this limit.

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

Pursuant to 326 IAC 8-1-6(1)(a), the requirement to reduce VOC emissions using the Best Available Control Technology (BACT) does not apply to the off-line parts booth (OLB-1), because it is subject to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating).

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

This rule applies to facilities located in any county, constructed after July 1, 1990, that perform surface coating of wood furniture (or wood furniture components), including cabinets (kitchen, bath, and vanity), tables, beds, chairs, sofas (nonupholstered), art objects, and any other coated furnishings made of solid wood, wood composition, or simulated wood material and which have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls. The off-line parts booth (OLB-1) is subject to the requirements of 326 IAC 8-2-12, since it will apply coatings to wood furniture (or wood furniture components) and has potential VOC emissions of greater than fifteen (15) pounds of VOC per day.

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), when applying surface coatings to wood furniture and cabinets in the off-line parts booth (OLB-1), the Permittee shall apply all coating material, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) or more of the following application methods:

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

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between

one-tenth (0.1) and ten (10) pound per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

The source utilizes High Volume Low Pressure (HVLP) spray application or Air Assisted Airless Spray application methods for all surface coating operations; therefore, the source is able to comply with 326 IAC 8-2-12.

326 IAC 8-11 (Wood Furniture Coatings)

Pursuant to 326 IAC 8-11(1), the off-line parts booth (OLB-1) is not subject to the requirements of 326 IAC 8-11 since the source is not located in Lake, Porter, Clark, or Floyd Counties.

Compliance Determination and Monitoring Requirements

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

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

The Compliance Determination Requirements applicable to this modification are as follows:

- (a) The compliance determination and monitoring requirements applicable to this proposed revision are as follows:

Emission Unit	Operating Parameters	Frequency	Range
Off-line Parts Booth (OLB-1)	Filter Inspections	Once per day	Normal/Abnormal
	Overspray	Once per week	Normal/Abnormal
	Stack Exhaust Observations	Once per month	Normal/Abnormal

The dry particulate filters for the off-line parts booth must operate properly to ensure compliance with 326 IAC 6.5 (Particulate Emission Limitations Except Lake County) and 326 IAC 2-7 (Part 70).

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T037-33447-00051. 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 proposed unit and to revise the description of several existing units. The descriptive changes will not result in any change to PTE or applicable requirements:

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:

- (c) One (1) finishing line, identified as Line B, constructed in 2008. Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components. The Line B finishing line consists of the following facilities:

- (1) **One (1) color match spray booth, identified as LBB-1, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOS-1.**
- (12) ~~Two (2)~~ **One (1)** toner spray booths, identified as ~~LBB-1 and~~ LBB-2, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOS-1.
- (23) ~~Two (2) stain-sealer~~ spray booths, identified as LBB-3 and LBB-4, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOS-1.
- (34) Two (2) sealer booths, identified as LBB-5 and LBB-6, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, using UV curable coatings and dry filters for particulate control, and exhausting through stacks LBS-5 and LBS-6, respectively.
- (45) Two (2) topcoat booths, identified as LBB-7 and LBB-8, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, using UV curable coatings and dry filters for particulate control, and exhausting through stacks LBS-7 and LBS-8, respectively.
- (56) Two (2) sanding operations (associated with Line B), controlled by a cartridge filter type dust collector DC-1, and exhausting 22,500 cubic feet per minute through stack DCS-1A and 22,500 cubic feet per minute through stack DCS-1B.

- (e) **One (1) off-line parts booth with an electric convection oven, approved in 2015 for construction, identified as OLB-1, with a maximum capacity of 100 units per hour, using dry filters as control, utilizing high volume low pressure (HVLP) and air assisted airless applicators, and exhausting to stack OLS-1.**

The booth is part of an existing affected source under the provisions of 40 CFR 63, Subpart JJ.

Modification No. 2:

Sections D.1 and D.2 have been amended as follows in order to incorporate the new unit and descriptive changes:

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

- (c) One (1) finishing line, identified as Line B, constructed in 2008. Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components. The Line B finishing line consists of the following facilities:
- (1) **One (1) color match spray booth, identified as LBB-1, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOS-1.**
 - (42) ~~Two (2)~~ **One (1) toner spray booths, identified as LBB-1 and LBB-2, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOS-1.**
 - (23) ~~Two (2) stain-sealer~~ spray booths, identified as LBB-3 and LBB-4, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOS-1.
 - (34) Two (2) sealer booths, identified as LBB-5 and LBB-6, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, using UV curable coatings and dry filters for particulate control, and exhausting through stacks LBS-5 and LBS-6, respectively.
 - (45) Two (2) topcoat booths, identified as LBB-7 and LBB-8, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, using UV curable coatings and dry filters for particulate control, and exhausting through stacks LBS-7 and LBS-8, respectively.

- (e) **One (1) off-line parts booth with an electric convection oven, approved in 2015 for construction, identified as OLB-1, with a maximum capacity of 100 units per hour, using dry filters as control, utilizing high volume low pressure (HVLP) and air assisted airless applicators, and exhausting to stack OLS-1.**

The booth is part of an existing affected source under the provisions of 40 CFR 63, Subpart JJ.

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

- (a) Pursuant to Significant Source Modification No. 037-20223-00051 (issued August 26, 2005) and Significant Permit Modification No. 037-20407-00051 (issued September 15, 2005) the VOC and particulate matter emissions from the two (2) finishing lines (Lines A and B) have been limited in order to render the requirements of 326 IAC 2-2 (PSD) not applicable. ~~Pursuant to~~ **In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable**, the Permittee shall comply with the following:

- (b2) The PM/PM10 emissions from Line A (LAB-1 through LAB-8) and Line B (LBB-1 through LBB-8) shall not exceed 2.43 tons/yr. The Permittee will show compliance with this limit by using dry filters for each booth and vent the emissions from booths LAB-1 through LAB-4 and LBB-1 through LBB-4 to the existing RTO. The cartridge/dry filters, shall be in operation at all times when these emission units are in operation.

- (b) Pursuant to Significant Source Modification No. 037-35863-00051 and Significant Permit Modification No. 037-35873-00051 and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the VOC input to the booth (OLB-1) , including coatings, dilution solvents, and cleaning solvents, shall not exceed 39 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with the above limit shall limit VOC emissions from the modification permitted in Significant Source Modification No. 037-35863-00051 and Significant Permit Modification No. 037-35873-00051 to less than forty (40) tons per twelve (12) month consecutive period, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.2 Particulate Matter (PM) Limitations [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(h), the one (1) conventional surface coating line, two (2) finishing lines (Lines A and B), one (1) automated spray booth (STB-20), and one (1) UV-cured mist coater booth (UVMC-1), and one (1) off-line parts booth (OLB-1) shall be controlled by a dry particulate filter, water wash, or an equivalent control device and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

Pursuant to 326 IAC 8-2-12 (**Wood Furniture and Cabinet Coating**), ~~the when applying~~ surface coatings ~~applied to wood furniture and cabinets by in~~ the two (2) finishing lines (Lines A and B), one (1) automated spray booth (STB-20), one (1) end coating booth (UVPB-1), two (2) UV sticklines (UVC-2 and UVC-4), and one (1) UV flatline (UVC-3), and one (1) off-line parts booth (OLB-1), the Permittee shall apply all coating material, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) or more ~~shall utilize one of the following application methods:~~

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC input limitation contained in Conditions D.1.1(a) and (b) 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.1.8 Particulate Matter

In order to comply with Condition D.1.1(b) and D.1.2, the dry filters shall be operating at all times when the one (1) conventional surface coating line, two (2) finishing lines (Lines A and B), one (1) automated spray booth (STB-20), and one (1) UV-cured mist coater booth (UVMC-1), and one (1) off-line parts booth (OLB-1) are in operation.

D.1.11 Dry Filter Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry particulate filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (CLS-1 through CLS-9, RTOS-1, LAS-5 through LAS-8, LBS-5 through LBS-8, STS-6, and

UVS-1) while the one (1) conventional surface coating line, two (2) finishing lines (Lines A and B), one (1) automated spray booth (STB-20), ~~and~~ one (1) UV-cured mist coater booth (UVMC-1), **and one (1) off-line parts booth (OLB-1)** are in operation. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.1.12 Record Keeping Requirement

- (a) To document the compliance status with Conditions D.1.1(a) **and (b)**, the Permittee shall maintain records in accordance with (1) through (65) below. Records maintained for (1) through (65) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limitations established Condition D.1.1(a) **and (b)**:

- (5) The total VOC input for off-line parts booth (OLB-1) for each month and each compliance period.**

D.1.13 Reporting Requirements

~~A quarterly~~ Quarterly reports of VOC emissions to document the compliance status with Conditions D.1.1(a) **and (b)** shall be submitted, using the reporting forms located at the end of this permit, or ~~its~~ **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 ~~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).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

- (c) One (1) finishing line, identified as Line B, approved for construction in 2005. Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components. The Line B finishing line consists of the following facilities:
- (56) Two (2) sanding operations (associated with Line B), controlled by a cartridge filter type dust collector DC-1, and exhausting 22,500 cubic feet per minute through stack DCS-1A and 22,500 cubic feet per minute through stack DCS-1B.

Modification No. 3:

Section E.1 has been modified as follows in order to incorporate the modification and the descriptive changes and update the requirements of 40 CFR 63, Subpart JJ:

SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

- (c) One (1) finishing line, identified as Line B, constructed in 2008. Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components. The Line B finishing line consists of the following facilities:

- (1) **One (1) color match spray booth, identified as LBB-1, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOS-1.**
- (12) ~~Two (2)~~ **One (1) toner spray booths, identified as LBB-1 and LBB-2, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOS-1.**
- (23) ~~Two (2)~~ **stain-sealer spray booths, identified as LBB-3 and LBB-4, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOS-1.**
- (34) ~~Two (2)~~ **sealer booths, identified as LBB-5 and LBB-6, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, using UV curable coatings and dry filters for particulate control, and exhausting through stacks LBS-5 and LBS-6, respectively.**
- (45) ~~Two (2)~~ **topcoat booths, identified as LBB-7 and LBB-8, utilizing high volume low pressure (HVLP) spray guns and air assisted airless spray applicators, using UV curable coatings and dry filters for particulate control, and exhausting through stacks LBS-7 and LBS-8, respectively.**
- *****
- (e) **One (1) off-line parts booth with an electric convection oven, approved in 2015 for construction, identified as OLB-1, with a maximum capacity of 100 units per hour, using dry filters as control, utilizing high volume low pressure (HVLP) and air assisted airless applicators, and exhausting to stack OLS-1.**
- The booth is part of an existing affected source under the provisions of 40 CFR 63, Subpart JJ.**
- *****

National Emissions Standards for Hazardous Air Pollutants (NESHAP) Requirements:

E.1.1 General Provisions Relating to National Emissions Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR 63.800, 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, unless otherwise specified in 40 CFR 63, Subpart JJ (National Emission Standards for Wood Furniture Manufacturing Operations), for the conventional line surface coating operation, the two (2) finishing lines (Lines A and B), the one manual spray booth (STB-19), the one (1) automated spray booth (STB-20), the one (1) end coat booth (UVPB-1), UV Sticklines (UVC-4 and UVC-2), UV Flatline (UVC-3), ~~and~~ the one (1) UV cured mist coater (UVMC-1), **and one (1) off-line parts booth (OLB-1).**
- *****

E.1.2 National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations [40 CFR 63, Subpart JJ] [326 IAC 20-14]

Pursuant to 40 CFR Part 63, Subpart JJ, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart JJ (included as Attachment A to the permit), which are incorporated by reference as 326 IAC 20-14, for the conventional line surface coating operation, the two (2) finishing lines (Lines A and B), the one manual spray booth (STB-19), the one (1) automated spray booth (STB-20), the one (1) end coat booth (UVPB-1), UV Sticklines (UVC-4 and UVC-2), UV Flatline (UVC-3), ~~and~~ the one (1) UV cured mist coater (UVMC-1), **and one (1) off-line parts**

booth (OLB-1) and all other activities associated with the wood furniture manufacturing operations as specified in 40 CFR Part 63, Subpart JJ. All of the wood furniture coating operations and emission units listed above must comply with the following provisions of 40 CFR Part 63, Subpart JJ:

Modification No. 4:

The following reporting form has been added in order to incorporate the new unit:

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

Part 70 Quarterly Report

Source Name: MasterBrand Cabinets, Inc.
Source Address: 614 W 3rd Street, Ferdinand, Indiana 47532
Part 70 Permit No.: T037-33447-00051
Facility: Off-line Parts Booth (OLB-1)
Parameter: VOC Emissions
Limit: The VOC input to the booth (OLB-1) , including coatings, dilution solvents, and cleaning solvents, shall not exceed 39 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: _____

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. 037-35863-00051 and Significant Permit Modification No. 037-35873-00051. 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: Emissions Calculations
Summary Table**

Page 1 of 10 TSD App A

Company Name: MasterBrand Cabinets, Inc.
Source Address: 614 W 3rd St., Ferdinand, IN 47532
SSM and SPM No.: 037-35863-00051 and 037-35873-00051
Reviewer: Brian Wright

Unlimited/Uncontrolled Emissions Before Integral Controls

Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHG as CO2e	Total HAPs	Highest Single HAP		
Conventional Line	52.8	52.8	52.8	-	-	624.7	-	-	179.9	103.7	Xylene	
Finishing Line A	26.3	26.3	26.3	-	-	Greater than 40	-	-	Greater than 25.0	Greater than 10.0	-	
Finishing Line B	26.3	26.3	26.3	-	-	Greater than 40	-	-	Greater than 25.0	Greater than 10.0	-	
Spray Booths (STB-19, STB-20)	2.65	2.65	2.65	-	-	3.03	-	-	1.86	1.86	Glycol Ethers	
End-Coat Booth (UVPB-1)	0.48	0.48	0.48	-	-	0.42	-	-	negl.	negl.	negl.	
UV-Cured Mist Coater (UVMC-1)	0.26	0.26	0.26	-	-	0.002	-	-	negl.	negl.	negl.	
Natural Gas-Fired Combustion	0.09	0.35	0.35	0.03	4.54	0.25	3.81	5,482	0.09	0.08	Hexane	
Woodworking (WW-1 through WW-8, and POD-4)	5,876	5,876	5,876	-	-	-	-	-	-	-	-	
Sanding Operation	730.2	730.2	730.2	-	-	-	-	-	-	-	-	
Off-Line Parts Booth	8.6	8.6	8.6	-	-	57.52	-	-	16.95	13.30	Xylene	
Total	6,724	6,724	6,724	0.03	4.54	Greater than 765.9	3.81	5,482	Greater than 248.8	Greater than 117.0	Xylene	

Limited Emissions (limits to render 326 IAC 2-2 (PSD) not applicable)

Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHG as CO2e	Total HAPs	Highest Single HAP		
Conventional Line	52.8	52.8	52.8	-	-	624.7	-	-	179.9	103.7	Xylene	
Finishing Line A	2.43	2.43	26.3	-	-	Less than 331.0	-	-	Greater than 25.0	Greater than 10.0	-	
Finishing Line B			26.3	-	-		-	-	Greater than 25.0	Greater than 10.0	-	
Spray Booths (STB-19, STB-20)	2.65	2.65	2.65	-	-	3.03	-	-	1.86	1.86	Glycol Ethers	
End-Coat Booth (UVPB-1)	0.48	0.48	0.48	-	-	0.42	-	-	negl.	negl.	negl.	
UV-Cured Mist Coater (UVMC-1)	0.26	0.26	0.26	-	-	0.002	-	-	negl.	negl.	negl.	
Natural Gas-Fired Combustion	0.09	0.35	0.35	0.03	4.54	0.25	3.81	5,482	0.09	0.08	Hexane	
Woodworking (WW-1 through WW-8, and POD-4)	2,134	2,090	3,424	-	-	-	-	-	-	-	-	
Sanding Operation	10.95	5.26	3,198.15	-	-	-	-	-	-	-	-	
Off-Line Parts Booth	8.60	8.60	8.60	-	-	39	-	-	16.95	Greater than 10	Xylene	
Total	2,212	2,163	6,740	0.03	4.54	Less than 998	3.81	5,482	Greater than 249	Greater than 113.7	Xylene	

Limited/Controlled Emissions

Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHG as CO2e	Total HAPs	Highest Single HAP		
Conventional Line	2.64	2.64	2.64	-	-	624.7	-	-	179.9	103.7	Xylene	
Finishing Line A	2.43	2.43	1.21	-	-	Less than 331.0	-	-	Greater than 25.0	Greater than 10.0	-	
Finishing Line B			1.21	-	-		-	-	Greater than 25.0	Greater than 10.0	-	
Spray Booths (STB-19, STB-20)	0.36	0.36	0.36	-	-	3.03	-	-	1.86	1.86	Glycol Ethers	
End-Coat Booth (UVPB-1)	0.48	0.48	0.48	-	-	0.42	-	-	negl.	negl.	negl.	
UV-Cured Mist Coater (UVMC-1)	0.01	0.01	0.01	-	-	0.002	-	-	negl.	negl.	negl.	
Natural Gas-Fired Combustion	0.09	0.35	0.35	0.03	4.54	0.25	3.81	5,482	0.09	0.08	Hexane	
Woodworking (WW-1 through WW-8, and POD-4)	58.76	58.76	58.76	-	-	-	-	-	-	-	-	
Sanding Operation	10.95	5.26	7.30	-	-	-	-	-	-	-	-	
Off-Line Parts Booth	8.60	8.60	8.60	-	-	39	-	-	16.95	Greater than 10.0	Xylene	
Total	84.32	78.88	80.92	0.03	4.54	Less than 998.42	3.81	5,482	Greater than 248.76	Greater than 113.7	Xylene	

**Appendix A: Emissions Calculations
Conventional Surface Coating Line PTE**

Page 2 of 10 TSD App A

**Company Name: MasterBrand Cabinets, Inc.
Source Address: 614 W 3rd St., Ferdinand, IN 47532
SSM and SPM No.: 037-35863-00051 and 037-35873-00051
Reviewer: Brian Wright**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non- Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum Throughput (unit/hour)	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	Potential PM/PM10/PM2.5 (ton/yr)	lb VOC/gal solids	Transfer Efficiency
CLB-1*																
Rouge Toner	7.0	95.94%	0.0%	95.9%	0.0%	4.06%	0.00700	225.0	6.70	6.70	10.55	253.13	46.20	0.29	164.94	85%
CLB-2*																
Rouge Wiping Toner	7.3	75.48%	0.0%	73.7%	0.0%	24.52%	0.01300	225.0	5.40	5.40	15.80	379.08	69.18	3.45	22.02	85%
CLB-3**																
Conventional Self-Sealer	7.6	72.04%	0.0%	72.0%	0.0%	27.96%	0.02400	225.0	5.48	5.48	29.57	709.57	129.50	7.54	19.58	85%
CLB-4***																
White Convnetional Enamel	9.0	56.71%	0.0%	56.7%	0.0%	43.29%	0.02400	225.0	5.11	5.11	27.59	662.20	120.85	13.84	11.80	85%
CLB-5 (Parts Booth)																
Rouge Toner	7.0	95.94%	0.0%	95.9%	0.0%	4.06%	0.00700	225.0	6.70	6.70	10.55	253.13	46.20	0.29	164.94	85%
Rouge Wiping Toner	7.3	75.48%	0.0%	73.7%	0.0%	24.52%	0.01300	225.0	5.40	5.40	15.80	379.08	69.18	3.45	22.02	85%
Conventional Self-Sealer	7.6	72.04%	0.0%	72.0%	0.0%	27.96%	0.02400	225.0	5.48	5.48	29.57	709.57	129.50	7.54	19.58	85%
White Convnetional Enamel	9.0	56.71%	0.0%	56.7%	0.0%	43.29%	0.02400	225.0	5.11	5.11	27.59	662.20	120.85	13.84	11.80	85%
Worst Case PTE:									6.70	6.70	29.57	709.57	129.50	13.84	164.94	
CLB-6 (Parts Booth)																
Rouge Toner	7.0	95.94%	0.0%	95.9%	0.0%	4.06%	0.00700	225.0	6.70	6.70	10.55	253.13	46.20	0.29	164.94	85%
Rouge Wiping Toner	7.3	75.48%	0.0%	73.7%	0.0%	24.52%	0.01300	225.0	5.40	5.40	15.80	379.08	69.18	3.45	22.02	85%
Conventional Self-Sealer	7.6	72.04%	0.0%	72.0%	0.0%	27.96%	0.02400	225.0	5.48	5.48	29.57	709.57	129.50	7.54	19.58	85%
White Convnetional Enamel	9.0	56.71%	0.0%	56.7%	0.0%	43.29%	0.02400	225.0	5.11	5.11	27.59	662.20	120.85	13.84	11.80	85%
Worst Case PTE:									6.70	6.70	29.57	709.57	129.50	13.84	164.94	

Uncontrolled PTE of the conventional surface coating line: 142.6 3,423 624.7 52.80

METHODOLOGY

*Booth CBL-1 and CBL-2 only use Toner

**Booth CBL-3 uses only Sealers

***Booth CBL-4 uses only Enamels

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)

Potential PM/PM10/PM2.5 (ton/yr) = (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

Dry Filter Control Efficiency	95.00%
Controlled PM/PM10/PM2.5 Emissions	2.64

**Appendix A: Emissions Calculations
Conventional Surface Coating Line PTE**

Company Name: MasterBrand Cabinets, Inc.
Source Address: 614 W 3rd St., Ferdinand, IN 47532
SSM and SPM No.: 037-35863-00051 and 037-35873-00051
Reviewer: Brian Wright

Material	Density (Lb/Gal)	Gal of Mat. (gal/unit)	Maximum Throughput (unit/hour)	Weight % Xylene	Weight % Ethylbenzene	Weight % Toluene	Weight % Trimethylbenzene	Xylene Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Trimethylbenzene Emissions (ton/yr)
CLB-1*											
Rouge Toner	7.0	0.00700	225.0	0.00%	0.00%	1.10%	0.00%	0.00	0.00	0.53	0.00
CLB-2*											
Rouge Wiping Toner	7.3	0.01300	225.0	32.00%	8.00%	0.31%	0.47%	30.05	7.51	0.29	0.44
CLB-3**											
Conventional Self-Sealer	7.6	0.02400	225.0	0.20%	0.05%	9.07%	0.00%	0.36	0.09	16.31	0.00
CLB-4***											
White Convnetional Enamel	9.0	0.02400	225.0	6.21%	1.11%	0.03%	0.00%	13.23	2.37	0.06	0.00
CLB-5 (Parts Booth)											
Rouge Toner	7.0	0.00700	225.0	0.00%	0.00%	1.10%	0.00%	0.00	0.00	0.53	0.00
Rouge Wiping Toner	7.3	0.01300	225.0	32.00%	8.00%	0.31%	0.47%	30.05	7.51	0.29	0.44
Conventional Self-Sealer	7.6	0.02400	225.0	0.20%	0.05%	9.07%	0.00%	0.36	0.09	16.31	0.00
White Convnetional Enamel	9.0	0.02400	225.0	6.21%	1.11%	0.03%	0.00%	13.23	2.37	0.06	0.00
Worst Case PTE:								30.05	7.51	16.31	0.44
CLB-6 (Parts Booth)											
Rouge Toner	7.0	0.00700	225.0	0.00%	0.00%	1.10%	0.00%	0.00	0.00	0.53	0.00
Rouge Wiping Toner	7.3	0.01300	225.0	32.00%	8.00%	0.31%	0.47%	30.05	7.51	0.29	0.44
Conventional Self-Sealer	7.6	0.02400	225.0	0.20%	0.05%	9.07%	0.00%	0.36	0.09	16.31	0.00
White Convnetional Enamel	9.0	0.02400	225.0	6.21%	1.11%	0.03%	0.00%	13.23	2.37	0.06	0.00
Worst Case PTE:								30.05	7.51	16.31	0.44
Uncontrolled PTE of the conventional surface coating line:								103.75	25.00	49.80	1.32
Total Uncontrolled PTE for HAPs:								179.87			

METHODOLOGY

*Booth CBL-1 and CBL-2 only use Toner

**Booth CBL-3 uses only Sealers

***Booth CBL-4 uses only Enamels

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

**Appendix A: Emissions Calculations
Line A and Line B PM Emissions**

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**Company Name: MasterBrand Cabinets, Inc.
Source Address: 614 W 3rd St., Ferdinand, IN 47532
SSM and SPM No.: 037-35863-00051 and 037-35873-00051
Reviewer: Brian Wright**

Line A (Surface Coating)

Type of Booths	Line A - Booth ID	Number of Booths	Control Device	Max. Coating Usage (gal/hr/booth)	Coating Solid Content (lbs/gal)	Transfer Efficiency* (%)	Uncontrolled PM/PM10/PM2.5 Emissions (tons/yr)	Control Efficiency* (%)	Controlled PM/PM10/PM2.5 Emissions (tons/yr)
Toner Booths	LAB-1,2	2	Dry Filters & RTO	5.87	0.074	60.0%	1.52	98.0%	0.03
Stain Booths	LAB-3,4	2	Dry Filters & RTO	4.94	0.038	60.0%	0.66	98.0%	0.01
Sealer Booths	LAB-5,6	2	Dry Filters	0.58	9.170	95.0%	2.34	96.0%	0.09
Topcoat-Back Booths	LAB-7	1	Dry Filters	0.84	9.170	95.0%	1.69	96.0%	0.07
Topcoat-Front Booths	LAB-8	1	Dry Filters	4.10	3.730	70.0%	20.1	95.0%	1.00
26.30									1.21

Line B (Surface Coating)

Type of Booths	Line B - Booth ID	Number of Booths	Control Device	Max. Coating Usage (gal/hr/booth)	Coating Solid Content (lbs/gal)	Transfer Efficiency* (%)	Uncontrolled PM/PM10/PM2.5 Emissions (tons/yr)	Control Efficiency* (%)	Controlled PM/PM10/PM2.5 Emissions (tons/yr)
Toner Booth and Color Match Booth	LBB-1,2	2	Dry Filters & RTO	5.87	0.074	60.0%	1.52	98.0%	0.03
Stain Booths	LBB-3,4	2	Dry Filters & RTO	4.94	0.038	60.0%	0.66	98.0%	0.01
Sealer Booths	LBB-5,6	2	Dry Filters	0.58	9.170	95.0%	2.34	96.0%	0.09
Topcoat-Back Booths	LBB-7	1	Dry Filters	0.84	9.170	95.0%	1.69	96.0%	0.07
Topcoat-Front Booths	LBB-8	1	Dry Filters	4.10	3.730	70.0%	20.1	95.0%	1.00
26.30									1.21

* This information was provided by the source based on the manufacturer's specifications. Booths LAB-1 through LAB-4 and LBB-1 through LBB-4 are spray booths. Booths LAB-5 through LAB-8 and LBB-5 through LBB-8 are UV coaters which use high solid content coatings and have high transfer and control efficiencies.

METHODOLOGY

Uncontrolled PM/PM10/PM2.5 Emissions (tons/yr) = Number of Booths x Max. Coating Usage (gal/hr/booth) x Coating Solid Content (lbs/gal) x (1-Transfer Efficiency) x 8760 hrs/yr x 1 ton/2000 lbs

Controlled PM/PM10/PM2.5 Emissions (tons/yr) = PTE of PM/PM10 before Control (tons/yr) x (1-Control Efficiency)

Appendix A: Emissions Calculations
Spray Booths STB-19 and STB-20

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Company Name: MasterBrand Cabinets, Inc.
Source Address: 614 W 3rd St., Ferdinand, IN 47532
SSM and SPM No.: 037-35863-00051 and 037-35873-00051
Reviewer: Brian Wright

STB-19

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	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	Potential PM/PM10/PM2.5 (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Augusta White Topcoat	10.43	18.20%	0%	18.20%	0%	53.45%	0.00008	220	1.90	1.90	0.03	0.82	0.15	0.17	3.55	75%
Antique White Edge Coat	10.31	14.58%	0%	14.58%	0%	43.18%	0.00004	220	1.50	1.50	0.01	0.32	0.06	0.08	3.48	75%
Neutral Edge Coat	10.38	17.93%	0%	17.93%	0%	52.94%	0.00012	220	1.86	1.86	0.05	1.14	0.21	0.24	3.52	75%
Dark Edge Coat	9.87	16.36%	0%	16.36%	0%	48.98%	0.00006	220	1.61	1.61	0.02	0.47	0.09	0.11	3.30	75%
TOTAL											0.05	1.14	0.21	0.24		

STB-20

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	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	Potential PM/PM10/PM2.5 (ton/yr)	lb VOC/gal solids	Transfer Efficiency	Control Device	Control Efficiency* (%)	PTE of PM/PM10/PM2.5 after Control (tons/yr)
*Sarsaparilla W/B Stain	8.70	75.12%	67.26%	7.86%	67.26%	22.18%	0.00168	378	2.09	0.68	0.43	10.43	1.90	2.41	3.08	60%	Dry Filter	90.0%	0.24
**Java W/B Stain	8.80	78.52%	66.99%	11.53%	66.99%	19.40%	0.00168	378	3.07	1.01	0.64	15.47	2.82	2.10	5.23	60%	Dry Filter	90.0%	0.21
TOTAL											0.64	15.47	2.82	2.41					
											Dry Filter Control Efficiency								
											Controlled PM/PM10/PM2.5 Emissions		0.12						

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hrs/yr) * (1 ton/2000 lbs)
Potential PM/PM10/PM2.5 (ton/yr) = (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)
To account for the operation of two identical booths, the maximum units/hour have been multiplied by 2.
Total = Sum of all solvents used
These coatings contain 0 to neg. amounts of HAPs

HAPs Emissions

Material	Unit ID	Density (Lb/Gal)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Weight % Glycol Ethers	Glycol Ethers Emissions (ton/yr)
Sarsaparilla W/B Stain	STB-20	8.70	0.00168	378	3.80%	0.92
Java W/B Stain	STB-20	8.80	0.00168	378	7.60%	1.86
Single HAP						1.86
Combined HAPs Total =						1.86

Note - Only the highest HAP containing coating is counted because both products cannot be used at the same time.

METHODOLOGY

PTE HAPs (tons/yr) = Density (lb/gal) x Max. Usage (gal/unit) x Maximum Throughput (unit/hr) x Weight % HAP x 8760 hrs/yr x 1 ton/2000 lbs

Appendix A: Emissions Calculations
Surface Coating Emissions - End Coat Booth (UVPB-1)

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Company Name: MasterBrand Cabinets, Inc.
Source Address: 614 W 3rd St., Ferdinand, IN 47532
SSM and SPM No.: 037-35863-00051 and 037-35873-00051
Reviewer: Brian Wright

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non- Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	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	Potential PM/PM10/PM2.5 (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Antique White Edge Coat	10.31	14.58%	0%	14.58%	0%	43.18%	0.00004	440	1.50	1.50	0.03	0.63	0.12	0.17	3.48	75%
Neutral Edge Coat	10.38	17.93%	0%	17.93%	0%	52.94%	0.00012	440	1.86	1.86	0.09	2.28	0.42	0.48	3.52	75%
Dark Edge Coat	9.87	16.36%	0%	16.36%	0%	48.98%	0.00006	440	1.61	1.61	0.04	0.94	0.17	0.22	3.30	75%
TOTAL											0.09	2.28	0.42	0.48		

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)

Potential PM/PM10/PM2.5 (ton/yr) = (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 = Sum of all solvents used

This coating contains 0 to neg. amounts of HAPs

Appendix A: Emissions Calculations
Surface Coating Emissions - UV-cured mist coater (UVMC-1)

Page 7 of 10 TSD App A

Company Name: MasterBrand Cabinets, Inc.
Source Address: 614 W 3rd St., Ferdinand, IN 47532
SSM and SPM No.: 037-35863-00051 and 037-35873-00051
Reviewer: Brian Wright

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non- Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	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	Potential PM/PM10/PM2.5 (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Spray UV Molding SS T/C	9.17	0.014%	0%	0.014%	0%	99.98%	0.00085	378	0.001	0.001	0.0004	0.01	0.002	0.26	0.001	98%
TOTAL											0.0004	0.01	0.002	0.26		
										Dry Filter Control Efficiency				95.00%		
										Controlled PM/PM10/PM2.5 Emissions				0.01		

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)

Potential PM/PM10/PM2.5 (ton/yr) = (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 = Sum of all solvents used

This coating contains 0 to neg. amounts of HAPs

Appendix A: Emissions Calculations
Woodworking PM Emissions

Page 8 of 10 TSD App A

Company Name: MasterBrand Cabinets, Inc.
Source Address: 614 W 3rd St., Ferdinand, IN 47532
SSM and SPM No.: 037-35863-00051 and 037-35873-00051
Reviewer: Brian Wright

Operation	Air Flow (acfm)	Outlet Grain Loading (gr/ascf)	Control Efficiency (%)	Uncontrolled PM/PM10/PM2.5 Emissions (lbs/hr)	Controlled PM/PM10/PM2.5 Emissions (lbs/hr)	Uncontrolled PM/PM10/PM2.5 Emissions (tons/yr)	Controlled PM/PM10/PM2.5E Emissions (tons/yr)
WW-1	61,000	0.003	99.0%	156.9	1.57	687.0	6.87
WW-2	61,000	0.003	99.0%	156.9	1.57	687.0	6.87
WW-3	35,000	0.01	99.0%	300.0	3.00	1,314	13.14
WW-4	61,000	0.003	99.0%	156.9	1.57	687.0	6.87
WW-5	61,000	0.003	99.0%	156.9	1.57	687.0	6.87
WW-6	48,000	0.003	99.0%	123.4	1.23	540.6	5.41
WW-7	61,000	0.002161	99.0%	113.0	1.13	494.9	4.95
WW-8	35,000	0.002161	99.0%	64.8	0.65	284.0	2.84
POD-4	61,000	0.002161	99.0%	113.0	1.13	494.9	4.95
Total PTE for Woodworking Stations:				1,342	13.42	5,876	58.76

Sanders (Line A)

Operation	Air Flow (acfm)	Outlet Grain Loading (gr/ascf)	Stack ID	Uncontrolled PM/PM10/PM2.5 Emissions (lbs/hr)	Controlled PM/PM10/PM2.5 Emissions (lbs/hr)	Uncontrolled PM/PM10/PM2.5 Emissions (tons/yr)	Control Efficiency (%)	Controlled PM/PM10/PM2.5 Emissions (tons/yr)
Sanding Operation (2)	22,500	0.002161	DCS-1A, DCS-1B	41.7	0.42	182.5	99.0%	1.83
Total PTE for each Line A Sander:						182.5		1.83
Total PTE for both Line A Sanders:						365.1		3.65

Sanders (Line B)

Operation	Air Flow (acfm)	Outlet Grain Loading (gr/ascf)	Stack ID	Uncontrolled PM/PM10/PM2.5 Emissions (lbs/hr)	Controlled PM/PM10/PM2.5 Emissions (lbs/hr)	Uncontrolled PM/PM10/PM2.5 Emissions (tons/yr)	Control Efficiency (%)	Controlled PM/PM10/PM2.5 Emissions (tons/yr)
Sanding Operation (2)	22,500	0.002161	DCS-1A, DCS-1B	41.7	0.42	182.5	99.0%	1.83
Total PTE for each Line B Sander:						182.5		1.83
Total PTE for both Line B Sanders:						365.1		3.65

Total PTE for all four (4) sanders **730.2**
Total PTE for all woodworking **6,607**

Limited Emissions (limits to render 326 IAC 2-2 (PSD) not applicable)

Operation	Construction Date	Pollutants Limited*	Pollutants Not Limited*	Limited PM Emissions (lbs/hr)	Limited PM10 Particulate Emissions (lbs/hr)	Limited PM2.5 Emissions (lbs/hr)	Limited PM Emissions (tons/yr)	Limited PM10 Particulate Emissions (tons/yr)	Limited PM2.5 Emissions (tons/yr)
WW-1	1968	---	PM/PM10/PM2.5	156.9	156.9	156.9	687.0	687.0	687.0
WW-2	1998	PM/PM10	PM2.5	5.68	3.40	156.9	24.9	14.9	687.0
WW-3	1968	---	PM/PM10/PM2.5	300.0	300.0	300.0	1314.0	1314.0	1314.0
WW-4	1997	PM/PM10	PM2.5	5.68	3.40	156.9	24.9	14.9	687.0
WW-5	1986	PM	PM10/PM2.5	5.68	156.9	156.9	24.9	24.9	24.88
WW-6	1986		PM10/PM2.5		123.4	123.4			
WW-7	2005	PM/PM10	PM2.5	2.60	1.60	113.0	11.4	7.01	7.01
WW-8	2011	PM/PM10/PM2.5	---	5.00	2.80	1.66	21.9	12.26	7.27
POD-4	2015	PM/PM10/PM2.5	---	5.70	3.42	2.28	25.0	14.98	9.99
Total Limited PTE for Woodworking:				487.2	751.8	1167.8	2133.9	2089.9	3424.2
Four (4) sanding stations	2005	PM/PM10	PM2.5	2.50	1.20	730.2	11.0	5.26	3198.1

METHODOLOGY

*Note: PM10 was not a regulated pollutant until July 31, 1987. (52 FR 24672-24715 published on July 1, 1987, and effective on July 31, 1987)
PM2.5 was not a regulated pollutant until July 15, 2008. (73 FR at 28321-28350 published on May 16, 2008, and effective on July 15, 2008)

Controlled PM/PM10/PM2.5 Emissions (lbs/hr) = Air Flow (acfm) * Outlet Grain Loading (gr/ascf) * 60 (min/hr) / 7000 (gr/lb)
Uncontrolled PM/PM10/PM2.5 Emissions (lbs/hr) = Controlled PM/PM10/PM2.5 Emissions (lbs/hr) / (1 - Control Efficiency (%))
Controlled PM/PM10/PM2.5 Emissions (tons/yr) = Controlled PM/PM10/PM2.5 Emissions (lbs/hr) * 8760 (hrs/yr) / 2000 (lbs/ton)
Uncontrolled PM/PM10/PM2.5 Emissions (tons/yr) = Uncontrolled PM/PM10/PM2.5 Emissions (lbs/hr) * 8760 (hrs/yr) / 2000 (lbs/ton)
Limited PM/PM10/PM2.5 Emissions (tons/yr) = Limited PM/PM10/PM2.5 Emissions (lbs/hr) * 8760 (hrs/yr) / 2000 (lbs/ton)

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

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

Page 9 of 10 TSD App A

Company Name: MasterBrand Cabinets, Inc.
Source Address: 614 W 3rd St., Ferdinand, IN 47532
SSM and SPM No.: 037-35863-00051 and 037-35873-00051
Reviewer: Brian Wright

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	
8.576	73.7	Thermal Oxidizer
1.0	8.6	Curing Oven (OV-1)
1.0	8.6	Curing Oven (OV-2)
Total 10.6	90.8	Total

	Pollutant						
Emission Factor in lb/MMCF	PM*	PM10*	direct PM2.5*	SO2	NOx 100 **see below	VOC	CO
	1.9	7.6	7.6	0.6		5.5	84
Potential Emission in tons/yr	0.09	0.35	0.35	0.03	4.54	0.25	3.81

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

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

HAPS Calculations

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total - Organics
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	9.5E-05	5.4E-05	3.4E-03	8.2E-02	1.5E-04	8.5E-02

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	2.3E-05	5.0E-05	6.4E-05	1.7E-05	9.5E-05	2.5E-04
					Total HAPs	8.6E-02
					Worst HAP	8.2E-02

Methodology is the same as above.

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

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

Greenhouse Gas Calculations

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	5,450	0.1	0.1
Summed Potential Emissions in tons/yr	5,450		
CO2e Total in tons/yr	5,482		

Methodology

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

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

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

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

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (25) + N2O Potential Emission ton/yr x N2O GWP (298).

**Appendix A: Emissions Calculations
Surface Coating**

Page 10 of 10 TSD App A

**Company Name: MasterBrand Cabinets, Inc.
Source Address: 614 W 3rd St., Ferdinand, IN 47532
SSM and SPM No.: 037-35863-00051 and 037-35873-00051
Reviewer: Brian Wright**

Material	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum Throughput (unit/hr)	Transfer Efficiency	Particulate Control Efficiency	wt% VOC	wt% Solids	wt% Xylene	wt% Ethylbenzene	wt% Toluene	wt% Trimethylbenzene
Rouge Toner	7	0.007	100	79%	95%	95.90%	4.06%	0.00%	0.00%	1.10%	0.00%
Rouge Wiping Toner	7.3	0.013	100	79%	95%	73.70%	24.52%	32.00%	8.00%	0.31%	0.47%
Conventional Self-Sealer	7.6	0.024	100	79%	95%	72%	27.96%	0.20%	0.05%	9.07%	0.00%
White Conventional Enamel	9	0.024	100	79%	95%	56.70%	43.29%	6.21%	1.11%	0.03%	0.00%

Material	Potential Emissions (tons/yr)							Controlled PM/PM10/PM2.5 Emissions (tons/yr)
	VOC	PM/PM10/PM2.5	Xylene	Ethylbenzene	Toluene	Trimethylbenzene	Total HAPs	
Rouge Toner	20.58	0.18	0.00	0.00	0.24	0.00	0.24	0.01
Rouge Wiping Toner	30.63	2.14	13.30	3.33	0.13	0.20	16.95	0.11
Conventional Self-Sealer	57.52	4.69	0.16	0.04	7.25	0.00	7.45	0.23
White Conventional Enamel	53.64	8.60	5.88	1.05	0.03	0.00	6.95	0.43
Worst-Case PTE	57.52	8.60	13.30	3.33	7.25	0.20	16.95	0.43

VOC/HAP Emissions (tons/yr) = Maximum Throughput (unit/hr) x Gal of Mat (gal/unit) x Density (lb/gal) x wt% VOC/HAP x 1 ton/2,000 lbs x 8,760 hrs/yr

Uncontrolled PM/PM10/PM2.5 Emissions (tons/yr) = Maximum Throughput (unit/hr) x Gal of Mat (gal/unit) x Density (lb/gal) x wt% solids x (1 - Control Eff.) x 1 ton/2,000 lbs x 8,760 hrs/yr

Controlled PM/PM10/PM2.5 Emissions (tons/yr) = Uncontrolled PM/PM10/PM2.5 Emissions (tons/yr) x (1 - Control Eff.)

Note: Only one coating can be applied at a time; therefore, worst-case PTE is based on the assumption that only the worst-case coating is being applied.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

July 10, 2015

Ms. Sally Gaines
MasterBrand Cabinets, Inc.
614 West 3rd St.
Ferdinand, IN 47532

Re: Public Notice
MasterBrand Cabinets, Inc.
Permit Level: Title V Significant Source
Modification and Significant Permit Modification
Permit Number: 037-35863-00051 and
037-35873-00051

Dear Ms. Gaines:

Enclosed is a copy of your draft Title V Significant Source Modification and Significant Permit Modification, 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 Herald in Jasper, Indiana publish the abbreviated version of the public notice no later than July 13, 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 Ferdinand Public Library, 112 East 16th Street in Ferdinand, 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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ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

July 9, 2015

The Herald
PO Box 31
Jasper, IN 47547-0031

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for MasterBrand Cabinets, Inc., Dubois 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 July 13, 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: Title V Significant Source Modification and Significant Permit Modification
Permit Number: 037-35863-00051 and 037-35873-00051

Enclosure

PN Newspaper.dot 6/13/2013



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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

July 10, 2015

To: Ferdinand Public 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: MasterBrand Cabinets, Inc.
Permit Number: 037-35863-00051 and 037-35873-00051

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

July 10, 2015

MasterBrand Cabinets, Inc.

037-35863-00051 and 037-35873-00051

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

July 10, 2015

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

Permit Number: 037-35863-00051 and 037-35873-00051

Applicant Name: MasterBrand Cabinets, Inc.

Location: Ferdinand, Dubois 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 7/10/2015 MasterBrand Cabinets, Inc-# 4/22 037-35863 and 35873-00051 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		Sally Gaines MasterBrand Cabinets, Inc-# 4/22 614 W 3rd St Ferdinand IN 47532 (Source CAATS)									
2		Scott Denhart GM MasterBrand Cabinets, Inc-# 4/22 614 W 3rd St Ferdinand IN 47532 (RO CAATS)									
3		Dubois County Commissioners One Courthouse Square Jasper IN 47546 (Local Official)									
4		Mr. Alec Kalla 8733 W. Summit Circle Drive French Lick IN 47432 (Affected Party)									
5		DuBois County Health Department 1187 S St. Charles Street Jasper IN 47546 (Health Department)									
6		Holly Argiris Environmental Resources Management (ERM) 8425 Woodfield Crossing Blvd, Suite 560-W Indianapolis IN 46240 (Consultant)									
7		John Blair 800 Adams Ave Evansville IN 47713 (Affected Party)									
8		Ferdinand Branch Library 112 E 16th Street Ferdinand IN 47532 (Library)									
9											
10											
11											
12											
13											
14											
15											

Total number of pieces Listed by Sender 8	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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