



# Indiana Department of Environmental Management

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

Michael R. Pence  
Governor

Carol S. Comer  
Commissioner

## NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

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

for Native Hardwoods, Inc. in Elkhart County

Significant Source Modification No. 039-36804-00460

Significant Permit Modification No. 039-36819-00460

The Indiana Department of Environmental Management (IDEM) has received an application from Native Hardwoods, Inc., located at 316 Roske Drive, Elkhart, Indiana 46516, for a significant modification of its Part 70 Operating Permit Renewal issued on October 23, 2015. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow Native Hardwoods, Inc. to make certain changes at its existing source. Native Hardwoods, Inc. has applied to construct and operate two new linear molding lines.

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:

Elkhart Public Library  
300 South 2nd St.  
Elkhart, IN 46516

and

IDEM Northern Regional Office  
300 N. Michigan Street, Suite 450  
South Bend, IN 46601-1295

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

### How can you participate in this process?

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

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing,

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

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SSM 039-36804-00460 and SPM 039-36819-00460 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 12<sup>th</sup> 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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## DRAFT

Jim Edmundson  
Native Hardwoods, Inc.  
316 Roske Dr.  
Elkhart, IN 46516

Re: 039-36804-00460  
Significant Source Modification

Dear Mr. Edmundson:

Native Hardwoods, Inc. was issued Part 70 Operating Permit Renewal No. T039-35510-00460 on October 23, 2015, for a stationary wood furniture milling, sanding and surface coating plant located at 316 Roske Drive, Elkhart, Indiana 46516. An application to modify the source was received on February 4, 2016. Pursuant to the provisions of 326 IAC 2-7-10.5, a Significant Source Modification is hereby approved as described in the attached Technical Support Document.

Pursuant to 326 IAC 2-7-10.5, the following emission units are approved for construction at the source:

- (g) Two (2) linear molding lines, approved in 2016 for construction, identified as LML1 and LML2, each with a maximum throughput of 5520 units per hour, utilizing HVLP and air-assisted airless applicators for coating, using dry filters as control, and exhausting to stacks LMLSV1 and LMLSV2, respectively.

The following construction conditions are applicable to the proposed modification:

#### General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

#### Effective Date of the Permit

3. Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

#### Commenced Construction

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(j), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

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### Approval to Construct

6. Pursuant to 326 IAC 2-7-10.5(h)(2), this Significant Source Modification authorizes the construction of the new emission unit(s), when the Significant Source Modification has been issued.

Pursuant to 326 IAC 2-7-10.5(m), the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

Pursuant to 326 IAC 2-7-12, operation of the new emission unit(s) is not approved until the Significant Permit Modification has been issued. Operating conditions shall be incorporated into the Part 70 Operating Permit as a Significant Permit Modification in accordance with 326 IAC 2-7-10.5(m)(2) and 326 IAC 2-7-12 (Permit Modification).

The source must comply with the requirements of 326 IAC 2-7-10.5(m)(2) and 326 IAC 2-7-12 before operation of any of the proposed emission units can begin.

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, or call at (800) 451-6027, and ask for Brian Wright or extension 4-6544 or dial (317) 234-6544.

Sincerely,

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

Attachments: Significant Source Modification and Technical Support Document

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



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*Commissioner*

## Significant Source Modification to a Part 70 Source

### OFFICE OF AIR QUALITY

**Native Hardwoods, Inc.  
316 Roske Drive  
Elkhart, Indiana 46516**

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

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. This permit also addresses certain new source review requirements for new and/or existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions.

Significant Source Modification No.: 039-36804-00460	
Issued by:  Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date:

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## TABLE OF CONTENTS

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

DRAFT

<b>Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]</b> .....	<b>21</b>
C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)][40 CFR 64][326 IAC 3-8]	
C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]	
<b>Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]</b> .....	<b>22</b>
C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]	
C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]	
C.14 Response to Excursions or Exceedances [40 CFR 64][326 IAC 3-8][326 IAC 2-7-5] [326 IAC 2-7-6]	
C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]	
<b>Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]</b> .....	<b>25</b>
C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]	
C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]	
C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [40 CFR 64][326 IAC 3-8]	
<b>Stratospheric Ozone Protection</b> .....	<b>27</b>
C.19 Compliance with 40 CFR 82 and 326 IAC 22-1	
<b>SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS</b> .....	<b>28</b>
<b>Emission Limitations and Standards [326 IAC 2-7-5(1)]</b> .....	<b>28</b>
D.1.1 PSD Minor Limit VOC [326 IAC 2-2]	
D.1.2 Hazardous Air Pollutants (HAP) [40 CFR 63, Subpart JJ] [326 IAC 20-14]	
D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]	
D.1.4 Particulate [326 IAC 6-3-2(d)]	
D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(12)]	
<b>Compliance Determination Requirements</b> .....	<b>30</b>
D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-4(a)(3)(A)][326 IAC 8-1-2(a)]	
D.1.7 Hazardous Air Pollutants (HAP) [40 CFR 63, Subpart JJ] [326 IAC 20-14] [326 IAC 2-4.1]	
<b>Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]</b> .....	<b>30</b>
D.1.8 Monitoring	
<b>Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]</b> .....	<b>30</b>
D.1.9 Record Keeping Requirements	
D.1.10 Reporting Requirements	
<b>SECTION D.2 FACILITY OPERATION CONDITIONS</b> .....	<b>32</b>
<b>Emission Limitations and Standards [326 IAC 2-7-5(1)]</b> .....	<b>32</b>
D.2.1 Baghouse Limitations [326 IAC 2-7-1(21)(J)(xxx)]	
D.2.2 Particulate [326 IAC 6-3-2]	
D.2.3 PSD Minor Limitations [326 IAC 2-2]	
D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]	
<b>Compliance Determination Requirements</b> .....	<b>33</b>
D.2.5 Particulate Control [326 IAC 2-7-1(21)(J)(xxx)(DD)][326 IAC 6-3-2][326 IAC 2-7-6(6)]	
D.2.6 Baghouse Inspections [326 IAC 2-7-1(21)(J)(xxx)(FF)]	
<b>Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]</b> .....	<b>34</b>
D.2.7 Broken or Failed Bag Detection [40 CFR 64][326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]	
<b>Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)][326 IAC 2-7-19]</b> .....	<b>34</b>
D.2.8 Record Keeping Requirements	
<b>CERTIFICATION</b> .....	<b>35</b>
<b>EMERGENCY OCCURRENCE REPORT</b> .....	<b>36</b>

DRAFT

**Part 70 Quarterly Report..... 40**  
**QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT ..... 41**

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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)]

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The Permittee owns and operates a stationary wood furniture milling, sanding and surface coating plant.

Source Address:	316 Roske Drive, Elkhart, Indiana 46516
General Source Phone Number:	574-293-9690
SIC Code:	2499
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) Four (4) air-assisted airless paint spray booths, identified as EU-01A through EU-01D, each constructed in 1997, each coating a maximum of 208.5 square feet of wood per hour, each using dry filters for overspray control, and exhausting to stacks S1 through S4, respectively;
- (b) One (1) spray booth equipped with HVLP spray guns, identified as EU-01E, constructed in 1997, applying adhesives to wood surfaces at a maximum rate of 12.5 square feet of wood per hour, using dry filters for overspray control, and exhausting to stack S5;
- (c) One (1) spray booth equipped with HVLP spray guns, identified as EU-01F, constructed in 2002, with a maximum throughput capacity of 160 square feet of wood per hour, using dry filters for particulate control, and exhausting to stack S6;
- (d) One (1) spray booth equipped with HVLP spray guns, identified as EU-01G, constructed in 2006, with a maximum throughput capacity of 160 square feet of wood per hour, using dry filters for particulate control, and exhausting to stack S7; and
- (e) One (1) flat-line spray booth equipped with HVLP spray guns, identified as EU-01H, constructed in 2010, with a maximum throughput capacity of 864 square feet of wood per hour, using dry filters for particulate control, and exhausting to stacks S8, S9, S10, and S11.
- (f) One (1) spray booth equipped with an HVLP spray gun, identified as EU-02, constructed in 2014, with a maximum throughput capacity of either 91.09 square feet per hour of cabinet frames or 186.8 square feet of cabinet doors, using a dry filter for particulate control, and exhausting to stack S12.
- (g) Two (2) linear molding lines, approved in 2016 for construction, identified as LML1 and LML2, each with a maximum throughput of 5520 units per hour, utilizing HVLP and air-

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assisted airless applicators for coating, using dry filters as control, and exhausting to stacks LMLSV1 and LMLSV2, respectively.

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

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

- (a) Woodworking operations, processing a combined maximum of 815 pounds of wood per hour, having a maximum outlet grain loading of 0.01 grain per dry standard cubic foot of outlet air and a maximum exhaust flow rate of 40,000 cubic feet per minute. The portion of woodworking operations processing a maximum of 765 pounds of wood per hour is controlled by baghouse BH-1 and the portion of woodworking operations processing a maximum of 50 pounds of wood per hour is controlled by baghouse BH-2, and exhausting indoors or to the atmosphere. [326 IAC 2-7-1(21)(J)(xxx)] [326 IAC 6-3-2]
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, consisting of one (1) corian countertop operation processing a maximum of 250 pounds of countertops per hour. Particulate emissions from the corian countertop operation are controlled by one (1) dust collector, identified as BH-3, and exhausting within the building and then to general ventilation. [326 IAC 2-7-1(21)(J)(xxiii)] [326 IAC 6-3-2]
- (c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, consisting of:
  - (1) Three (3) natural gas-fired split heating systems, identified as HU01 - HU03, each rated at 0.125 million British thermal units per hour (MMBtu/hr);
  - (2) Fifteen (15) natural gas-fired infrared heaters, identified as HU04 - HU11, and HU-14 - HU-20, each rated at 0.200 MMBtu/hr; and
  - (3) Two (2) natural gas-fired unit heaters, identified as HU12 and HU13, each rated at 0.175 MMBtu/hr.
- (b) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.
- (c) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (d) Blowdown from any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

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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);

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- (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]

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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)]

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- (a) This permit, T039-35510-00460, 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]

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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]

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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)]

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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)]

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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)]

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- (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 April 15 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.

DRAFT

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).

DRAFT

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

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

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

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

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

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

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

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

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

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

DRAFT

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

DRAFT

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 T039-35510-00460 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).

DRAFT

- (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.

DRAFT

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

DRAFT

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]**

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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]**

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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

DRAFT

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.

DRAFT

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

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

DRAFT

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of

DRAFT

326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

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

All required notifications shall be submitted to:

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

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

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to 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.8 Performance Testing [326 IAC 3-6]

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- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

## Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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- (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

DRAFT

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

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

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

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

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

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

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

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

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

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

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- (l) 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:

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- (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.
    - (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.

DRAFT

- (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 Quality Improvement Plan (QIP) ~~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) ~~(c)(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) ~~(c)(a)(2)~~ of this condition and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this condition (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.
  - (2) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for

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expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements

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

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

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

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

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

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

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

The statement must be submitted to:

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

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

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

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:
  - (AA) All calibration and maintenance records.
  - (BB) All original strip chart recordings for continuous monitoring instrumentation.
  - (CC) Copies of all reports required by the Part 70 permit.Records of required monitoring information include the following, where applicable:

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

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

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

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

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- (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 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.

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

- (b) The address for report submittal is:

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

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

### **Stratospheric Ozone Protection**

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

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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) Four (4) air-assisted airless paint spray booths, identified as EU-01A through EU-01D, each constructed in 1997, each coating a maximum of 208.5 square feet of wood per hour, each using dry filters for overspray control, and exhausting to stacks S1 through S4, respectively;
- (b) One (1) spray booth equipped with HVLP spray guns, identified as EU-01E, constructed in 1997, applying adhesives to wood surfaces at a maximum rate of 12.5 square feet of wood per hour, using dry filters for overspray control, and exhausting to stack S5;
- (c) One (1) spray booth equipped with HVLP spray guns, identified as EU-01F, constructed in 2002, with a maximum throughput capacity of 160 square feet of wood per hour, using dry filters for particulate control, and exhausting to stack S6;
- (d) One (1) spray booth equipped with HVLP spray guns, identified as EU-01G, constructed in 2006, with a maximum throughput capacity of 160 square feet of wood per hour, using dry filters for particulate control, and exhausting to stack S7; and
- (e) One (1) flat-line spray booth equipped with HVLP spray guns, identified as EU-01H, constructed in 2010, with a maximum throughput capacity of 864 square feet of wood per hour, using dry filters for particulate control, and exhausting to stacks S8, S9, S10, and S11.
- (f) One (1) spray booth equipped with an HVLP spray gun, identified as EU-02, constructed in 2014, with a maximum throughput capacity of either 91.09 square feet per hour of cabinet frames or 186.8 square feet of cabinet doors, using a dry filter for particulate control, and exhausting to stack S12.
- (g) Two (2) linear molding lines, approved in 2016 for construction, identified as LML1 and LML2, each with a maximum throughput of 5520 units per hour, utilizing HVLP and air-assisted airless applicators for coating, using dry filters as control, and exhausting to stacks LMLSV1 and LMLSV2, respectively.

(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 Limit VOC [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the total VOC input (including coatings, dilution solvents, and cleaning solvents) to the surface coating operations, identified as EU-01A through EU-01H, EU-02, LML1, and LML2, combined, shall not exceed 249 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 250 tons per year, and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

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#### D.1.2 Hazardous Air Pollutants (HAP) [40 CFR 63, Subpart JJ] [326 IAC 20-14]

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In order render the requirements of 326 IAC 20-14 and 40 CFR 63, Subpart JJ not applicable, HAP emissions from the surface coating operations, identified as EU-01A through EU-01H, EU-02, LML1, and LML2, shall be limited as follows:

- (a) Each single HAP input, including coatings, dilution solvents, and cleaning solvents, to the surface coating operations, identified as EU-01A through EU-01H, EU-02, LML1, and LML2, combined, shall be limited such that any single HAP emitted is less than 9.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) Combined HAP input, including coatings, dilution solvents, and cleaning solvents, to the surface coating operations, identified as EU-01A through EU-01H, EU-02, LML1, and LML2, combined, shall be limited such that combined HAPs emitted is less than 24.8 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits shall limit the source-wide single HAP emissions to less than ten (10) tons per twelve (12) consecutive month period, source-wide combined HAP emissions to less than twenty-five (25) tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 20-14 and 40 CFR 63, Subpart JJ not applicable.

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

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Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), when surface coating wood furniture and wood cabinets in surface coating operations EU-01A through EU-01D, EU-01F, EU-01G, EU-01H, EU-02, LML1, and LML2, 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 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 Particulate [326 IAC 6-3-2(d)]

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Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating operations, identified as EU-01A through EU-01H, EU-02, LML1, and LML2, shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

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

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## Compliance Determination Requirements **[326 IAC 2-7-5(1)]**

### D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-4(a)(3)(A)][326 IAC 8-1-2(a)]

Compliance with the VOC and HAP limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAP data sheets or Certified Product Data Sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

### D.1.7 Hazardous Air Pollutants (HAP) [40 CFR 63, Subpart JJ] [326 IAC 20-14] [326 IAC 2-4.1]

Compliance with the HAP content limitations contained in Condition D.1.2 shall be determined by the following equations;

- (a) Single HAP input shall be based on the following equation:

Source-wide Single HAP Input (tons/reporting period) =  $\Sigma$  (Single HAP containing material usage (Gallons/reporting period) X Single HAP content (lbs/gallon) X 1 ton / 2000 lbs)

- (b) Combined HAP input shall be based on the following equation:

Source-wide Combined HAP Input (tons/reporting period) =  $\Sigma$  (Combined HAP containing material usage (Gallons/reporting period) X Combined HAP content (lbs/gallon) X 1 ton / 2000 lbs)

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

### D.1.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the 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 (S1, S2, S3, S4, S5, S6 and S7, S8, S9, S10, S11, S12, LMLSV1, and LMLSV2) while one (1) or more of the booths 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. 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.1.9 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC limitation established in Condition D.1.1.
- (1) The VOC content of each coating material and solvent used.
- (2) The amount of coating material and solvent less water used on monthly basis.

DRAFT

- (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) A log of the dates of use;
  - (4) The cleanup solvent input for each month;
  - (5) The total VOC input for each month; and
  - (6) The total VOC input for each compliance period.
- (b) To document the compliance status with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP input limitations established in Condition D.1.2. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.
  - (1) The HAP content and amount of each coating material and solvent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (2) The Single HAP and Combined HAP input for each month; and
  - (3) The Single HAP and Combined HAP input for each compliance period.
- (c) To document the compliance status with Condition D.1.8:
  - (1) The Permittee shall maintain a log of weekly overspray observations and monthly inspections.
  - (2) The Permittee shall maintain a log of daily inspections. The Permittee shall include in its daily log when an inspection was not performed and the reason for the lack of an inspection (e.g., the process did not operate that day).
- (d) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

#### D.1.10 Reporting Requirements

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

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## SECTION D.2 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(14)]:

#### Insignificant Activities

- (a) Woodworking operations, processing a combined maximum of 815 pounds of wood per hour, having a maximum outlet grain loading of 0.01 grain per dry standard cubic foot of outlet air and a maximum exhaust flow rate of 40,000 cubic feet per minute. The portion of woodworking operations processing a maximum of 765 pounds of wood per hour is controlled by baghouse BH-1 and the portion of woodworking operations processing a maximum of 50 pounds of wood per hour is controlled by baghouse BH-2, and exhausting indoors or to the atmosphere. [326 IAC 2-7-1(21)(J)(xxx)] [326 IAC 6-3-2]

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

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

#### D.2.1 Baghouse Limitations [326 IAC 2-7-1(21)(J)(xxx)]

The woodworking operations controlled by baghouses BH-1 and BH-2 shall be an insignificant activity for Title V permitting purposes provided that the baghouse operations meet the requirements of 326 IAC 2-7-1(21)(J)(xxx), including the following:

- (a) Each woodworking baghouse shall not exhaust to the atmosphere greater than forty thousand (40,000) cubic feet of air per minute and shall not emit particulate matter with a diameter less than ten (10) microns in excess of one-hundredth (0.01) grain per dry standard cubic foot of outlet air.
- (b) The opacity from each baghouse shall not exceed ten percent (10%).
- (c) Visible emissions from the baghouse when venting to the atmosphere shall be observed daily using procedures in accordance with Method 22 and normal or abnormal emissions are recorded. In the event abnormal emissions are observed for greater than six (6) minutes in duration, the following shall occur:
  - (1) The baghouse shall be inspected.
  - (2) Corrective actions, such as replacing or reseating bags, are initiated, when necessary.

#### D.2.2 Particulate [326 IAC 6-3-2]

- (a) In order to ensure that the woodworking facilities controlled by baghouse BH-2 are each exempt from the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), baghouse BH-2 shall be in operation and control particulate emissions from the woodworking facilities at all times that the facilities are in operation.
- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from:
  - (1) The insignificant woodworking facilities controlled by baghouse BH-1 shall not exceed 2.15 pounds per hour when operating at a process weight rate of 765 pounds per hour.

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- (2) The insignificant corian countertop operation controlled by dust collector BH-3 shall not exceed 1.02 pounds per hour when operating at a process weight rate of 250 pounds per hour.

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

Interpolation of the data for the process weight rate from 100 pounds per hour 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.2.3 PSD Minor Limitations [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the PM, PM10, and PM2.5 emissions after control from the woodworking facilities shall be less than the following emission limitations:

Emission Unit Description	Control Device	PM Emission Limit (lbs/hour)	PM10 Emission Limit (lbs/hour)	PM2.5 Emission Limit (lbs/hour)
Woodworking	BH-1	14.23	14.23	14.23
Woodworking	BH-2	13.18	13.18	13.18

Compliance with these limits, combined with the potential to emit PM, PM10, and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM, PM10, and PM2.5 to less than 250 tons per year, each, and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable

#### D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

### Compliance Determination Requirements [\[326 IAC 2-7-5\(1\)\]](#)

#### D.2.5 Particulate Control [326 IAC 2-7-1(21)(J)(xxx)(DD)][326 IAC 6-3-2][326 IAC 2-7-6(6)]

- (a) The baghouses for particulate control (BH-1 and BH-2) shall be in operation at all times when the insignificant woodworking facilities are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

#### D.2.6 Baghouse Inspections

An inspection shall be performed semiannually of all bags controlling the insignificant woodworking facilities when venting indoors. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. All defective bags shall be replaced.

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

### **D.2.7 Broken or Failed Bag Detection [40 CFR 64][326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]**

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- (a) For a single compartment baghouse controlling emissions from a process operated continuously, failed units and the associated process shall be shut down immediately until the failed unit have 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 emissions unit. 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's 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.2.8 Record Keeping Requirements**

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- (a) To document the compliance status with Conditions D.2.1(c) and D.2.6, the Permittee shall maintain records of the results of the inspections required under Conditions D.2.1(c) and D.2.6 and the dates the vents are redirected.
- (b) To document the compliance status with Condition D.2.1(c), the Permittee shall maintain records of daily visible emission notations of the baghouse exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (e.g., the process did not operate that day).
- (c) The Permittee shall maintain records of corrective actions to document the compliance status with 326 IAC 2-7-1(21)(J)(xxx)(GG)(dd).
- (d) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

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

Source Name: Native Hardwoods, Inc.  
Source Address: 316 Roske Drive, Elkhart, Indiana 46516  
Part 70 Permit No.: T039-35510-00460

**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: Native Hardwoods, Inc.  
Source Address: 316 Roske Drive, Elkhart, Indiana 46516  
Part 70 Permit No.: T039-35510-00460

**This form consists of 2 pages**

**Page 1 of 2**

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

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

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , 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: Native Hardwoods, Inc.  
Source Address: 316 Roske Drive, Elkhart, Indiana 46516  
Part 70 Permit No.: T039-35510-00460  
Facility: Surface coating operations identified as EU-01A through EU-01H, EU-02, LML1, and LML2  
Parameter: VOC Input  
Limit: The total VOC input (including coatings, dilution solvents, and cleaning solvents) to the surface coating operations, identified as EU-01A through EU-01H, EU-02, LML1, and LML2, combined, shall not exceed 249 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

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

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

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

**Part 70 Quarterly Report**

Source Name: Native Hardwoods, Inc.  
 Source Address: 316 Roske Drive, Elkhart, Indiana 46516  
 Part 70 Permit No.: T039-35510-00460  
 Facility: Surface coating operations identified as EU-01A through EU-01H, EU-02, LML1, and LML2  
 Parameter: Individual HAP input  
 Limit: Each single HAP input, including coatings, dilution solvents, and cleaning solvents, to the surface coating operations, identified as EU-01A through EU-01H, EU-02, LML1, and LML2, combined, shall be limited such that any single HAP emitted is less than nine and nine-tenths (9.9) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Source-wide Single HAP Input (tpy) =  $\Sigma$  (Single HAP containing material usage (Gallons) X Single HAP content (lbs/gallon) X 1 ton / 2000 lbs)

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: Native Hardwoods, Inc.  
 Source Address: 316 Roske Drive, Elkhart, Indiana 46516  
 Part 70 Permit No.: T039-35510-00460  
 Facility: Surface coating operations identified as EU-01A through EU-01H, EU-02, LML1, and LML2  
 Parameter: Combined HAP input  
 Limit: Combined HAP input, including coatings, dilution solvents, and cleaning solvents, to the surface coating operations, identified as EU-01A through EU-01H, EU-02, LML1, and LML2, combined, shall be limited such that combined HAPs emitted is less than twenty-four and eight- tenths (24.8) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Source-wide Combined HAP Input (tpy) =  $\Sigma$  (Combined HAP containing material usage (Gallons) X Combined HAP content (lbs/gallon) X 1 ton / 2000 lbs)

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: Native Hardwoods, Inc.  
Source Address: 316 Roske Drive, Elkhart, Indiana 46516  
Part 70 Permit No.: T039-35510-00460

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

<p>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".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

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

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:	Native Hardwoods, Inc.
Source Location:	316 Roske Drive, Elkhart, IN 46516
County:	Elkhart
SIC Code:	2499 (Wood Products, Not Elsewhere Classified)
Operation Permit No.:	T039-35510-00460
Operation Permit Issuance Date:	October 23, 2015
Significant Source Modification No.:	039-36804-00460
Significant Permit Modification No.:	039-36819-00460
Permit Reviewer:	Brian Wright

**Existing Approvals**

The source submitted an application for a Part 70 Operating Permit Renewal on October 23, 2015. There have been no subsequent approvals issued.

**County Attainment Status**

The source is located in Elkhart County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. <sup>1</sup>
PM <sub>2.5</sub>	Unclassifiable or attainment effective April 5, 2005, for the annual PM <sub>2.5</sub> standard.
PM <sub>2.5</sub>	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM <sub>2.5</sub> standard.
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
<sup>1</sup> 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<sub>x</sub>) 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<sub>x</sub> 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<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
  
- (b) **PM<sub>2.5</sub>**  
Elkhart County has been classified as attainment for PM<sub>2.5</sub>. Therefore, direct PM<sub>2.5</sub>, SO<sub>2</sub>, and NO<sub>x</sub> 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

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	185.72
PM <sub>10</sub>	185.81
PM <sub>2.5</sub>	185.81
SO <sub>2</sub>	0.01
NO <sub>x</sub>	1.63
VOC	249.09
CO	1.37
Single HAP	9.93
Total HAPs	24.83

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

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

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant, excluding GHGs, is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) These emissions are based upon TSD Appendix A of permit No. T039-35510-00460.
- (c) This existing source is not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

**Description of Proposed Modification**

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Native Hardwoods, Inc. on February 4, 2016, relating to construct and operate two (2) linear molding lines at their existing stationary wood furniture milling, sanding and surface coating plant. The following is a list of the proposed emission units and pollution control device(s):

- (a) Two (2) linear molding lines, approved in 2016 for construction, identified as LML1 and LML2, each with a maximum throughput of 5520 units per hour, utilizing HVLP and air-assisted airless applicators for coating, using dry filters as control, and exhausting to stacks LMLSV1 and LMLSV2, respectively.

**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.

<b>Increase in PTE Before Controls of the Modification</b>	
<b>Pollutant</b>	<b>Potential To Emit (ton/yr)</b>
PM	30.86
PM <sub>10</sub>	30.86
PM <sub>2.5</sub>	30.86
SO <sub>2</sub>	0.00
VOC	522.86
CO	0.00
NO <sub>x</sub>	0.00
Highest Single HAPs	44.07 (Toluene)
Total HAPs	46.36

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 PM, PM10, PM2.5 and VOC is each greater than twenty-five (25) tons per year before control and the potential to emit greater than or equal to ten (10) tons per year as defined under Section 112(b) of the CAA and twenty-five (25) tons per year of any combination of HAPs. 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 <sub>10</sub>	PM <sub>2.5</sub> *	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO
LML1	4.50	4.50	4.50	0.00	0.00	<249	0.00
LML2	26.36	26.36	26.36	0.00	0.00		0.00
<b>Total for Modification</b>	<b>30.86</b>	<b>30.86</b>	<b>30.86</b>	<b>0.00</b>	<b>0.00</b>	<b>&lt;249</b>	<b>0.00</b>
PSD Major Source Thresholds	250	250	250	250	250	250	250

\*PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.

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\\_4q18.pdf](http://www.supremecourt.gov/opinions/13pdf/12-1146_4q18.pdf)) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court’s decision. U.S. EPA’s guidance states that U.S. EPA will no longer require PSD or Title V permits for sources “previously classified as ‘Major’ based solely on greenhouse gas emissions.”

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

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

**PSD Minor Limit VOC [326 IAC 2-2]**

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the total VOC input (including coatings, dilution solvents, and cleaning solvents) to the surface coating operations, identified as EU-01A through EU-01H, EU-02, LML1, and LML2, combined, shall not exceed 249 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 250 tons per year, each, and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

### **Federal Rule Applicability Determination**

#### **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 linear molding lines (LML1 and LML2) do 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 requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Wood Furniture Manufacturing Operations, 40 CFR 63, Subpart JJ (326 IAC 20-14), since the linear molding lines (LML1 and LML2) are not located at a major source of HAPs. The source will continue to limit the source-wide HAP emissions to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.

In order render the requirements of 326 IAC 20-14 and 40 CFR 63, Subpart JJ not applicable, HAP emissions from the surface coating operations, identified as EU-01A through EU-01H, EU-02, LML1, and LML2, shall be limited as follows:

- (a) Each single HAP input, including coatings, dilution solvents, and cleaning solvents, to the surface coating operations, identified as EU-01A through EU-01H, EU-02, LML1, and LML2, combined, shall be limited such that any single HAP emitted is less than nine and nine-tenths (9.9) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) Combined HAP input, including coatings, dilution solvents, and cleaning solvents, to the surface coating operations, identified as EU-01A through EU-01H, EU-02, LML1, and LML2, combined, shall be limited such that combined HAPs emitted is less than twenty-four and eight-tenths (24.8) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits shall limit the source-wide single HAP emissions to less than ten (10) tons per twelve (12) consecutive month period, source-wide HAP emissions to less than twenty-five (25) tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 20-14 and 40 CFR 63, Subpart JJ not applicable.

- (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 linear molding lines (LML1 and LML2) do 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 linear molding lines (LML1 and LML2) do not manufacture metal furniture.
- (f) There are no 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 or Standard (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)
LML1 - VOC	None	Y	126.89	NA	100	N	N
LML2 - VOC	None	Y	395.97	NA	100	N	N
LML1 - PM/PM10/PM2.5	Dry Filters	Y	4.50	0.44	100	N	N
LML2 - PM/PM10/PM2.5	Dry Filters	Y	26.36	2.59	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.

<b>State Rule Applicability Determination</b>
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The following state rules are applicable to the source due to the modification:

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

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

**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 linear modling lines (LML1 and LML2) will each limit emissions to less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

**326 IAC 2-6 (Emission Reporting)**

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

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

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

EPA per Federal Register 79 FR 54978. This only applies to Title V Permittees and Title V compliance certifications.

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

Pursuant to 326 IAC 6-3-1(a), the linear molding lines (LML1 and LML2) are subject to the requirements of 326 IAC 6-3-2(d) because they are surface coating operations that each have a maximum usage rate greater than five (5) gallons per day of coating.

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 linear molding lines (LML1 and LML2) are 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 linear molding lines (LML1 and LML2), because they are 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 linear molding lines (LML1 and LML2) are subject to the requirements of 326 IAC 8-2-12, since each will be constructed after July 1, 1990, each will apply coatings to wood furniture (or wood furniture components), and each 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 linear molding lines (LML1 and LML2), 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 linear molding lines (LML1 and LML2) utilizes High Volume Low Pressure (HVLP) spray application or Air Assisted Airless Spray application methods; therefore, the linear molding lines (LML1 and LML2) are each able to comply with 326 IAC 8-2-12.

**326 IAC 8-11 (Wood Furniture Coatings)**

Pursuant to 326 IAC 8-11(1), the linear molding lines (LML1 and LML2) are 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
Linear Molding Line (LML1)	Filter Inspections	Once per day	Normal/Abnormal
	Overspray	Once per week	Normal/Abnormal
	Stack Exhaust Observations	Once per month	Normal/Abnormal
Linear Molding Line (LML2)	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 6-3 (Particulate Emission Limitations for Manufacturing Processes).

**Proposed Changes**

The changes listed below have been made to Part 70 Operating Permit No. T039-35510-00460. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

**Modification No. 1:**

Section A.2 and A.3 have been modified as follows in order to incorporate the new units and requested changes by the source:

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

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

\*\*\*\*\*

- (g) **Two (2) linear molding lines, approved in 2016 for construction, identified as LML1 and LML2, each with a maximum throughput of 5520 units per hour, utilizing HVLP and air-assisted airless applicators for coating, using dry filters as control, and exhausting to stacks LMLSV1 and LMLSV2, respectively.**

\*\*\*\*\*

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

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

- (a) Woodworking operations, processing a combined maximum of 815 pounds of wood per hour, having a maximum outlet grain loading of 0.01 grain per dry standard cubic foot of outlet air and a maximum exhaust flow rate of 40,000 cubic feet per minute. The portion of woodworking operations processing a maximum of 765 pounds of wood per hour is controlled by baghouse BH-1 and the portion of woodworking operations processing a maximum of 50 pounds of wood per hour is controlled by baghouse BH-2, **and exhausting indoors or to the atmosphere.** [326 IAC 2-7-1(21)(J)(xxx)] [326 IAC 6-3-2]

**Modification No. 2:**

Section D.2 and the reporting forms have been amended as follows in order to incorporate the new units and to provide clarification regarding the applicable requirements:

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

\*\*\*\*\*

- (g) **Two (2) linear molding lines, approved in 2016 for construction, identified as LML1 and LML2, each with a maximum throughput of 5520 units per hour, utilizing HVLP and air-assisted airless applicators for coating, using dry filters as control, and exhausting to stacks LMLSV1 and LMLSV2, respectively.**

(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 Limit VOC [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the total VOC input (including coatings, dilution solvents, and cleaning solvents) to the surface coating operations, identified as EU-01A through EU-01H, ~~and~~ EU-02, **LML1, and LML2**, combined, shall not exceed 249 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 250 tons per year, ~~each~~, and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.2 Hazardous Air Pollutants (HAP) [40 CFR 63, Subpart JJ] [326 IAC 20-14]

In order render the requirements of 326 IAC 20-14 and 40 CFR 63, Subpart JJ not applicable, HAP emissions from the surface coating operations, identified as EU-01A through EU-01H, ~~and~~ EU-02, **LML1, and LML2**, shall be limited as follows:

- (a) Each single HAP input, including coatings, dilution solvents, and cleaning solvents, to the surface coating operations, identified as EU-01A through EU-01H, ~~and EU-02~~, **LML1, and LML2**, combined, shall be limited such that any single HAP emitted is less than ~~nine and nine-tenths (9.9)~~ tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) Combined HAP input, including coatings, dilution solvents, and cleaning solvents, to the surface coating operations, identified as EU-01A through EU-01H, ~~and EU-02~~, **LML1, and LML2**, combined, shall be limited such that combined HAPs emitted is less than ~~twenty-four and eight-tenths (24.8)~~ tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits shall limit the source-wide single HAP emissions to less than ten (10) tons per twelve (12) consecutive month period, source-wide **combined** HAP emissions to less than twenty-five (25) tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 20-14 and 40 CFR 63, Subpart JJ not applicable.

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

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Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), when surface coating wood furniture and wood cabinets in surface coating operations EU-01A through EU-01D, EU-01F, EU-01G, EU-01H, ~~and EU-02~~, **LML1, and LML2**, 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 or more of the following application methods:

\*\*\*\*\*

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

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Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating operations, identified as EU-01A through EU-01H, ~~and EU-02~~, **LML1, and LML2**, shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

\*\*\*\*\*

#### D.1.7 Hazardous Air Pollutants (HAP) [40 CFR 63, Subpart JJ] [326 IAC 20-14] [326 IAC 2-4.1]

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Compliance with the HAP content limitations contained in Condition D.1.2 shall be determined by the following equations;

- (a) Single HAP input shall be based on the following equation:

Source-wide Single HAP Input (~~tpy~~**tons/reporting period**) =  $\Sigma$  (Single HAP containing material usage (Gallons/**reporting period**) X Single HAP content (lbs/gallon) X 1 ton / 2000 lbs)

- (b) Combined HAP input shall be based on the following equation:

Source-wide Combined HAP Input (~~tpy~~**tons/reporting period**) =  $\Sigma$  (Combined HAP containing material usage (Gallons/**reporting period**) X Combined HAP content (lbs/gallon) X 1 ton / 2000 lbs)

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

#### D.1.8 Monitoring

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- (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 (S1, S2, S3, S4, S5, S6 and S7, S8, S9, S10, S11, ~~and S12~~, **LMLSV1, and LMLSV2**) while one (1) or more of the booths 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.1.9 Record Keeping Requirements

- \*\*\*\*\*
- (b) To document the compliance status with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP input limitations established in Condition D.1.2. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.
    - (1) The HAP content and amount of each coating material, adhesive and solvent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

\*\*\*\*\*

#### Modification No. 3:

Section D.2 has been modified as follows in accordance with IDEM's Compliance Monitoring Guidance:

#### SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(14)]:

Insignificant Activities

- (a) Woodworking operations, processing a combined maximum of 815 pounds of wood per hour, having a maximum outlet grain loading of 0.01 grain per dry standard cubic foot of outlet air and a maximum exhaust flow rate of 40,000 cubic feet per minute. The portion of woodworking operations processing a maximum of 765 pounds of wood per hour is controlled by baghouse BH-1 and the portion of woodworking operations processing a maximum of 50 pounds of wood per hour is controlled by baghouse BH-2, **and exhausting indoors or to the atmosphere.** [326 IAC 2-7-1(21)(J)(xxx)] [326 IAC 6-3-2]

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

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

#### D.2.1 Baghouse Limitations [326 IAC 2-7-1(21)(J)(xxx)]

The woodworking operations controlled by baghouses BH-1 and BH-2 shall be an insignificant activity for Title V permitting purposes provided that the baghouse operations meet the requirements of 326 IAC 2-7-1(21)(J)(xxx), including the following:

- (a) Each woodworking baghouse shall not exhaust to the atmosphere greater than forty thousand (40,000) cubic feet of air per minute and shall not emit particulate matter with a diameter less than ten (10) microns in excess of one-hundredth (0.01) grain per dry standard cubic foot of outlet air.
- (b) The opacity from each baghouse shall not exceed ten percent (10%).

- (c) Visible emissions from the baghouse **when venting to the atmosphere** shall be observed daily using procedures in accordance with Method 22 and normal or abnormal emissions are recorded. In the event abnormal emissions are observed for greater than six (6) minutes in duration, the following shall occur:
- (1) The baghouse shall be inspected.
  - (2) Corrective actions, such as replacing or reseating bags, are initiated, when necessary.

\*\*\*\*\*

D.2.6 Baghouse Inspections [~~326 IAC 2-7-1(21)(J)(xxx)(FF)~~]

An inspection shall be performed ~~each calendar quarter~~ **semiannually** of all bags controlling the insignificant woodworking facilities when venting ~~to the atmosphere~~ **indoors**. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. ~~Inspections are optional when venting to the indoors.~~ All defective bags shall be replaced.

**Modification No. 4:**

The reporting forms have been amended as follows in order to incorporate the new units:

PART 70 QUARTERLY REPORT FORM

Source Name: Native Hardwoods, Inc.  
Source Address: 316 Roske Drive, Elkhart, Indiana 46516  
Part 70 Permit No.: T039-35510-00460  
Facility: Surface coating operations identified as EU-01A through EU-01H, ~~and EU-02,~~  
**LML1, and LML2**  
Parameter: VOC Input  
Limit: The total VOC input (including coatings, dilution solvents, and cleaning solvents) to the surface coating operations, identified as EU-01A through EU-01H, ~~and EU-02,~~ **LML1, and LML2**, combined, shall not exceed 249 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

\*\*\*\*\*

PART 70 QUARTERLY REPORT FORM

Source Name: Native Hardwoods, Inc.  
Source Address: 316 Roske Drive, Elkhart, Indiana 46516  
Part 70 Permit No.: T039-35510-00460  
Facility: Surface coating operations identified as EU-01A through EU-01H, ~~and EU-02,~~  
**LML1, and LML2**  
Parameter: Individual HAP input  
Limit: Each single HAP input, including coatings, dilution solvents, and cleaning solvents, to the surface coating operations, identified as EU-01A through EU-01H, ~~and EU-02,~~ **LML1, and LML2**, combined, shall be limited such that any single HAP emitted is less than nine and nine-tenths (9.9) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Source-wide Single HAP Input (tpy) =  $\Sigma$  (Single HAP containing material usage (Gallons) X Single HAP content (lbs/gallon) X 1 ton / 2000 lbs)

\*\*\*\*\*

PART 70 QUARTERLY REPORT FORM

Source Name: Native Hardwoods, Inc.  
Source Address: 316 Roske Drive, Elkhart, Indiana 46516  
Part 70 Permit No.: T039-35510-00460  
Facility: Surface coating operations identified as EU-01A through EU-01H, ~~and EU-02,~~  
**LML1, and LML2**  
Parameter: Combined HAP input  
Limit: Combined HAP input, including coatings, dilution solvents, and cleaning solvents,  
to the surface coating operations, identified as EU-01A through EU-01H, ~~and EU-~~  
02, **LML1, and LML2**, combined, shall be limited such that combined HAPs  
emitted is less than twenty-four and eight- tenths (24.8) tons per twelve (12)  
consecutive month period, with compliance determined at the end of each month.

**Modification No. 5:**

IDEM, OAQ revised the CAM portion of the Section C.14 Response to Excursions or Exceedances to provide clarity. In paragraph (II)(c), the acronym QIP is being spelled out as Quality Improvement Plan (QIP) because this is the first time it is mentioned in the condition. In paragraphs (II)(f) and (II)(h)(1), the reference to paragraph (II)(a)(2) is being changed to paragraph (II)(c). Referencing paragraph (II)(a)(2) is correct, however IDEM, OAQ believes that referencing paragraph (II)(c) provides clarity.:

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

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\*\*\*  
(II)

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(e) If a QIP is required, the Permittee shall develop and implement a **Quality Improvement Plan (QIP)** ~~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)(~~c~~)(~~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:

\*\*\*

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

\*\*\*

**Modification No. 6:**

IDEM added the rule citation 326 IAC 2-7-5(1) to the Compliance Determination Requirements subsection title in Sections D.1 and D.2 to clarify the authority of these conditions.

Section D.1  
Compliance Determination Requirements **[326 IAC 2-7-5(1)]**

Section D.2  
Compliance Determination Requirements **[326 IAC 2-7-5(1)]**

<b>Conclusion and Recommendation</b>
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The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 039-36804-00460 and Significant Permit Modification No. 039-36819-00460. The staff recommend to the Commissioner that this Part 70 Significant Source and Significant Permit Modification be approved.

<b>IDEM Contact</b>
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- (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  
Emissions Summary

Company Name: Native Hardwoods, Inc.  
Source Address: 316 Roske Drive, Elkhart, IN 46516  
Significant Source Modification No.: 039-36804-00460  
Significant Permit Modification No.: 039-36819-00460  
Reviewer: Brian Wright

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

Emission Units	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Highest Single HAP (Toluene)	Combined HAPs
EU-01A	2.32	2.32	2.32	-----	-----	27.01	-----	Toluene 1.96	2.74
EU-01B	2.32	2.32	2.32	-----	-----	27.01	-----	Toluene 1.96	2.74
EU-01C	8.05	8.05	8.05	-----	-----	20.36	-----	Toluene 0.45	4.01
EU-01D	8.05	8.05	8.05	-----	-----	20.36	-----	Toluene 0.45	4.01
EU-01E	0.08	0.08	0.08	-----	-----	0.98	-----	Toluene 0.00	0.35
EU-01F	1.92	1.92	1.92	-----	-----	25.74	-----	Toluene 0.33	1.33
EU-01G	1.78	1.78	1.78	-----	-----	20.72	-----	Toluene 1.51	2.11
EU-01H	33.14	33.14	33.14	-----	-----	243.29	-----	Toluene 24.64	31.36
EU-02	3.57	3.57	3.57	-----	-----	14.33	-----	Xylene 0.21	0.57
LML1	4.50	4.50	4.50	-----	-----	126.89	-----	Xylene 1.56	1.56
LML2	26.36	26.36	26.36	-----	-----	395.97	-----	Toluene 44.07	44.81
Woodworking	484.66	484.66	484.66	-----	-----	-----	-----	-----	-----
Natural Gas Combustion	0.03	0.12	0.12	0.01	1.63	0.09	1.37	-----	0.03
<b>Total (Non-Fugitive)</b>	<b>576.77</b>	<b>576.86</b>	<b>576.86</b>	<b>0.01</b>	<b>1.63</b>	<b>922.76</b>	<b>1.37</b>	<b>Toluene 75.38</b>	<b>95.61</b>
Paved Roads	0.09	0.02	4.18E-03	-----	-----	-----	-----	-----	-----

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

Emission Units	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Highest Single HAP	Combined HAPs
EU-01A	2.32	2.32	2.32	-----	-----	27.01	-----	Toluene 1.96	2.74
EU-01B	2.32	2.32	2.32	-----	-----	27.01	-----	Toluene 1.96	2.74
EU-01C	8.05	8.05	8.05	-----	-----	20.36	-----	Toluene 0.45	4.01
EU-01D	8.05	8.05	8.05	-----	-----	20.36	-----	Toluene 0.45	4.01
EU-01E	0.08	0.08	0.08	-----	-----	0.98	-----	Toluene 0.00	0.35
EU-01F	1.92	1.92	1.92	-----	-----	25.74	-----	Toluene 0.33	1.33
EU-01G	1.78	1.78	1.78	-----	-----	20.72	-----	Toluene 1.51	2.11
EU-01H	33.14	33.14	33.14	-----	-----	243.29	-----	Toluene 24.64	31.36
EU-02	3.57	3.57	3.57	-----	-----	14.33	-----	Xylene 0.21	0.57
LML1	4.50	4.50	4.50	-----	-----	126.89	-----	Xylene 1.56	1.56
LML2	26.36	26.36	26.36	-----	-----	395.97	-----	Toluene 44.07	44.81
Woodworking	4.85	4.85	4.85	-----	-----	-----	-----	-----	-----
Natural Gas Combustion	0.03	0.12	0.12	0.01	1.63	0.09	1.37	-----	0.03
<b>Total (Non-Fugitive)</b>	<b>96.95</b>	<b>97.05</b>	<b>97.05</b>	<b>0.01</b>	<b>1.63</b>	<b>922.76</b>	<b>1.37</b>	<b>Toluene 75.38</b>	<b>95.61</b>
Paved Roads (Fugitive)	0.09	0.02	4.18E-03	-----	-----	-----	-----	-----	-----

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

Emission Units	PM	PM10	PM2.5	SO2	NOx	VOC***	CO	Highest Single HAP	Combined HAPs
EU-01A	2.32	2.32	2.32	-----	-----	249.00	-----	Less than 9.90	Less than 24.80
EU-01B	2.32	2.32	2.32	-----	-----		-----		
EU-01C	8.05	8.05	8.05	-----	-----		-----		
EU-01D	8.05	8.05	8.05	-----	-----		-----		
EU-01E	0.08	0.08	0.08	-----	-----		-----		
EU-01F	1.92	1.92	1.92	-----	-----		-----		
EU-01G	1.78	1.78	1.78	-----	-----		-----		
EU-01H	33.14	33.14	33.14	-----	-----		-----		
EU-02	3.57	3.57	3.57	-----	-----		-----		
LML1	4.50	4.50	4.50	-----	-----		-----		
LML2	26.36	26.36	26.36	-----	-----		-----		
Woodworking	124.47	124.47	124.47	-----	-----		-----		
Natural Gas Combustion	0.03	0.12	0.12	0.01	1.63	0.09	1.37	0.03	0.03
<b>Total (Non-Fugitive)</b>	<b>216.58</b>	<b>216.67</b>	<b>216.67</b>	<b>0.01</b>	<b>1.63</b>	<b>249.09</b>	<b>1.37</b>	<b>Less than 9.93</b>	<b>Less than 24.83</b>
Paved Roads (Fugitive)	0.09	0.02	4.18E-03	-----	-----	-----	-----	-----	-----

Limited and Controlled Potential to Emit (tons/year)\*\*

Emission Units	PM	PM10	PM2.5	SO2	NOx	VOC***	CO	Highest Single HAP****	Combined HAPs****
EU-01A	0.23	0.23	0.23	-----	-----	249.00	-----	Less than 9.90	Less than 24.80
EU-01B	0.23	0.23	0.23	-----	-----		-----		
EU-01C	0.79	0.79	0.79	-----	-----		-----		
EU-01D	0.79	0.79	0.79	-----	-----		-----		
EU-01E	0.01	0.01	0.01	-----	-----		-----		
EU-01F	0.19	0.19	0.19	-----	-----		-----		
EU-01G	0.17	0.17	0.17	-----	-----		-----		
EU-01H	3.25	3.25	3.25	-----	-----		-----		
EU-02	0.35	0.35	0.35	-----	-----		-----		
LML1	0.44	0.44	0.44	-----	-----		-----		
LML2	2.59	2.59	2.59	-----	-----		-----		
Woodworking	4.85	4.85	4.85	-----	-----		-----		
Natural Gas Combustion	0.03	0.12	0.12	0.01	1.63	0.09	1.37	0.03	0.03
<b>Total (Non-Fugitive)</b>	<b>13.92</b>	<b>14.01</b>	<b>14.01</b>	<b>0.01</b>	<b>1.63</b>	<b>249.09</b>	<b>1.37</b>	<b>Less than 9.93</b>	<b>Less than 24.83</b>
Paved Roads (Fugitive)	0.09	0.02	4.18E-03	-----	-----	-----	-----	-----	-----

Notes

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

\*\*After VOC/HAP limits, after dry filter controls for the surface coating operations, and the integral woodworking controls.

\*\*\* In order to render requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the total VOC input to the spray booths (EU-01A through EU-01H and EU-02) and the linear molding lines (LML1 and LML2), including coatings, dilution solvents, and cleaning solvents, shall not exceed 249 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

\*\*\*\*In order to render the requirements of 326 IAC 20-14 and 40 CFR 63, Subpart JJ not applicable, total emissions from the spray booths (EU-01A through EU-01H and EU-02) and the linear molding lines (LML1 and LML2) of each single HAP shall be less than 9.9 tons per year and combined HAPs shall be less than 24.80 tons per year

**Appendix A: Emissions Calculations  
Modification Summary**

**Company Name:** Native Hardwoods, Inc.  
**Source Address:** 316 Roske Drive, Elkhart, IN 46516  
**Significant Source Modification No.:** 039-36804-00460  
**Significant Permit Modification No.:** 039-36819-00460  
**Reviewer:** Brian Wright

**Uncontrolled/Unlimited Potential to Emit (tons/year)**

<b>Emission Units</b>	<b>PM</b>	<b>PM10</b>	<b>PM2.5</b>	<b>SO2</b>	<b>NOx</b>	<b>VOC</b>	<b>CO</b>	<b>Highest Single HAP</b>	<b>Total HAP</b>
LML1	4.50	4.50	4.50	-----	-----	126.89	-----	Xylene 1.56	1.56
LML2	26.36	26.36	26.36	-----	-----	395.97	-----	Toluene 44.07	44.81
<b>Modification PTE</b>	<b>30.86</b>	<b>30.86</b>	<b>30.86</b>	<b>0.00</b>	<b>0.00</b>	<b>522.86</b>	<b>0.00</b>	<b>Toluene 44.07</b>	<b>46.36</b>

**Appendix A: Emissions Calculations  
VOC and Particulate  
from Surface Coating Operations**

Company Name: Native Hardwoods, Inc.  
Source Address: 316 Roske Drive, Elkhart, IN 46516  
Significant Source Modification No.: 039-36804-00460  
Significant Permit Modification No.: 039-36819-00460  
Reviewer: Brian Wright

Material	Unit ID	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. - gal/unit (gal./sq. ft.)	Maximum unit/hour (sq. ft. / hr)	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	lb VOC/gal solids	Transfer Efficiency	Uncontrolled Particulate Potential (lb/hr)	PM Control Efficiency	Controlled Particulate Potential (lb/hr)	Uncontrolled Particulate Potential (ton/yr)	Controlled Particulate Potential (tons/yr)
Chemcraft Optiseal 900	EU-01A	7.59	78.61%	21.1%	57.9%	19.2%	14.19%	0.00625	208.500	5.44	4.40	5.73	137.54	25.10	30.99	75%	0.53	90%	0.05	2.32	0.23
Laquer Thinner	EU-01A	7.00	100.00%	0.0%	100.0%	0.0%	0.00%	0.00026	208.500	7.00	7.00	0.37	8.93	1.63	0.00	75%	0.00	90%	0.00	0.00	0.00
MEK	EU-01A	6.73	100.00%	0.0%	100.0%	0.0%	0.00%	0.00005	208.500	6.73	6.73	0.06	1.52	0.28	0.00	100%	0.00	90%	0.00	0.00	0.00
Chemcraft Optiseal 900	EU-01B	7.59	78.61%	21.1%	57.9%	19.2%	14.19%	0.00625	208.500	5.44	4.40	5.73	137.54	25.10	30.99	75%	0.53	90%	0.05	2.32	0.23
Laquer Thinner	EU-01B	7.00	100.00%	0.0%	100.0%	0.0%	0.00%	0.00026	208.500	7.00	7.00	0.37	8.93	1.63	0.00	75%	0.00	90%	0.00	0.00	0.00
MEK	EU-01B	6.73	100.00%	0.0%	100.0%	0.0%	0.00%	0.00005	208.500	6.73	6.73	0.06	1.52	0.28	0.00	100%	0.00	90%	0.00	0.00	0.00
Plasticlear 90 Sheen	EU-01C	8.36	38.40%	0.0%	38.4%	0.0%	61.60%	0.00685	208.500	3.21	3.21	4.58	110.04	20.08	5.21	75%	1.84	90%	0.18	8.05	0.79
MEK	EU-01C	6.73	100.00%	0.0%	100.0%	0.0%	0.00%	0.00005	208.500	6.73	6.73	0.06	1.52	0.28	0.00	100%	0.00	0%	0.00	0.00	0.00
Plasticlear 90 Sheen	EU-01D	8.36	38.40%	0.0%	38.4%	0.0%	61.60%	0.00685	208.500	3.21	3.21	4.58	110.04	20.08	5.21	75%	1.84	90%	0.18	8.05	0.79
MEK	EU-01D	6.73	100.00%	0.0%	100.0%	0.0%	0.00%	0.00005	208.500	6.73	6.73	0.06	1.52	0.28	0.00	100%	0.00	NA	0.00	0.00	0.00
Clear Spray Adhesive	EU-01E	6.32	82.25%	26.5%	55.8%	0.0%	0.00%	0.00500	12.500	3.52	3.52	0.22	5.29	0.96	0.00	75%	0.02	90%	0.00	0.08	0.01
MEK	EU-01E	6.73	100.00%	0.0%	100.0%	0.0%	0.00%	0.00005	12.500	6.73	6.73	0.00	0.09	0.02	0.00	100%	0.00	NA	0.00	0.00	0.00
Windsor Birch	EU-01F	7.58	76.90%	0.0%	76.9%	0.0%	0.0%	0.00625	160.000	5.83	5.83	5.83	139.90	25.53	0.00	75%	0.44	90%	0.04	1.92	0.19
MEK	EU-01F	6.73	100.00%	0.0%	100.0%	0.0%	0.00%	0.00005	160.000	6.73	6.73	0.05	1.16	0.21	0.00	100%	0.00	NA	0.00	0.00	0.00
Chemcraft Optiseal 900	EU-01G	7.59	78.61%	21.1%	57.9%	19.2%	14.19%	0.00625	160.000	5.44	4.40	4.40	105.54	19.26	30.99	75%	0.41	90%	0.04	1.78	0.17
Laquer Thinner	EU-01G	7.00	100.00%	0.0%	100.0%	0.0%	0.00%	0.00026	160.000	7.00	7.00	0.29	6.85	1.25	0.00	75%	0.00	90%	0.00	0.00	0.00
MEK	EU-01G	6.73	100.00%	0.0%	100.0%	0.0%	0.00%	0.00005	160.000	6.73	6.73	0.05	1.16	0.21	0.00	75%	0.00	90%	0.00	0.00	0.00
Sealer - 6627SS	EU-01H	7.66	72.60%	24.3%	48.3%	22.4%	27.40%	0.00850	864.000	4.76	3.70	27.17	652.11	119.01	13.50	75%	3.85	90%	0.39	16.88	1.66
Topcoat - Medium Rub Precat	EU-01H	7.40	77.00%	35.9%	41.1%	31.9%	23.00%	0.01010	864.000	4.47	3.04	26.54	636.97	116.25	13.22	75%	3.71	90%	0.37	16.26	1.60
Laquer Thinner	EU-01H	7.00	100.00%	0.0%	100.0%	0.0%	0.00%	0.00026	864.000	7.00	7.00	1.57	37.74	6.89	0.00	75%	0.00	NA	NA	NA	NA
MEK	EU-01H	6.75	100.00%	0.0%	100.0%	0.0%	0.00%	0.00005	864.000	6.75	6.75	0.26	6.30	1.15	0.00	75%	0.00	NA	NA	NA	NA
Rollie Williams Paint Spot Nanochem - Spice Spray Stain 54166.601	EU-02	7.28	50.12%	0.0%	50.1%	0.0%	0.00%	0.00480	186.800	3.65	3.65	3.27	78.55	14.33	0.00	75%	0.81	90%	0.08	3.57	0.35
<b>Total Potential to Emit (tons/year)</b>														<b>399.81</b>						<b>61.22</b>	<b>6.01</b>

**METHODOLOGY**

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

**Appendix A: Emissions Calculations  
HAP Emissions from Spray Coating Operations**

Company Name: Native Hardwoods, Inc.  
Source Address: 316 Roske Drive, Elkhart, IN 46516  
Significant Source Modification No.: 039-36804-00460  
Significant Permit Modification No.: 039-36819-00460  
Reviewer: Brian Wright

Material	Unit ID	Density (lb/gal)	Gal of Mat. - gal/unit (gal./sq. ft.)	Maximum unit/hour (sq. ft. / hr)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Ethylbenzene	Weight % Cumene	Weight % Hexane	PTE Xylene (ton/yr)	PTE Toluene (ton/yr)	PTE Formaldehyde (ton/yr)	PTE Ethylbenzene (ton/yr)	PTE Cumene (ton/yr)	PTE Hexane (ton/yr)	Line Combined HAPs (ton/yr)
Chemcraft Optiseal 900	EU-01A	7.59	0.00625	208.500	4.53%	0.00%	0.07%	0.94%	0.00%	0.00%	1.96	0.00	0.03	0.41	0.00	0.00	2.74
Laquer Thinner	EU-01A	7.00	0.00026	208.500	0.00%	20.71%	0.00%	0.00%	0.00%	0.00%	0.00	0.34	0.00	0.00	0.00	0.00	
Chemcraft Optiseal 900	EU-01B	7.59	0.00625	208.500	4.53%	0.00%	0.07%	0.94%	0.00%	0.00%	1.96	0.00	0.03	0.41	0.00	0.00	2.74
Laquer Thinner	EU-01B	7.00	0.00026	208.500	0.00%	20.71%	0.00%	0.00%	0.00%	0.00%	0.00	0.34	0.00	0.00	0.00	0.00	
Plasticlear 90 Sheen	EU-01C	8.36	0.00685	208.500	0.87%	3.81%	1.78%	1.22%	0.00%	0.00%	0.45	1.99	0.93	0.64	0.00	0.00	4.01
Plasticlear 90 Sheen	EU-01D	8.36	0.00685	208.500	0.87%	3.81%	1.78%	1.22%	0.00%	0.00%	0.45	1.99	0.93	0.64	0.00	0.00	4.01
Clear Spray Adhesive	EU-01E	6.32	0.00500	12.500	0.00%	15.0%	0.00%	0.00%	0.00%	5.0%	0.00	0.26	0.00	0.00	0.00	0.09	0.35
Windsor Birch	EU-01F	7.58	0.00625	160.000	1.0%	0.00%	0.00%	1.00%	2.00%	0.00%	0.33	0.00	0.00	0.33	0.66	0.00	1.33
Chemcraft Optiseal 900	EU-01G	7.59	0.00625	160	4.53%	0.00%	0.07%	0.94%	0.00%	0.00%	1.51	0.00	0.02	0.31	0.00	0.00	2.11
Laquer Thinner	EU-01G	7.00	0.00026	160	0.00%	20.71%	0.00%	0.00%	0.00%	0.00%	0.00	0.26	0.00	0.00	0.00	0.00	
Sealer - 6627SS	EU-01H	7.66	0.00850	864.000	10.0%	0.00%	1.00%	1.00%	0.00%	0.00%	24.64	0.00	2.46	2.46	0.00	0.00	31.36
Topcoat - Medium Rub Precat	EU-01H	7.40	0.01010	864.000	0.00%	0.00%	1.0%	0.00%	0.00%	0.00%	0.00	0.00	2.83	0.00	0.00	0.00	
Laquer Thinner	EU-01H	7.00	0.00026	864.000	0.00%	20.71%	0.00%	0.00%	0.00%	0.00%	0.00	1.43	0.00	0.00	0.00	0.00	
<b>Total Potential to Emit of Each Single HAP (tons/year)</b>											31.31	6.61	7.24	5.20	0.66	0.09	

Material	Unit ID	Density (lb/gal)	Gal of Mat. - gal/unit (gal./sq. ft.)	Maximum unit/hour (sq. ft. / hr)	Weight % Xylene	Weight % Glycol Ethers*	Weight % Cobalt	PTE Xylene (tons/yr)	PTE Glycol Ethers (tons/yr)*	PTE Cobalt (tons/yr)	PTE of Total HAPs
Rollie Williams Paint Spot Nanochem - Spice Spray Stain 54166.601	EU-02	7.28	0.00480	186.800	0.73%	0.67%	0.61%	0.21	0.19	0.17	0.57

**Total Potential to Emit of Combined HAPs (tons/year) 49.22**  
**Total Potential to Emit of Highest Single HAP (tons/year) 31.52 (Xylene)**

**METHODOLOGY**

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

\*Glycol Ethers consisting of: Diethylene Glycol Monobutyl Ether (0.1%), Ethylene Glycol Monopropyl Ether (0.51%), Glycol Ethers (.beta.-Alanine, [4-[(4,5-dicyano-1-ethyl-1H-imidazol-2-yl)azo]-3- methylphenyl]-N-2-propenyl-, 2-methoxyethyl ester) (0.06%)

**Appendix A: Emissions Calculations  
VOC and Particulate  
from Linear Molding Line Surface Coating Operations**

**Company Name: Native Hardwoods, Inc.  
Source Address: 316 Roske Drive, Elkhart, IN 46516  
Significant Source Modification No.: 039-36804-00460  
Significant Permit Modification No.: 039-36819-00460  
Reviewer: Brian Wright**

Material	Unit ID	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Maximum Usage gal/unit (gal./ft. ft.)	Maximum Throughput unit/hour (ft. ft. / hr)	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	lb VOC/gal solids	Transfer Efficiency	Uncontrolled Particulate Potential (lb/hr)	PM Control Efficiency	Controlled Particulate Potential (lb/hr)	Uncontrolled Particulate Potential (ton/yr)	Controlled Particulate Potential (tons/yr)												
SLW Rapture S/W Stain	LML1	8.10	83.83%	38.2%	45.63%	32.2%	16.17%	0.00142	5520	5.45	3.70	28.97	695.30	126.89	22.86	90%	1.03	90%	0.10	4.50	0.44												
Acetone	LML1	6.69	100.00%	100.0%	0.0%	0.0%	0.00%	0.00005	5520	0.00	0.00	0.00	0.00	0.00	0.00	100%	0.00	90%	0.00	0.00	0.00												
<b>Line Total PTE</b>												<b>28.97</b>	<b>695.30</b>	<b>126.89</b>																			
Postcat 30SH Clear	LML2	7.79	66.49%	22.9%	43.6%	15.9%	25.07%	0.00390	5520	4.04	3.39	73.03	1752.83	319.89	13.53	90%	5.62	90%	0.56	24.61	2.42												
Catalyst 873-0870	LML2	7.44	81.33%	0.0%	81.3%	0.0%	19.00%	0.00052	5520	6.05	6.05	17.37	416.85	76.07	0.00	90%	0.40	90%	0.04	1.75	0.17												
Acetone	LML2	6.69	100.00%	100.0%	0.0%	0.0%	0.00%	0.00005	5520	0.00	0.00	0.00	0.00	0.00	0.00	100%	0.00	90%	0.00	0.00	0.00												
<b>Line Total PTE</b>												<b>90.40</b>	<b>2169.68</b>	<b>395.97</b>																			
<b>Total Potential to Emit (tons/year)</b>																																	
														<b>522.86</b>		<b>30.86</b>		<b>3.03</b>															

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

**Appendix A: Emissions Calculations  
HAP Emissions from Spray Coating Operations**

**Company Name: Native Hardwoods, Inc.  
Source Address: 316 Roske Drive, Elkhart, IN 46516  
Significant Source Modification No.: 039-36804-00460  
Significant Permit Modification No.: 039-36819-00460  
Reviewer: Brian Wright**

Material	Unit ID	Density (lb/gal)	Maximum Usage gal/unit (gal./lf. ft.)	Maximum Throughput unit/hour (lf. ft. / hr)	Weight % Xylene	Weight % Toluene	Weight % MIBK	PTE Xylene (ton/yr)	PTE Toluene (ton/yr)	PTE MIBK (ton/yr)	Total HAPs (ton/yr)
SLW Rapture S/W Stain	LML1	8.10	0.00142	5520	0.56%	0.00%	0.00%	1.56	0.00	0.00	1.56
Acetone	LML1	6.69	0.00005	5520	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
<b>Line Total PTE</b>								<b>1.56</b>	<b>0.00</b>	<b>0.00</b>	<b>1.56</b>
Postcat 30SH Clear	LML2	7.79	0.00390	5520	0.00%	6.00%	0.10%	0.00	44.07	0.73	44.81
Catalyst 873-0870	LML2	7.44	0.00052	5520	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
Acetone	LML2	6.69	0.00005	5520	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
<b>Line Total PTE</b>								<b>0.00</b>	<b>44.07</b>	<b>0.73</b>	<b>44.81</b>

**Total Potential to Emit (tons/year)      1.56      44.07      0.73      46.36**

**METHODOLOGY**

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

**Appendix A: Emissions Calculations  
Woodworking and Corian Countertop Grinding/Machining**

**Company Name: Native Hardwoods, Inc.  
Source Address: 316 Roske Drive, Elkhart, IN 46516  
Significant Source Modification No.: 039-36804-00460  
Significant Permit Modification No.: 039-36819-00460  
Reviewer: Brian Wright**

Operation	Baghouse	Process Weight Rate (lbs/hr)	Process Weight Rate (tons/hr)	Air Flow Rate (acfm)	Outlet Grain Loading (gr/ascf)	Control Efficiency (%)	Uncontrolled PTE of PM/PM10/PM2.5 (lbs/hr)	Uncontrolled PTE of PM/PM10/PM2.5 (tons/yr)	Controlled PTE of PM/PM10/PM2.5 (lbs/hr)	Controlled PTE of PM/PM10/PM2.5 (tons/yr)	326 IAC 6-3-2 Maximum Allowable Emissions (lb/hr)
Woodworking	BH-1	765	0.383	24600	0.0027	99.0%	56.93	249.36	0.57	2.49	2.15
Woodworking	BH-2	50	0.025	20500	0.003	99.0%	52.71	230.89	0.53	2.31	N/A
Corian Countertop Grinding/Machining	BH-3	250	0.125	3000	0.00039	99.0%	1.01	4.42	0.01	0.04	1.02
<b>TOTAL</b>							<b>110.65</b>	<b>484.66</b>	<b>1.11</b>	<b>4.85</b>	

**Limited to Render 326 IAC 2-2 (PSD) Not Applicable**

	Baghouse	Limited Efficiency (%)	Limited PTE of PM/PM10/PM2.5 (lbs/hr)	Limited PTE of PM/PM10/PM2.5 (tons/yr)
Limited	BH-1	75.0%	14.23	62.33
Limited	BH-2	75.0%	13.18	57.73
Uncontrolled/Unlimited	BH-3	NA	1.01	4.42
<b>TOTAL</b>			<b>28.42</b>	<b>124.47</b>

**Methodology**

Controlled PTE of PM/PM10/PM2.5 (lbs/hr) = Flow Rate (acfm) x Outlet Grain Loading (grains/ascf) x 60 (min/hr) x 1/7000 (lb/grains)

Controlled PTE of PM/PM10/PM2.5 (tons/yr) = Controlled PTE of PM/PM10/PM2.5 (lbs/hr) x 8760 (hr/yr) x 1/2000 (ton/lbs)

Uncontrolled PTE of PM/PM10/PM2.5 (lbs/hr) = Controlled PTE of PM/PM10/PM2.5 (lbs/hr) x 1/(1 - Control Efficiency (%))

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

Limited PTE of PM/PM10/PM2.5 (lbs/hr) = Uncontrolled PTE of PM/PM10/PM2.5 (lbs/hr) x (1 - Limited Efficiency (%))

Limited PTE of PM/PM10/PM2.5 (tons/yr) = Limited PTE of PM/PM10/PM2.5 (lbs/hr) x 8760 (hr/yr) x 1/2000 (ton/lbs)

326 IAC 6-3-2 Maximum Allowable Emissions (lb/hr) = (4.10 \* (Process Weight Rate (tons/hr) ^ 0.67))

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

**Company Name: Native Hardwoods, Inc.  
Source Address: 316 Roske Drive, Elkhart, IN 46516  
Significant Source Modification No.: 039-36804-00460  
Significant Permit Modification No.: 039-36819-00460  
Reviewer: Brian Wright**

# of Emission Units	Emission Unit ID	Total Heat Input Capacity (MMBtu/hr)
3	HU01-HU-03	0.38
15	HU04-HU11 HU14-HU20	3.00
2	HU12-HU13	0.35
<b>Total</b>		<b>3.73</b>

HHV	Potential Throughput
mmBtu	MMCF/yr
mmscf	MMCF/yr
1000	32.63

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
Potential Emission in tons/yr	0.03	0.12	0.12	0.01	**see below	0.09	1.37

\*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

**Hazardous Air Pollutants (HAPs)**

	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	3.4E-05	2.0E-05	1.2E-03	2.9E-02	5.5E-05	3.1E-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	8.2E-06	1.8E-05	2.3E-05	6.2E-06	3.4E-05	8.9E-05
					<b>Total HAPs</b>	<b>3.1E-02</b>
					<b>Worst HAP</b>	<b>2.9E-02</b>

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.

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

Company Name: Native Hardwoods, Inc.  
 Source Address: 316 Roske Drive, Elkhart, IN 46516  
 Significant Source Modification No.: 039-36804-00460  
 Significant Permit Modification No.: 039-36819-00460  
 Reviewer: Brian Wright

**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)	3.0	1.0	3.0	5.0	15.0	1000	0.189	0.6	207.4
Vehicle (leaving plant) (one-way trip)	3.0	1.0	3.0	5.0	15.0	1000	0.189	0.6	207.4
<b>Totals</b>			<b>6.0</b>		<b>30.0</b>			<b>1.1</b>	<b>414.8</b>

Average Vehicle Weight Per Trip = 5.0 tons/trip  
 Average Miles Per Trip = 0.19 miles/trip

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

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	5.0	5.0	5.0	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m <sup>2</sup> = 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, Eext =  $E * [1 - (p/4N)]$  (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, Eext = Ef \* [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

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	0.449	0.090	0.0220	lb/mile
Mitigated Emission Factor, Eext =	0.411	0.082	0.0202	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)	0.05	0.01	2.29E-03	0.04	0.01	2.09E-03
Vehicle (leaving plant) (one-way trip)	0.05	0.01	2.29E-03	0.04	0.01	2.09E-03
<b>Totals</b>	<b>0.09</b>	<b>0.02</b>	<b>4.57E-03</b>	<b>0.09</b>	<b>0.02</b>	<b>4.18E-03</b>

**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)  
 Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] \* [1 - Dust Control Efficiency]

**Abbreviations**

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



# Indiana Department of Environmental Management

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100 N. Senate Avenue • Indianapolis, IN 46204

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**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

April 21, 2016

Mr. Jim Edmundson  
Native Hardwoods, Inc.  
316 Roske Drive  
Elkhart, IN 46516

Re: Public Notice  
Native Hardwoods, Inc.  
Permit Level: Title V Significant Source  
Modification and Significant Permit Modification  
Permit Number: 039-36804-00460 and  
039-36819-00460

Dear Mr. Edmundson:

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 Elkhart Truth in Elkhart, Indiana publish the abbreviated version of the public notice no later than April 23, 2016. 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 Elkhart Public Library, 300 South 2<sup>nd</sup> Street in Elkhart, 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 2/17/2016



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**Michael R. Pence**  
*Governor*

**Carol S. Comer**  
*Commissioner*

## **ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING**

April 19, 2016

Elkhart Truth  
421 South Second Street  
PO Box 487  
Elkhart, IN 46515

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Native Hardwoods, Inc., Elkhart 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 April 23, 2016.

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: 039-36804-00460 and 039-36819-00460

Enclosure

PN Newspaper.dot 2/17/2016



# Indiana Department of Environmental Management

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**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

April 21, 2016

To: Elkhart 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: Native Hardwoods, Inc.**  
**Permit Number: 039-36804-00460 and 039-36819-00460**

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 2/17/2016



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Governor

**Carol S. Comer**  
Commissioner

## Notice of Public Comment

**April 21, 2016**

**Native Hardwoods, Inc.**

**039-36804-00460 and 039-36819-00460**

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](mailto: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 2/17/2016



# Indiana Department of Environmental Management

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**Michael R. Pence**  
*Governor*

**Carol S. Comer**  
*Commissioner*

## **AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD DRAFT INDIANA AIR PERMIT**

April 21, 2016

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

**Permit Number:** 039-36804-00460 and 039-36819-00460  
**Applicant Name:** Native Hardwoods, Inc.  
**Location:** Elkhart, Elkhart 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](mailto:chammack@idem.IN.gov) or (317) 233-2414.

Affected States Notification.dot 2/17/2016

# Mail Code 61-53

IDEM Staff	VHAUN 4/21/2016		DRAFT		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Native Hardwoods, Inc. 039-36804 and 36819-00460 Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Jim Edmundson Native Hardwoods, Inc. 316 Roske Drive Elkhart IN 46516 (Source CAATS)										
2		Elkhart City Council and Mayors Office 229 South Second Street Elkhart IN 46516 (Local Official)										
3		Elkhart Public Library 300 S 2nd St Elkhart IN 46516-3184 (Library)										
4		Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 (Health Department)										
5		Middlebury Town Council and Town Manager P.O. Box 812, 418 North Main Street Middlebury IN 46540 (Local Official)										
6		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 (Local Official)										
7		Mr. Doug Elliott D & B Environmental Services, Inc. 401 Lincoln Way West Osceola IN 46561 (Consultant)										
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<b>7</b>			