



Indiana Department of Environmental Management

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

Michael R. Pence
Governor

Carol S. Comer
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Significant Revision to a
Minor Source Operating Permit (MSOP)

for MJ Finishing in Marshall County

Significant Permit Revision No.: 099-37107-00104

The Indiana Department of Environmental Management (IDEM) has received an application from MJ Finishing, located at 5311 East County Line Road, Bremen, IN 46506, for a significant revision of its MSOP issued on September 20, 2012. If approved by IDEM's Office of Air Quality (OAQ), this proposed revision would allow MJ Finishing to make certain changes at its existing source. MJ Finishing has applied to add one (1) new emergency generator, constructed in 2015, to the permit. Additionally, MJ Finishing has indicated that the existing 110 HP natural gas-fired internal combustion generator (NG1), approved in 2013 for construction, has been removed from service, and requests the unit be removed from the permit. Finally, MJ Finishing has indicated that the existing, previously permitted, 175 HP diesel generator, which was removed from the permit in 2013, was not removed from service but was retained onsite for emergency use.

The applicant has constructed and is operating new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

IDEM is aware that the 175 HP diesel fuel-fired emergency generator (EG-1), which is subject to the requirements of NESHAP Subpart ZZZZ, was removed from the permit in 2013 but was not removed from service, but instead was retained onsite for emergency use and operated without a proper permit, and that the 2.192 MMBtu/hr natural gas-fired, spark ignition, 4 stroke, lean burn, RICE generator (NG2), which is subject to the requirements of NSPS Subpart JJJJ and NESHAP Subpart ZZZZ, was constructed and operated prior to receipt of the proper permit. IDEM is reviewing these matters and will take appropriate action. This draft significant permit revision contains provisions to bring unpermitted equipment into compliance with construction and operation permit rules.

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

Bremen Public Library
304 N Jackson
Bremen, IN 46506

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 SPR 099-37107-00104 in all correspondence.

Comments should be sent to:

Hannah L. Desrosiers
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 3-9327
Or dial directly: (317) 233-9327
Fax: (317)-232-6749 attn: Hannah Desrosiers
E-mail: hdesrosi@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 Ms. Hannah L. Desrosiers of my staff at the above address.



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



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Carol S. Comer
Commissioner

Mr. Matthew Schmucker
President
MJ Finishing
5311 E County Line Road
Bremen, IN 46506

Re: 099-37107-00104
Significant Revision to
M099-32074-00104

Dear Mr. Schmucker:

MJ Finishing was issued a Minor Source Operating Permit (MSOP) Renewal No. M099-32074-00104 on September 20, 2012, for a stationary wood furniture and cabinet surface coating plant, located at 5311 East County Line Road, Bremen, IN 46506. On April 21, 2016, the Office of Air Quality (OAQ) received an application from the source requesting the addition of one (1) new emergency generator, constructed in 2015, to the permit. Additionally, MJ Finishing has indicated that the existing 110 HP natural gas-fired internal combustion generator (NG1), approved in 2013 for construction, has been removed from service, and requests the unit be removed from the permit. Finally, MJ Finishing has indicated that the existing, previously permitted, 175 HP diesel generator, which was removed from the permit in 2013, was not removed from service but was retained onsite for emergency use. The attached Technical Support Document (TSD) provides additional explanation of the changes to the source/permit.

Pursuant to the provisions of 326 IAC 2-6.1-6, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-6.1-6(i). Pursuant to the provisions of 326 IAC 2-6.1-6, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-6.1-6, this permit shall be revised by incorporating the significant permit revision into the permit.

All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire MSOP as revised. The permit references the below listed attachment(s). Since these attachment(s) have been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of these attachment(s) with this revision:

Attachment A: 40 CFR 60, Subpart JJJJ, New Source Performance Standards (NSPS) for Stationary Spark Ignition Internal Combustion Engines

Attachment B: 40 CFR 63, Subpart ZZZZ, National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

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

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

A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Ms. Hannah Desrosiers, of my staff, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251 at 317-233-9327 or 1-800-451-6027, and ask for extension 3-9327.

Sincerely,

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

Attachments: Technical Support Documents and revised permit

NB/hd

cc: File - Marshall County
Marshall County Health Department
U.S. EPA, Region V
Compliance and Enforcement Branch



Indiana Department of Environmental Management

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Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

**MJ Finishing
5311 East County Line Road
Bremen, Indiana 46506**

(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.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

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 MSOP under 326 IAC 2-6.1.

Operation Permit No. M099-32074-00104	
Issued by: Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: September 20, 2012 Expiration Date: September 20, 2022

Minor Permit Revision No. 099-33808-00104, issued December 31, 2013

Significant Permit Revision No. 099-37107-00104	
Issued by: Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date: September 20, 2022

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National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines NESHAP [40 CFR Part 63, Subpart ZZZZ]	Attachment B

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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 and A.2 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 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary wood furniture and cabinet surface coating plant.

Source Address:	5311 East County Line Road, Bremen, Indiana 46506
General Source Phone Number:	574-646-2080
SIC Code:	2499
County Location:	Marshall
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source 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

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

- (a) Three (3) surface coating booths, identified as Booth 1, Booth 2, and Booth 3, constructed in 2007, for applying stain to wood products, utilizing an air assisted airless spray system, coating a combined maximum of 70 units per hour, using dry filters for particulate matter overspray control, and exhausting to stacks S1, S2, and S3.
- (b) One (1) surface coating and sanding booth, identified as Booth 4, constructed in 2007, for applying sealer to wood products, utilizing an air assisted airless spray system, coating a maximum of 70 units per hour, using dry filters for particulate matter overspray control, and exhausting to stack S4.
- (c) One (1) surface coating booth, identified as Booth 5, constructed in 2007, for applying topcoat to wood products, utilizing an air assisted airless spray system, coating a maximum of 70 units per hour using dry filters for particulate matter overspray control, and exhausting to stack S5.
- (d) One (1) 2.192 MMBtu/hr (250 HP), natural gas-fired, spark ignition, 4 stroke, lean burn, RICE generator, identified as NG2, ordered and manufactured in 2015, installed and approved in 2016 for construction, uncontrolled and exhausting outside the building.

Under 40 CFR 60, Subpart JJJJ (NSPS for Stationary Spark Ignition Internal Combustion Engines), and 40 CFR 63, Subpart ZZZZ (NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE)), this generator is considered a new affected source.
- (e) One (1) propane gas-fired air make-up unit, identified as H1, constructed in 2007, with a maximum heat input capacity of 6 MMBtu per hour.
- (f) One (1) 175 HP diesel fuel-fired emergency generator, identified as EG1, manufactured in 2001, relocated and installed at the source in 2007, and permitted in 2016, uncontrolled and exhausting outside the building.

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Under 40 CFR Part 63, Subpart ZZZZ (NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE)), this generator is considered an affected facility.

- (g) One (1) propane gas-fired boiler, identified as H2, constructed in 2007, rated at 0.6 MMBtu per hour.

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SECTION B

GENERAL CONDITIONS

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

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 2-1.1-1) shall prevail.

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, M099-32074-00104, is issued for a fixed term of ten (10) 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

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

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

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

B.7 Duty to Provide Information

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

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

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

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

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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 Permittee shall implement the PMPs.

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

B.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M099-32074-00104 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.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.12 Permit Renewal [326 IAC 2-6.1-7]

- (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 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete 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 one hundred twenty (120) days prior to the date of the expiration of this permit; and

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- (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 2-6.1 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 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 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
- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

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

B.15 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][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 permitted 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

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- (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.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 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

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.17 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.
- (b) 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.18 Credible Evidence [326 IAC 1-1-6]

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

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SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(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 Permit Revocation [326 IAC 2-1.1-9]

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

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

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.

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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.

- (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.

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- (f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

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.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (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 2-6.1-5(a)(2)]

C.10 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.11 Instrument Specifications [326 IAC 2-1.1-11]

- (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.

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- (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

C.12 Response to Excursions or Exceedances

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.13 Actions Related to Noncompliance Demonstrated by a Stack Test

- (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

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- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

C.14 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (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. 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 2-1.1-11][326 IAC 2-6.1-2][IC 13-14-1-13]

- (a) Reports required by conditions in Section D of 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
- (b) 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

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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 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.

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SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Three (3) surface coating booths, identified as Booth 1, Booth 2, and Booth 3, constructed in 2007, for applying stain to wood products, utilizing an air assisted airless spray system, coating a combined maximum of 70 units per hour, using dry filters for particulate matter overspray control, and exhausting to stacks S1, S2, and S3.
- (b) One (1) surface coating and sanding booth, identified as Booth 4, constructed in 2007, for applying sealer to wood products, utilizing an air assisted airless spray system, coating a maximum of 70 units per hour, using dry filters for particulate matter overspray control, and exhausting to stack S4.
- (c) One (1) surface coating booth, identified as Booth 5, constructed in 2007, for applying topcoat to wood products, utilizing an air assisted airless spray system, coating a maximum of 70 units per hour using dry filters for particulate matter overspray control, and exhausting to stack S5.

(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 2-6.1-5(a)(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood products in spray booths Booth 1 - Booth 5 shall utilize one 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.1.2 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2(d), particulate from the spray booths Booth 1 - Booth 5 shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with the manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

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- (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for spray booths Booth 1 - Booth 5 and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (g) One (1) propane gas-fired boiler, identified as H2, constructed in 2007, rated at 0.6 MMBtu per hour.

(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 2-6.1-5(a)(1)]

D.2.1 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, particulate emissions from the one (1) propane gas-fired boiler, identified as H2 shall not exceed 0.6 pounds per million British thermal units (MMBtu) per hour heat input.

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SECTION E.1

NSPS REQUIREMENTS

Emissions Unit Description: Generators

- (d) One (1) 2.192 MMBtu/hr (250 HP), natural gas-fired, spark ignition, 4 stroke, lean burn, RICE generator, identified as NG2, ordered and manufactured in 2015, installed and approved in 2016 for construction, uncontrolled and exhausting outside the building.

Under 40 CFR 60, Subpart JJJJ (NSPS for Stationary Spark Ignition Internal Combustion Engines), and 40 CFR 63, Subpart ZZZZ (NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE)), this generator is considered a new affected source.

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

New Source Performance Standards (NSPS) Requirements [326 IAC 2 6.1 5(a)(1)]

E.1.1 General Provisions Relating to New Source Performance Standards (NSPS) [40 CFR Part 60, Subpart A][326 IAC 12-1]

- (a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 12-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 60, Subpart JJJJ:

- (b) Pursuant to 40 CFR 60.4, the Permittee shall submit all required notifications and reports to:

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

and

United States Environmental Protection Agency, Region 5
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

E.1.2 Stationary Spark Ignition Internal Combustion Engines NSPS [40 CFR Part 60, Subpart JJJJ] [326 IAC 12]

The Permittee shall comply with the following provisions of 40 CFR Part 60, Subpart JJJJ (included as Attachment A to the operating permit), which are incorporated by reference as 326 IAC 12, for the emission unit(s) listed above:

- | | | | |
|-----|--------------------------------------|------|------------------------|
| (1) | 40 CFR 60.4230(a)(4)(iii), (c) | (6) | 40 CFR 60.4244; |
| (2) | 40 CFR 60.4233(e), (h) | (7) | 40 CFR 60.4245(a), (d) |
| (3) | 40 CFR 60.4234 | (8) | 40 CFR 60.4246 |
| (4) | 40 CFR 60.4236(a); | (9) | 40 CFR 60.4248; and |
| (5) | 40 CFR 63.4243(b), (e), (f), and (g) | (10) | Tables 1, 2, and 3. |

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SECTION E.2

NESHAP REQUIREMENTS

Emissions Unit Description: Generators

- (d) One (1) 2.192 MMBtu/hr (250 HP), natural gas-fired, spark ignition, 4 stroke, lean burn, RICE generator, identified as NG2, ordered and manufactured in 2015, installed and approved in 2016 for construction, uncontrolled and exhausting outside the building.

Under 40 CFR 60, Subpart JJJJ (NSPS for Stationary Spark Ignition Internal Combustion Engines), and 40 CFR 63, Subpart ZZZZ (NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE)), this generator is considered a new affected source.

- (f) One (1) 175 HP diesel fuel-fired emergency generator, identified as EG1, manufactured in 2001, relocated and installed at the source in 2007, and permitted in 2016, uncontrolled and exhausting outside the building.

Under 40 CFR Part 63, Subpart ZZZZ (NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE)), this generator is considered an affected facility.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2 6.1 5(a)(1)]

E.2.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1, for the 175 HP diesel fuel-fired emergency generator (EG1), except as otherwise specified in 40 CFR Part 63, Subpart ZZZZ.

- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

E.2.1 Stationary Reciprocating Internal Combustion Engines NESHAP [40 CFR Part 63, Subpart ZZZZ] [326 IAC 20-82]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart ZZZZ (included as Attachment B to the operating permit), which are incorporated by reference as 326 IAC 20-82, except as otherwise specified in 40 CFR Part 63, Subpart ZZZZ:

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- (a) The 2.192 MMBtu/hr, natural gas-fired, spark ignition, 4 stroke, lean burn, RICE generator, identified as NG2:

(1)	40 CFR 63.6580	(5)	40 CFR 63.6665
(2)	40 CFR 63.6585	(6)	40 CFR 63.6670
(3)	40 CFR 63.6590(a)(2)(iii) & (c)(1)	(7)	40 CFR 63.6675
(4)	40 CFR 63.6595(a)(7)		

- (b) The 175 HP diesel fuel-fired emergency generator (EG1):

(1)	40 CFR 63.6580	(10)	40 CFR 63.6640(a), (e), (f)
(2)	40 CFR 63.6585(a), (c), (d)	(11)	40 CFR 63.6645(a)(5)
(3)	40 CFR 63.6590(a)(2)(iii), & (iv)	(12)	40 CFR 63.6650(h)
(4)	40 CFR 63.6595(a)(1), (b), & (c)	(13)	40 CFR 63.6655(a), (b), (d), (e), (f)
(5)	40 CFR 63.6603(a)	(14)	40 CFR 63.6660
(6)	40 CFR 63.6604(b)	(15)	40 CFR 63.6665
(7)	40 CFR 63.6605(a), (b)	(16)	40 CFR 63.6670
(8)	40 CFR 63.6625(e)(3), (f), (h), (i)	(17)	40 CFR 63.6675
(9)	40 CFR 63.6635	(18)	Tables 2b, 2d, 4, 6, 8.

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

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	MJ Finishing
Address:	5311 East County Line Road
City:	Bremen, Indiana 46506
Phone #:	574-646-2080
MSOP #:	M099-32074-00104

I hereby certify that MJ Finishing is :

☐ still in operation.

I hereby certify that MJ Finishing is :

☐ no longer in operation.

☐ in compliance with the requirements of
MSOP M099-32074-00104.

☐ not in compliance with the requirements of
MSOP M099-32074-00104.

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

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

Noncompliance:

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MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FAX NUMBER: (317) 233-6865

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ? _____, 25 TONS/YEAR SULFUR DIOXIDE ? _____, 25 TONS/YEAR NITROGEN OXIDES? _____, 25 TONS/YEAR VOC ? _____, 25 TONS/YEAR HYDROGEN SULFIDE ? _____, 25 TONS/YEAR TOTAL REDUCED SULFUR ? _____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ? _____, 25 TONS/YEAR FLUORIDES ? _____, 100 TONS/YEAR CARBON MONOXIDE ? _____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ? _____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ? _____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ? _____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ? _____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF "MALFUNCTION" AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____

LOCATION: (CITY AND COUNTY) _____

PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____

CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO₂, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

DRAFT

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

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

**Technical Support Document (TSD) for a Significant Permit Revision
to a Minor Source Operating Permit (MSOP) Renewal**

Source Description and Location

Source Name:	MJ Finishing
Source Location:	5311 East County Line Road, Bremen, IN 46506
County:	Marshall
SIC Code:	2499 (Wood Products, Not Elsewhere Classified)
Operation Permit No.:	M099-32074-00104
Operation Permit Issuance Date:	September 20, 2012
Significant Permit Revision No.:	099-37107-00104
Permit Reviewer:	Hannah L. Desrosiers

On April 21, 2016, the Office of Air Quality (OAQ) received an application from MJ Finishing related to a modification to an existing stationary wood furniture and cabinet surface coating plant.

Existing Approvals

The source was issued MSOP Renewal No. M099-32074-00104 on September 20, 2012. The source has since received Minor Permit Revision No. 099-33808-00104, issued on December 31, 2013.

County Attainment Status

The source is located in Marshall County. The following attainment status designations are applicable to Marshall County

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. ¹
PM _{2.5}	Unclassifiable or attainment effective April 5, 2005, for the annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.	

(Air Pollution Control Division; 326 IAC 1-4-51; filed Dec 26, 2007, 1:43 p.m.: 20080123-IR-326070308FRA; filed Jan 30, 2013, 12:34 p.m.: 20130227-IR-326110774FRA; filed Oct 25, 2013, 2:41 p.m.: 20131120-IR-326130164FRA)

(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. Marshall 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}
Marshall 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
Marshall 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

- (a) The fugitive emissions of regulated pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.
- (b) 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.

Status of the Existing Source

The table below summarizes the uncontrolled/unlimited potential to emit of the entire source, prior to the proposed revision:

This PTE table is from the TSD for MSOP MPR No. 099-33808-00104, issued on December 31, 2013.

Process/ Emission Unit	Uncontrolled/Unlimited Potential To Emit of the Entire Source Prior to Revision (tons/year)								
	PM	PM10*	PM2.5*	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Surface Coating Booths 1-5	12.40	12.40	12.40	0.0	0.0	67.54	0.0	13.72	9.47 (Toluene)
Propane Combustion (H1, H2)	0.06	0.22	0.22	6.32E-4	4.11	0.32	2.37	0	0.0
Natural Gas Combustion (NG1)	2.8E-4	0.04	0.04	2.1E-3	14.74	0.43	1.15	0.26	0.19 (Formaldehyde)
Unpaved Roads	0.65	0.14	0.01	0.0	0.0	0.0	0.0	0.0	-
Total PTE of Entire Source	13.02	12.80	12.67	2.1E-3	18.85	68.29	3.51	13.98	9.47 (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	NA
*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".									

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by MJ Finishing on April 21, 2016, relating to the addition of one (1) new emergency generator, constructed in 2015, to the permit. Additionally, MJ Finishing has indicated that the existing 110 HP natural gas-fired internal combustion generator (NG1), approved in 2013 for construction, has been removed from service, and requests the

unit be removed from the permit. Finally, MJ Finishing has indicated that the existing, previously permitted, 175 HP diesel generator, which was removed from the permit in 2013, was not removed from service but was retained onsite for emergency use.

The following is a list of the unpermitted emission units:

- (a) One (1) 2.192 MMBtu/hr (250 HP), natural gas-fired, spark ignition, 4 stroke, lean burn, RICE generator, identified as NG2, ordered and manufactured in 2015, installed and approved in 2016 for construction, uncontrolled and exhausting outside the building.

Under 40 CFR 60, Subpart JJJJ (NSPS for Stationary Spark Ignition Internal Combustion Engines), and 40 CFR 63, Subpart ZZZZ (NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE)), this generator is considered a new affected source.

- (b) One (1) 175 HP diesel fuel-fired emergency generator, identified as EG1, manufactured in 2001, relocated and installed at the source in 2007, and permitted in 2016, uncontrolled and exhausting outside the building.

Under 40 CFR Part 63, Subpart ZZZZ (NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE)), this generator is considered an affected facility.

The source has removed the following emission unit:

- (c) One (1) natural gas-fired generator, identified as NG1, approved for construction in 2013, with a maximum capacity of 110 HP.

Under 40 CFR 60, Subpart JJJJ, this generator is considered a new affected source.
Under 40 CFR 63, Subpart ZZZZ, this generator is considered a new affected source.

Enforcement Issues

- (a) IDEM, OAQ is aware that the 2.192 MMBtu/hr (250 HP), natural gas-fired, spark ignition, 4 stroke, lean burn, RICE generator (NG2), which is subject to the requirements of NSPS Subpart JJJJ and NESHAP Subpart ZZZZ, was constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction and operating permit rules; and
- (b) IDEM, OAQ is aware that the 175 HP diesel fuel-fired emergency generator (EG-1), which is subject to the requirements of NESHAP Subpart ZZZZ, was removed from the permit in 2013 but was not removed from service. Instead, the unit was retained onsite for emergency use and operated without a proper permit. IDEM, OAQ is reviewing these matters and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the operating permit rules.

Emission Calculations

See Appendices A.1 and A.2 of this TSD for detailed emission calculations.

Permit Level Determination – MSOP Revision

The following table is used to determine the appropriate permit level under 326 IAC 2-6.1-6. This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	Uncontrolled/Unlimited Potential To Emit of Proposed Revision (tons/year)								
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Natural Gas-fired Generator (NG2)	7.40E-4	0.10	0.10	5.65E-3	39.17	1.13	3.04	0.69	0.507 (formaldehyde)
Emergency Generator (EG1)	0.10	0.10	0.10	0.09	1.36	0.11	0.29	1.19E-3	3.61E-4 (formaldehyde)
Total PTE of Proposed Revision	0.10	0.19	0.19	0.10	40.53	1.24	3.34	0.69	0.51 (formaldehyde)
Significant Thresholds	> 25	> 25	> 25	> 25	> 25	> 25	> 100	> 25	>10

Pursuant to 326 IAC 2-6.1-6(i)(1)(E), this MSOP is revised through a Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit Revision and the proposed revision involves the construction of new emission units with a potential to emit greater than or equal to twenty-five (25) tons per year of Nitrogen oxides (NO_x).

PTE of the Entire Source After Issuance of the MSOP Revision

The table below summarizes the uncontrolled/unlimited potential to emit of the entire source, with updated emissions shown as **bold** values and previous emissions shown as ~~strikethrough~~ values.

Process/ Emission Unit	Uncontrolled/Unlimited Potential To Emit of the Entire Source After Revision								
	PM	PM10*	PM2.5**	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Surface Coating Booths 1-5	12.40	12.40	12.40	0	0	67.54	0	13.72	9.47 (toluene)
Natural Gas-fired Generator (NG2)	7.40E-4	0.10	0.10	5.65E-3	39.17	1.13	3.04	0.69	0.51 (formaldehyde)
Propane Combustion (H1, H2)	0.06	0.22	0.22	6.32E-4	4.11	0.32	2.37	0	0
Natural Gas Combustion (NG1)	2.8E-4	0.04	0.04	2.1E-3	14.74	0.43	1.15	0.26	0.19 (formaldehyde)
Emergency Generator (EG1)	0.10	0.10	0.10	0.09	1.36	0.11	0.29	1.19E-3	3.61E-4 (formaldehyde)
Total PTE of Entire Source Excluding Fugitives	12.56	12.81	12.81	0.10	44.64	69.10	5.71	14.41	9.47 (toluene)
Title V Major Source Thresholds	-	100	100	100	100	100	100	25	10
Fugitive Emissions (Unpaved Roads)	0.56 0.65	0.14	0.01	-- --	-- --	-- --	-- --	-- --	-- --
Total PTE of Entire Source Including Fugitives	13.12 13.02	12.96 12.80	12.83 12.67	0.10 2.1E-3	44.64 18.85	69.10 68.29	5.71 3.51	14.41 13.98	9.47 (toluene)
MSOP Threshold	25	25	25	25	25	25	-	-	-

negl. = negligible
 * 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".
 **PM_{2.5} listed is direct PM_{2.5}.

The table below summarizes the uncontrolled/unlimited potential to emit of the entire source after issuance of this revision. The table below was generated from the above table, with bold text un-bolded and strikethrough text deleted.

Process/ Emission Unit	Uncontrolled/Unlimited Potential To Emit of the Entire Source After Revision (tons/year)								
	PM	PM10*	PM2.5**	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Surface Coating Booths 1-5	12.40	12.40	12.40	0	0	67.54	0	13.72	9.47 (toluene)
Natural Gas-fired Generator (NG2)	7.40E-4	0.10	0.10	5.65E-3	39.17	1.13	3.04	0.69	0.51 (formaldehyde)
Propane Combustion (H1, H2)	0.06	0.22	0.22	6.32E-4	4.11	0.32	2.37	0	0
Emergency Generator (EG1)	0.10	0.10	0.10	0.09	1.36	0.11	0.29	1.19E-3	3.61E-4 (formaldehyde)
Total PTE of Entire Source Excluding Fugitives	12.56	12.81	12.81	0.10	44.64	69.10	5.71	14.41	9.47 (toluene)
Title V Major Source Thresholds	-	100	100	100	100	100	100	25	10
Fugitive Emissions (Paved Roads)	0.56	0.14	0.01	-- --	-- --	-- --	-- --	-- --	-- --
Total PTE of Entire Source Including Fugitives	13.21	12.96	12.83	0.10	44.64	69.10	5.71	14.41	9.47 (toluene)
MSOP Threshold	25	25	25	25	25	25	-	-	-
* 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".									
** PM _{2.5} listed is direct PM _{2.5} .									

MSOP Status

(1) Criteria Pollutants

This revision to an existing Title V minor stationary source will not change the minor status, because the uncontrolled/unlimited potential to emit criteria pollutants from the entire source will still be less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-6.1 (MSOP).

(2) HAPs

This revision will not change the minor status of the source, because the uncontrolled/unlimited potential to emit of any single HAP will still be less than ten (10) tons per year and the PTE of a combination of HAPs will still be less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

Permit Level Determination – PSD or Emission Offset or Nonattainment NSR

(a) PSD Minor Source – PM

This modification to an existing PSD minor stationary source will not change the PSD minor status, because the uncontrolled/unlimited potential to emit PM from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

(b) PSD Minor Source – Other Regulated Pollutants

This modification to an existing PSD minor stationary source will not change the PSD minor status, because the uncontrolled/unlimited potential to emit of all other PSD regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See the "PTE of the Entire Source After Issuance of the MSOP Revision Section) above or Appendix A for more detail.

Federal Rule Applicability Determination

Compliance Assurance Monitoring (CAM)

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

New Source Performance Standards (NSPS)

- (b) 40 CFR 60, Subpart Dc - Standards for Small Industrial-Commercial-Institutional Steam Generating Units

The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included in the permit for the 175 HP diesel fuel-fired emergency generator (EG1), or the 2.192 MMBtu/hr (250 HP), natural gas-fired, spark ignition, 4 stroke, lean burn, RICE generator (NG2), because each unit is an internal combustion engine (ICE) and not a steam generating unit, as defined in 40 CFR 60.41c.

- (c) 40 CFR Part 60, Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

(1) The requirements of the New Source Performance Standards (NSPS) for Stationary Compression Ignition Internal Combustion Engines, 40 CFR Part 60, Subpart IIII (326 IAC 12), are not included in the permit for the 175 HP diesel fuel-fired emergency generator (EG1), constructed and manufactured in 2001, because construction commenced before June 12, 2006 and the unit was manufactured prior to January 1, 2009. *For the purposes of this rule, the date that construction commences is the date the engine is ordered by the original owner or operator.*

(2) The requirements of the New Source Performance Standards (NSPS) for Stationary Compression Ignition Internal Combustion Engines, 40 CFR Part 60, Subpart IIII (326 IAC 12), are not included in the permit for the 2.192 MMBtu/hr (250 HP), natural gas-fired, spark ignition, 4 stroke, lean burn, RICE generator (NG2), since the unit is a spark ignition (SI) internal combustion engine and not a compression ignition (CI) internal combustion engine.

- (d) 40 CFR 60, Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

(1) The requirements of the New Source Performance Standard for Stationary Spark Ignition Internal Combustion Engines, 40 CFR 60, Subpart JJJJ (4J) (326 IAC 12), are not included in the permit for the 175 HP diesel fuel-fired emergency generator (EG1), because the generator is a compression ignition internal combustion engine and not a spark ignition internal combustion engine.

(2) The 2.192 MMBtu/hr natural gas-fired, spark ignition, 4 stroke, lean burn, RICE generator (NG2) (< 30 liters/cylinder displacement, 250 horsepower), constructed and manufactured in 2015, is subject to the requirements of the New Source Performance Standard for Stationary Spark Ignition Internal Combustion Engines, 40 CFR 60, Subpart JJJJ (326 IAC 12), because it is a stationary, spark ignition (SI) internal combustion engine (ICE), constructed (ordered) after June 12, 2006 and manufactured after July 1, 2008, with a maximum engine power rating greater than 100 HP (75 KW) and less than 500 HP (373 KW), that has never been modified (as defined under §60.14) or reconstructed (as defined under §60.15). *For the purposes of this rule, the date that construction commences is the date the engine is ordered by the original owner or operator.*

The 2.192 MMBtu/hr (250 HP), natural gas-fired, spark ignition, 4 stroke, lean burn, RICE generator (NG2) is subject to the following applicable portions of the NSPS for emergency SI ICE:

- | | | | |
|-----|-----------------------------------|------|-------------------------|
| (1) | 40 CFR 60.4230(a)(4)(iii), (c); | (6) | 40 CFR 60.4244; |
| (2) | 40 CFR 60.4233(e), (h); | (7) | 40 CFR 60.4245(a), (d); |
| (3) | 40 CFR 60.4234; | (8) | 40 CFR 60.4246; |
| (4) | 40 CFR 60.4236(a); | (9) | 40 CFR 60.4248; and |
| (5) | 40 CFR 60.4243(b), (e), (f), (g); | (10) | Tables 1, 2, & 3. |

Notes: Pursuant to 40 CFR 60.4243(f), testing is only required if the engine is non-certified or the engine, and any associated control device, is not operated and maintained according to the manufacturer's written emission-related instructions, or if the emission-related settings are changed in a way that is not permitted by the manufacturer.

On May 4, 2016, the U.S. Court of Appeals for the D.C. Circuit issued a mandate vacating paragraphs 40 CFR 60.4243(d)(2)(ii) - (iii) of NSPS Subpart JJJJ. Therefore, these paragraphs no longer have any legal effect and any engine that is operated for purposes specified in these paragraphs becomes a non-emergency engine and must comply with all applicable requirements for a non-emergency engine.

For additional information, please refer to the USEPA's Guidance Memo:
<https://www3.epa.gov/airtoxics/icengines/docs/RICEVacaturGuidance041516.pdf>

Since the federal rule has not been updated to remove these vacated requirements, the text below shows the vacated language as ~~strike through~~ text. At this time, IDEM is not making any changes to the permit's attachment due to this vacatur. However, the permit will not reference the vacated requirements, as applicable.

40 CFR 60.4243(d)(2) You may operate your emergency stationary ICE for any combination of the purposes specified in paragraphs (d)(2)(i) ~~through (iii)~~ of this section for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (d)(3) of this section counts as part of the 100 hours per calendar year allowed by this paragraph (d)(2).

- (i) Emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year.
- ~~(ii) Emergency stationary ICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see §60.17), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.~~
- ~~(iii) Emergency stationary ICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.~~

The requirements of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated as 326 IAC 12-1, apply to the 2.192 MMBtu/hr (250 HP), natural gas-fired, spark ignition, 4 stroke, lean burn, RICE generator (NG2) except as otherwise specified in 40 CFR 60, Subpart JJJJ.

- (e) There are no other New Source Performance Standards (NSPS) (40 CFR Part 60) included for this proposed modification.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (f) 40 CFR 63, Subpart ZZZZ - NESHAP for Stationary Reciprocating Internal Combustion Engines
- (1) The 175 HP diesel fuel-fired emergency generator (EG1) (< 30 liters/cylinder displacement), constructed before June 12, 2006, is subject to the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, 40 CFR 63, Subpart ZZZZ (326 IAC 20-82), because it is considered an existing (*construction commenced before June 12, 2006*) stationary reciprocating internal combustion engine (RICE) at an area source of hazardous air pollutant (HAP) emissions. The unit has never been modified (as defined under §60.14) or reconstructed (as defined under §60.15). *For the purposes of this rule, the date that construction commenced is the date on-site fabrication, erection, or installation ("physical" construction) of the affected source (engine) started when the unit was brand new. A change in ownership of an existing stationary RICE does not make that stationary RICE a new or reconstructed stationary RICE.*

The 175 HP diesel fuel-fired emergency generator (EG1) is subject to the following applicable portions of the NESHAP for new stationary RICE at an area source of HAP:

- | | | | |
|-----|-------------------------------------|------|---------------------------------------|
| (1) | 40 CFR 63.6580 | (10) | 40 CFR 63.6640(a), (e), (f) |
| (2) | 40 CFR 63.6585(a), (c), (d) | (11) | 40 CFR 63.6645(a)(5) |
| (3) | 40 CFR 63.6590(a)(2)(iii), & (iv) | (12) | 40 CFR 63.6650(h) |
| (4) | 40 CFR 63.6595(a)(1), (b), & (c) | (13) | 40 CFR 63.6655(a), (b), (d), (e), (f) |
| (5) | 40 CFR 63.6603(a) | (14) | 40 CFR 63.6660 |
| (6) | 40 CFR 63.6604(b) | (15) | 40 CFR 63.6665 |
| (7) | 40 CFR 63.6605(a), (b) | (16) | 40 CFR 63.6670 |
| (8) | 40 CFR 63.6625(e)(3), (f), (h), (i) | (17) | 40 CFR 63.6675 |
| (9) | 40 CFR 63.6635 | (18) | Tables 2b, 2d, 4, 6, 8. |

Notes: Existing emergency compression ignition (CI) stationary RICE located at an area source of HAP are not subject to numerical CO or formaldehyde emission limitations, but are only subject to work and management practices under Table 2d and Table 6.

On May 4, 2016, the U.S. Court of Appeals for the D.C. Circuit issued a mandate vacating paragraphs 40 CFR 63.6640(f)(2)(ii) - (iii) of NESHAP Subpart ZZZZ. Therefore, these paragraphs no longer have any legal effect and any engine that is operated for purposes specified in these paragraphs becomes a non-emergency engine and must comply with all applicable requirements for a non-emergency engine.

For additional information, please refer to the USEPA's Guidance Memo:
<https://www3.epa.gov/airtoxics/icengines/docs/RICEVacaturGuidance041516.pdf>

Since the federal rule has not been updated to remove these vacated requirements, the text below shows the vacated language as ~~strike through~~ text. At this time, IDEM is not making any changes to the permit's attachment due to this vacatur. However, the permit will not reference the vacated requirements, as applicable.

40 CFR 63.6640(f)(2) You may operate your emergency stationary RICE for any combination of the purposes specified in paragraphs (f)(2)(i) ~~through (iii)~~ of this section for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraphs (f)(3) and (4) of this section counts as part of the 100 hours per calendar year allowed by this paragraph (f)(2).

- (i) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.
- ~~(ii) Emergency stationary RICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see §63.14), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.~~
- ~~(iii) Emergency stationary RICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.~~

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

- (2) The 2.192 MMBtu/hr (250 HP), natural gas-fired, spark ignition, 4 stroke, lean burn, RICE generator (NG2) (< 30 liters/cylinder displacement, 282 horsepower), constructed and manufactured in 2015, is subject to the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, 40 CFR 63, Subpart ZZZZ (326 IAC 20-82), because it is considered a new *(construction commenced on or after June 12, 2006)* stationary reciprocating internal combustion engine (RICE) at an area source of hazardous air pollutant (HAP) emissions, that has never been modified (as defined under §60.14) or reconstructed (as defined under §60.15). *For the purposes of this rule, the date that construction commenced is the date on-site fabrication, erection, or installation ("physical" construction) of the affected source (engine) started when the unit was brand new. A change in ownership of an existing stationary RICE does not make that stationary RICE a new or reconstructed stationary RICE.*

The 2.192 MMBtu/hr (250 HP), natural gas-fired, spark ignition, 4 stroke, lean burn, RICE generator (NG2) is subject to the following applicable portions of the NESHAP for new stationary RICE at an area source of HAP:

- | | | | |
|-----|------------------------------------|-----|----------------|
| (1) | 40 CFR 63.6580 | (5) | 40 CFR 63.6665 |
| (2) | 40 CFR 63.6585 | (6) | 40 CFR 63.6670 |
| (3) | 40 CFR 63.6590(a)(2)(iii) & (c)(1) | (7) | 40 CFR 63.6675 |
| (4) | 40 CFR 63.6595(a)(7) | | |

Notes: Pursuant to 40 CFR 63.6590(c)(1), a new or reconstructed stationary RICE located at an area source must meet the requirements of this part by meeting the requirements of 40 CFR part 60 subpart JJJJ, for spark ignition engines. No further requirements apply for such engines under this part.

On May 4, 2016, the U.S. Court of Appeals for the D.C. Circuit issued a mandate vacating paragraphs 40 CFR 63.6640(f)(2)(ii) - (iii) of NESHAP Subpart ZZZZ. Therefore, these paragraphs no longer have any legal effect and any engine that is operated for purposes specified in these paragraphs becomes a non-emergency engine and must comply with all applicable requirements for a non-emergency engine.

For additional information, please refer to the USEPA's Guidance Memo:
<https://www3.epa.gov/airtoxics/icengines/docs/RICEVacaturGuidance041516.pdf>

Since the federal rule has not been updated to remove these vacated requirements, the text below shows the vacated language as ~~striketrough~~ text. At this time, IDEM is not making any changes to the permit's attachment due to this vacatur. However, the permit will not reference the vacated requirements, as applicable.

40 CFR 63.6640(f)(2) You may operate your emergency stationary RICE for any combination of the purposes specified in paragraphs (f)(2)(i) ~~through (iii)~~ of this section for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraphs (f)(3) and (4) of this section counts as part of the 100 hours per calendar year allowed by this paragraph (f)(2).

- (i) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.
- ~~(ii) Emergency stationary RICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see §63.14), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.~~
- ~~(iii) Emergency stationary RICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.~~

Pursuant to 40 CFR 63.6665, the 2.192 MMBtu/hr (250 HP), natural gas-fired, spark ignition, 4 stroke, lean burn, RICE generator (NG2) does not have to meet the requirements of 40 CFR 63, Subpart A (General Provisions), since it is considered a new stationary RICE located at an area source of HAP emissions.

- (g) 40 CFR 63, Subpart JJJJJJ - NESHAPs for Industrial, Commercial, and Institutional Boilers Area Sources
The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources (40 CFR 63, Subpart JJJJJJ) are not included in the permit for the 175 HP diesel fuel-fired emergency generator (EG1), or the 2.192 MMBtu/hr (250 HP), natural gas-fired, spark ignition, 4 stroke, lean burn, RICE generator (NG2), since each unit is an internal combustion engine and not a boiler.
- (h) There are no other National Emission Standards for Hazardous Air Pollutants (40 CFR Part 63), 326 IAC 14 and 326 IAC 20 included for this proposed revision.

State Rule Applicability Determination

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the "Permit Level Determination – MSOP" section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))
See the "PTE of the Entire Source After Issuance of the MSOP Revision" Section above.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from both of the new units combined 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.

See TSD Appendix A.2 for the detailed calculations.
- (d) 326 IAC 4-2-2 (Incinerators)
The proposed revision is not subject to the requirements of 326 IAC 4 2 2, because the 175 HP diesel fuel-fired emergency generator (EG1) and the 2.192 MMBtu/hr (250 HP), natural gas-fired, spark ignition, 4 stroke, lean burn, RICE generator (NG2), are each not an incinerator, as defined by 326 IAC 1-2-34, since the units do not burn waste substances.
- (e) 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)
The proposed revision is not subject to the requirements of 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating), since the 175 HP diesel fuel-fired emergency generator (EG1) and the 2.192 MMBtu/hr (250 HP), natural gas-fired, spark ignition, 4 stroke, lean burn, RICE generator (NG2), each do not meet the definition of an indirect heating unit, as defined under 326 IAC 1-2-19.
- (f) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
The proposed revision is not subject to the requirements of 326 IAC 6-3, since the 175 HP diesel fuel-fired emergency generator (EG1) and the 2.192 MMBtu/hr (250 HP), natural gas-fired, spark ignition, 4 stroke, lean burn, RICE generator (NG2), each are not a "manufacturing process" as defined under 326 IAC 6-3-1.5.
- (g) 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)
The proposed revision is not subject to the requirements of 326 IAC 7-1.1, because the potential to emit sulfur dioxide from the 175 HP diesel fuel-fired emergency generator (EG1) and the 2.192 MMBtu/hr (250 HP), natural gas-fired, spark ignition, 4 stroke, lean burn, RICE generator (NG2), is less than twenty-five (25) tons per year and ten (10) pounds per hour, each.

See TSD Appendix A.2 for the detailed calculations.
- (h) 326 IAC 8-1-6 (New Facilities; General Reduction Requirements)
The proposed revision is not subject to the requirements of 326 IAC 8-1-6, because the 175 HP diesel fuel-fired emergency generator (EG1) and the 2.192 MMBtu/hr (250 HP), natural gas-fired,

spark ignition, 4 stroke, lean burn, RICE generator (NG2), each has potential VOC emissions of less than twenty-five (25) tons per year.

See TSD Appendix A.2 for the detailed calculations.

- (i) There are no 326 IAC 8 Rules that are applicable to the 175 HP diesel fuel-fired emergency generator (EG1), or the 2.192 MMBtu/hr (250 HP), natural gas-fired, spark ignition, 4 stroke, lean burn, RICE generator (NG2).
- (j) 326 IAC 9-1-1 (Carbon Monoxide Emission Limits)
The proposed revision is not subject to the requirements of 326 IAC 9-1-1 (Carbon Monoxide Emission Limits), since there are no applicable emission limits for the source under 326 IAC 9-1-2.
- (k) 326 IAC 10-1-1 (Nitrogen Oxides Control)
The proposed revision is not subject to the requirements of 326 IAC 10-1-1 (Nitrogen Oxides Control), since the source is not located in Clark or Floyd counties.
- (l) 326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Categories)
The proposed revision is not subject to the requirements of 326 IAC 10-3, because the 175 HP diesel fuel-fired emergency generator (EG1) and the 2.192 MMBtu/hr (250 HP), natural gas-fired, spark ignition, 4 stroke, lean burn, RICE generator (NG2), are each a reciprocating internal combustion engine and not a Portland cement kiln or a blast furnace gas fired boiler, and is not specifically listed under 326 IAC 10-3-1(a)(2).
- (m) 326 IAC 10-5 (Nitrogen Oxide Reduction Program for Internal Combustion Engines (ICE))
The proposed revision is not subject to the requirements of 326 IAC 10-5, since the 175 HP diesel fuel-fired emergency generator (EG1) and the 2.192 MMBtu/hr (250 HP), natural gas-fired, spark ignition, 4 stroke, lean burn, RICE generator (NG2), each do not meet the definition of an affected engine, as defined in 326 IAC 10-5-2(1). Although each unit is an internal combustion engine, neither unit is specifically listed in the NOx SIP Call engine inventory.
- (n) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (o) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Compliance Determination, Monitoring and Testing Requirements
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- (a) The compliance determination and monitoring requirement applicability determination for this revision is as follows:
 - (1) In order to assure compliance with 40 CFR 63, Subpart ZZZZ, the Permittee shall comply with all applicable requirements of §63.6603, §63.6604, §60.6625, and §60.6640, for the 175 HP diesel fuel-fired emergency generator (EG1); and
 - (2) In order to assure compliance with 40 CFR 60, Subpart JJJJ and 40 CFR 63, Subpart ZZZZ, the Permittee shall comply with all applicable requirements of §60.4243 for the 2.192 MMBtu/hr (250 HP), natural gas-fired, spark ignition, 4 stroke, lean burn, RICE generator (NG2).
- Note: Pursuant to 40 CFR 60.4243(f), testing of the 2.192 MMBtu/hr (250 HP), natural gas-fired, spark ignition, 4 stroke, lean burn, RICE generator (NG2) is only required if the engine is non-certified or the engine, and any associated control device, is not operated and maintained according to the manufacturer's written emission-related instructions, or if the emission-related settings are changed in a way that is not permitted by the manufacturer.

Proposed Changes

The following changes listed below are due to the proposed revision.

- (a) Existing Sections A.2 - Emission Units and Pollution Control Equipment Summary, D.2- Emissions Unit Operation Conditions, E.1 - NSNS Requirements, and E.2 - NESHAPS requirements, have been revised to include emission unit descriptions for the 175 HP diesel fuel-fired emergency generator (EG1) and the 2.192 MMBtu/hr (250 HP), natural gas-fired, spark ignition, 4 stroke, lean burn, RICE generator (NG2), and renumber emission unit lettering as appropriate.
- (b) Existing Section E.1 - NSPS Requirements has been revised to incorporate by reference the requirements of 40 CFR 60, Subpart JJJJ (NSPS for Stationary Spark Ignition Internal Combustion Engines) for the 2.192 MMBtu/hr (250 HP), natural gas-fired, spark ignition, 4 stroke, lean burn, RICE generator (NG2). A copy of the rule is attached to the permit as Attachment A; and
- (c) Existing Section E.2 - NESHAPS Requirements, has been revised to incorporate by reference the requirements of 40 CFR Part 63, Subpart ZZZZ (NESHAP for Stationary Reciprocating Internal Combustion Engines) for the the 175 HP diesel fuel-fired emergency generator (EG1) and the 2.192 MMBtu/hr (250 HP), natural gas-fired, spark ignition, 4 stroke, lean burn, RICE generator (NG2), and to indicate that a copy of the rule is attached to the permit as Attachment B.

IDEM, OAQ made additional revisions to the permit as described below in order to update the language to match the most current version of the applicable rule, to eliminate redundancy within the permit, and to provide clarification regarding the requirements of these conditions.

- (a) IDEM revised existing Sections E.1 and E.2 for clarity. The existing Sections E - New Source Performance Standards (NSPS) Requirements and National Emissions Standards for Hazardous Air Pollutants (NESHAP) Requirements language, has been replaced with standardized versions of the E Section language.
- (b) IDEM added the rule citation 326 IAC 2 6.1 5(a)(1) to the New Source Performance Standards (NSPS) Requirements subsection title in Section E.1 to clarify the authority of these conditions.
- (c) IDEM added the rule citation 326 IAC 2-6.1-5(a)(1) to the National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements subsection title in Sections E.2 to clarify the authority of these conditions; and
- (d) IDEM, OAQ, has clarified that a copy of the Federal Rule would be attached 'to the operating permit' rather than 'of this permit'.

Unaffected permit conditions have been re-numbered and the Table of Contents updated, as applicable. The Permit has been revised as follows, with deleted language shown as ~~strikeouts~~ and new language **bolded**.

A.2 Emission Units and Pollution Control Equipment Summary

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

- (d) **One (1) 2.192 MMBtu/hr (250 HP), natural gas-fired, spark ignition, 4 stroke, lean burn, RICE generator, identified as NG2, ordered and manufactured in 2015, installed and approved in 2016 for construction, uncontrolled and exhausting outside the building.**

Under 40 CFR 60, Subpart JJJJ (NSPS for Stationary Spark Ignition Internal Combustion Engines), and 40 CFR 63, Subpart ZZZZ (NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE)), this generator is considered a new affected source.

(ed) One (1) propane gas-fired air make-up unit, identified as H1, constructed in 2007, with a maximum heat input capacity of 6 MMBtu per hour.

~~(e) One (1) natural gas-fired generator, identified as NG1, approved for construction in 2013, with a maximum capacity of 110 HP.~~

~~Under 40 CFR 60, Subpart JJJJ, this generator is considered a new affected source.
Under 40 CFR 63, Subpart ZZZZ, this generator is considered a new affected source.~~

(f) **One (1) 175 HP diesel fuel-fired emergency generator, identified as EG1, manufactured in 2001, relocated and installed at the source in 2007, and permitted in 2016, uncontrolled and exhausting outside the building.**

Under 40 CFR Part 63, Subpart ZZZZ (NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE)), this generator is considered an affected facility.

(gf) One (1) propane gas-fired boiler, identified as H2, constructed in 2007, rated at 0.6 MMBtu per hour.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(fg) One (1) propane gas-fired boiler, identified as H2, constructed in 2007, rated at 0.6 MMBtu per hour.

SECTION E.1 ~~NSPS REQUIREMENTS~~FACILITY OPERATION CONDITIONS

Emissions Unit Description: Generators

(d) **One (1) 2.192 MMBtu/hr (250 HP), natural gas-fired, spark ignition, 4 stroke, lean burn, RICE generator, identified as NG2, ordered and manufactured in 2015, installed and approved in 2016 for construction, uncontrolled and exhausting outside the building.**

Under 40 CFR 60, Subpart JJJJ (NSPS for Stationary Spark Ignition Internal Combustion Engines), and 40 CFR 63, Subpart ZZZZ (NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE)), this generator is considered a new affected source.

~~(e) One (1) natural gas-fired generator, identified as NG1, approved for construction in 2013, with a maximum capacity of 110 HP.~~

~~Under 40 CFR 60, Subpart JJJJ, this generator is considered a new affected source.~~

~~Under 40 CFR 63, Subpart ZZZZ, this generator is considered a new affected source.~~

New Source Performance Standards (NSPS) Requirements **[326 IAC 2 6.1 5(a)(1)]**~~[46 CFR 60]~~

E.1.1 General Provisions Relating to New Source Performance Standards (NSPS) ~~[40 CFR Part 60, Subpart A]~~**[326 IAC 12-1]**

(a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 12-1, **for the emission unit(s) listed above, except as otherwise**~~as specified in 40 CFR Part 60, Subpart JJJJ: for the natural gas-fired generator NG1.~~

- (b) Pursuant to 40 CFR 60.4, the Permittee shall submit all required notifications and reports to:

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

and

United States Environmental Protection Agency, Region 5
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

E.1.2 ~~New Source Performance Standards (NSPS) for Stationary Spark Ignition Internal Combustion Engines~~ **NSPS** [40 CFR Part 60, Subpart JJJJ] [326 IAC 12]

The Permittee shall comply with the following provisions of 40 CFR Part 60, Subpart JJJJ (included as Attachment A **to the operating** of this permit), which are incorporated by reference as 326 IAC 12, for the **emission unit(s) listed above**~~natural gas-fired generator NG1~~:

- | | | | |
|------|---|-------|------------------------|
| (1) | 40 CFR 60.4230(a)(4)(iii), (c) | (75) | 40 CFR 60.4245(a), (d) |
| (2) | 40 CFR 60.4233(e), (h) | (86) | 40 CFR 60.4246 |
| (3) | 40 CFR 60.4234 | (97) | 40 CFR 60.4248; and |
| (4) | 40 CFR 60.4236(a); | (108) | Tables 1, 2, and 3. |
| (54) | 40 CFR 63.4243(a)(1), (b)(1), and (e), (f), and (g) | (9) | Table 3 |
| (6) | 40 CFR 60.4244; | | |

SECTION E.2 ~~NESHAP REQUIREMENTS~~**FACILITY OPERATION CONDITIONS**

Emissions Unit Description: Generators

- (d) One (1) 2.192 MMBtu/hr (250 HP), natural gas-fired, spark ignition, 4 stroke, lean burn, RICE generator, identified as NG2, ordered and manufactured in 2015, installed and approved in 2016 for construction, uncontrolled and exhausting outside the building.

Under 40 CFR 60, Subpart JJJJ (NSPS for Stationary Spark Ignition Internal Combustion Engines), and 40 CFR 63, Subpart ZZZZ (NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE)), this generator is considered a new affected source.

- ~~(e) One (1) natural gas-fired generator, identified as NG1, approved for construction in 2013, with a maximum capacity of 110 HP.~~

~~Under 40 CFR 60, Subpart JJJJ, this generator is considered a new affected source.~~

~~Under 40 CFR 63, Subpart ZZZZ, this generator is considered a new affected source.~~

- (f) One (1) 175 HP diesel fuel-fired emergency generator, identified as EG1, manufactured in 2001, relocated and installed at the source in 2007, and permitted in 2016, uncontrolled and exhausting outside the building.

Under 40 CFR Part 63, Subpart ZZZZ (NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE)), this generator is considered an affected facility.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements
~~[326 IAC 2 6.1 5(a)(1)] [40 CFR 63]~~

E.2.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1, for the 175 HP diesel fuel-fired emergency generator (EG1), except as otherwise specified in 40 CFR Part 63, Subpart ZZZZ.
- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

~~E.2.1 National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines NESHAP [40 CFR Part 63, Subpart ZZZZ] [326 IAC 20-82]~~

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart ZZZZ (included as Attachment B **to the operating** of this permit), which are incorporated by reference as 326 IAC 20-82, except as otherwise specified in 40 CFR Part 63, Subpart ZZZZ, ~~for the natural gas-fired generator NG1:~~

- (a) The 2.192 MMBtu/hr (250 HP), natural gas-fired, spark ignition, 4 stroke, lean burn, RICE generator, identified as NG2:

- | | | | |
|-----|------------------------------------|-----|----------------|
| (1) | 40 CFR 63.6580 | (5) | 40 CFR 63.6665 |
| (2) | 40 CFR 63.6585 | (6) | 40 CFR 63.6670 |
| (3) | 40 CFR 63.6590(a)(2)(iii) & (c)(1) | (7) | 40 CFR 63.6675 |
| (4) | 40 CFR 63.6595(a)(7) | | |

- (b) The 175 HP diesel fuel-fired emergency generator (EG1):

- | | | | |
|----------------|---|------|---------------------------------------|
| (1) | 40 CFR 63.6580 | (10) | 40 CFR 63.6640(a), (e), (f) |
| (2) | 40 CFR 63.6585(a), (c), (d) | (11) | 40 CFR 63.6645(a)(5) |
| (3) | 40 CFR 63.6590(a)(2)(iii), & (iv) | (12) | 40 CFR 63.6650(h) |
| (4) | 40 CFR 63.6595(a)(1), (b), & (c) | (13) | 40 CFR 63.6655(a), (b), (d), (e), (f) |
| (5) | 40 CFR 63.6603(a) | (14) | 40 CFR 63.6660 |
| (6) | 40 CFR 63.6604(b) | (15) | 40 CFR 63.6665 |
| (7) | 40 CFR 63.6605(a), (b) | (16) | 40 CFR 63.6670 |
| (8) | 40 CFR 63.6625(e)(3), (f), (h), (i) | (17) | 40 CFR 63.6675 |
| (9) | 40 CFR 63.6635 | (18) | Tables 2b, 2d, 4, 6, 8. |
| (1) | 40 CFR 63.6580 | | |
| (2) | 40 CFR 63.6585 | | |
| (3) | 40 CFR 63.6590(a)(2)(iii) and (c)(1) | | |

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

* * * * *

No other changes were made to the permit as a result of this revision.

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 April 21, 2016. Additional information was received April 26, 2016 through June 23, 2016.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed MSOP Significant Permit Revision No. 099-37107-00104. The staff recommends to the Commissioner that this MSOP Significant Permit Revision be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Ms. Hannah Desrosiers at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-9327 or toll free at 1-800-451-6027 extension 3-9327.
- (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.1: Emission Calculations
PTE of the Entire Source after Issuance of the Revision

Company Name: MJ Finishing
Source Address : 5311 E County Line Rd, Bremen, Indiana 46506
Minor Permit Revision No.: M099-37107-00104
Reviewer: Hannah L. Desrosiers

Uncontrolled Potential to Emit (PTE) (tons/year)									
Emission Unit/ ID	PM	PM10	PM2.5	SO2	NOx	VOC	CO	HAP	Worst Single HAP
Surface Coating Booths 1-5	12.40	12.40	12.40	0	0	67.54	0	13.72	9.47 (toluene)
Natural Gas-fired Generator (NG2)	7.40E-04	0.10	0.10	5.65E-03	39.17	1.13	3.04	0.69	0.51 (formaldehyde)
Propane Combustion (H1, H2)	0.06	0.22	0.22	6.32E-04	4.11	0.32	2.37	0	0 -- --
Emergency Generator (EG1)	0.10	0.10	0.10	0.09	1.36	0.11	0.29	1.19E-03	3.61E-04 (formaldehyde)
Total PTE of Entire Source Excluding Fugitives	12.56	12.81	12.81	0.10	44.64	69.10	5.71	14.41	9.47 (toluene)
Unpaved Roads	0.56	0.14	0.01	-- --	-- --	-- --	-- --	-- --	-- --
Total PTE of Entire Source	13.12	12.96	12.83	0.10	44.64	69.10	5.71	14.41	9.47 (toluene)

Controlled Potential to Emit (tons/year)									
Emission Unit/ ID	PM	PM10	PM2.5	SO2	NOx	VOC	CO	HAP	Worst Single HAP
Surface Coating Booths 1-5*	0.62	0.62	0.62	0	0	67.54	0	13.72	9.47 (toluene)
Natural Gas-fired Generator (NG2)	7.40E-04	0.10	0.10	5.65E-03	39.17	1.13	3.04	0.69	0.51 (formaldehyde)
Propane Combustion (H1, H2)	0.06	0.22	0.22	6.32E-04	4.11	0.32	2.37	0	0 -- --
Emergency Generator (EG1)	0.10	0.10	0.10	0.09	1.36	0.11	0.29	1.19E-03	3.61E-04 (formaldehyde)
Total PTE of Entire Source Excluding Fugitives	0.78	1.03	1.03	0.10	44.64	69.10	5.71	14.41	9.47 (toluene)
Unpaved Roads	0.56	0.14	0.01	-- --	-- --	-- --	-- --	-- --	-- --
Total PTE of Entire Source	1.34	1.18	1.05	0.10	44.64	69.10	5.71	14.41	9.47 (toluene)

* Potential to emit (PTE) of each of the surface coating booths 1 through 5 are after consideration of the dry filter controls. Pursuant to 326 IAC 6-3-2(d), the particulate emissions from each of the spray painting booths shall be controlled by dry particulate filters and the Permittee shall operate the control devices in accordance with the manufacturer's specifications. Compliance with this standard, in conjunction with a conservative assumption of 95% capture and control, shall limit PM, PM10, and PM2.5 emissions from the spray coating booths to the values shown.

Emissions from all other units shown in the table are the uncontrolled PTE.

Appendix A.1: Emission Calculations
Volatile Organic Compound (VOC), Particulate (PM/PM10/PM2.5), and
Hazardous Air Pollutants (HAPs) Emissions from Surface Coating Operations
Spray Booths (Booth 1- Booth 5)

Company Name: MJ Finishing
Source Address : 5311 E County Line Rd, Bremen, Indiana 46506
Minor Permit Revision No.: M099-37107-00104
Reviewer: Hannah L. Desrosiers

Volatile Organic Compound (VOC) and Particulate (PM/PM10/PM2.5) Emissions

Material	Density (lbs/gal)	Weight % Water	Weight % VOC	Weight % Solids	Maximum Capacity (unit/hr)	Maximum Capacity (gal/unit)	Maximum Usage * (gals/hour)	VOC (lbs/gal)	PTE of VOC (lbs/hour)	PTE of VOC (lbs/day)	Actual Emissions of VOC*** (lbs/day)	PTE of VOC (tons/year)	PTE PM/PM10/PM2.5 (lbs/hr)	PTE of PM/PM10/PM2.5 Before Controls (tons/year)	Transfer Efficiency**
Stain Booths (Booth 1, 2, and 3)															
Stain Blend 4002 (FMDS-11)	6.96	0.0%	76.58%	23.4%	70	0.0083	0.581	5.33	3.10	74.32	24.77	13.56	0.95	1.45	65%
Seal & Sand (Booth 4)															
Low VOC Catalyzed sealer	7.93	0.0%	62.96%	37.04%	70	0.0167	1.169	4.99	5.84	140.08	46.69	25.56	3.43	5.26	65%
Top Coat (Booth 5)															
Aristovar HV Topcoat	7.84	0.0%	59.53%	40.5%	70	0.0167	1.169	4.67	5.46	130.94	43.65	23.90	3.71	5.69	65%
Solvent Usage (Booth 1, 2, 3, 4, and 5)															
Wash Thinner -2739	7.02	0.0%	100.00%	0.00%	70	0.002	0.147	7.02	1.03	24.77	8.26	4.52	0.00	0.0	100%
Totals[†]									15.42	370.11	123.37	67.54	8.09	12.40	

**Dry Filter Control Efficiency = 95.0%
PTE of PM/PM10/PM2.5 (After Controls) = 0.620

Hazardous Air Pollutants (HAPs) Emissions

Material	Density (lbs/gal)	Maximum Capacity (gal/unit)	Maximum Usage * (gals/hour)	Weight % Toluene	Weight % Xylene	Weight % Ethylbenzene	Weight % Formaldehyde	Weight % MEK	PTE of Toluene (tons/yr)	PTE of MEK (tos/yr)	PTE of Ethylbenzene (tons/yr)	PTE of Formaldehyde (tons/yr)	PTE of Xylene (tons/yr)	Total PTE of HAPs
Stain Booths (Booth 1, 2, and 3)														
Stain Blend 4002 (FMDS-11)	6.96	0.0083	0.581	0.0%	0.0%	0.0%	0.0%	0%	0.0	0.0	0.0	0.0	0.0	0.00
Seal & Sand (Booth 4)														
Low VOC Catalyzed sealer	7.93	0.0167	1.169	10.19%	1.11%	0.39%	0.11%	0%	4.137	0.0	0.158	0.045	0.451	4.79
Top Coat (Booth 5)														
Aristovar HV Topcoat	7.84	0.0167	1.169	6%	4.44%	1.97%	0.09%	0%	2.605	0.0	0.791	0.036	1.782	5.21
Solvent Usage (Booth 1, 2, 3, 4, and 5)														
Wash Thinner -2739	7.69	0.002	0.147	55.00%	0.0%	0.0%	0.0%	20%	2.723	0.990	0.0	0.0	0.0	3.71
Totals[†]									9.466	0.990	0.949	0.081	2.233	13.72

NOTES

The Permittee coats 70 units of furniture per hour. Average unit weighs approximately 15 pounds. Average finished unit is 8 square feet

†The total PTE of VOC, PM/PM10/PM2.5, and HAP is a combined total for Booths 1-5.

* Maximum Usage as reported by source, based on materials used during an actual production run. Operator applies stain, sealer and topcoat to the wood furniture in sequence to produce the finished product.

**Assume transfer efficiency of 65% for air assisted airless spray guns and control efficiency of 89% for dry filters.

***Anticipated actual hours of operation assumed = 2000 hrs, 8 hours per day, 5 days per week, and 50 weeks per year

METHODOLOGY

VOC (lbs/gal) = Density (lbs/gal) x Weight % VOC (%)

PTE of PM/PM10 Before Controls (tons/year) = Density (lbs/gal) x Weight % Solids x Maximum Usage (gals/hour) x 8760 (hours/year) x 1 ton/2000 lbs x (1 - Transfer Efficiency %)

HAPS emission rate (tons/yr) = [Maximum Usage (lb/hr)] * [Weight % HAP] * [8760 hours/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 of VOC per Gallon Coating = [Density (lb/gal)] * [Weight % VOCs]

PTE of VOC (lbs/hr) = [Maximum Usage (lbs/hr)] * [Weight % VOCs]

PTE of VOC (lbs/day) = [PTE of VOC (lbs/hr)] * [24 hours/day]

PTE of VOC (tons/yr) = [PTE of VOC (lbs/day)] * [(365 days/yr)] * [1 ton/2000 lbs]

PTE of PM/PM10 (tons/yr) = [Density (lbs/gal)] * [Maximum Usage (gal/day)] * [(Weight % Solids)] * [1 - Transfer efficiency] * [365 days/yr] * [1 ton/2000 lbs]

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

Appendix A.1: Emission Calculations
Reciprocating Internal Combustion Engines - Natural Gas
4-Stroke Lean-Burn (4SLB) Engines
NG Generator (NG2)

Company Name: MJ Finishing
Source Address: 5311 E County Line Rd, Bremen, Indiana 46506
Permit Number: M099-37107-00104
Reviewer: Hannah L. Desrosiers

Maximum Heat Input Capacity (MMBtu/hr)	2.192
Maximum Hours Operated per Year (hr/yr)	8,760
Potential Fuel Usage (MMBtu/yr)	19,202
High Heat Value (MMBtu/MMscf)	1,020
Potential Fuel Usage (MMcf/yr)	18.83

Criteria Pollutants	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO
Emission Factor (lb/MMBtu)	7.71E-05	9.99E-03	9.99E-03	5.88E-04	4.08E+00	1.18E-01	3.17E-01
Potential Emissions (tons/yr)	0.0007	0.10	0.10	0.006	39.17	1.13	3.04

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

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

Hazardous Air Pollutants (HAPs)

Pollutant	Emission Factor (lb/MMBtu)	Potential Emissions (tons/yr)
Acetaldehyde	8.36E-03	0.080
Acrolein	5.14E-03	0.049
Benzene	4.40E-04	0.004
Biphenyl	2.12E-04	0.002
1,3-Butadiene	2.67E-04	0.003
Formaldehyde	5.28E-02	0.507
Methanol	2.50E-03	0.024
Hexane	1.10E-03	0.011
Toluene	4.08E-04	0.004
2,2,4-Trimethylpentane	2.50E-04	0.002
Xylene	1.84E-04	0.002
Total		0.69
Max		0.51 (formaldehyde)

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

Methodology

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

Potential Fuel Usage (MMBtu/yr) = [Maximum Heat Input Capacity (MMBtu/hr)] * [Maximum Hours Operating per Year (hr/yr)]

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

Abbreviations

PM = Particulate Matter

PM10 = Particulate Matter (<10 um)

SO2 = Sulfur Dioxide

NOx = Nitrous Oxides

VOC - Volatile Organic Compounds

CO = Carbon Monoxide

CO2 = Carbon Dioxide

CH4 = Methane

N2O = Nitrous Oxide

CO2e = CO2 equivalent emissions

Appendix A.1: Emission Calculations
LPG-Propane - Industrial Boilers
Heaters H1 and H2

Company Name: MJ Finishing
Source Address : 5311 E County Line Rd, Bremen, Indiana 46506
Significant Permit Revision No.: M099-37107-00104
Reviewer: Hannah L. Desrosiers

Emission Unit ID	Heat Input Capacity MMBtu/hr
H1	6.00
H2	0.60
Total:	6.60

Potential Throughput kgals/year
631.87

SO₂ Emission factor = 0.10 x S

S = Sulfur Content = 0.02 grains/100ft³

	Pollutant						
Emission Factor in lb/kgal	PM*	PM10*	direct PM2.5**	SO ₂	NO _x	VOC	CO
	0.2	0.7	0.7	0.002 (0.10S)	13.0	1.0 **TOC value	7.5
Potential Emission in tons/yr	0.06	0.22	0.22	6.3E-04	4.11	0.32	2.37

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

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

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

Methodology

1 gallon of LPG has a heating value of 84,000 Btu

1 gallon of propane has a heating value of 81,500 Btu (use this to convert emission factors to an energy basis for propane)

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

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

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

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

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

modified 05/2016 hd.
updated 7/11

Appendix A.1: Emission Calculations
Reciprocating Internal Combustion Engines - Diesel Fuel
Output Rating (<=600 HP)
Maximum Input Rate (<=4.2 MMBtu/hr)
Emergency Generator (EG1)

Company Name: MJ Finishing
Address City IN Zip: 5311 E County Line Rd, Bremen, Indiana 46506
Permit Number: M099-37107-00104
Reviewer: Hannah L. Desrosiers

Emissions calculated based on output rating (hp)

Output Horsepower Rating (hp)	175.0
Maximum Hours Operated per Year	500
Potential Throughput (hp-hr/yr)	87,500

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/hp-hr	0.0022	0.0022	0.0022	0.0021	0.0310	0.0025	0.0067
Potential Emission in tons/yr	0.10	0.10	0.10	0.09	1.36	0.11	0.29

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

Hazardous Air Pollutants (HAPs)

	Pollutant							
	Benzene	Toluene	Xylene	1,3-Butadiene	Formaldehyde	Acetaldehyde	Acrolein	Total PAH HAPs***
Emission Factor in lb/hp-hr****	6.53E-06	2.86E-06	2.00E-06	2.74E-07	8.26E-06	5.37E-06	6.48E-07	1.18E-06
Potential Emission in tons/yr	2.86E-04	1.25E-04	8.73E-05	1.20E-05	3.61E-04	2.35E-04	2.83E-05	5.15E-05

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

****Emission factors in lb/hp-hr were calculated using emission factors in lb/MMBtu and a brake specific fuel consumption of 7,000 Btu / hp-hr (AP-42 Table 3.3-1).

Potential Emission of Total HAPs (tons/yr)	1.19E-03
"Worst Case" Individual HAP (tons/yr)	3.61E-04
	(formaldehyde)

Methodology

Emission Factors are from AP 42 (Supplement B 10/96) Tables 3.4-1 , 3.4-2, 3.4-3, and 3.4-4.

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

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

Appendix A.1: Emission Calculations Fugitive Dust Emissions - Unpaved Roads

Company Name: MJ Finishing
Source Address : 5311 E County Line Rd, Bremen, Indiana 46506
Minor Permit Revision No.: M099-37107-00104
Reviewer: Hannah L. Desrosiers

Unpaved Roads at Industrial Site

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (11/2006).

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	10.0	1.0	10.0	15.0	150.0	230	0.044	0.4	159.0
Vehicle (leaving plant) (one-way trip)	10.0	1.0	10.0	15.0	150.0	230	0.044	0.4	159.0
Totals			20.0		300.0			0.9	318.0

Average Vehicle Weight Per Trip = 15.0 tons/trip
Average Miles Per Trip = 0.04 miles/trip

Unmitigated Emission Factor, $E_f = k[(s/12)^a][(W/3)^b]$ (Equation 1a from AP-42 13.2.2)

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	4.8	4.8	4.8	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Sand/Gravel Processing Plant)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)
W =	15.0	15.0	15.0	tons = average vehicle weight (provided by source)
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E * [(365 - P)/365]$ (Equation 2 from AP-42 13.2.2)

Mitigated Emission Factor, $E_{ext} = E * [(365 - P)/365]$

where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, E_f =	5.32	1.36	0.14	lb/mile
Mitigated Emission Factor, E_{ext} =	3.50	0.89	0.09	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	0.42	0.11	0.01	0.28	0.07	0.007
Vehicle (leaving plant) (one-way trip)	0.42	0.11	0.01	0.28	0.07	0.007
Totals	0.85	0.22	0.02	0.56	0.14	0.014

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 μ m)
PM2.5 = Particulate Matter (<2.5 μ m)
PTE = Potential to Emit

Appendix A.2: Emissions Calculations
PTE of the Revision

Company Name: MJ Finishing
Source Address: 5311 E County Line Rd, Bremen, Indiana 46506
Permit Number: M099-37107-00104
Reviewer: Hannah L. Desrosiers

Process	Unrestricted Potential to Emit (tons/year)								Worst Individual HAP
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Combined HAPs	
Natural Gas-fired Generator (NG2)	7.40E-04	0.10	0.10	5.65E-03	39.17	1.13	3.04	0.688	0.507 (formaldehyde)
Emergency Generator (EG1)	0.10	0.10	0.10	0.09	1.36	0.11	0.29	1.19E-03	3.61E-04 (formaldehyde)
Totals	0.10	0.19	0.19	0.10	40.53	1.24	3.34	0.69	0.51 (formaldehyde)

Unrestricted = uncontrolled and unlimited

NA = not applicable

Appendix A.2: Emissions Calculations
Reciprocating Internal Combustion Engines - Natural Gas
4-Stroke Lean-Burn (4SLB) Engines
NG Generator (NG2)

Company Name: MJ Finishing
Source Address: 5311 E County Line Rd, Bremen, Indiana 46506
Permit Number: M099-37107-00104
Reviewer: Hannah L. Desrosiers

Maximum Heat Input Capacity (MMBtu/hr)	2.192
Maximum Hours Operated per Year (hr/yr)	8,760
Potential Fuel Usage (MMBtu/yr)	19,202
High Heat Value (MMBtu/MMscf)	1,020
Potential Fuel Usage (MMcf/yr)	18.83

Criteria Pollutants	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO
Emission Factor (lb/MMBtu)	7.71E-05	9.99E-03	9.99E-03	5.88E-04	4.08E+00	1.18E-01	3.17E-01
Potential Emissions (tons/yr)	0.0007	0.10	0.10	0.006	39.17	1.13	3.04

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

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

Hazardous Air Pollutants (HAPs)

Pollutant	Emission Factor (lb/MMBtu)	Potential Emissions (tons/yr)
Acetaldehyde	8.36E-03	0.080
Acrolein	5.14E-03	0.049
Benzene	4.40E-04	0.004
Biphenyl	2.12E-04	0.002
1,3-Butadiene	2.67E-04	0.003
Formaldehyde	5.28E-02	0.507
Methanol	2.50E-03	0.024
Hexane	1.10E-03	0.011
Toluene	4.08E-04	0.004
2,2,4-Trimethylpentane	2.50E-04	0.002
Xylene	1.84E-04	0.002

Total **0.69**
Max **0.507 (formaldehyde)**

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

Methodology

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

Potential Fuel Usage (MMBtu/yr) = [Maximum Heat Input Capacity (MMBtu/hr)] * [Maximum Hours Operating per Year (hr/yr)]

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

Abbreviations

PM = Particulate Matter

PM10 = Particulate Matter (<10 um)

SO2 = Sulfur Dioxide

NOx = Nitrous Oxides

VOC - Volatile Organic Compounds

CO = Carbon Monoxide

CO2 = Carbon Dioxide

CH4 = Methane

N2O = Nitrous Oxide

CO2e = CO2 equivalent emissions

Appendix A.2: Emissions Calculations
Reciprocating Internal Combustion Engines - Diesel Fuel
Output Rating (<=600 HP)
Maximum Input Rate (<=4.2 MMBtu/hr)
Emergency Generator (EG1)

Company Name: MJ Finishing
Address City IN Zip: 5311 E County Line Rd, Bremen, Indiana 46506
Permit Number: M099-37107-00104
Reviewer: Hannah L. Desrosiers

Emissions calculated based on output rating (hp)

Output Horsepower Rating (hp)	175.0
Maximum Hours Operated per Year	500
Potential Throughput (hp-hr/yr)	87,500

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/hp-hr	0.0022	0.0022	0.0022	0.0021	0.0310	0.0025	0.0067
Potential Emission in tons/yr	0.10	0.10	0.10	0.09	1.36	0.11	0.29

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

Hazardous Air Pollutants (HAPs)

	Pollutant							
	Benzene	Toluene	Xylene	1,3-Butadiene	Formaldehyde	Acetaldehyde	Acrolein	Total PAH HAPs***
Emission Factor in lb/hp-hr****	6.53E-06	2.86E-06	2.00E-06	2.74E-07	8.26E-06	5.37E-06	6.48E-07	1.18E-06
Potential Emission in tons/yr	2.86E-04	1.25E-04	8.73E-05	1.20E-05	3.61E-04	2.35E-04	2.83E-05	5.15E-05

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

****Emission factors in lb/hp-hr were calculated using emission factors in lb/MMBtu and a brake specific fuel consumption of 7,000 Btu / hp-hr (AP-42 Table 3.3-1).

Potential Emission of Total HAPs (tons/yr)	1.19E-03
"Worst Case" Individual HAP (tons/yr)	3.61E-04
	(formaldehyde)

Methodology

Emission Factors are from AP 42 (Supplement B 10/96) Tables 3.4-1 , 3.4-2, 3.4-3, and 3.4-4.

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

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



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

September 20, 2016

Matthew Schmucker
MJ Finishing
5311 E County Line Rd
Bremen, IN 46506

Re: Public Notice
MJ Finishing
Permit Level: MSOP - Significant Permit Revision
Permit Number: 099 - 37107 - 00104

Dear Matthew Schmucker:

Enclosed is a copy of your draft MSOP - Significant Permit Revision, 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 Plymouth Pilot News in Plymouth, Indiana publish the abbreviated version of the public notice no later than September 24, 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 Bremen Public Library, 304 N Jackson St in Bremen IN. 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 Hannah Desrosiers, 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 3-9327 or dial (317) 233-9327.

Sincerely,
Len Pogost

Len Pogost
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 2/17/2016



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

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

Michael R. Pence
Governor

Carol S. Comer
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

September 20, 2016

Plymouth Pilot News
Attn: Classifieds
P.O. Box 220
Plymouth, IN 46563

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for MJ Finishing, Marshall 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 September 24, 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 Len Pogost at 800-451-6027 and ask for extension 3-2803 or dial 317-233-2803.

Sincerely,

Len Pogost

Len Pogost
Permit Branch
Office of Air Quality

Permit Level: MSOP - Significant Permit Revision
Permit Number: 099 - 37107 - 00104

Enclosure
PN Newspaper.dot 6/13/2013



Indiana Department of Environmental Management

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

September 20, 2016

To: Bremen Public Library 304 N Jackson St Bremen IN

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: MJ Finishing
Permit Number: 099 - 37107 - 00104

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



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

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

Michael R. Pence
Governor

Carol S. Comer
Commissioner

Notice of Public Comment

September 20, 2016

MJ Finishing

099 - 37107 - 00104

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	LPOGOST 9/20/2016 MJ Finishing 099 - 37107 - 00104 draft		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	 Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handling Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		Matthew Schmucker MJ Finishing 5311 E County Line Rd Bremen IN 46506 (Source CAATS)									
2		Bremen Public Library 304 N Jackson St Bremen IN 46506-1130 (Library)									
3		Marshall County Commissioners 112 West Jefferson Street Plymouth IN 46563 (Local Official)									
4		Bremen Town Council and Town Manager 111 South Center Street Bremen IN 46506 (Local Official)									
5		Marshall County Health Department 112 W Jefferson Street, Suite 103 Plymouth IN 46563-1764 (Health Department)									
6		LaPaz Town Council PO Box 0820 LaPaz IN 46537 (Local Official)									
7		Ms. Julie Grzesiak 139 N. Michigan St. Argos IN 46501 (Affected Party)									
8		James Heim J.C. Heim and Associates 57901 Blue Heron Drive Goshen IN 46528 (Consultant)									
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Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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