



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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

Michael R. Pence
Governor

Carol S. Comer
Commissioner

To: Interested Parties
Date: November 20, 2015
From: Matthew Stuckey, Chief
Permits Branch
Office of Air Quality
Source Name: Northwest Hardwoods Inc.
Permit Level: Registration
Permit Number: 039-36148-00117
Source Location: 1810 Conant St Elkhart Indiana
Type of Action Taken: Initial Permit

Notice of Decision: Approval - Registration

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

The final decision is available on the IDEM website at: <http://www.in.gov/apps/idem/caats/>
To view the document, select Search option 3, then enter permit 36148.

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

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

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

(continues on next page)

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

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

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

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

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



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**REGISTRATION
OFFICE OF AIR QUALITY**

**Northwest Hardwoods, Inc.
1810 Conant Street
Elkhart, Indiana 46516**

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

Registration No. R039-36148-00117	
Issued by:  Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: November 20, 2015

SECTION A

SOURCE SUMMARY

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

A.1 General Information

The Registrant owns and operates a stationary wholesale building material distribution & cut to size oriented strand board's facility.

Source Address:	1810 Conant Street, Elkhart, Indiana 46516
General Source Phone Number:	(574) 293-2512
SIC Code:	2421 (Sawmills and Planing Mills, General) 5031 (Lumber, Plywood, and Millwork)
County Location:	Elkhart County
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Registration

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) woodworking operation, identified as Reman (P-01), capable of processing 33,000 pounds of panels per hour, equipped with a baghouse dust collector (C-01) for particulate control, exhausting through stack S-01, and consisting of:
 - (1) One (1) SCMI Jumbo Panel Saw, identified as P-01a, constructed in 1983;
 - (2) One (1) Giben Model Y3000/4500x1600 Saw, identified as P-01b, constructed in 2005;
 - (3) One (1) SCMI M3 gang Rip Saw, identified as P-01c, constructed in 2008; and
 - (4) One (1) Whirlwind Model 212 Chow Saw, identified as P-01d, constructed in 2010.
- (b) One (1) aboveground diesel storage tank, identified as I02, constructed after 1985, with maximum storage capacity of 200 gallons, and dispensing 200 gallons per month.
- (c) One (1) natural gas space heater, identified as I01, with a maximum heat input capacity of 0.8 MMBtu/hr.
- (d) Paved roads and parking lots.

SECTION B GENERAL CONDITIONS

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

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

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

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

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

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

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

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

- (a) All terms and conditions of permits established prior to Registration No. R039-36148-00117 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this registration.

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

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

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

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

Indianapolis, IN 46204-2251

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

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

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

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

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

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

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

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

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

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

The Registrant shall implement the PMPs.

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Opacity [326 IAC 5-1]

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

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

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

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

SECTION D.1

EMISSION UNIT OPERATION CONDITIONS

Emission Unit Description:

- (a) One (1) woodworking operation, identified as Reman (P-01), capable of processing 33,000 pounds of panels per hour, equipped with a baghouse dust collector (C-01) for particulate control, exhausting through stack S-01, and consisting of:
- (1) One (1) SCMI Jumbo Panel Saw, identified as P-01a, constructed in 1983;
 - (2) One (1) Giben Model Y3000/4500x1600 Saw, identified as P-01b, constructed in 2005;
 - (3) One (1) SCMI M3 gang Rip Saw, identified as P-01c, constructed in 2008; and
 - (4) One (1) Whirlwind Model 212 Chow Saw, identified as P-01d, constructed in 2010.

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

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

D.1.1 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking operation (P-01) shall not exceed 26.82 pounds per hour when operating at a process weight rate of 16.5 tons per hour.

The pounds per hour limitation was calculated with the following equation:

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

$$E = 4.10 P^{0.67}$$

Where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

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

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

Compliance Determination Requirements [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

D.1.3 Particulate Control

In order to comply with Condition D.1.1, the baghouse dust collector (C-01) for particulate control shall be in operation and control emissions from the woodworking operation (P-01) at all times the woodworking operation (P-01) is in operation.

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

**REGISTRATION
ANNUAL NOTIFICATION**

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

Company Name:	Northwest Hardwoods, Inc.
Address:	1810 Conant St.
City:	Elkhart, Indiana 46516
Phone Number:	(574) 293-2512
Registration No.:	R039-36148-00117

I hereby certify that Northwest Hardwoods, Inc. is:

- still in operation.
- no longer in operation.
- in compliance with the requirements of Registration No. R039-36148-00117.
- not in compliance with the requirements of Registration No. R039-36148-00117.

I hereby certify that Northwest Hardwoods, Inc. is:

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

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

Noncompliance:

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

Technical Support Document (TSD) for a Re-Registration

Source Description and Location
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Source Name:	Northwest Hardwoods, Inc.
Source Location:	1810 Conant Street, Elkhart, Indiana 46516
County:	Elkhart County
SIC Code:	2421 (Sawmills and Planing Mills, General) 5031 (Lumber, Plywood, and Millwork)
Permit Reviewer:	Registration No.: R039-36148-00117 Adam Wheat

On August 10, 2015, the Office of Air Quality (OAQ) received an application from Northwest Hardwoods, Inc. related to the operation of an existing wholesale building material distribution and cut to size oriented strand board facility.

Existing Approvals

The source has been operating under Registration No. R039-2020-00117, issued on September 26, 1991.

County Attainment Status

The source is located in Elkhart County

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. ¹
PM _{2.5}	Unclassifiable or attainment effective April 5, 2005, for the annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
¹ Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including Elkhart County, and is a maintenance area for the 1-hour National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005.	

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

- (b) **PM_{2.5}**
Elkhart County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, 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
Elkhart County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

The fugitive emissions of criteria pollutants, hazardous air pollutants, and greenhouse gases are counted toward the determination of 326 IAC 2-5.5 (Registrations) applicability.

Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Northwest Hardwoods, Inc. on May 26, 2015, relating to a name and ownership change for the existing wholesale building material distribution and cut to size oriented strand board facility. The source has been operating under Registration No. R039-2020-00117, issued on September 26, 1991. Pursuant to 326 IAC 2-5.5-2, the source was required to apply for approval under 326 IAC 2-5 not later than December 25, 2000.

The source consists of the following existing emission units:

- (a) One (1) woodworking operation, identified as Reman (P-01), capable of processing 33,000 pounds of panels per hour, equipped with a baghouse dust collector (C-01) for particulate control, exhausting through stack S-01, and consisting of:
- (1) One (1) SCMI Jumbo Panel Saw, identified as P-01a, constructed in 1983.
- (b) One (1) aboveground diesel storage tank, identified as I02, constructed after 1985, with maximum storage capacity of 200 gallons, and dispensing 200 gallons per month.
- (c) Paved roads and parking lots.

Unregistered Emission Units and Pollution Control Equipment

The source consists of the following unregistered emission unit:

- (a) One (1) Giben Model Y3000/4500x1600 Saw, identified as P-01b, constructed in 2005.
- (b) One (1) SCMI M3 gang Rip Saw, identified as P-01c, constructed in 2008.
- (c) One (1) Whirlwind Model 212 Chow Saw, identified as P-01d, constructed in 2010.
- (d) One (1) natural gas space heater, identified as I01, with a maximum heat input capacity of 0.8 MMBtu/hr.

"Integral Part of the Process" Determination

In October 1993 a Final Order Granting Summary Judgment was signed by Administrative Law Judge ("ALJ") Garrettson resolving an appeal filed by Kimball Hospitality Furniture 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 from the woodworking operations were calculated after consideration of the controls for purposes of determining permit level and the applicability of Prevention of Significant Deterioration (PSD) and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

Enforcement Issues

IDEM is aware that equipment has been constructed and operated prior to obtaining a re-registration. Pursuant to 326 IAC 2-5.5-2, the source was required to apply for approval under 326 IAC 2-5 not later than December 25, 2000. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the registration rules.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination –Registration

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

Process/ Emission Unit	Potential To Emit of the Entire Source (tons/year)								
	PM	PM10*	PM2.5*	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Woodworking (P-01)**	5.63	5.63	5.63	-	-	-	-	-	-
Natural Gas Combustion	0.01	0.03	0.00	0.35	0.02	0.02	0.29	0.01	6.31E-03 (Hexane)
Diesel Dispensing	-	-	-	-	-	3.3E-4	-	-	-
Paved Roads (Fugitive Emissions)	1.79	0.36	0.09	-	-	-	-	-	-
Total PTE of Entire Source	7.43	6.02	5.72	0.35	0.02	0.02	0.29	0.01	6.31E-03 (Hexane)
Exemptions Levels**	< 5	< 5	< 5	< 10	< 10	< 10	< 25	< 25	< 10
Registration Levels**	< 25	< 25	< 25	< 25	< 25	< 25	< 100	< 25	< 10

*Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a regulated air pollutant".
 **Potential to emit of the woodworking operation (P-01) is after integral woodworking controls.

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."

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of PM, PM10, and PM2.5 are within the ranges listed in 326 IAC 2-5.5-1(b)(1). The PTE of all other regulated criteria pollutants are less than the ranges listed in 326 IAC 2-5.5-1(b)(1). Therefore, the source is subject to the provisions of 326 IAC 2-5.5 (Registrations). A Registration will be issued.

- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978, 40 CFR 60, Subpart K (326 IAC 12), are not included for this registration, since the aboveground diesel storage tank (I02) has a storage a storage capacity of less than 40,000 gallons. The aboveground diesel storage tank (I02) has a maximum capacity of 200 gallons.
- (b) The requirements of the New Source Performance Standard for Storage Vessels For Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984, 40 CFR 60, Subpart Ka (326 IAC 12), are not included for this registration, since the aboveground diesel storage tank (I02) has a storage a storage capacity of less than 40,000 gallons. The aboveground diesel storage tank (I02) has a maximum capacity of 200 gallons.
- (c) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, 40 CFR 60, Subpart Kb (326 IAC 12), are not included for this registration, since the aboveground diesel storage tank (I02) has a maximum capacity of less than 75 cubic meters (m³) (19,813 gallons).
- (d) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the registration.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations (40 CFR Part 63, Subpart JJ) (63.800 through 63.808) (326 IAC 20-14), are not included for this registration, since this source does not manufacture wood furniture and is not a major source of HAPs. This source is only a wholesale building material distribution and cut to size oriented strand board facility.
- (f) The requirements for the National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products (40 CFR 63, Subpart DDDD) (63.2230 through 63.2292), are not included in this registration, since this source does not perform plywood or composite wood products manufacturing (as defined by 40 CFR 63.2292) and it is not a major source of HAPs.

Pursuant to 40 CFR 63.2292, "plywood and composite wood products (PCWP) manufacturing facility" means a facility that manufactures plywood and/or composite wood products by bonding wood material (fibers, particles, strands, veneers, etc.) or agricultural fiber, generally with resin under heat and pressure, to form a panel, engineered wood product, or other product defined in §63.2292. Plywood and composite wood products manufacturing facilities also include facilities that manufacture dry veneer and lumber kilns located at any facility. Plywood and composite wood products include, but are not limited to, plywood, veneer, particleboard, molded particleboard, oriented strandboard, hardboard, fiberboard, medium density fiberboard, laminated strand lumber, laminated veneer lumber, wood I-joists, kiln-dried lumber, and glue-laminated beams.

This source does not manufacture plywood and/or composite wood products by bonding wood material (fibers, particles, strands, veneers, etc.) or agricultural fiber, generally with resin under heat and pressure, to form a panel, engineered wood product, or other product defined in §63.2292. This source is only a wholesale building material distribution and cut to size oriented strand board facility.

- (g) The requirements for the National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products 40 CFR 63, Subpart QQQQ (63.4680 through 63.4768) (326 IAC 20-79) are not included for this registration, since the source does not surface coat wood building products and is not a major source of HAPs. This source is only a wholesale building material distribution and cut to size oriented strand board facility.
- (h) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the registration.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-5.5 (Registrations)
Registration applicability is discussed under the Permit Level Determination – Registration section above.
- (b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (c) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (d) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this registration:
 - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

- (e) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
The source is subject to the requirements of 326 IAC 6-4, because it has the potential to emit fugitive particulate emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (f) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.
- (g) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Each of the emission units at this source is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each emission unit is less than twenty-five (25) tons per year.
- (h) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (i) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Woodworking Operation

- (j) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the woodworking operation shall not exceed 26.82 pounds per hour when operating at a process weight rate of 16.5 tons per hour. The pound per hour limitation was calculated with the following equation:

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

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

The baghouse (C-01) shall be in operation at all times the woodworking operation is in operation, in order to comply with this limit.

Natural Gas Combustion

- (k) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
The natural gas-fired space heater (I01) at the source is exempt from the requirements of 326 IAC 6-3, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight. In addition, pursuant to 326 IAC 6-3-1(b)(14), the natural gas-fired space heater at this source is also exempt from the requirements of 326 IAC 6-3, because it has potential particulate emissions of less than five hundred fifty one thousandths (0.551) pound per hour.
- (l) 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)
Pursuant to 326 IAC 7-1.1-1, the natural gas-fired space heater (I01) at this source is not subject to the requirements of 326 IAC 7-1.1, since it has unlimited sulfur dioxide (SO₂) emissions less than twenty-five (25) tons per year and ten (10) pounds per hour.

- (m) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The natural gas-fired space heater (I01) at this source is not subject to the requirements of 326 IAC 8-1-6, since the potential unlimited VOC emissions from each unit is less than twenty-five (25) tons per year.

Diesel Storage Tank

- (n) 326 IAC 8-4-3 (Petroleum Liquid Storage Facility)
The diesel tank, identified as Tank I02, is not subject to the requirements of 326 IAC 8-4-3, since the diesel tank has storage capacity less than 39,000 gallons. Therefore, 326 IAC 8-4-3 does not apply.
- (o) 326 IAC 8-9 (Volatile Organic Liquid Vessels)
The diesel tank, identified as Tank I02, is not subject to the requirements of 326 IAC 8-9, since the source is not located in Clark, Floyd, Lake or Porter Counties. Therefore, 326 IAC 8-9 does not apply.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on August 10, 2015.

The operation of this source shall be subject to the conditions of the attached proposed Registration No. R039-36148-00117. The staff recommends to the Commissioner that this Registration be approved.

IDEM Contact

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

**TSD Appendix A: Emission Calculations
Emission Summary**

Company Name: Northwest Hardwood, Inc.
Source Address: 1810 Conant Street, Elkhart, Indiana 46516
Registration No.: R039-36148-00117
Reviewer: Adam Wheat

Uncontrolled Potential to Emit (tons/year) (Before Integral Woodworking Controls)

Emissions Unit	PM*	PM10*	PM2.5*	SO₂	NO_x	VOC	CO	Total HAPs	Highest Single HAP	
Woodworking Operations*	28.16	28.16	28.16	-	-	-	-	-	-	-
Natural Gas Combustion	0.01	0.03	0.00	0.35	0.02	0.02	0.29	0.01	6.31E-03	Hexane
Diesel Dispensing	-	-	-	-	-	3.3E-04	-	-	-	-
Paved Roads	1.79	0.36	0.09	-	-	-	-	-	-	-
Total	29.95	28.54	28.25	0.35	0.02	0.02	0.29	0.01	0.01	Hexane

Unlimited Potential to Emit (tons/year) (After Integral Woodworking Controls)

Emissions Unit	PM*	PM10*	PM2.5*	SO₂	NO_x	VOC	CO	Total HAPs	Highest Single HAP	
Woodworking Operations*	0.56	0.56	0.56	-	-	-	-	-	-	-
Natural Gas Combustion	0.01	0.03	0.00	0.35	0.02	0.02	0.29	0.01	6.31E-03	Hexane
Diesel Dispensing	-	-	-	-	-	3.3E-04	-	-	-	-
Paved Roads	1.79	0.36	0.09	-	-	-	-	-	-	-
Total	2.36	0.95	0.65	0.35	0.02	0.02	0.29	0.01	0.01	Hexane

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

**TSD Appendix A: Emission Calculations
Particulate Emissions
From Woodworking Operations**

**Company Name: Northwest Hardwood, Inc.
Source Address: 1810 Conant Street, Elkhart, Indiana 46516
Registration No.: R039-36148-00117
Reviewer: Adam Wheat**

Maximum Outlet Grain Loading	Flow Rate (ACFM)	Control Efficiency	Controlled PM/PM10/PM2.5 Emissions (lbs/hr)	Controlled PM/PM10/PM2.5 Emissions (tons/yr)	Uncontrolled PM/PM10/PM2.5 Emissions (lbs/hr)	Uncontrolled PM/PM10/PM2.5 Emissions (tons/yr)
0.001	15,000	98%	0.13	0.56	6.43	28.16

Methodology:

Controlled PM/PM10/PM2.5 Emissions (lbs/hr) = [Maximum Outlet Grain Loading (grains/acfm)] * [Flowrate (acfm)] * [60 (min/hr)] * [1/7000 lbs/grain]

Controlled PM/PM10/PM2.5 Emissions (tons/yr) = [Controlled Emissions (lbs/hr)] * [8760 (hrs/yr)] / [2000 (lbs/ton)]

Uncontrolled PM/PM10/PM2.5 Emissions (lb/hr) = [Controlled PTE (lb/hr)] / [1 - Control Efficiency %]

Uncontrolled PM/PM10/PM2.5 Emissions (tons/yr) = [Uncontrolled Emissions (lb/hr)] * [8,760 (hrs/yr)] / [2000 (tons/yr)]

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

**TSD Appendix A: Emission Calculations
Miscellaneous Natural Gas Combustion**

Company Name: Northwest Hardwood, Inc.
Source Address: 1810 Conant Street, Elkhart, Indiana 46516
Registration No.: R039-36148-00117
Reviewer: Adam Wheat

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Emission Unit ID
0.80	7.01	I01

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10/PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100	5.5	84
				**see below		
Potential Emission in tons/yr	0.01	0.03	2.10E-03	0.35	0.02	0.29

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined. PM2.5 assumed equal to PM10.

**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/1,000 MMBtu

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

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
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	7.4E-06	4.2E-06	2.6E-04	6.3E-03	1.2E-05

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.8E-06	3.9E-06	4.9E-06	1.3E-06	7.4E-06
	Total HAPs:				6.6E-03

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.

**TSD Appendix A: Emission Calculations
Fuel-Dispensing Operations
VOC Emissions from Diesel Fuel Only**

Company Name: Northwest Hardwood, Inc.
Source Address: 1810 Conant Street, Elkhart, Indiana 46516
Registration No.: R039-36148-00117
Reviewer: Adam Wheat

Fuel Emissions

1. Loading (AP-42, Chapter 5)

Loading Losses:

$$LL = 12.46 \frac{SPM}{T}$$

where S = Saturation Factor (Table 5.2-1, AP-42)
P = True vapor pressure of liquid loaded (psia)
M = Molecular weight of vapors (lb/lb-mole)
T = Temperature, °R (°F + 460)
LL = Loading Loss Emission Factor (lb/kgal)

For diesel fuel:

S = 1.45 (Splash loading: dedicated normal service)
P = 0.009 psia
M = 130 lb/lb-mol
T = 530 °R

LL = 0.040 lb/kgal
4.0E-05 lb/gal

Throughput = 2400 gal/year
Uncontrolled Emissions = 0.10 lb/year
4.8E-05 tons/year

2. Storage

Storage Losses (TANKS 4.0.9d)

For diesel:

Uncontrolled Emission = 0.56 lbs/year
2.8E-04 tons/year

$$E = 11.0(F)$$

Summary

Diesel

Loading Emissions	4.8E-05 tons/year
Storage Emissions	2.8E-04 tons/year
Total	3.3E-04 tons/year

**TSD Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads**

Company Name: Northwest Hardwood, Inc.
Source Address: 1810 Conant Street, Elkhart, Indiana 46516
Registration No.: R039-36148-00117
Reviewer: Adam Wheat

Paved Roads at Industrial Site

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	12.0	1.0	12.0	40.0	480.0	660	0.125	1.5	547.5
Vehicle (leaving plant) (one-way trip)	12.0	1.0	12.0	40.0	480.0	600	0.114	1.4	497.7
Totals			24.0		960.0			2.9	1045.2

Average Vehicle Weight Per Trip =

40.0

 tons/trip
 Average Miles Per Trip =

0.12

 miles/trip

Unmitigated Emission Factor, $E_f = [k * (sL)^{0.91} * (W)^{1.02}]$ (Equation 1 from AP-42 13.2.1)

where k =

PM	PM10	PM2.5
0.011	0.0022	0.00054

 lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
 W =

40.0

 tons = average vehicle weight (provided by source)
 sL =

9.7

 g/m² = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E_f * [1 - (p/4N)]$ (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, $E_{ext} = E_f * [1 - (p/4N)]$
 where p =

125

 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
 N =

365

 days per year

Unmitigated Emission Factor, $E_f =$

PM	PM10	PM2.5
3.745	0.749	0.1838

 lb/mile
 Mitigated Emission Factor, $E_{ext} =$

PM	PM10	PM2.5
3.424	0.685	0.1681

 lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	1.03	0.21	0.05	0.94	0.19	0.05
Vehicle (leaving plant) (one-way trip)	0.93	0.19	0.05	0.85	0.17	0.04
Totals	1.96	0.39	0.10	1.79	0.36	0.09

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
 Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
 Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
 Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
 Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
 Unmitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Unmitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
 Mitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Mitigated Emission Factor (lb/mile)) * (ton/2000 lbs)

Abbreviations

PM = Particulate Matter
 PM10 = Particulate Matter (<10 um)
 PM2.5 = Particle Matter (<2.5 um)
 PTE = Potential to Emit



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

TO: Shane M Montgomery
Northwest Hardwoods Incorporated
1810 Conant Street
Elkhart, IN 46516-4755

DATE: November 20, 2015

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

SUBJECT: Final Decision
Registration
039-36148-00117

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

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

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

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

Final Applicant Cover letter.dot 8/27/2015

Mail Code 61-53

IDEM Staff	CDENNY 11/20/2015 Northwest Hardwoods Incorporated 039-36148-00117 (final)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	

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											Remarks
1		Shane M Montgomery Northwest Hardwoods Incorporated 1810 Conant Street Elkhart IN 46516-4755 (Source CAATS)									
2		Elkhart City Council and Mayors Office 229 South Second Street Elkhart IN 46516 (Local Official)									
3		Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 (Health Department)									
4		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 (Local Official)									
5		Maurer Investments LLC 3940 Lexington Park Dr Elkhart IN 46514 (Affected Party)									
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