



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

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Michael R. Pence
Governor

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Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a New Source Review and
Federally Enforceable State Operating Permit (FESOP)

for Lake Area Designs, LLC in LaGrange County

FESOP No.: F087-37015-00678

The Indiana Department of Environmental Management (IDEM) has received an application from Lake Area Designs, LLC, located at 1260 N. Detroit St., LaGrange, Indiana 46761, for a new source review and FESOP. If approved by IDEM's Office of Air Quality (OAQ), this proposed permit would allow Lake Area Designs, LLC to construct and operate new spray booths. Due to this change, the source will transition from a MSOP to a FESOP.

The applicant intends to construct and operate new equipment that will emit air pollutants. The potential to emit of any regulated pollutants will be limited to less than the TV and/or PSD major threshold levels, respectively. IDEM has reviewed this application, and has developed preliminary findings, consisting of a draft permit and several supporting documents, that would allow the applicant to make this change.

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

LaGrange Public Library
203 W. Spring St.
LaGrange, IN 46761

and

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

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

How can you participate in this process?

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

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, 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 F087-37015-00678 in all correspondence.

Comments should be sent to:

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

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

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

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, at the IDEM Regional Office indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

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



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



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Commissioner

Federally Enforceable State Operating Permit OFFICE OF AIR QUALITY

**Lake Area Designs, LLC
1260 N. Detroit St.
LaGrange, Indiana 46761**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 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 existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-8-11.1, applicable to those conditions

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

Operation Permit No. F087-37015-00678	
Issued by:	Issuance Date:
Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Expiration Date:

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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 2-8-3(b)]

The Permittee owns and operates a stationary wood parts manufacturing and finishing plant.

Source Address:	1260 N. Detroit St., LaGrange, Indiana 46761
General Source Phone Number:	260-499-3222
SIC Code:	2431 (Wood Window and Door Manufacturing), 2511 (Wood Household Furniture)
County Location:	Lagrange
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State 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 2-8-3(c)(3)]

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

- (a) One (1) woodworking operation, identified as WW1, constructed in 2014, with a maximum capacity of 1,000 pounds per hour, controlled by dust collector DC1 at a maximum air flow of 8,500 acfm, and exhausting indoors.
- (b) One (1) woodworking operation, identified as WW2, constructed in 2014, with a maximum capacity of 500 pounds per hour, controlled by dust collector DC2 at a maximum air flow of 4,000 acfm, and exhausting indoors.
- (c) One Spray Booth Operation, identified as SB1, constructed in 2014, with a maximum capacity of 10 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB1.
- (d) One Spray Booth Operation, identified as SB2, constructed in 2014, with a maximum capacity of 10 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB2.
- (e) One Spray Booth Operation, identified as SB3, constructed in 2014, with a maximum capacity of 10 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB3.
- (f) One Spray Booth Operation, identified as SB4, constructed in 2015, with a maximum capacity of 10 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB4.
- (g) One Spray Booth Operation, identified as SB5, approved in 2016 for construction, with a maximum capacity of 12 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB5.

- (h) One Spray Booth Operation, identified as SB6, approved in 2016 for construction, with a maximum capacity of 12 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB6.
- (i) One Spray Booth Operation, identified as SB7, approved in 2016 for construction, with a maximum capacity of 12 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB7.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu (10 MMBtu) per hour, including the following:
 - (1) Ten (10) space heating units, located in Plant 1, each with a maximum heat input capacity of 0.06 MMBtu per hour, constructed in 2014, and exhausting at stack SH1S.
 - (2) Two (2) space heating units, located in Plant 2, each with a maximum heat input capacity of 0.08 MMBtu per hour, constructed in 2014, and exhausting at stack SH1S.
 - (3) One (1) space heating unit, located in Plant 2, with a maximum heat input capacity of 0.06 MMBtu per hour, constructed in 2014, and exhausting at stack SH1S.
 - (4) One (1) space heating units, located in Plant 3, each with a maximum heat input capacity of 4.54 MMBtu per hour, constructed in 2014, and exhausting at stack AM1S.
 - (5) One (1) space heating unit, located in the office, each with a maximum heat input capacity of 0.04 MMBtu per hour, constructed in 2014, and exhausting at stack SH2S.
 - (6) One (1) natural gas fired air makeup unit, identified as AM2, approved in 2016 for construction, with a maximum heat input capacity of 4.54 MMBtu/hr, and exhausting to stack SVAM2.
- (b) Paved roads.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]

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

B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, F087-37015-00678, 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, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]

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

B.5 Severability [326 IAC 2-8-4(4)]

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 2-8-4(5)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

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

B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
 - (1) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), 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) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

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

- (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 2-8-4(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.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]

- (a) If required by specific condition(s) in Section D of this permit, 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) 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.12 Emergency Provisions [326 IAC 2-8-12]

- (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 except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or 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 2-8-4(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.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 2-8-3(c)(6) 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 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) 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.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

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

- (a) All terms and conditions of permits established prior to F087-37015-00678 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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 2-8-3(h) and 326 IAC 2-8-9.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State 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 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 2-8-8(a)]
- (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 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(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 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

- (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 2-8-3. 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least 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 2-8 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 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (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 approval required by 326 IAC 2-8-11.1 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

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 2-8-15(b)(1) and (c). 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 2-8-15(b)(1) and (c).

- (b) Emission Trades [326 IAC 2-8-15(b)]
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 2-8-15(b).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]
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 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (d) 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.19 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than 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) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][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.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-8-4(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 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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.

Testing Requirements [326 IAC 2-8-4(3)]

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

Compliance Monitoring Requirements [326 IAC 2-8-4(1)][326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

- (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

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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

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

Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.13 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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

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

- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system);
or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

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

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

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

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

C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (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) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. 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.17 Compliance with 40 CFR 82 and 326 IAC 22-1

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (c) One Spray Booth Operation, identified as SB1, constructed in 2014, with a maximum capacity of 10 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB1.
- (d) One Spray Booth Operation, identified as SB2, constructed in 2014, with a maximum capacity of 10 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB2.
- (e) One Spray Booth Operation, identified as SB3, constructed in 2014, with a maximum capacity of 10 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB3.
- (f) One Spray Booth Operation, identified as SB4, constructed in 2015, with a maximum capacity of 10 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB4.
- (g) One Spray Booth Operation, identified as SB5, approved in 2016 for construction, with a maximum capacity of 12 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB5.
- (h) One Spray Booth Operation, identified as SB6, approved in 2016 for construction, with a maximum capacity of 12 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB6.
- (i) One Spray Booth Operation, identified as SB7, approved in 2016 for construction, with a maximum capacity of 12 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB7.

(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 2-8-4(1)]

D.1.1 FESOP Limitations [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render the requirements 326 IAC 2-7 (Part 70 Permits) not applicable, the total input of VOC to the spray booths (SB1 through SB7) shall not exceed 99 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit shall limit VOC from the entire source to less than 100 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

D.1.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), particulate from the spray booths (SB1 through SB7) shall be controlled by dry particulate filters, waterwash, or an equivalent control device, and the Permittee shall operate each control device in accordance with manufacturer's specifications.

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

Pursuant to 326 IAC 8-2-12, when applying surface coatings to wood furniture and cabinets in the spray booths (SB1 through SB7), 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) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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 2-8-4(1)]

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

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

D.1.6 Particulate Control

In order to comply with Condition D.1.2, the dry filters for particulate control shall be in operation at all times when the spray booths (SB1 through SB7) are in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4(1)][326 IAC 2-8-5(a)(1)]

D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters associated with spray booths (SB1 through SB7). To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating operations stacks while the operations are in operation. If a condition exists which should result in a response step, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.1.8 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.1.1 and D.1.5, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC input limit 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 used on a monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (3) The cleanup solvent usage for each month.
 - (4) The total VOC input for each month; and
 - (5) The total VOC input for each compliance period.
- (b) To document the compliance status with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.
- (c) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.1.9 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.1.1 shall be submitted using the reporting form located at the end of this permit, or its 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 report submitted by the Permittee does require a certification that meet the requirements of 326 IAC 2-8-5(a)(1) by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) woodworking operation, identified as WW1, constructed in 2014, with a maximum capacity of 1,000 pounds per hour, controlled by dust collector DC1 at a maximum air flow of 8,500 acfm, and exhausting indoors.
- (b) One (1) woodworking operation, identified as WW2, constructed in 2014, with a maximum capacity of 500 pounds per hour, controlled by dust collector DC2 at a maximum air flow of 4,000 acfm, and exhausting indoors.

(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 2-8-4(1)]

D.2.1 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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 2-8-4(1)]

D.2.2 Particulate Control

In order to assure that the woodworking operations (WW1 and WW2) are exempt from the requirements of 326 IAC 6-3-2, the dust collectors (DC1 and DC2) for particulate control shall be in operation and control emissions from the woodworking operation at all times that the woodworking operation is in operation.

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Lake Area Designs, LLC
Source Address: 1260 N. Detroit St., LaGrange, Indiana 46761
FESOP Permit No.: F087-37015-00678

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:

Date:

**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**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Lake Area Designs, LLC
Source Address: 1260 N. Detroit St., LaGrange, Indiana 46761
FESOP Permit No.: F087-37015-00678

This form consists of 2 pages

Page 1 of 2

- | |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">• 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 2-8-12 |
|--|

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:

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

FESOP Quarterly Report

Source Name: Lake Area Designs, LLC
Source Address: 1260 N. Detroit St., LaGrange, Indiana 46761
FESOP Permit No.: F087-37015-00678
Facility: Spray Booths (SB1 through SB7)
Parameter: VOC
Limit: The total input of VOC to the spray booths (SB1 through SB7) shall not exceed 99 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: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE AND ENFORCEMENT BRANCH
 FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Lake Area Designs, LLC
 Source Address: 1260 N. Detroit St., LaGrange, Indiana 46761
 FESOP Permit No.: F087-37015-00678

Months: _____ to _____ Year: _____

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

Technical Support Document (TSD) for a MSOP Transitioning to a Federally Enforceable State Operating Permit (FESOP) with New Source Review (NSR)

Source Description and Location

Source Name: Lake Area Designs, LLC
Source Location: 1260 N. Detroit St., LaGrange, IN 46761
County: LaGrange
SIC Code: 2431 (Wood Window and Door Manufacturing),
2511 (Wood Household Furniture)
Operation Permit No.: F087-37015-00678
Permit Reviewer: Brian Wright

On March 30, 2016, the Office of Air Quality (OAQ) received an application from Lake Area Designs, LLC related to the construction and operation of new emission units at an existing stationary wood parts manufacturing and finishing plant and transition from a MSOP to a FESOP.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) MSOP No. M087-34329-00678, issued on June 9, 2014, and;
- (b) MSOP Minor Permit Revision No. 087-35624-00678, issued on April 2, 2015.

Due to this application, the source is transitioning from a MSOP to a FESOP.

County Attainment Status

The source is located in LaGrange County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. ¹
PM _{2.5}	Unclassifiable or attainment effective April 5, 2005, for the annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.

¹Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.

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

- (b) **PM_{2.5}**
LaGrange County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**
LaGrange County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Background and Description of Permitted Emission Units

The Office of Air Quality (OAQ) has reviewed an application, submitted by Lake Area Designs, LLC on March 30, 2016, relating to the construction and operation of three (3) new spray booths. Due to this change, the source will transition from a MSOP to a FESOP.

The source consists of the following permitted emission units:

- (a) One (1) woodworking operation, identified as WW1, constructed in 2014, with a maximum capacity of 1,000 pounds per hour, controlled by dust collector DC1 at a maximum air flow of 8,500 acfm, and exhausting indoors.
- (b) One (1) woodworking operation, identified as WW2, constructed in 2014, with a maximum capacity of 500 pounds per hour, controlled by dust collector DC2 at a maximum air flow of 4,000 acfm, and exhausting indoors.
- (c) One Spray Booth Operation, identified as SB1, constructed in 2014, with a maximum capacity of 10 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB1.
- (d) One Spray Booth Operation, identified as SB2, constructed in 2014, with a maximum capacity of 10 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB2.
- (e) One Spray Booth Operation, identified as SB3, constructed in 2014, with a maximum capacity of 10 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB3.
- (f) One Spray Booth Operation, identified as SB4, constructed in 2015, with a maximum capacity of 10 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB4.
- (g) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu (10 MMBtu) per hour, including the following:
 - (1) Ten (10) space heating units, located in Plant 1, each with a maximum heat input capacity of 0.06 MMBtu per hour, constructed in 2014, and exhausting at stack SH1S.
 - (2) Two (2) space heating units, located in Plant 2, each with a maximum heat input capacity of 0.08 MMBtu per hour, constructed in 2014, and exhausting at stack SH1S.

- (3) One (1) space heating unit, located in Plant 2, with a maximum heat input capacity of 0.06 MMBtu per hour, constructed in 2014, and exhausting at stack SH1S.
 - (4) One (1) space heating units, located in Plant 3, each with a maximum heat input capacity of 4.54 MMBtu per hour, constructed in 2014, and exhausting at stack AM1S.
 - (5) One (1) space heating unit, located in the office, each with a maximum heat input capacity of 0.04 MMBtu per hour, constructed in 2014, and exhausting at stack SH2S.
- (h) Paved roads.

The following is a list of the new emission units and pollution control devices:

- (a) One Spray Booth Operation, identified as SB5, approved in 2016 for construction, with a maximum capacity of 12 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB5.
- (b) One Spray Booth Operation, identified as SB6, approved in 2016 for construction, with a maximum capacity of 12 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB6.
- (c) One Spray Booth Operation, identified as SB7, approved in 2016 for construction, with a maximum capacity of 12 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB7.
- (d) One (1) natural gas fired air makeup unit, identified as AM2, approved in 2016 for construction, with a maximum heat input capacity of 4.54 MMBtu/hr, and exhausting to stack SVAM2.

“Integral Part of the Process” Determination

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

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – FESOP

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

Pollutant	Potential To Emit (tons/year)
PM	36.86
PM10 ⁽¹⁾	37.11
PM2.5 ⁽¹⁾	37.11
SO ₂	0.03
NO _x	4.27
VOC	146.32
CO	3.59

- (1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10) and particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers (PM2.5), not particulate matter (PM), are each considered as a "regulated air pollutant".

HAPs	Potential To Emit (tons/year)
Toluene	5.72
Methanol	2.31
Xylene	3.12
TOTAL HAPs	11.17

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(30)) of VOC is greater than one hundred (100) tons per year. The PTE of all other regulated criteria pollutants are each less than one hundred (100) tons per year. The source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a New Source Review and a Federally Enforceable State Operating Permit (FESOP) (326 IAC 2-8), because the source will limit emissions to less than the Title V major source threshold levels.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(30)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

PTE of the Entire Source After Issuance of the FESOP

The table below summarizes the potential to emit of the entire source after issuance of this FESOP (after integral woodworking controls), reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this FESOP, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of FESOP (tons/year)								
	PM	PM10*	PM2.5*	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP (Toluene)
Woodworking WW1**	0.96	0.96	0.96	0.00	0.00	0.00	0.00	0.0	0.0
Woodworking WW2**	0.45	0.45	0.45	0.00	0.00	0.00	0.00	0.0	0.0
Spray Booth SB1***	5.02	5.02	5.02	0.00	0.00	99.00	0.00	0.77	0.77 Methanol
Spray Booth SB2***	5.02	5.02	5.02	0.00	0.00		0.00	0.77	0.77 Methanol
Spray Booth SB3***	5.02	5.02	5.02	0.00	0.00		0.00	0.77	0.77 Methanol
Spray Booth SB4***	2.65	2.65	2.65	0.00	0.00		0.00	3.07	1.44 Toluene
Spray Booth SB5***	5.88	5.88	5.88	0.00	0.00		0.00	1.91	1.43 Toluene
Spray Booth SB6***	5.88	5.88	5.88	0.00	0.00		0.00	1.91	1.43 Toluene
Spray Booth SB7***	5.88	5.88	5.88	0.00	0.00		0.00	1.91	1.43 Toluene
Insignificant Activities	0.08	0.32	0.32	0.03	4.27	0.23	3.59	0.08	1.5E-4 Toluene
Total PTE of Entire Source	36.86	37.11	37.11	0.03	4.27	99.23	3.59	11.17	5.72 Toluene
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250		NA
Paved Roads (Fugitive)	0.15	0.03	0.01	0.00	0.00	0.00	0.00	0.0	0.0

*Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant".
 **The PM/PM10/PM2.5 emissions from the woodworking operations are after integral woodworking controls.
 ***The total input of VOC to the seven (7) spray booths (SB1 through SB7) shall not exceed 99 tons per twelve (12) month consecutive period.

(a) FESOP Status

This existing source is not a Title V major stationary source, because the potential to emit criteria pollutants from the entire source will be limited to less than the Title V major source threshold levels. In addition, this existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs is less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year of total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act and is subject to the provisions of 326 IAC 2-8 (FESOP).

Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable, the total input of VOC to the seven (7) spray booths (SB1 through SB7) shall not exceed 99 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 100 tons per

twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

(b) PSD Minor Source

This existing source is not a major stationary source, under PSD (326 IAC 2-2), because:

- (1) The potential to emit of all PSD regulated pollutants are less than 250 tons per year,
- (2) This source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

(c) GHGs

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

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

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Spray of Metal Furniture, 40 CFR 60, Subpart EE (326 IAC 12), are not included in this proposed permit, since the spray booths (SB1 through SB7) only coat wood furniture and wood building products and not metal.
- (b) The requirements of the New Source Performance Standard for Automobiles and Light Duty Truck Spray Operations, 40 CFR 60, Subpart MM (326 IAC 12), are not included in this proposed permit, since the spray booths (SB1 through SB7) only coat wood furniture and wood building products and not automobiles or light duty trucks.
- (c) The requirements of the New Source Performance Standard for Industrial Spray: Large Appliances, 40 CFR 60, Subpart SS (326 IAC 12), are not included in this proposed permit, since the spray booths (SB1 through SB7) only coat wood furniture and wood building products and not large appliances.
- (d) The requirements of the New Source Performance Standard for Metal Coil Spray, 40 CFR 60, Subpart TT (326 IAC 12), are not included in this proposed permit, since the spray booths (SB1 through SB7) only coat wood furniture and wood building products and not metal coils.
- (e) The requirements of the New Source Performance Standard for the Beverage Can Spray Industry, 40 CFR 60, Subpart WW (326 IAC 12), are not included in this proposed permit, since the spray booths (SB1 through SB7) only coat wood furniture and wood building products and not beverage cans.
- (f) The requirements of the New Source Performance Standard for Industrial Spray: Spray of Plastic Parts for Business Machines, 40 CFR 60, Subpart TTT (326 IAC 12), are not included in this

proposed permit, since the spray booths (SB1 through SB7) only coat wood furniture and wood building products and not plastic parts for business machines.

- (g) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this proposed permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (h) 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), are not included in this permit since the source is not a major source of HAPs.
- (i) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Spray of Automobiles and Light-Duty Trucks, 40 CFR 63.3080, Subpart IIII (326 IAC 20-85), are not included in this proposed permit, since the spray booths (SB1 through SB7) are not located in or part of a major source of HAPs and do not coat automobiles or light duty trucks.
- (j) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Spray of Metal Cans, 40 CFR 63.3480, Subpart KKKK (326 IAC 20-86), are not included in this proposed permit, since the spray booths (SB1 through SB7) are not located in or part of a major source of HAPs and do not coat metal cans.
- (k) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Spray of Miscellaneous Metal Parts and Products, 40 CFR 63.3880, Subpart MMMM (326 IAC 20-80), are not included in this proposed permit, since the spray booths (SB1 through SB7) are not located in or part of a major source of HAPs and do not coat metal parts or products.
- (l) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Spray of Large Appliances, 40 CFR 63.4080, Subpart NNNN (326 IAC 20-63), are not included in this proposed permit, since the spray booths (SB1 through SB7) are not located in or part of a major source of HAPs and do not coat large appliances.
- (m) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Spray of Plastic Parts and Products, 40 CFR 63.4480, Subpart PPPP (326 IAC 20-81), are not included in this proposed permit, since the spray booths (SB1 through SB7) are not located in or part of a major source of HAPs and do not coat plastic parts or products.
- (n) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Spray of Wood Building Products, 40 CFR 63.4680, Subpart QQQQ (326 IAC 20-79), are not included in this proposed permit, since the spray booths (SB1 through SB7) are not located in or part of a major source of HAPs.
- (o) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Spray of Metal Furniture, 40 CFR 63.4880, Subpart RRRR (326 IAC 20-78), are not included in this proposed permit, since the spray booths (SB1 through SB7) are not located in or part of a major source of HAPs and do not coat metal furniture.
- (p) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Spray of Metal Coil, 40 CFR 63.5080, Subpart SSSS (326 IAC 20-64), are not included in this proposed permit, since the spray booths (SB1 through SB7) are not located in or part of a major source of HAPs and do not coat metal coil.
- (q) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD (63.7480 through 63.7575) (326 IAC 20-95), are not included in this permit, because this source is not a major source of HAPs as defined in 40 CFR 63.2.

- (r) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Paint Stripping and Miscellaneous Spray Operations at Area Sources, 40 CFR 63.11169, Subpart HHHHHH (6H), are not included in this proposed permit, since the spray booths (SB1 through SB7) do not have a paint stripping operation that utilizes chemical strippers that contain methylene chloride, do not coat or refinish auto bodies, or use coatings that contain chromium, lead, manganese, nickel, or cadmium to coat metal or plastic parts.
- (s) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers for Area Sources, 40 CFR 63, Subpart JJJJJJ, are not included in this permit, since the fourteen (14) natural gas fired heaters are each not a boiler.
- (t) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included for this proposed permit.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-8-4 (FESOP)
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
This source is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new units is 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.
- (d) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (e) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
 - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A,

- (f) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
The source is subject to the requirements of 326 IAC 6-4, because the paved roads have the potential to emit fugitive particulate emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (g) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, because the paved have potential fugitive particulate emissions less than 25 tons per year.
- (h) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (i) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Woodworking

- (j) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b), the requirements of 326 IAC 6-3-2 are not applicable to the woodworking operations (WW1 and WW2), since each has potential particulate emissions after integral woodworking controls of less than five hundred fifty-one thousandths (0.551) pound per hour.

In order to assure that the woodworking operation and woodworking operations (WW1 and WW2) are exempt from the requirements of 326 IAC 6-3-2, the dust collectors (DC1 and DC2) for particulate control shall be in operation and control emissions from the woodworking operations (WW1 and WW2) at all times that the woodworking operations (WW1 and WW2) are in operation.

Spray Booths (SB1 through SB7)

- (k) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(15), the spray booths (SB1 through SB7) are subject to the requirements of 326 IAC 6-3, since each unit has the potential to use equal to or greater than five (5) gallons per day of surface coatings. Pursuant to 326 IAC 6-3-2, particulate from the spray booths (SB1 through SB7) shall be controlled by dry particulate filters, waterwashes, or equivalent control devices, and the Permittee shall operate the control devices in accordance with manufacturer's specifications.
- (l) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Pursuant to 326 IAC 8-1-6, the spray booths (SB1 through SB7) are not subject to requirements of this rule because they are subject to the requirements of 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating).
- (m) 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)
Pursuant to 326 IAC 8-2-1(a)(4), the spray booths (SB1 through SB7) are subject to 326 IAC 8-2-12, because each unit was constructed after July 1, 1990, the actual VOC emissions before controls for each unit are greater than fifteen (15) pounds per day, and it applies surface coating to wood furnishings as defined in 326 IAC 8-2-12(a).

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), when applying surface coatings to wood furniture and cabinets in the spray booths (SB1 through SB7), 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) 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.

The spray booths (SB1 through SB7) are equipped with HVLP spray applicators. Therefore, the spray booths (SB1 through SB7) are able to comply with this rule.

- (n) 326 IAC 8-11 (Wood Furniture Coatings)
 Pursuant to 326 IAC 8-11-1, this source is not subject to the requirements of 326 IAC 8-11 because the source is not located in one of the following counties: Lake Porter, Clark, or Floyd County.

Natural Gas Combustion

- (o) 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heat)
 The natural gas fired units are not subject to the requirements of 326 IAC 6-2 since they are not sources of indirect heat.
- (p) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
 The natural gas fired units are each not subject to the requirements of 326 IAC 6-3, since they each are not a "manufacturing process" as defined by 326 IAC 6-3-1.5.
- (q) 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)
 Pursuant to 326 IAC 7-1.1-1, the natural gas fired units are each not subject to the requirements of 326 IAC 7-1, since each has unlimited sulfur dioxide (SO₂) emissions less than twenty-five (25) tons per year and ten (10) pounds per hour respectively.
- (r) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
 Each of the natural gas fired units is not subject to the requirements of 326 IAC 8-1-6, since each has unlimited VOC potential emissions of less than twenty-five (25) tons per year.

Compliance Determination, Monitoring and Testing Requirements
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- (a) The compliance determination and monitoring requirements applicable to this source are as follows:

Emission Unit	Operating Parameters	Frequency	Range
Spray Booths SB1 - SB7	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 spray booths (SB1 through SB7) must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on March 30, 2016.

The operation of this source shall be subject to the conditions of the attached proposed New Source Review and FESOP No. F087-37015-00678. The staff recommends to the Commissioner that this New Source Review and FESOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Brian Wright at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-6544 or toll free at 1-800-451-6027 extension 4-6544.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emissions Calculations
Potential to Emit Summary**

Company Name: Lake Area Designs, LLC
Source Address: 1260 N. Detroit St., LaGrange, IN 46761
Permit Number: F087-37015-00678
Reviewer: Brian Wright

Unlimited Potential to Emit Integral Woodworking Before Controls (ton/yr)*										
Emission Unit/ID	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	HAP	Worst Single HAP (Toluene)	
Woodworking WW1	95.73	95.73	95.73	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Woodworking WW2	45.05	45.05	45.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Spray Booth SB1	5.02	5.02	5.02	0.00	0.00	20.07	0.00	0.77	0.77	Methanol
Spray Booth SB2	5.02	5.02	5.02	0.00	0.00	20.07	0.00	0.77	0.77	Methanol
Spray Booth SB3	5.02	5.02	5.02	0.00	0.00	20.07	0.00	0.77	0.77	Methanol
Spray Booth SB4	2.65	2.65	2.65	0.00	0.00	22.96	0.00	3.07	1.44	Toluene
Spray Booth SB5	5.88	5.88	5.88	0.00	0.00	20.98	0.00	1.91	1.43	Toluene
Spray Booth SB6	5.88	5.88	5.88	0.00	0.00	20.98	0.00	1.91	1.43	Toluene
Spray Booth SB7	5.88	5.88	5.88	0.00	0.00	20.98	0.00	1.91	1.43	Toluene
NG Combustion	0.08	0.32	0.32	0.03	4.27	0.23	3.59	0.08	1.5E-04	Toluene
Total (non-fugitive)	176.2	176.5	176.5	0.0	4.3	146.3	3.6	11.17	5.72	Toluene
Paved Roads (fugitive)	0.15	0.03	0.01	0.00	0.00	0.00	0.00	0.00	0.00	

Unlimited Potential to Emit After Integral Woodworking Controls (ton/yr)*										
Emission Unit/ID	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	HAP	Worst Single HAP (Toluene)	
Woodworking WW1	0.96	0.96	0.96	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Woodworking WW2	0.45	0.45	0.45	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Spray Booth SB1	5.02	5.02	5.02	0.00	0.00	20.07	0.00	0.77	0.77	Methanol
Spray Booth SB2	5.02	5.02	5.02	0.00	0.00	20.07	0.00	0.77	0.77	Methanol
Spray Booth SB3	5.02	5.02	5.02	0.00	0.00	20.07	0.00	0.77	0.77	Methanol
Spray Booth SB4	2.65	2.65	2.65	0.00	0.00	22.96	0.00	3.07	1.44	Toluene
Spray Booth SB5	5.88	5.88	5.88	0.00	0.00	20.98	0.00	1.91	1.43	Toluene
Spray Booth SB6	5.88	5.88	5.88	0.00	0.00	20.98	0.00	1.91	1.43	Toluene
Spray Booth SB7	5.88	5.88	5.88	0.00	0.00	20.98	0.00	1.91	1.43	Toluene
NG Combustion	0.08	0.32	0.32	0.03	4.27	0.23	3.59	0.08	1.5E-04	Toluene
Total (non-fugitive)	36.86	37.11	37.11	0.03	4.27	146.32	3.59	11.17	5.72	Toluene
Paved Roads (fugitive)	0.15	0.03	0.01	0.00	0.00	0.00	0.00	0.00	0.00	

Limited Potential to Emit After Integral Woodworking Controls (ton/yr)*										
Emission Unit/ID	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	HAP	Worst Single HAP (Toluene)	
Woodworking WW1	0.96	0.96	0.96	0.00	0.00	0.00	0.00	0.0	0.0	0.0
Woodworking WW2	0.45	0.45	0.45	0.00	0.00	0.00	0.00	0.0	0.0	0.0
Spray Booth SB1	5.02	5.02	5.02	0.00	0.00	99.00	0.00	0.77	0.77	Methanol
Spray Booth SB2	5.02	5.02	5.02	0.00	0.00		0.00	0.77	0.77	Methanol
Spray Booth SB3	5.02	5.02	5.02	0.00	0.00		0.00	0.77	0.77	Methanol
Spray Booth SB4	2.65	2.65	2.65	0.00	0.00		0.00	3.07	1.44	Toluene
Spray Booth SB5	5.88	5.88	5.88	0.00	0.00		0.00	1.91	1.43	Toluene
Spray Booth SB6	5.88	5.88	5.88	0.00	0.00		0.00	1.91	1.43	Toluene
Spray Booth SB7	5.88	5.88	5.88	0.00	0.00		0.00	1.91	1.43	Toluene
NG Combustion	0.08	0.32	0.32	0.03	4.27	0.23	3.59	0.08	1.5E-04	Toluene
Total (non-fugitive)	36.86	37.11	37.11	0.03	4.27	99.23	3.59	11.17	5.72	Toluene
Paved Roads (fugitive)	0.15	0.03	0.01	0.00	0.00	0.00	0.00	0.00	0.00	

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

**Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render the requirements 326 IAC 2-7 (Part 70 Permits) not applicable, total VOC input to the seven (7) spray booths shall not exceed 99 tons per twelve (12) month consecutive period

**Appendix A: Emissions Calculations
Particulate from Woodworking Operations**

Company Name: Lake Area Designs, LLC
Source Address: 1260 N. Detroit St., LaGrange, IN 46761
Permit Number: F087-37015-00678
Reviewer: Brian Wright

Unit	Maximum Air Flow (acfm)	Design Outlet Grain Loading (grains/acf)	Overall Control Efficiency	PTE of PM/PM10/PM2.5 After Control (lb/hr)	PTE of PM/PM10/PM2.5 After Control (tons/yr)	PTE of PM/PM10/PM2.5 Before Control (lb/hr)	PTE of PM/PM10/PM2.5 Before Control (tons/yr)
WW1	8500	0.003	99%	0.22	0.96	21.86	95.73
WW2	4000	0.003	99%	0.10	0.45	10.29	45.05

Equipment List
Panel Saw
Table Saw
Chop Saw
Upcut Saw
Resaw
Rip Saw
43" Drum sander
37" Drum sander
Belt Sander
Molder
32" plainer
Jointer
Table Saw
Chop Saw
Belt Sander
Molder

Methodology:

PM10 and PM2.5 emissions assumed equal to PM emissions

PTE of PM/PM10/PM2.5 After Control (lb/hr) = Design Outlet Grain Loading (grains/acf) * Maximum Air Flow (acfm) * 60 min/hr / 7000 grains/lb

PTE of PM/PM10/PM2.5 After Control (ton/yr) = [PTE of PM/PM10/PM2.5 After Control (lb/hr)] * 8760 hrs / 2000 lbs/ton

PTE of PM/PM10/PM2.5 Before Control (lb/hr) = [PTE of PM/PM10/PM2.5 After Control (lb/hr)] / (1 - control efficiency)

PTE of PM/PM10/PM2.5 Before Control (ton/yr) = [PTE of PM/PM10/PM2.5 Before Control (lb/hr)] * 8760 hrs / 2000 lbs/ton

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

Company Name: Lake Area Designs, LLC
Source Address: 1260 N. Detroit St., LaGrange, IN 46761
Permit Number: F087-37015-00678
Reviewer: Brian Wright

Spray Booth SB1

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Maximum (gal/day)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Stain																	
FG-2689 Stain	7.22	63.52%	0.00%	63.52%	0.00%	35.34%	0.0999	10.00	23.98	4.59	4.59	4.58	109.96	20.07	4.03	12.98	65%
Sealer																	
Aristocoat Premium 30	7.85	58.21%	9.90%	48.31%	0.00%	33.01%	0.0999	10.00	23.98	3.79	3.79	3.79	90.93	16.59	5.02	11.49	65%
Topcoat																	
Aristocoat Premium 30	7.85	58.21%	9.90%	48.31%	0.00%	33.01%	0.0999	10.00	23.98	3.79	3.79	3.79	90.93	16.59	5.02	11.49	65%
Cleanup Solvent																	
Acetone	6.61	100.00%	100.00%	0.00%	100.00%	0.00%	0.0020	10.00	0.48	--	0.00	0.00	0.00	0.00	0.00	n/a	100%

Total Potential to Emit (Worst Case Surface Coating + Cleanup Solvent) 4.58 109.96 20.07 5.02

METHODOLOGY

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

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Ethylbenzene	Ethylbenzene Emissions (ton/yr)	Weight % Methanol	Methanol Emissions (ton/yr)	Total HAP Emissions (ton/yr)
Stain								
FG-2689 Stain	7.22	0.0999	10.00	0.00%	0.00	2.43%	0.77	0.77
Sealer								
Aristocoat Premium 30	7.85	0.0999	10.00	0.99%	0.34	0.00%	0.00	0.34
Topcoat								
Aristocoat Premium 30	7.85	0.0999	10.00	0.99%	0.34	0.00%	0.00	0.34
Cleanup Solvent								
Acetone	6.61	0.0020	10.00	0.00%	0.00	0.00%	0.00	0.00

Total Potential to Emit (Worst Case Surface Coating + Cleanup Solvent) 0.34 0.77 0.77

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
Surface coating materials listed are worst case materials.

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

Company Name: Lake Area Designs, LLC
Source Address: 1260 N. Detroit St., LaGrange, IN 46761
Permit Number: F087-37015-00678
Reviewer: Brian Wright

Spray Booth SB2

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Maximum (gal/day)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Stain																	
FG-2689 Stain	7.22	63.52%	0.00%	63.52%	0.00%	35.34%	0.0999	10.00	23.98	4.59	4.59	4.58	109.96	20.07	4.03	12.98	65%
Sealer																	
Aristocoat Premium 30	7.85	58.21%	9.90%	48.31%	0.00%	33.01%	0.0999	10.00	23.98	3.79	3.79	3.79	90.93	16.59	5.02	11.49	65%
Topcoat																	
Aristocoat Premium 30	7.85	58.21%	9.90%	48.31%	0.00%	33.01%	0.0999	10.00	23.98	3.79	3.79	3.79	90.93	16.59	5.02	11.49	65%
Cleanup Solvent																	
Acetone	6.61	100.00%	100.00%	0.00%	100.00%	0.00%	0.0020	10.00	0.48	--	0.00	0.00	0.00	0.00	0.00	n/a	100%

Total Potential to Emit (Worst Case Surface Coating + Cleanup Solvent) 4.58 109.96 20.07 5.02

METHODOLOGY

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

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Ethylbenzene	Ethylbenzene Emissions (ton/yr)	Weight % Methanol	Methanol Emissions (ton/yr)	Total HAP Emissions (ton/yr)
Stain								
FG-2689 Stain	7.22	0.0999	10.00	0.00%	0.00	2.43%	0.77	0.77
Sealer								
Aristocoat Premium 30	7.85	0.0999	10.00	0.99%	0.34	0.00%	0.00	0.34
Topcoat								
Aristocoat Premium 30	7.85	0.0999	10.00	0.99%	0.34	0.00%	0.00	0.34
Cleanup Solvent								
Acetone	6.61	0.0020	10.00	0.00%	0.00	0.00%	0.00	0.00

Total Potential to Emit (Worst Case Surface Coating + Cleanup Solvent) 0.34 0.77 0.77

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
 Surface coating materials listed are worst case materials.

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

Company Name: Lake Area Designs, LLC
Source Address: 1260 N. Detroit St., LaGrange, IN 46761
Permit Number: F087-37015-00678
Reviewer: Brian Wright

Spray Booth SB3

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Maximum (gal/day)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Stain																	
FG-2689 Stain	7.22	63.52%	0.00%	63.52%	0.00%	35.34%	0.0999	10.00	23.98	4.59	4.59	4.58	109.96	20.07	4.03	12.98	65%
Sealer																	
Aristocoat Premium 30	7.85	58.21%	9.90%	48.31%	0.00%	33.01%	0.0999	10.00	23.98	3.79	3.79	3.79	90.93	16.59	5.02	11.49	65%
Topcoat																	
Aristocoat Premium 30	7.85	58.21%	9.90%	48.31%	0.00%	33.01%	0.0999	10.00	23.98	3.79	3.79	3.79	90.93	16.59	5.02	11.49	65%
Cleanup Solvent																	
Acetone	6.61	100.00%	100.00%	0.00%	100.00%	0.00%	0.0020	10.00	0.48	--	0.00	0.00	0.00	0.00	0.00	n/a	100%

Total Potential to Emit (Worst Case Surface Coating + Cleanup Solvent) 4.58 109.96 20.07 5.02

METHODOLOGY

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

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Ethylbenzene	Ethylbenzene Emissions (ton/yr)	Weight % Methanol	Methanol Emissions (ton/yr)	Total HAP Emissions (ton/yr)
Stain								
FG-2689 Stain	7.22	0.0999	10.00	0.00%	0.00	2.43%	0.77	0.77
Sealer								
Aristocoat Premium 30	7.85	0.0999	10.00	0.99%	0.34	0.00%	0.00	0.34
Topcoat								
Aristocoat Premium 30	7.85	0.0999	10.00	0.99%	0.34	0.00%	0.00	0.34
Cleanup Solvent								
Acetone	6.61	0.0020	10.00	0.00%	0.00	0.00%	0.00	0.00

Total Potential to Emit (Worst Case Surface Coating + Cleanup Solvent) 0.34 0.77 0.77

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
Surface coating materials listed are worst case materials.

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

Company Name: Lake Area Designs, LLC
Source Address: 1260 N. Detroit St., LaGrange, IN 46761
Permit Number: F087-37015-00678
Reviewer: Brian Wright

Spray Booth SB4

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Maximum (gal/day)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Topcoat																	
HC 20 Precatalyzed Lacquer	7.75	75.22%	0.07%	75.14%	0.00%	18.83%	0.0900	10.00	21.60	5.82	5.82	5.24	125.79	22.96	2.65	30.92	65%
Cleanup Solvent																	
Acetone	6.61	100.00%	100.00%	0.00%	100.00%	0.00%	0.0020	10.00	0.48	--	0.00	0.00	0.00	0.00	0.00	n/a	100%

Total Potential to Emit (Worst Case Surface Coating + Cleanup Solvent) **5.24** **125.79** **22.96** **2.65**

METHODOLOGY

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

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Ethylbenzene	Ethylbenzene Emissions (ton/yr)	Weight % Formaldehyde	Formaldehyde Emissions (ton/yr)	Weight % xylenes	Xylenes Emissions (ton/yr)	Weight % toluene	Toluene Emissions (ton/yr)	Total HAP Emissions (ton/yr)
Topcoat												
HC 20 Precatalyzed Lacquer	7.75	0.0900	10.00	0.91%	0.28	0.05%	0.01	4.38%	1.34	4.71%	1.44	3.07
Cleanup Solvent												
Acetone	6.61	0.0020	10.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00

Total Potential to Emit (Worst Case Surface Coating + Cleanup Solvent) **0.28** **0.01** **1.34** **1.44** **3.07**

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
 Surface coating materials listed are worst case materials.

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

Company Name: Lake Area Designs, LLC
Source Address: 1260 N. Detroit St., LaGrange, IN 46761
Permit Number: F087-37015-00678
Reviewer: Brian Wright

Spray Booth SB5

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Maximum (gal/day)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Stain																	
FS-17888 Stain	7.05	95.36%	68.46%	26.90%	68.46%	1.80%	0.0899	12.00	25.89	6.01	1.90	2.05	49.10	8.96	0.54	105.51	65%
Sealer																	
Precatalyzed Sealer	7.40	76.99%	40.22%	36.77%	40.22%	16.46%	0.0899	12.00	25.89	4.55	2.72	2.94	70.45	12.86	2.82	16.53	65%
Topcoat																	
Aristocoat Topcoat 30	8.00	55.51%	0.00%	55.51%	0.00%	35.60%	0.0899	12.00	25.89	4.44	4.44	4.79	114.93	20.98	5.88	12.47	65%
Cleanup Solvent																	
Acetone	6.61	100.00%	100.00%	0.00%	100.00%	0.00%	0.0020	12.00	0.57	--	0.00	0.00	0.00	0.00	0.00	n/a	100%

Total Potential to Emit (Worst Case Surface Coating + Cleanup Solvent) 4.79 114.93 20.98 5.88

METHODOLOGY

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

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Ethylbenzene	Ethylbenzene Emissions (ton/yr)	Weight % Xylene	Xylene Emissions (ton/yr)	Weight % Toluene	Toluene Emissions (ton/yr)	Weight % Formaldehyde	Formaldehyde Emissions (ton/yr)	Total HAP Emissions (ton/yr)
Stain												
FS-17888 Stain	7.05	0.0899	12.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00
Sealer												
Precatalyzed Sealer	7.40	0.0899	12.00	0.29%	0.10	1.04%	0.36	4.09%	1.43	0.04%	0.01	1.91
Topcoat												
Aristocoat Topcoat 30	8.00	0.0899	12.00	0.70%	0.26	2.74%	1.04	0.01%	0.00	0.13%	0.05	1.35
Cleanup Solvent												
Acetone	6.61	0.0020	12.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00

Total Potential to Emit (Worst Case Surface Coating + Cleanup Solvent) 0.26 1.04 1.43 0.05 1.91

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
Surface coating materials listed are worst case materials.

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

Company Name: Lake Area Designs, LLC
Source Address: 1260 N. Detroit St., LaGrange, IN 46761
Permit Number: F087-37015-00678
Reviewer: Brian Wright

Spray Booth SB6

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Maximum (gal/day)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Stain																	
FS-17888 Stain	7.05	95.36%	68.46%	26.90%	68.46%	1.80%	0.0899	12.00	25.89	6.01	1.90	2.05	49.10	8.96	0.54	105.51	65%
Sealer																	
Precatalyzed Sealer	7.40	76.99%	40.22%	36.77%	40.22%	16.46%	0.0899	12.00	25.89	4.55	2.72	2.94	70.45	12.86	2.82	16.53	65%
Topcoat																	
Aristocoat Topcoat 30	8.00	55.51%	0.00%	55.51%	0.00%	35.60%	0.0899	12.00	25.89	4.44	4.44	4.79	114.93	20.98	5.88	12.47	65%
Cleanup Solvent																	
Acetone	6.61	100.00%	100.00%	0.00%	100.00%	0.00%	0.0020	12.00	0.57	--	0.00	0.00	0.00	0.00	0.00	n/a	100%

Total Potential to Emit (Worst Case Surface Coating + Cleanup Solvent) **4.79** **114.93** **20.98** **5.88**

METHODOLOGY

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

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Ethylbenzene	Ethylbenzene Emissions (ton/yr)	Weight % Xylene	Xylene Emissions (ton/yr)	Weight % Toluene	Toluene Emissions (ton/yr)	Weight % Formaldehyde	Formaldehyde Emissions (ton/yr)	Total HAP Emissions (ton/yr)
Stain												
FS-17888 Stain	7.05	0.0899	12.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00
Sealer												
Precatalyzed Sealer	7.40	0.0899	12.00	0.29%	0.10	1.04%	0.36	4.09%	1.43	0.04%	0.01	1.91
Topcoat												
Aristocoat Topcoat 30	8.00	0.0899	12.00	0.70%	0.26	2.74%	1.04	0.01%	0.00	0.13%	0.05	1.35
Cleanup Solvent												
Acetone	6.61	0.0020	12.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00

Total Potential to Emit (Worst Case Surface Coating + Cleanup Solvent) **0.26** **1.04** **1.43** **0.05** **1.91**

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
 Surface coating materials listed are worst case materials.

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

Company Name: Lake Area Designs, LLC
Source Address: 1260 N. Detroit St., LaGrange, IN 46761
Permit Number: F087-37015-00678
Reviewer: Brian Wright

Spray Booth SB7

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Maximum (gal/day)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Stain																	
FS-17888 Stain	7.05	95.36%	68.46%	26.90%	68.46%	1.80%	0.0899	12.00	25.89	6.01	1.90	2.05	49.10	8.96	0.54	105.51	65%
Sealer																	
Precatalyzed Sealer	7.40	76.99%	40.22%	36.77%	40.22%	16.46%	0.0899	12.00	25.89	4.55	2.72	2.94	70.45	12.86	2.82	16.53	65%
Topcoat																	
Aristocoat Topcoat 30	8.00	55.51%	0.00%	55.51%	0.00%	35.60%	0.0899	12.00	25.89	4.44	4.44	4.79	114.93	20.98	5.88	12.47	65%
Cleanup Solvent																	
Acetone	6.61	100.00%	100.00%	0.00%	100.00%	0.00%	0.0020	12.00	0.57	--	0.00	0.00	0.00	0.00	0.00	n/a	100%

Total Potential to Emit (Worst Case Surface Coating + Cleanup Solvent) **4.79** **114.93** **20.98** **5.88**

METHODOLOGY

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

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Ethylbenzene	Ethylbenzene Emissions (ton/yr)	Weight % Xylene	Xylene Emissions (ton/yr)	Weight % Toluene	Toluene Emissions (ton/yr)	Weight % Formaldehyde	Formaldehyde Emissions (ton/yr)	Total HAP Emissions (ton/yr)
Stain												
FS-17888 Stain	7.05	0.0899	12.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00
Sealer												
Precatalyzed Sealer	7.40	0.0899	12.00	0.29%	0.10	1.04%	0.36	4.09%	1.43	0.04%	0.01	1.91
Topcoat												
Aristocoat Topcoat 30	8.00	0.0899	12.00	0.70%	0.26	2.74%	1.04	0.01%	0.00	0.13%	0.05	1.35
Cleanup Solvent												
Acetone	6.61	0.0020	12.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00

Total Potential to Emit (Worst Case Surface Coating + Cleanup Solvent) **0.26** **1.04** **1.43** **0.05** **1.91**

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
Surface coating materials listed are worst case materials.

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

Company Name: Lake Area Designs, LLC
Source Address: 1260 N. Detroit St., LaGrange, IN 46761
Permit Number: F087-37015-00678
Reviewer: Brian Wright

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
9.94	1020	85.4

Unit	Heat Input Capacity (MMBtu/hr)	
Plt. 1 Space Heating Units	0.60	10 units at 0.06 MMBtu/hr each
Plt. 2 Space Heating Units	0.16	2 units at 0.08 MMBtu/hr each
Plt. 2 Space Heating Unit	0.06	1 unit at 0.06 MMBtu/hr
Plt. 3 Space Heating Unit	4.54	1 unit at 4.54 MMBtu/hr
Office Space Heating Unit	0.04	1 unit at 0.04 MMBtu/hr
Air Make Up Unit	4.54	1 unit at 4.54 MMBtu/hr
Total	9.94	

	Pollutant						
Emission Factor in lb/MMCF	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons/yr	0.1	0.3	0.3	0.03	4.3	0.2	3.6

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
 PM2.5 emission factor is filterable and condensable PM2.5 combined.
 **Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

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

HAPS Calculations

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total - Organics
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	9.0E-05	5.1E-05	3.2E-03	0.08	1.5E-04	0.08
	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	2.1E-05	4.7E-05	6.0E-05	1.6E-05	9.0E-05	0.00
						Total HAPs
						0.08
						Worst HAP
						0.08

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: Lake Area Designs, LLC
Source Address: 1260 N. Detroit St., LaGrange, IN 46761
Permit Number: F087-37015-00678
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) (roundtrip)	1.0	10.0	10.0	15.0	150.0	175	0.033	0.3	121.0
Vehicle (leaving plant) (roundtrip)	1.0	10.0	10.0	15.0	150.0	175	0.033	0.3	121.0
Totals			10.0		150.0			0.3	121.0

Average Vehicle Weight Per Trip =

15.0	tons/trip
------	-----------

 Average Miles Per Trip =

0.03	miles/trip
------	------------

Unmitigated Emission Factor, $E_f = [k * (sL)^{0.91} * (W)^{1.02}]$ (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 =	15.0	15.0	15.0	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m ² = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3

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

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

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

 N =

365	days per year
-----	---------------

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f =$	1.377	0.275	0.0676	lb/mile
Mitigated Emission Factor, $E_{ext} =$	1.259	0.252	0.0618	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) (roundtrip)	0.08	0.02	0.00	0.08	0.02	0.00
Vehicle (leaving plant) (roundtrip)	0.08	0.02	0.00	0.08	0.02	0.00
Totals	0.17	0.03	0.01	0.15	0.03	0.01

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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Michael R. Pence
Governor

Carol S. Comer
Commissioner

June 1, 2016

Mr. Danny Wingard
Lake Area Designs, LLC
PO Box 298
LaGrange, IN 46761

Re: Public Notice
Lake Area Designs, LLC
Permit Level: New Source Review and Federally
Enforceable State Operating Permit (FESOP)
Permit Number: 087-37015-00678

Dear Mr. Wingard:

Enclosed is a copy of your draft New Source Review and Federally Enforceable State Operating Permit (FESOP), Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the LaGrange News in LaGrange, Indiana publish the abbreviated version of the public notice no later than June 3, 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 LaGrange Public Library, 203 West Spring Street in LaGrange, 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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ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

May 27, 2016

LaGrange News
PO Box 148
LaGrange, IN 46761

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Lake Area Designs, LLC, LaGrange County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than June 3, 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: New Source Review and Federally Enforceable State Operating Permit (FESOP)
Permit Number: 087-37015-00678

Enclosure
PN Newspaper.dot 8/27/2015



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Michael R. Pence
Governor

Carol S. Comer
Commissioner

June 1, 2016

To: LaGrange 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: Lake Area Designs, LLC
Permit Number: 087-37015-00678

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 2/16/2016



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Michael R. Pence
Governor

Carol S. Comer
Commissioner

Notice of Public Comment

June 1, 2016
Lake Area Designs, LLC
087-37015-00678

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

Please Note: *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
PN AAA Cover.dot 2/17/2016

Mail Code 61-53

IDEM Staff	VHAUN 6/1/2016 Lake Area Designs LLC 087-37015-00678 DRAFT		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	 Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	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		Danny Wingard Lake Area Designs LLC PO Box 298 Lagrange IN 46761 (Source CAATS)										
2		Mr. Steve Roosz NISWMD 2320 W 800 S, P.O. Box 370 Ashley IN 46705 (Affected Party)										
3		LaGrange Co Public Library 203 W Spring St Lagrange IN 46761-1899 (Library)										
4		LaGrange County Health Dept. 304 B Townline Road Lagrange IN 46761 (Health Department)										
5		Mr. Doug Elliott D & B Environmental Services, Inc. 401 Lincoln Way West Osceola IN 46561 (Consultant)										
6		LaGrange Town Council 1201 N Townline Road LaGrange IN 46761 (Local Official)										
7		LaGrange County Commissioners 114 W. Michigan St. LaGrange IN 46761 (Local Official)										
8		Bobilya Real Estate, Inc. 6329 Shady Creek Ct Fort Wayne IN 46814 (Affected Party)										
9		ATJ Real Estate Holdings, LLC 1200 N Detroit Street LaGrange IN 46761 (Affected Party)										
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