



# Indiana Department of Environmental Management

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

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

**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

## NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal of a  
Part 70 Operating Permit

for Grabill Cabinet in Allen County

Part 70 Operating Permit Renewal No.: T003-36722-00038

Significant Source Modification No.: 003-37217-00038

The Indiana Department of Environmental Management (IDEM) has received an application from Grabill Cabinet, located at 13844 Sawmill Drive Grabill, IN 46741-9481, for a significant source modification and renewal of its Part 70 Operating Permit issued on October 20, 2011. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow Grabill Cabinet to make certain changes at its existing source. Grabill Cabinet has applied to add 55 natural gas-fired units and spray gun cleaning operation to its permit and modify all of its existing paint and laminating booths to be able to apply any paint and laminating surface coating at any booth.

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

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

Allen County Library (Grabill Branch)  
13521 State St.  
Grabill, IN 46741

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

### How can you participate in this process?

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

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

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so

that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number Part 70 Operating Permit Renewal No. T003-36722-00038 and SSM 003-37217-00038 in all correspondence.

**Comments should be sent to:**

Adam Wheat  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for extension 3-8397  
Or dial directly: (317) 233-8397  
Fax: (317) 232-6749 attn: Adam Wheat  
E-mail: [awheat@idem.IN.gov](mailto:awheat@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, and the IDEM public file room on the 12<sup>th</sup> floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

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



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



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Governor

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**Carol S. Comer**  
Commissioner

## Significant Source Modification to a Part 70 Source

### OFFICE OF AIR QUALITY

**Grabill Cabinet  
13844 Sawmill Rd.  
Grabill, IN 46741**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses certain new source review requirements for new and/or existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions.

Significant Source Modification No.: 003-37217-00038	
Issued by:  Nathan C. Bell Section Chief, Permits Branch Office of Air Quality	Issuance Date:

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**SECTION A SOURCE SUMMARY**

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.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 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]**

The Permittee owns and operates a stationary hardwood cabinet manufacturing operation.

Source Address: 13844 Sawmill Road, Grabill, Indiana 46741  
 General Source Phone Number: (260) 376-1500  
 SIC Code: 2434 (Wood Kitchen Cabinets)  
 County Location: Allen  
 Source Location Status: Attainment for all criteria pollutants  
 Source Status: Part 70 Operating Permit Program  
 Minor Source, under PSD and Emission Offset Rules  
 Major Source, Section 112 of the Clean Air Act  
 Not 1 of 28 Source Categories

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

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

- (a) Fourteen (14) surface coating and laminating booths, each equipped with HVLP spray guns, using dry filters to control particulate emissions, with emissions exhausting through stacks, as identified in the following table:

Booth ID #	Date Constructed/Modified	Application Method	Control Device	Stack/Vent ID#
SB-1	1985	HVLP	Dry Filter	S-9
SB-2	1985	HVLP	Dry Filter	S-2
SB-3	1985	HVLP	Dry Filter	S-3
SB-4	2000	HVLP	Dry Filter	S-4
SB-5	2000	HVLP	Dry Filter	S-5
SB-6	2000	HVLP	Dry Filter	S-6
SB-7	2000	HVLP	Dry Filter	S-7
SB-8	2000	HVLP	Dry Filter	S-8
SB-9	2000	HVLP	Dry Filter	S-9
SB-10	1985	Low Pressure Spray	Dry Filter	S-10
SB-11	1985	Low Pressure Spray	Dry Filter	S-11
SB-12	2000	HVLP	Dry Filter	S-12
SB-14	2016	HVLP	Dry Filter	S-14
SB-15	1985	Low Pressure Spray	Dry Filter	S-15

Under the National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations (40 CFR 63, Subpart JJ), the fourteen (14) surface coating and laminating booths are considered to be existing wood furniture surface coating operations.

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- (b) Research and development surface coating booth, identified as SB-13, consisting of one (1) insignificant surface coating booth used for research and development activity and developing new coating schemes, installed in 2001, exhausting to stack S-13, coating a maximum of 5 units per hour. [NESHAP, Subpart JJ]
- (c) Woodworking operations, consisting of various woodworking machines, with a maximum process weight of 6,500 pounds per hour, with emissions controlled by cyclones and/or baghouses, as specified in the following table.

Control Device ID	Control type	Installation year	Maximum Capacity (cfm)	Stack/Vent ID
DC-1	cyclone/baghouse	1985	9,000	Indoors
DC-2	cyclone/baghouse	1985	16,000	Indoors
DC-3	cyclone/baghouse	1985	55,000	DC-3/Indoors during the winter
DC-4	dust collector/rotoclone	2000	14,000	Indoors
DC-5	dalmatic baghouse	2000	10,000	Indoors
DC-6	dust collector	2000	4,000	Indoors
DC-7	return dust collector	2000	4,000	Indoors
DC-8	return dust collector	2000	4,000	Indoors
DC-9	return dust collector	2000	2,200	Indoors
DC-10	return dust collector	1985	4,000	Indoors
DC-11	return dust collector	1990	5,500	Indoors
DC-12	cyclone dust collector	2000	4,488	Indoors
DC-13	cyclone/return dust collector	2000	10,000	Indoors
DC-14	return dust collector	2000	8,000	Indoors
DC-15	dust collector	2000	2,200	Indoors

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)]

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

- (a) Sixteen (16) natural gas-fired air make up units, identified as SH-1 through SH-16, with a maximum heat input capacity of 0.15 MMBtu/hr each, each unit constructed in 2000 and each exhausting to vents V-1 through V-16 respectfully.
- (b) One (1) natural gas-fired space heater, identified as SH-17, with a maximum heat input capacity of 5.30 MMBtu/hr constructed in 2000, and exhausting indoors.
- (c) One natural gas fired air make up unit, identified as SH-18, with a maximum heat input capacity of 5.30 MMBtu/hr constructed in 2000, and exhausting indoors.
- (d) Five (5) natural gas-fired space heaters, identified as SH-19 through SH-23, with a maximum heat input capacity of 0.06 MMBtu/hr each, each unit constructed in 1995 and each exhausting to vents V-19 through V-23 respectfully.
- (e) Eight (8) natural gas-fired space heaters, identified as SH-24 through SH-31, with a maximum heat input capacity of 0.04 MMBtu/hr each, each unit constructed in 1998 and each exhausting to vents V-24 through V-31 respectfully.
- (f) Eight (8) natural gas-fired space heaters, identified as SH-32 through SH-39, with a maximum heat input capacity of 0.04 MMBtu/hr each, each unit constructed in 1998 and each exhausting to vents V-32 through V-39 respectfully.

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- (g) Six (6) natural gas-fired space heaters, identified as SH-40 through SH-45, with a maximum heat input capacity of 0.1 MMBtu/hr each, each unit constructed in 1998 and each exhausting to vents V-40 through V-45 respectfully.
- (h) Six (6) natural gas-fired space heaters, identified as SH-46 through SH-51, with a maximum heat input capacity of 0.120 MMBtu/hr each, each unit constructed in 1998 and each exhausting to vents V-46 through V-51 respectfully.
- (i) One (1) natural gas-fired self-contained heating unit, identified as SH-52, with a maximum heat input capacity of 1.29 MMBtu/hr, constructed in 2000 and exhausting to stack ID S-12.
- (j) Three (3) natural gas-fired office forced air furnaces, identified as SH-53 through SH-55 with a maximum heat input capacity of 0.120 MMBtu/hr each, each unit constructed in 2000 and each exhausting to stack IDs S-53 through S-55 respectively.
- (k) One (1) spray gun cleaning operation, identified as GC-1, approved in 2016 for construction, with a maximum throughput of 450 gallons of solvent per year, uncontrolled, and exhausting indoors.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

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## SECTION B GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-7-1]

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

### B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

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- (a) This permit, 003-36722-00038, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

### B.4 Enforceability [326 IAC 2-7-7][IC 13-17-12]

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

### B.5 Severability [326 IAC 2-7-5(5)]

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The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

### B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

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

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B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:
- (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and
  - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(35).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

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

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or  
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)  
Facsimile Number: 317-233-6865

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

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

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

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

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

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

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

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

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

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to

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be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

**B.13** Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to 003-36722-00038 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
  - (2) revised under 326 IAC 2-7-10.5, or
  - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

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

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

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

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

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

Request for renewal shall be submitted to:

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

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

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

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

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

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (c) without a prior permit revision, if each of the following conditions is met:
  - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
  - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:  
  
Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

and

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

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

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

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

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(37)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
  - (1) A brief description of the change within the source;
  - (2) The date on which the change will occur;
  - (3) Any change in emissions; and
  - (4) Any permit term or condition that is no longer applicable as a result of the change.

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

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

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

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

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

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as

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such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

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

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:  
  
Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

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

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

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

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## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

#### C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

#### C.6 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

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- (2) If there is a change in the following:
  - (A) Asbestos removal or demolition start date;
  - (B) Removal or demolition contractor; or
  - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

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

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

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

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

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

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

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

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

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

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

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

### C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)][40 CFR 64][326 IAC 3-8]

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- (a) For new units:  
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.
- (b) For existing units:  
Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance to begin such monitoring. If, due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

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

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

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

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

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

**C.11 Risk Management Plan [326 IAC 2-7-5(11)][40 CFR 68]**

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

**C.12 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]**

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

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

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

#### C.13 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

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

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

The statement must be submitted to:

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

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

#### C.14 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

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

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

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

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

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

- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of

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permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

**C.15 General Reporting Requirements [326 IAC 2-7-5(3)(C)][326 IAC 2-1.1-11]**

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B -Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

**Stratospheric Ozone Protection**

**C.16 Compliance with 40 CFR 82 and 326 IAC 22-1**

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

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**SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS**

**Facility Description [ 326 IAC 2-7-5(15)]**

- (a) Fourteen (14) surface coating and laminating booths, each equipped with HVLP spray guns, using dry filters to control particulate emissions, with emissions exhausting through stacks, as identified in the following table:

Booth ID #	Date Constructed/Modified	Application Method	Control Device	Stack/Vent ID#
SB-1	1985	HVLP	Dry Filter	S-9
SB-2	1985	HVLP	Dry Filter	S-2
SB-3	1985	HVLP	Dry Filter	S-3
SB-4	2000	HVLP	Dry Filter	S-4
SB-5	2000	HVLP	Dry Filter	S-5
SB-6	2000	HVLP	Dry Filter	S-6
SB-7	2000	HVLP	Dry Filter	S-7
SB-8	2000	HVLP	Dry Filter	S-8
SB-9	2000	HVLP	Dry Filter	S-9
SB-10	1985	Low Pressure Spray	Dry Filter	S-10
SB-11	1985	Low Pressure Spray	Dry Filter	S-11
SB-12	2000	HVLP	Dry Filter	S-12
SB-14	2016	HVLP	Dry Filter	S-14
SB-15	1985	Low Pressure Spray	Dry Filter	S-15

Under the National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations (40 CFR 63, Subpart JJ), the fourteen (14) surface coating and laminating booths are considered to be existing wood furniture surface coating operations.

- (b) Research and development surface coating booth, identified as SB-13, consisting of one (1) insignificant surface coating booth used for research and development activity and developing new coating schemes, installed in 2001, exhausting to stack S-13, coating a maximum of 5 units per hour. [NESHAP, Subpart JJ]

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

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

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

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), when applying surface coatings to wood furniture and cabinets in the fourteen (14) surface coating and laminating booths and one (1) research and development booth (SB-1 through SB-15), the Permittee shall apply all coating material, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) or more of the following application methods:

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

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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(d)]**

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Pursuant to 326 IAC 6-3-2(d), particulate from the fourteen (14) surface coating and laminating booths and one (1) research and development booth (SB-1 through SB-15) shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

**D.1.3 PSD Minor Limit [326 IAC 2-2]**

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In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the total combined VOC input to the fourteen (14) surface coating and laminating booths and one (1) research and development booth (SB-1 through SB-15) shall not exceed 225 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

Compliance with this limit, in conjunction with the potential to emit VOC from all other emission units at this source, shall limit the source-wide VOC emissions to less than 250 tons per 12 consecutive month period and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

**D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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

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

**D.1.5 Particulate**

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In order to assure compliance with Condition D.1.2, particulate from the fourteen (14) surface coating and laminating booths and one (1) research and development booth (SB-1 through SB-15) shall be controlled by a dry particulate filter, and the Permittee shall operate the filter in accordance with the manufacturer's specifications.

**D.1.6 Volatile Organic Compounds**

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Compliance with the VOC input limitation contained in Condition D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

**D.1.7 Monitoring**

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters associated with the fourteen (14) surface coating and laminating booths and one (1) research and development booth (SB-1 through SB-15). To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks while one or more of the booths are in operation. If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

#### **D.1.8 Record Keeping Requirement**

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- (a) To document the compliance status with Conditions D.1.3 and D.1.6, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC input limit established in Condition D.1.3. Records necessary to demonstrate compliance shall be available no later than 30 days of the end of each compliance period.
- (1) The VOC content of each coating material and solvent used.
- (2) The amount of coating material and solvent less water used on a monthly basis.
- (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (3) The cleanup solvent usage for each month.
- (4) The total VOC input each month and each compliance period.
- (b) To document the compliance status with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations, and the daily and monthly inspections required by Condition D.1.7.
- (c) Section C – General Record Keeping Requirements, of this permit contains the Permittee's obligations with regard to the records required by this condition.

#### **D.1.9 Reporting Requirements**

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A quarterly summary of the information to document the compliance status with Condition D.1.3 shall be submitted using the reporting form located at the end of this permit, or its equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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**Section D.2 EMISSIONS UNIT OPERATION CONDITIONS**

**Facility Description [ 326 IAC 2-7-5(15)]**

(c) Woodworking operations, consisting of various woodworking machines, with a maximum process weight of 6,500 pounds per hour, with emissions controlled by cyclones and/or baghouses, as specified in the following table.

Control Device ID	Control Type	Installation Year	Maximum Capacity (cfm)	Stack/Vent ID
DC-1	cyclone/baghouse	1985	9,000	Indoors
DC-2	cyclone/baghouse	1985	16,000	Indoors
DC-3	cyclone/baghouse	1985	55,000	DC-3/Indoors during the winter
DC-4	dust collector/rotoclone	2000	14,000	Indoors
DC-5	dalmatic baghouse	2000	10,000	Indoors
DC-6	dust collector	2000	4,000	Indoors
DC-7	return dust collector	2000	4,000	Indoors
DC-8	return dust collector	2000	4,000	Indoors
DC-9	return dust collector	2000	2,200	Indoors
DC-10	return dust collector	1985	4,000	Indoors
DC-11	return dust collector	1990	5,500	Indoors
DC-12	cyclone dust collector	2000	4,488	Indoors
DC-13	cyclone/return dust collector	2000	10,000	Indoors
DC-14	return dust collector	2000	8,000	Indoors
DC-15	dust collector	2000	2,200	Indoors

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

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

**D.2.1 Particulate [326 IAC 6-3-2]**

In order to assure that each of the woodworking operations is not subject to the requirements of 326 IAC 6-3-2, the integral dust collectors for particulate control shall be in operation and control emissions from each of the woodworking operations at all times that each of the woodworking operations is in operation.

**D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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

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

**D.2.3 Particulate Control [326 IAC 2-7-6(6)]**

- (a) In order to comply with Condition D.2.1, the dust collectors, cyclones and baghouses for particulate control shall be in operation and control emissions from the woodworking operations at all times that the woodworking operations are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also

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include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

#### **D.2.4 Visible Emissions Notations**

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- (a) Daily visible emission notations of the stack exhaust from the woodworking operations controlled by cyclone/baghouse DC-3 shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

#### **D.2.5 Baghouse Inspections**

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An inspection shall be performed semiannually of all bags controlling the woodworking operations controlled by dust collectors DC-1 through DC-15 when venting to the indoors. All defective bags shall be replaced.

#### **D.2.6 Broken or Failed Bag Detection**

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- (a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

#### **D.2.7 Record Keeping Requirements**

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- (a) To document the compliance status with Condition D.2.4, the Permittee shall maintain daily records of the visible emission notations of the stack exhaust from the woodworking operations controlled by cyclone/baghouse DC-3 when venting to the atmosphere. The Permittee shall include in its daily record when a visible emission notation is not taken

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and the reason for the lack of a visible emission notation (e.g., the process did not operate that day).

- (b) To document the compliance status with Condition D.2.5 , the Permittee shall maintain records of the results of the inspections required under Condition D.2.5 when venting to the indoors.
- (c) Section C – General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

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## SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (k) One (1) spray gun cleaning operation, identified as GC-1, approved in 2016 for construction, with a maximum throughput of 450 gallons of solvent per year, uncontrolled, and exhausting indoors.

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

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

#### D.3.1 Volatile Organic Compound (VOC) Limitations [326 IAC 8-3]

In order to render the requirements of 326 IAC 8-3 (Organic Solvent Degreasing Operations) not applicable, the VOC input to the spray gun cleaning operation (GC-1) shall be less than fifteen (15) pounds per day of VOC. Compliance with this limit shall render the requirements of 326 IAC 8-3 (Organic Solvent Degreasing Operations) not applicable to the spray gun cleaning operation (GC-1).

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

#### D.3.2 Volatile Organic Compounds [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC input limitation contained in Condition D.3.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

#### D.3.3 Record Keeping Requirement

- (a) To document the compliance status with Conditions D.3.1, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC input limit established in Condition D.3.1.
- (1) The VOC content of each solvent used.
  - (2) The amount of solvent used on a daily basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type, VOC content, and amount of solvent used.
- (b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligation with regard to the records required by this condition.

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**SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS**

**Emissions Unit Description:**

- (a) Fourteen (14) surface coating and laminating booths, each equipped with HVLP spray guns, using dry filters to control particulate emissions, with emissions exhausting through stacks, as identified in the following table:

Booth ID #	Date Constructed/Modified	Application Method	Control Device	Stack/Vent ID#
SB-1	1985	HVLP	Dry Filter	S-9
SB-2	1985	HVLP	Dry Filter	S-2
SB-3	1985	HVLP	Dry Filter	S-3
SB-4	2000	HVLP	Dry Filter	S-4
SB-5	2000	HVLP	Dry Filter	S-5
SB-6	2000	HVLP	Dry Filter	S-6
SB-7	2000	HVLP	Dry Filter	S-7
SB-8	2000	HVLP	Dry Filter	S-8
SB-9	2000	HVLP	Dry Filter	S-9
SB-10	1985	Low Pressure Spray	Dry Filter	S-10
SB-11	1985	Low Pressure Spray	Dry Filter	S-11
SB-12	2000	HVLP	Dry Filter	S-12
SB-14	2016	HVLP	Dry Filter	S-14
SB-15	1985	Low Pressure Spray	Dry Filter	S-15

Under the National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations (40 CFR 63, Subpart JJ), the fourteen (14) surface coating and laminating booths are considered to be existing wood furniture surface coating operations.

- (b) Research and development surface coating booth, identified as SB-13, consisting of one (1) insignificant surface coating booth used for research and development activity and developing new coating schemes, installed in 2001, exhausting to stack S-13, coating a maximum of 5 units per hour. [NESHAP, Subpart JJ]

(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 2-7-5(1)]**

**E.1.1 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 63.809, 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, as specified in Table 1 of 40 CFR Part 63, Subpart JJ in accordance with the schedule in 40 CFR 63, Subpart JJ.
- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

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

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

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The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart JJ (included as Attachment A to the operating permit), which are incorporated by reference as 326 IAC 20-14, for the emission unit(s) listed above:

- (1) 40 CFR 63.800(a), (c), (d), (e), and (g)
- (2) 40 CFR 63.801
- (3) 40 CFR 63.802(a)
- (4) 40 CFR 63.803(a) through (g)
- (5) 40 CFR 63.803(h)(1) through (3), (h)(5), (h)(6)
- (6) 40 CFR 63.803(i) through (l)
- (7) 40 CFR 63.804(a)(1), (a)(2) and (a)(4)
- (8) 40 CFR 63.804(b)
- (9) 40 CFR 63.804(c)(1)
- (10) 40 CFR 63.804(f)
- (11) 40 CFR 63.804(g)(1) - (g)(3), (g)(5), (g)(7) and (g)(8)
- (12) 40 CFR 63.805(a)
- (13) 40 CFR 63.806(a) through (e)
- (14) 40 CFR 63.806(h) through (j)
- (15) 40 CFR 63.807(a), (c), (e)
- (16) 40 CFR 63.808
- (17) Tables 2 through 6 to 40 CFR 63, Subpart JJ (the applicable portions).

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

**E.1.3 Testing Requirements [326 IAC 2-1.1-11][326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]**

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In order to document the compliance status with Condition E.1.2, the Permittee shall perform the testing required under 40 CFR 63, Subpart JJ, utilizing methods as approved by the Commissioner, at least once every five (5) years from the date of the most recent valid compliance demonstration. Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

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

Source Name: Grabill Cabinet  
Source Address: 13844 Sawmill Road, Grabill, Indiana 46741  
Part 70 Permit No.: 003-36722-00038

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify) \_\_\_\_\_.
- Report (specify) \_\_\_\_\_.
- Notification (specify) \_\_\_\_\_.
- Affidavit (specify) \_\_\_\_\_.
- Other (specify) \_\_\_\_\_.

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: (317) 233-0178  
Fax: (317) 233-6865**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Grabill Cabinet  
Source Address: 13844 Sawmill Road, Grabill, Indiana 46741  
Part 70 Permit No.: 003-36722-00038

**This form consists of 2 pages**

**Page 1 of 2**

- |   |
|---|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li>• The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and</li><li>• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.</li></ul> |
|---|

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

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

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

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

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

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

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

**Part 70 Quarterly Report**

Source Name: Grabill Cabinet  
Source Address: 13844 Sawmill Road, Grabill, Indiana 46741  
Part 70 Permit No.: T003-36722-00038  
Facility: SB-1 through SB-15  
Parameter: VOC  
Limit: The total combined VOC input to the fourteen (14) surface coating and laminating booths and one (1) research and development booths (SB-1 through SB-15) shall not exceed 225 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

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

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

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

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

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

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

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

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

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR QUALITY  
 COMPLIANCE AND ENFORCEMENT BRANCH  
 PART 70 OPERATING PERMIT  
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Grabill Cabinet  
 Source Address: 13844 Sawmill Road, Grabill, Indiana 46741  
 Part 70 Permit No.: 003-36722-00038

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

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B -Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C- General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement (specify permit condition #)</b>	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement (specify permit condition #)</b>	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

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

Form Completed by: \_\_\_\_\_

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

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

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

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

**Technical Support Document (TSD) for a Part 70 Operating Permit Renewal  
and Significant Source Modification**

<b>Source Background and Description</b>
--

<b>Source Name:</b>	<b>Grabill Cabinet</b>
<b>Source Location:</b>	<b>13844 Sawmill Drive Allen, IN 46741</b>
<b>County:</b>	<b>Allen</b>
<b>SIC Code:</b>	<b>2434 (Wood Kitchen Cabinets)</b>
<b>Permit Renewal No.:</b>	<b>T003-36722-00038</b>
<b>Significant Source Modification No.:</b>	<b>T003-37217-00038</b>
<b>Permit Reviewer:</b>	<b>Clinton Mccrowey/Adam Wheat</b>

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Grabill Cabinet relating to the operation of a stationary hardwood cabinet manufacturing operation. On January 15, 2016, Grabill Cabinet submitted an application to the OAQ requesting to renew its operating permit. On May 23, 2016, Grabill Cabinet submitted an application for a Significant Source Modification (SSM).

As part of this SSM and Renewal, Grabill Cabinet has requested to make the following modifications:

- (a) To modify surface coating booth operations to allow the use new/different coatings, to allow all the booths to be operated at the maximum capacity, and to allow all the booths to either perform surface coating or lamination for flexibility. As a result of the proposed modification, the change in the uncontrolled/unlimited PTE of 14 surface coating booths is greater than 25 tons/year and a Significant Source Modification (SSM) is required for this modification.
- (b) To update the woodworking operations to indicate that they are now controlled by 15 dust collectors (previously 8 dust collectors) with different outlet grain loading and flow rate values. The PTE emission calculations for the woodworking operations have been updated based on the updated control devices, outlet grain loading values, and flow rate values.
- (c) To add 55 existing natural gas-fired units and spray gun cleaning operation, as well as remove 2 natural gas-fired boilers.

In addition, IDEM OAQ has updated the description of the maximum capacity for the research and development booths from a maximum of 2 gallons of material per week to a maximum throughput of 5 units per hour. Finally, IDEM OAQ has changed the SIC Code for the source from 2599 to 2434.

<b>Permitted Emission Units and Pollution Control Equipment</b>
---

The source consists of the following permitted emission units:

- (a) Fourteen (14) surface coating and laminating booths, each equipped with HVLP spray guns, using dry filters to control particulate emissions, with emissions exhausting through stacks, as identified in the following table:

Booth ID #	Date Constructed/Modified	Application Method	Control Device	Stack/Vent ID#
SB-1	1985	HVLP	Dry Filter	S-9
SB-2	1985	HVLP	Dry Filter	S-2
SB-3	1985	HVLP	Dry Filter	S-3
SB-4	2000	HVLP	Dry Filter	S-4
SB-5	2000	HVLP	Dry Filter	S-5
SB-6	2000	HVLP	Dry Filter	S-6
SB-7	2000	HVLP	Dry Filter	S-7
SB-8	2000	HVLP	Dry Filter	S-8
SB-9	2000	HVLP	Dry Filter	S-9
SB-10	1985	Low Pressure Spray	Dry Filter	S-10
SB-11	1985	Low Pressure Spray	Dry Filter	S-11
SB-12	2000	HVLP	Dry Filter	S-12
SB-14	2016	HVLP	Dry Filter	S-14
SB-15	1985	Low Pressure Spray	Dry Filter	S-15

Under the National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations (40 CFR 63, Subpart JJ), the fourteen (14) surface coating and laminating booths are considered to be existing wood furniture surface coating operations.

- (b) Research and development surface coating booth, identified as SB-13, consisting of one (1) insignificant surface coating booth used for research and development activity and developing new coating schemes, installed in 2001, exhausting to stack S-13, coating a maximum of 5 units per hour. [NESHAP, Subpart JJ]
- (c) Woodworking operations, consisting of various woodworking machines, with a maximum process weight of 6,500 pounds per hour, with emissions controlled by cyclones and/or baghouses, as specified in the following table.

Control Device ID	Control Type	Installation Year	Maximum Capacity (cfm)	Stack/Vent ID
DC-1	cyclone/baghouse	1985	9,000	Indoors
DC-2	cyclone/baghouse	1985	16,000	Indoors
DC-3	cyclone/baghouse	1985	55,000	DC-3/Indoors during the winter
DC-4	dust collector/rotoclone	2000	14,000	Indoors
DC-5	dalmatic baghouse	2000	10,000	Indoors
DC-6	dust collector	2000	4,000	Indoors
DC-7	return dust collector	2000	4,000	Indoors
DC-8	return dust collector	2000	4,000	Indoors
DC-9	return dust collector	2000	2,200	Indoors
DC-10	return dust collector	1985	4,000	Indoors
DC-11	return dust collector	1990	5,500	Indoors
DC-12	cyclone dust collector	2000	4,488	Indoors
DC-13	cyclone/return dust collector	2000	10,000	Indoors
DC-14	return dust collector	2000	8,000	Indoors
DC-15	dust collector	2000	2,200	Indoors

### Insignificant Activities

The source also consists of the following insignificant activities:

- (a) Sixteen (16) natural gas-fired air make up units, identified as SH-1 through SH-16, with a maximum heat input capacity of 0.15 MMBtu/hr each, each unit constructed in 2000 and each exhausting to vents V-1 through V-16 respectfully.
- (b) One (1) natural gas-fired space heater, identified as SH-17, with a maximum heat input capacity of 5.30 MMBtu/hr constructed in 2000, and exhausting indoors.
- (c) One (1) natural gas fired air make up unit, identified as SH-18, with a maximum heat input capacity of 5.30 MMBtu/hr constructed in 2000, and exhausting indoors.
- (d) Five (5) natural gas-fired space heaters, identified as SH-19 through SH-23, with a maximum heat input capacity of 0.06 MMBtu/hr each, each unit constructed in 1995 and each exhausting to vents V-19 through V-23 respectfully.
- (e) Eight (8) natural gas-fired space heaters, identified as SH-24 through SH-31, with a maximum heat input capacity of 0.04 MMBtu/hr each, each unit constructed in 1998 and each exhausting to vents V-24 through V-31 respectfully.
- (f) Eight (8) natural gas-fired space heaters, identified as SH-32 through SH-39, with a maximum heat input capacity of 0.04 MMBtu/hr each, each unit constructed in 1998 and each exhausting to vents V-32 through V-39 respectfully.
- (g) Six (6) natural gas-fired space heaters, identified as SH-40 through SH-45, with a maximum heat input capacity of 0.1 MMBtu/hr each, each unit constructed in 1998 and each exhausting to vents V-40 through V-45 respectfully.
- (h) Six (6) natural gas-fired space heaters, identified as SH-46 through SH-51, with a maximum heat input capacity of 0.120 MMBtu/hr each, each unit constructed in 1998 and each exhausting to vents V-46 through V-51 respectfully.
- (i) One (1) natural gas-fired self-contained heating unit, identified as SH-52, with a maximum heat input capacity of 1.29 MMBtu/hr, constructed in 2000 and exhausting to stack ID S-12.
- (j) Three (3) natural gas-fired office forced air furnaces, identified as SH-53 through SH-55 with a maximum heat input capacity of 0.120 MMBtu/hr each, each unit constructed in 2000 and each exhausting to stack IDs S-53 through S-55 respectfully.
- (k) One (1) spray gun cleaning operation, identified as GC-1, approved in 2016 for construction, with a maximum throughput of 450 gallons of solvent per year, uncontrolled, and exhausting indoors.

### Emission Units and Pollution Control Equipment Removed From the Source

The source has removed the following emission units:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, consisting of:
  - (1) One (1) natural gas-fired boiler for radiant heating, constructed in 1985, with a maximum heat input capacity of 3.0 MMBtu/hr, and exhausting to stack 1. [326 IAC 6-2-4].
  - (2) One (1) natural gas-fired boiler for radiant heating, constructed in 1985, with a maximum heat input capacity of 3.1 MMBtu/hr, and exhausting to stack 2. [326 IAC 6-2-4].

### Existing Approvals

The source was issued Part 70 Operating Permit No. T003-30381-00038 on October 20, 2011. There have been no subsequent approvals issued.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

### Air Pollution Control Justification as an Integral Part of the Process

As part of the second Title V renewal No. T003-30381-00038, issued on October 20, 2011, IDEM, OAQ previously determined that the dust collectors an integral part of the woodworking operations as follows:

- (a) The air from the controls needs to be returned to the plant in order to minimize heat needed in the plant during winter.
- (b) For the health and safety of the employees and to minimize housekeeping expense, the controls need to be operated at 99.9% efficiency to return air.
- (c) The controls need to be operated near the work surface during finishing, molding and sanding operations, because the dust and chips generated during these operations would build up and cause quality problems.

IDEM, OAQ is not reevaluating the integral justification at this time. Therefore, the potential PM, PM<sub>2.5</sub> and PM<sub>10</sub> emissions from the dust collectors will continue to be calculated after consideration of the woodworking operations for purposes of determining permitting level, 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), and 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) applicability.

### Enforcement Issue

There are no enforcement actions pending.

### Emission Calculations

See Appendix A of this document for detailed emission calculations.

### County Attainment Status

The source is located in Allen County.

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

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

- (a) Ozone Standards  
Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Allen County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) PM<sub>2.5</sub>  
Allen County has been classified as attainment for PM<sub>2.5</sub>. Therefore, direct PM<sub>2.5</sub>, SO<sub>2</sub>, and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Other Criteria Pollutants  
Allen County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

**Fugitive Emissions**

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

**Unrestricted Potential Emissions**

This table reflects the unrestricted potential emissions of the source. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit. If the control equipment has been determined to be integral, the table reflects the PTE after consideration of the integral control device.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	673.91
PM10	674.33
PM2.5	674.33
SO2	0.04
NOx	7.26
VOC	825.74
CO	6.10
Total HAP	232.76
Highest Single HAP	230.58 (Xylene)

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

**Part 70 Permit Conditions**

This source is subject to the requirements of 326 IAC 2-7, because the source met the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

**Permit Level Determination – Part 70 Modification to an Existing Source**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit. If the control equipment has been determined to be integral, the table reflects the PTE after consideration of the integral control device.

<b>Total PTE Increase due to the Modification</b>			
<b>Pollutant</b>	<b>PTE New Emission Units (ton/yr)</b>	<b>Net Increase to PTE of Modified Emission Units (ton/yr)</b>	<b>Total PTE for New and Modified Units (ton/yr)</b>
PM	0.14	665.6	665.7
PM <sub>10</sub>	0.55	665.6	666.1
PM <sub>2.5</sub>	0.55	665.6	666.1
SO <sub>2</sub>	0.04	0.00	0.04
NO <sub>x</sub>	7.26	0.00	7.26
VOC	1.95	743.5	745.5
CO	6.10	0.00	6.10
Total HAPs	1.07	220.0	221.1
Highest Single HAP	0.93 (MIBK)	159.8 (Xylene)	159.8 (Xylene)

This source modification is subject to 326 IAC 2-7-10.5(g)(4) because the potential to emit of PM, PM10, PM2.5, and VOC greater than twenty-five (25) tons per year before control. The modification will be incorporated into the Part 70 Operating Permit Renewal.

**Permit Level Determination – PSD**

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 source and permit modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

<b>Process / Emission Unit</b>	<b>Project Emissions (ton/yr)</b>						
	<b>PM</b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub>*</b>	<b>SO<sub>2</sub></b>	<b>NO<sub>x</sub></b>	<b>VOC</b>	<b>CO</b>
Total for Modification**	33.54	33.95	33.95	0.04	7.26	226.95	6.10
PSD Major Source Thresholds	250	250	250	250	250	250	250

\*PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.  
 \*\*Pursuant to 326 IAC 6-3-2(d), the particulate emissions from surface coating and laminating booths and research and development booth 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 surface coating operations to the values shown.

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

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

This modification to an existing minor PSD stationary source is not major because the emissions increase of VOC will be limited to less than the PSD major source threshold and the emissions increase of each of the other PSD regulated pollutants are less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the total combined VOC input to the fourteen (14) surface coating and laminating booths and one (1) research and development booth (SB-1 through SB-15) shall not exceed 225 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

Compliance with this limit, in conjunction with the potential to emit VOC from all other emission units at this source, shall limit the source-wide VOC emissions to less than 250 tons per 12 consecutive month period and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

<b>Potential to Emit After Issuance</b>
---

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any new control equipment is considered federally enforceable only after issuance of this Part 70 permit renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)								
	PM	PM <sub>10</sub> *	PM <sub>2.5</sub> *	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP (xylene)
14 Surface Coating and Laminating Booths***	32.83	32.83	32.83	-	-	225.00	-	227.74	227.74
Research and Development Booth***	0.57	0.57	0.57	-	-		-	3.95	2.84
Natural Gas Units	0.14	0.55	0.55	0.04	7.26	0.40	6.10	0.14	negl.
Woodworking	5.72	5.72	5.72	-	-		-	-	-
Spray Gun Cleaning Operation	-	-	-	-	-	1.55	-	0.93	-
<b>Total PTE of Entire Source</b>	<b>39.26</b>	<b>39.68</b>	<b>39.68</b>	<b>0.04</b>	<b>7.26</b>	<b>226.95</b>	<b>6.10</b>	<b>323.76</b>	<b>230.58 (xylene)</b>
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
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 <sub>2.5</sub> listed is direct PM <sub>2.5</sub> . ***Pursuant to 326 IAC 6-3-2(d), the particulate emissions from surface coating and laminating booths and research and development booth 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 surface coating operations to the values shown.									

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

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

(a) PSD Minor Status

This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the total combined VOC input to the fourteen (14) surface coating and laminating booths and one (1) research and development booth (SB-1 through SB-15) shall not exceed 225 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

Compliance with this limit, in conjunction with the potential to emit VOC from all other emission units at this source, shall limit the source-wide VOC emissions to less than 250 tons per 12 consecutive month period and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

(b) HAPs Major Status

This existing source is a major source of HAPs, as defined in 40 CFR 63.2, because HAP emissions are greater than ten (10) tons per year for a single HAP. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

<b>Federal Rule Applicability</b>
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New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Fossil-Fuel-Fired Steam Generators, 40 CFR 60, Subpart D (326 IAC 12) are not included in this permit, for the natural gas-fired combustion units (SH-1 through SH-55), since these units have a heat input capacity of less than 250 MMBtu/hr each.
- (b) The requirements of the New Source Performance Standard for Electric Utility Steam Generating Units, 40 CFR 60, Subpart Da (326 IAC 12) are not included in this permit, for the natural gas-fired combustion units (SH-1 through SH-55), since these units do not meet the definition of an electric utility steam generating unit as defined in 40 CFR § 60.41Da and have a heat input capacity of less than 250 MMBtu/hr each.
- (c) The requirements of the New Source Performance Standard for Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Db (326 IAC 12) are not included in this permit, for the natural gas-fired combustion units (SH-1 through SH-55), since these units have a heat input capacity of less than 100 MMBtu/hr each.
- (d) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60.40, Subpart Dc (326 IAC 12) are not included in this permit for the natural gas-fired combustion units (SH-1 through SH-55), since these units do not have a maximum heat input capacity between one hundred (100) MMBtu/hr and ten (10) MMBtu/hr each.
- (e) The requirements of the New Source Performance Standard for Surface Coating of Metal Furniture, 40 CFR 60.310, Subpart EE (326 IAC 12), are not included in this permit, since the source does not operate a metal furniture surface coating operation.
- (f) The requirements of the New Source Performance Standard for Industrial Surface Coating: Large Appliances, 40 CFR 60.450, Subpart SS (326 IAC 12), are not included in this permit, since the source does not operate a surface coating operation in a large appliance surface coating line as defined in 40 CFR § 60.451.
- (g) The requirements of the New Source Performance Standard for Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines, 40 CFR 60.720, Subpart TTT (326 IAC 12), are not included in this permit, since the source does not operate a spray booth in which plastic parts for the use in the manufacture of business machines receive prime coats, color coats or touch-up coats.
- (h) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) in the permit.

National Emission Standards for Hazardous Air Pollutants

- (i) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning, 40 CFR 63, Subpart T (63.460 through 63.470) (326 IAC 20-6), are not included in the permit, because the spray gun cleaning operation at this source does not use a degreasing solvent that contains any of the halogenated compounds listed in 40 CFR 63.460(a) at a concentration greater than 5% by weight.

(j) This source is subject to the requirements of 40 CFR 63, Subpart JJ, National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations (326 IAC 20-14), because this source performs wood furniture manufacturing operations and is a major source of HAPs. The affected source to which this subpart applies is each facility located at a source, engaged, either in part or in whole, in the manufacture of wood furniture or wood furniture components. This source is an existing source, because the wood furniture manufacturing and surface coating operations existed at this site prior to December 7, 1995. The affected facilities include the fourteen (14) surface coating and laminating booths and one (1) research and development booth (SB-1 through SB-15). Non applicable portions of the NESHAP will not be included in the permit. The the fourteen (14) surface coating and laminating booths and one (1) research and development booth (SB-1 through SB-15) are subject to the following portions of Subpart JJ.

- (1) 40 CFR 63.800(a), (c), (d), (e), and (g)
- (2) 40 CFR 63.801
- (3) 40 CFR 63.802(a)
- (4) 40 CFR 63.803(a) through (g)
- (5) 40 CFR 63.803(h)(1) through (3), (h)(5), (h)(6)
- (6) 40 CFR 63.803(i) through (l)
- (7) 40 CFR 63.804(a)(1), (a)(2) and (a)(4)
- (8) 40 CFR 63.804(b)
- (9) 40 CFR 63.804(c)(1)
- (10) 40 CFR 63.804(f)
- (11) 40 CFR 63.804(g)(1) through (g)(3), (g)(5), (g)(7) and (g)(8)
- (12) 40 CFR 63.805(a)
- (13) 40 CFR 63.806(a) through (e)
- (14) 40 CFR 63.806(h) through (j)
- (15) 40 CFR 63.807(a), (c), (e)
- (16) 40 CFR 63.808
- (17) Tables 2 through 6 to 40 CFR 63, Subpart JJ (the applicable portions).

The provisions of 40 CFR 63, Subpart A – General Provisions, which are incorporated as 326 IAC 20-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart JJ).

- (k) The requirements of 40 CFR 63, Subpart DDDD (4D), National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products, are not included in this permit, because this source does not manufacture plywood and/or composite wood products by bonding wood material (fibers, particles, strands, veneers, etc.) or agricultural fiber, generally with resin under heat and pressure, to form a structural panel or engineered wood product.
- (l) The requirements of 40 CFR 63, Subpart IIII (4I), National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks (326 IAC 20-85), are not included in this permit, because this source does not perform automobile or light-duty truck surface coating.
- (m) The requirements of 40 CFR 63, Subpart KKKK (4K), National Emission Standard for Hazardous Air Pollutants: Surface Coating of Metal Cans (326 IAC 20-86), are not included in this permit, because this source does not apply surface coating materials to metal cans or can ends.
- (n) The requirements of 40 CFR 63, Subpart MMMM (4M), National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (326 IAC 20-80), are not included in this permit, because this source does not surface coat miscellaneous metal parts.
- (o) The requirements of 40 CFR 63, Subpart NNNN (4N), National Emission Standards for Hazardous Air Pollutants: Surface Coating of Large Appliances (326 IAC 20-63), are not included

- in this permit, because this source does not surface large appliance parts or products as defined in §63.4181.
- (p) The requirements of 40 CFR 63, Subpart PPPP (4P), National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products (326 IAC 20-81), are not included in this permit, because this source perform surface coating on plastic parts.
  - (q) The requirements of 40 CFR 63, Subpart QQQQ (4Q), National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products (326 IAC 20-79), are not included in this permit, because this source perform surface coating on wood building products.
  - (r) The requirements of 40 CFR 63, Subpart RRRR (4R), National Emission Standard for Hazardous Air Pollutants: Surface Coating of Metal Furniture (326 IAC 20-78), are not included in this permit, because this source perform surface coating on metal furniture.
  - (s) The requirements of 40 CFR 63, Subpart SSSS (4S), National Emission Standard for Hazardous Air Pollutants: Surface Coating of Metal Coil (326 IAC 20-64), are not included in this permit, because this source perform surface coating on metal coils.
  - (t) The requirements of 40 CFR 63, Subpart HHHHHH (6H), National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources) are not included in this permit, because this source does not perform paint stripping operations, autobody refinishing operations, and does not apply coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), collectively referred to as the target HAP to any part or product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment.
  - (u) The requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ (6J), are not included in the permit, because the natural gas-fired combustion units (SH-1 through SH-55) are not considered boilers as defined in §63.11237.
  - (v) There are no other NESHAP (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

- (w) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing pollutant-specific emission unit that meets the following criteria:
  - (1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;
  - (2) is subject to an emission limitation or standard for that pollutant; and
  - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of CAM to each existing emission unit and each emission limitation or standard for a specified pollutant based on the criteria specified under 40 CFR 64.2:

Emission Unit	Pollutanat	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
14 Surface Coating and Laminating booths*	PM**	Y	Y	46.90	2.35	100	N	N
	PM <sub>10</sub> /PM <sub>2.5</sub>	Y	N	46.90	2.35	100	N	N
	VOC	N	Y	57.84	57.84	100	N	N
Research and Development booth	PM**	Y	Y	11.38	0.57	100	N	N
	PM <sub>10</sub> /PM <sub>2.5</sub>	Y	N	11.38	0.57	100	N	N
	VOC	N	Y	14.04	14.04	100	N	N
Woodworking Equipment	PM/PM <sub>10</sub> /PM <sub>2.5</sub>	Y	Y	2.86	2.86	100	N***	N

\*CAM Analysis shown is for each individual booth. All 14 surface coating and laminating booths are identical.  
 \*\*Under 326 IAC 6-3-2. PM is limited as a surrogate for the Part 70 regulated pollutant, PM10. Therefore, uncontrolled PTE and controlled PTE reflect the emissions of PM10.  
 \*\*\*Pursuant to 40 CFR Part 64.1, the control devices are considered to be inherent process equipment. Therefore, based on the evaluation, the requirements of 40 CFR Part 64, CAM, are not applicable.

Pursuant to 40 CFR Part 64.1, the definition of inherent process equipment is “equipment that is necessary for the proper or safe functioning of the process, or material recovery equipment that the owner or operator documents is installed and operated primarily for purposes other than compliance with air pollution regulations. Equipment that must be operated at an efficiency higher than that achieved during normal process operations in order to comply with the applicable emission limitation or standard is not inherent process equipment. For the purposes of this part, inherent process equipment is not considered subject to CAM.”

The cyclone and baghouses for the woodworking processes would be installed if no air quality regulations were in place in order to provide for employee safety and property protection. These cyclone and baghouses meet the definition of inherent process equipment and after careful review of the criteria set forth by the U.S. EPA for determining whether equipment is air pollution control equipment or process equipment, classification of the baghouses as process equipment is justified. Therefore, the woodworking operations at this source are not subject to Compliance Assurance Monitoring (CAM).

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to any of the existing units as part of this Part 70 permit renewal.

**State Rule Applicability - Entire Source**

- (a) 326 IAC 1-6-3 (Preventive Maintenance Plan)  
 The source is subject to 326 IAC 1-6-3.
- (b) 326 IAC 2-2 (PSD)  
 PSD applicability is discussed under the Potential to Emit After Issuance section.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
 The coating operations are subject to NESHAP, Subpart JJ. Therefore the requirements of 326 IAC 2-4.1 do not apply to the coating operations.

- (d) 326 IAC 2-6 (Emission Reporting)  
This source, not located in Lake, Porter, or LaPorte County, is subject to 326 IAC 2-6 (Emission Reporting), because it is required to have an operating permit pursuant to 326 IAC 2-7 (Part 70). The potential to emit of VOC and PM10 is less than 250 tons per year; and the potential to emit of CO, NOx, and SO2 is less than 2,500 tons per year. Therefore, pursuant to 326 IAC 2-6-3(a)(2), triennial reporting is required. An emission statement shall be submitted in accordance with the compliance schedule in 326 IAC 2-6-3 by July 1, 2016, and every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.
- (e) 326 IAC 2-7-6(5) (Annual Compliance Certification)  
The U.S. EPA Federal Register 79 FR 54978 notice does not exempt Title V Permittees from the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D), but the submittal of the Title V annual compliance certification to IDEM satisfies the requirement to submit the Title V annual compliance certifications to EPA. IDEM does not intend to revise any permits, since the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D) still apply, but Permittees can note on their Title V annual compliance certification that submission to IDEM has satisfied reporting to EPA per Federal Register 79 FR 54978. This only applies to Title V Permittees and Title V compliance certifications.
- (f) 326 IAC 5-1 (Opacity Limitations)  
This source is subject to the opacity limitations specified in 326 IAC 5-1-2(2).
- (g) 326 IAC 6-4 (Fugitive Dust Emissions)  
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), fugitive dust shall not be visible crossing the boundary or property line of a source. Observances of visible emissions crossing property lines may be refuted by factual data expressed in 326 IAC 6-4-2(1), (2) or (3).
- (h) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)  
This source is not subject to the requirements of 326 IAC 6-5, because it has potential fugitive particulate emissions less than 25 tons per.
- (i) 326 IAC 6.5 PM Limitations Except Lake County  
This source is not subject to 326 IAC 6.5, because the source is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne. The source is located in Allen County.
- (j) 326 IAC 12 (New Source Performance Standards)  
See Federal Rule Applicability Section of this TSD.
- (k) 326 IAC 20 (Hazardous Air Pollutants)  
See Federal Rule Applicability Section of this TSD.

<b>State Rule Applicability – Individual Facilities</b>
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***Surface Coating and Lamination Operations***

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-1, the fourteen (14) surface coating and laminating booths and the one (1) research and development booth (SB-1 through SB-15) are subject to the requirements of 326 IAC 6-3, since the units each have the potential to use equal to or greater than five (5) gallons of coating per day. Pursuant to 326 IAC 6-3-2(d), the fourteen (14) surface coating and laminating booths and the one (1) research and development booth (SB-1 through SB-15) shall use dry filters for particulate control at all times the surface coating and laminating booths are in operation. The control device shall be operated with manufacturer's specifications.

(b) 326 IAC 8-1-6 (Volatile Organic Compounds - BACT)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, which have potential volatile organic compound (VOC) emission of 25 tons per year or more, and which are not otherwise regulated by another provision of Article 8.

The fourteen (14) surface coating and laminating booths and one (1) research and development booth (SB-1 through SB-15) are regulated under the provisions of 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating) and therefore, are not subject to the provisions of 326 IAC 8-1-6.

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

Pursuant to 326 IAC 8-2-1 and 326 IAC 8-2-12, this rule applies to facilities located in any county, constructed after July 1, 1990, that perform surface coating of wood furniture (or wood furniture components), including cabinets (kitchen, bath and vanity), tables, beds, chairs, sofas (nonupholstered), art objects, and any other coated furnishings made of solid wood, wood composition or simulated wood material and which have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls.

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), when applying surface coatings to wood furniture and cabinets in the fourteen (14) surface coating and laminating booths and one (1) research and development booth (SB-1 through SB-15), the Permittee shall apply all coating material, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) or more of the following application methods:

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

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

The fourteen (14) surface coating and laminating booths and one (1) research and development booth (SB-1 through SB-15) are equipped with HVLP. Therefore, the surface coating processes are able to comply with this rule.

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

Pursuant to 326 IAC 8-11-1, this source is not subject to the requirements of 326 IAC 8-11, because the source is not located in one of the following counties: Lake, Porter, Clark, or Floyd County. This source is located in Allen County.

**Woodworking Operations**

(e) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

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

In order to assure that each of the woodworking operations is not subject to the requirements of 326 IAC 6-3-2, the integral dust collectors for particulate control shall be in operation and control

emissions from each of the woodworking operations at all times that each of the woodworking operations is in operation.

### **Natural Gas Combustion Units**

- (f) 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)  
The natural gas-fired combustion units (SH-1 through SH-55) are each not subject to the requirements of 326 IAC 6-2, since these units are not sources of indirect heating pursuant to 326 IAC 6-2-1(a)
- (g) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-1 the natural gas-fired combustion units (SH-1 through SH-55) are each not subject to the requirements of 326 IAC 6-3, since these units are each not considered a manufacturing processes and each has potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour, pursuant to 326 IAC 6-3-1(b)(14).
- (h) 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)  
The natural gas-fired combustion units (SH-1 through SH-55) are each not subject to the requirements of 326 IAC 7, since each unit has a potential to emit SO<sub>2</sub> of less than twenty-five (25) tons per year and a potential to emit of less than ten (10) pounds per hour pursuant to 326 IAC 7-1.1-1.
- (i) 326 IAC 8-1-6 (Volatile Organic Compounds - BACT)  
The natural gas-fired combustion units (SH-1 through SH-55) are each not subject to the requirements of 326 IAC 8-1-6, since each unit has a potential to emit VOC of less than twenty-five (25) tons per year.
- (j) 326 IAC 9-1 (Carbon Monoxide Emission Limits)  
The natural gas-combustion units (SH-1 through SH-55) are each not subject to the requirements of 326 IAC 9-1, since the source does not operate any petroleum refining, ferrous metal smelters or refuse incineration and refuse burning equipment.
- (k) 326 IC 10-1 (Nitrogen Oxides Control in Clark and Floyd Counties)  
The natural gas-fired combustion units (SH-1 through SH-55) are each not subject to 326 IAC 10-1, because the source is not located in either of Clark or Floyd Counties. The source is located in Allen County.

### **Spray Gun Cleaning Operation**

- (l) 326 IAC 8-1-6 (General Reduction Requirements)  
This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, which have potential volatile organic compound (VOC) emission of 25 tons per year or more, and which are not otherwise regulated by another provision of Article 8. The uncontrolled potential VOC emissions from the gun cleaner operation (GC-1) solvent usage is less than twenty-five (25) tons per year, therefore, the requirements of 326 IAC 8-1-6 do not apply are not included in the permit.
- (k) 326 IAC 8-3 (Organic Solvent Degreasing Operations)  
Pursuant to 326 IAC 8-3-1:
  - (1) Pursuant to 326 IAC 8-3-1(c)(1)(B), the requirements of 326 IAC 8-3-2(a) apply to degreasers constructed after January 1, 1980, located anywhere in the state.

The spray gun cleaning operation, identified as GC-1, meets the definition of a cold cleaner degreaser as defined in 326 IAC 1-2-18.5, it was constructed in 2011, and it is located in Allen County. Therefore, this unit meets the applicability for this rule.

- (2) Pursuant to 326 IAC 8-3-1(c)(2)(A), the requirements of 326 IAC 8-3-2 apply to cold cleaner degreasers constructed after July 1, 1990, located anywhere in the state, which do not have a remote solvent reservoir.

The spray gun cleaning operation, identified as GC-1, is not equipped with a remote solvent reservoir, and it was constructed in 2016. Therefore, this unit meets the applicability for this rule.

- (3) The requirements of 326 IAC 8-3-8 apply to any source that uses solvent for use in cold cleaner degreasers on and after January 1, 2015, anywhere in the state.

The spray gun cleaning operation, identified as GC-1, meets the definition of a cold cleaner degreaser as defined in 326 IAC 1-2-18.5 and this source uses a solvent in GC-1 with a solvent VOC content that is greater than or equal to one percent (1%) VOC by weight, and this source is located in Allen County. Therefore, this unit meets the applicability for this rule.

In order to render the requirements of 326 IAC 8-3 not applicable, the source has agreed to limit VOC emissions from the spray gun cleaning operation to less than fifteen (15) pounds of VOC per day. The Permittee shall comply with the following:

The VOC input to the spray gun cleaning operation (GC-1) shall be less than fifteen (15) pounds per day of VOC.

Compliance with this limit shall render the requirements of 326 IAC 8-3 (Organic Solvent Degreasing Operations) not applicable to the spray gun cleaning operation (GC-1).

The source has calculated the worst case solvent usage at 450 gallons of solvent per year in the spray gun cleaning operation. The spray gun cleaning operation will ship waste solvent offsite for recycling or disposal. Assuming that all of the waste solvent is emitted, the average daily potential to emit is 8.51 pounds of VOC per day. The source will be capable of complying with the fifteen (15) pounds of VOC per day limitation by keeping records of the average daily VOC emissions. IDEM, OAQ will not require reporting of daily VOC input to the spray gun cleaning operation.

### **Compliance Determination and Monitoring Requirements**

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

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

- (1) The compliance monitoring requirements applicable to the surface coating operation and woodworking processes are as follows:

Emission Units	Control	Parameter	Frequency	Reason for compliance monitoring
Surface coating spray booths and laminating booths	Dry Filters	Filter inspection	Daily	To ensure that the filters operate properly in order to comply with 326 IAC 6-3-2 and 326 IAC 2-7 (Part 70).
		Overspray Observation	Weekly	
		Overspray on the rooftops and the ground	Monthly	
Woodworking processes	Baghouse	Visible emission notations	Daily (when venting outdoors)	To ensure that the filters operate properly in order to comply with 326 IAC 6-3-2 and 326 IAC 2-7 (Part 70).
		Baghouse inspection	Semiannually (when venting indoors)	

- (2) To determine compliance with the VOC input limit, the Permittee shall:
- (i) Determine compliance pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

The source has calculated the worst case solvent usage at 450 gallons of solvent per year in the spray gun cleaning operation. The spray gun cleaning operation will ship waste solvent offsite for recycling or disposal. Assuming that all of the waste solvent is emitted, the average daily potential to emit is 8.51 pounds of VOC per day. The source will be capable of complying with the fifteen (15) pounds of VOC per day limitation by keeping records of the average daily VOC emissions. IDEM, OAQ will not require reporting of daily VOC input to the spray gun cleaning operation.

**Conclusion and Recommendation**

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 003-37217-00038. The operation of this stationary wood furniture manufacturing source shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. T003-36722-00038. The staff recommend to the Commissioner that this Part 70 Significant Source Modification be approved.

The staff recommends to the Commissioner that the Significant Source Modification and Part 70 Operating Permit Renewal be approved. This recommendation is based on the following facts and conditions. Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

**IDEM Contact**

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

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

**Appendix A: Emission Calculations  
Summary of Source Modification**

**Company Name:** Grabill Cabinet  
**Source Address:** 13844 Sawmill Road, Grabill, Indiana, 46741  
**Part 70 Permit Renewal No.:** T003-36722-00038  
**Significant Source Modification No.:** 003-37217-00038  
**Reviewer:** Clinton Mccrowey/Adam Wheat

**Uncontrolled PTE Before Modification**

Emission Unit	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Highest Single HAP	
Surface Coating Booths (SB-01 through SB-12, SB-14, and SB-15)	2.48	2.48	2.48	-	-	80.26	-	11.67	7.03	Xylene
R&D Booth (SB-13)*	-	-	-	-	-	-	-	-	-	-
<b>Total</b>	<b>2.48</b>	<b>2.48</b>	<b>2.48</b>	<b>0.00</b>	<b>0.00</b>	<b>80.26</b>	<b>0.00</b>	<b>11.67</b>	<b>7.03</b>	<b>Xylene</b>

\*R&D Booth previously uncalculated.

**Uncontrolled PTE After Modification**

Emission Unit	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Highest Single HAP	
Surface Coating Booths (SB-01 through SB-12, SB-14, and SB-15)	656.67	656.67	656.67	-	-	809.75	-	227.74	163.99	Xylene
R&D Booth	11.38	11.38	11.38	-	-	14.04	-	3.95	2.84	Xylene
<b>Total</b>	<b>668.1</b>	<b>668.1</b>	<b>668.1</b>	<b>0.00</b>	<b>0.00</b>	<b>823.8</b>	<b>0.00</b>	<b>231.69</b>	<b>166.83</b>	<b>Xylene</b>

**Total PTE of Modification**

Emission Unit	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Highest Single HAP	
Change in PTE of Modified Units	665.6	665.6	665.6	-	-	743.5	-	220.0	159.8	Xylene
New Natural Gas Units	0.14	0.55	0.55	0.04	7.26	0.40	6.10	0.14	0.13	Hexane
New Spray Gun Cleaning Operation	-	-	-	-	-	1.55	-	0.93	0.93	MIBK
<b>Total</b>	<b>665.7</b>	<b>666.1</b>	<b>666.1</b>	<b>0.04</b>	<b>7.26</b>	<b>745.5</b>	<b>6.10</b>	<b>221.1</b>	<b>159.8</b>	<b>Xylene</b>

**Limited PTE of Modification**

Emission Unit	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Highest Single HAP	
Surface Coating Booths (SB-01 through SB-12, SB-14, and SB-15)	32.83	32.83	32.83	-	-	225.0	-	227.7	164.0	Xylene
R&D Booth	0.57	0.57	0.57	-	-		-	3.95	2.84	Xylene
New Natural Gas Units	0.14	0.55	0.55	0.04	7.26	0.40	6.10	0.14	0.13	Hexane
New Spray Gun Cleaning Operation	-	-	-	-	-	1.55	-	0.93	0.93	MIBK
<b>Total</b>	<b>33.54</b>	<b>33.95</b>	<b>33.95</b>	<b>0.04</b>	<b>7.26</b>	<b>226.95</b>	<b>6.10</b>	<b>232.76</b>	<b>166.8</b>	<b>Xylene</b>

**Appendix A: Emission Calculations  
Summary of Emissions**

**Company Name: Grabill Cabinet**  
**Source Address: 13844 Sawmill Road, Grabill, Indiana, 46741**  
**Part 70 Permit Renewal No.: T003-36722-00038**  
**Significant Source Modification No.: 003-37217-00038**  
**Reviewer: Clinton Mccrowey/Adam Wheat**

Unlimited/Uncontrolled Potential to Emit of the Entire Source Before Woodworking Integral Controls (ton/yr) <sup>1</sup>										
Emission Unit	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Highest Single HAP (xylene)	
Surface Coating and Laminating Booths (SB-01 through SB-12, SB-14, SB-14)	656.67	656.67	656.67	-	-	809.75	-	227.74	227.74	xylene
Research and Development Booth (SB-13)	11.38	11.38	11.38	-	-	14.04	-	3.95	2.84	xylene
Natural Gas Units	0.14	0.55	0.55	0.04	7.26	0.40	6.10	0.14	-	-
Woodworking	572.11	572.11	572.11	-	-	-	-	-	-	-
Spray Gun Cleaning Operator	-	-	-	-	-	1.55	-	0.93	-	-
<b>Total PTE</b>	<b>1,240</b>	<b>1,241</b>	<b>1,241</b>	<b>0.04</b>	<b>7.26</b>	<b>825.74</b>	<b>6.10</b>	<b>232.76</b>	<b>230.58</b>	<b>xylene</b>

Unlimited Potential to Emit of the Entire Source After Integral Woodworking Controls (tons/year) <sup>1</sup>										
Emission Unit	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Highest Single HAP (xylene)	
Surface Coating and Laminating Booths (SB-01 through SB-12, SB-14, SB-14)	656.67	656.67	656.67	-	-	809.75	-	227.74	227.74	xylene
Research and Development Booth (SB-13)	11.38	11.38	11.38	-	-	14.04	-	3.95	2.84	xylene
Natural Gas Units	0.14	0.55	0.55	0.04	7.26	0.40	6.10	0.14	-	-
Woodworking <sup>2</sup>	5.72	5.72	5.72	-	-	-	-	-	-	-
Spray Gun Cleaning Operator	-	-	-	-	-	1.55	-	0.93	-	-
<b>Total PTE</b>	<b>673.91</b>	<b>674.33</b>	<b>674.33</b>	<b>0.04</b>	<b>7.26</b>	<b>825.74</b>	<b>6.10</b>	<b>232.76</b>	<b>230.58</b>	<b>xylene</b>

Limited/Controlled Potential to Emit of the Entire Source After Integral Controls (tons/year) <sup>1</sup>										
Emission Unit	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Highest Single HAP (xylene)	
Surface Coating and Laminating Booths (SB-01 through SB-12, SB-14, SB-14)**	32.83	32.83	32.83	-	-	225.00	-	227.74	227.74	xylene
Research and Development Booth (SB-13)**	0.57	0.57	0.57	-	-	-	-	3.95	2.84	xylene
Natural Gas Units	0.14	0.55	0.55	0.04	7.26	0.40	6.10	0.14	-	-
Woodworking	5.72	5.72	5.72	-	-	-	-	-	-	-
Spray Gun Cleaning Operator	-	-	-	-	-	1.55	-	0.93	-	-
<b>Total PTE</b>	<b>39.26</b>	<b>39.68</b>	<b>39.68</b>	<b>0.04</b>	<b>7.26</b>	<b>226.95</b>	<b>6.10</b>	<b>232.76</b>	<b>230.58</b>	<b>xylene</b>

"-" = negligible emissions

<sup>1</sup> In October 1993 a Final Order Granting Summary Judgment was signed by Administrative Law Judge ("ALJ") Garrettsen resolving an appeal filed by Kimball Hospitality Furniture Inc. (Cause Nos. 92-A-J-730 and 92-A-J-833) related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls are necessary for the facility to produce its normal product and are integral to the normal operation of the facility, and therefore, potential emissions should be calculated after controls. Based on this ruling, potential emissions for particulate matter were calculated after consideration of the controls for purposes of determining operating permit level and the applicability of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)).

<sup>2</sup>Pursuant to 326 IAC 6-3-2(d), the particulate emissions from surface coating and laminating booths and R&D booth 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 surface coating operations to the values shown.

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

**Company Name: Grabill Cabinet  
Source Address: 13844 Sawmill Road, Grabill, Indiana, 46741  
Part 70 Permit Renewal No.: T003-36722-00038  
Significant Source Modification No.: 003-37217-00038  
Reviewer: Clinton Mccrowey/Adam Wheat**

Unit ID	description	Number of Units	Construction Date	Maximum Heat Capacity per unit (MMBtu/hr)	Total heat capacity (MMBtu/hr)
SH-1 - SH-16	Space Heater	16	2000	0.15	2.40
SH-17	Air Make-up Units	1	2000	5.30	5.30
SH-18	Air Make-up Unit	1	2000	5.30	5.30
SH-19 - SH-23	Space Heaters	5	1995	0.06	0.30
SH-24 - SH-31	Space Heaters	8	1998	0.04	0.32
SH-32 - SH-39	Space Heaters	8	1998	0.04	0.32
SH-40 - SH-45	Space Heaters	6	1998	0.10	0.60
SH-46 - SH-51	Space Heats	6	1998	0.12	0.72
SH-52	Self-contained heating uni	1	2000	1.29	1.29
SH-53 - SH-55	Office forced air furnaces	3	2000	0.12	0.36
<b>Total</b>	-	<b>55</b>		-	<b>16.91</b>

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
16.91	1020	145.2

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.14	0.55	0.55	0.04	7.26	0.40	6.10

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined  
PM2.5 emission factor is filterable and condensable PM2.5 combined  
\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 3:

**Methodology**

All emission factors are based on normal firing.  
MMBtu = 1,000,000 Btu  
MMCF = 1,000,000 Cubic Feet of Gas  
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-0;  
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBt  
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Hazardous Air Pollutants (HAPs)**

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total - Organics
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	1.5E-04	8.7E-05	5.4E-03	0.13	2.5E-04	<b>0.14</b>

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	3.6E-05	8.0E-05	1.0E-04	2.8E-05	1.5E-04	<b>4.0E-04</b>
					<b>Total HAPs</b>	<b>0.14</b>
					<b>Worst HAP</b>	<b>0.13</b>

Methodology is the same as above.  
The five highest organic and metal HAPs emission factors are provided above.  
Additional HAPs emission factors are available in AP-42, Chapter 1.4

**TSD Appendix A: Emissions Calculations  
Particulate (PM/PM10/PM2.5) Emissions  
from Woodworking Operations**

**Company Name: Grabill Cabinet  
Source Address: 13844 Sawmill Road, Grabill, Indiana, 46741  
Part 70 Permit Renewal No.: T003-36722-00038  
Significant Source Modification No.: 003-37217-00038  
Reviewer: Clinton Mccrowey/Adam Wheat**

Unit ID/Control Device	Control Efficiency (%)	Outlet Grain Loading (grains/cub. ft.)	Air Flow Rate (cfm.)	PTE of PM/PM10/PM2.5 Before Controls (lb/hr)	PTE of PM/PM10/PM2.5 Before Controls (tons/yr)	PTE of PM/PM10/PM2.5 After Controls (lb/hr)	PTE of PM/PM10/PM2.5 After Controls (tons/yr)
DC-1	99.0%	0.001	9,000	7.71	33.79	0.077	0.34
DC-2	99.0%	0.001	16,000	13.71	60.07	0.137	0.60
DC-3	99.0%	0.001	55,000	47.14	206.49	0.471	2.06
DC-4	99.0%	0.001	14,000	12.00	52.56	0.120	0.53
DC-5	99.0%	0.001	10,000	8.57	37.54	0.086	0.38
DC-6	99.0%	0.001	4,000	3.43	15.02	0.034	0.15
DC-7	99.0%	0.001	4,000	3.43	15.02	0.034	0.15
DC-8	99.0%	0.001	4,000	3.43	15.02	0.034	0.15
DC-9	99.0%	0.001	2,200	1.89	8.26	0.019	0.08
DC-10	99.0%	0.001	4,000	3.43	15.02	0.034	0.15
DC-11	99.0%	0.001	5,500	4.71	20.65	0.047	0.21
DC-12	99.0%	0.001	4,488	3.85	16.85	0.038	0.17
DC-13	99.0%	0.001	10,000	8.57	37.54	0.086	0.38
DC-14	99.0%	0.001	8,000	6.86	30.03	0.069	0.30
DC-15	99.0%	0.001	2,200	1.89	8.26	0.019	0.08
<b>Total</b>				<b>130.62</b>	<b>572.11</b>	<b>1.31</b>	<b>5.72</b>

**Methodology**

Assume PM=PM10=PM2.5

PTE of PM/PM10/PM2.5 Before Controls (lb/hr) = PTE of PM/PM10/PM2.5 After Controls (lb/hr) / (1 - Control Efficiency)

PTE of PM/PM10/PM2.5 Before Controls (tons/yr) = PTE of PM/PM10/PM2.5 Before Controls (lbs/hr) x (8760 hr/yr) x (ton/2000 lb)

PTE of PM/PM10/PM2.5 After Controls (lbs/hr) = Outlet Grain Loading (grains/cub. ft.) x Air Flow Rate (acfm) x (60 min/hr) x (lb/7000 grains)

PTE of PM/PM10/PM2.5 After Controls (tons/yr) = PTE of PM/PM10/PM2.5 After Controls (lbs/hr) x (8760 hr/yr) x (ton/2000 lb)

**Appendix A: Emissions Calculations**  
**VOC and Particulate**  
 From Surface Coating Operations  
 Fourteen (14) Surface Coating and Laminating Booths (SB-1 through SB-12, and SB-14, SB-15)

Company Name: **Grabill Cabinet**  
 Source Address: **13844 Sawmill Road, Grabill, Indiana, 46741**  
 Part 70 Permit Renewal No.: **T003-36722-00038**  
 Significant Source Modification No.: **003-37171-00038**  
 Reviewer: **Clinton McCrowley/Adam Wheat**

Number*	Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water + Exempt-VOC	Weight % VOC	Volume % Water + Exempt-VOC	Volume % Non-Volatiles (solids)	Vol of Mat. (gal/unit)	Maximum (unit/hour)	Vol of Material per month (gal/month)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC tons per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
1	Cemcolor bright yellow colorant, Product Code: C31Y0010	9.10	45.40%	0.00%	45.40%	0.00%	46.54%	0.206	10.0	1483.2	4.13	4.13	8.51	204.17	37.26	22.41	8.87	50%
2	Cemcolor mon azo red, Product Code: C31R001	9.00	51.60%	0.00%	51.60%	0.00%	41.27%	0.206	10.0	1483.2	4.65	4.65	9.57	229.67	41.91	19.66	11.25	50%
3	Cemoglo black dye stain concentrate, Product Code: S75K002	6.85	96.52%	18.75%	77.77%	18.75%	2.12%	0.206	10.0	1483.2	6.56	5.33	10.98	263.52	48.09	1.08	251.63	50%
4	EnduraGreen brushmark boardwalk, Product Code: A60B000	11.61	41.83%	34.63%	7.20%	34.63%	40.75%	0.206	10.0	1483.2	1.28	0.84	1.72	41.30	7.54	30.46	2.05	50%
5	EnduraGreen brushmark mini, Product Code: A60G000	11.60	41.86%	34.73%	7.11%	34.73%	40.74%	0.206	10.0	1483.2	1.28	0.82	1.70	40.77	7.44	30.42	2.02	50%
6	EnduraGreen white brushmark, Product Code: A60W000	11.61	41.73%	34.66%	7.08%	34.66%	40.82%	0.206	10.0	1483.2	1.26	0.82	1.69	40.62	7.41	30.53	2.01	50%
7	FC-7740 baywood (S5310), Product Code: D22N0202t	7.33	79.89%	0.17%	79.73%	0.17%	17.04%	0.206	10.0	1483.2	5.85	5.84	12.04	288.93	52.73	6.65	34.29	50%
8	FC-7756 glenwood (S5210), Product Code: D22N0265t	7.81	69.62%	0.05%	69.57%	0.05%	22.51%	0.206	10.0	1483.2	5.44	5.43	11.19	268.62	49.02	10.71	24.13	50%
9	FP-18419 glacier, Product Code: E29A00358+K	9.39	45.32%	0.00%	45.32%	0.00%	41.29%	0.206	10.0	1483.2	4.26	4.26	8.77	210.43	38.40	23.17	10.31	50%
10	FP-19188 white dove, Product Code: E29CW1011+K	9.39	45.31%	0.00%	45.31%	0.00%	41.29%	0.206	10.0	1483.2	4.26	4.26	8.77	210.44	38.41	23.18	10.31	50%
11	FP-19187 cameo, Product Code: E29CW10149+K	9.40	45.28%	0.00%	45.28%	0.00%	41.31%	0.206	10.0	1483.2	4.26	4.26	8.77	210.40	38.40	23.20	10.30	50%
12	FP-19188 super white, Product Code: E29CW10107+K	9.39	45.32%	0.00%	45.32%	0.00%	41.29%	0.206	10.0	1483.2	4.26	4.26	8.77	210.43	38.40	23.17	10.31	50%
13	FP-19189 Cashmere, Product Code: E29N00512+K	9.45	45.05%	0.00%	45.05%	0.00%	41.34%	0.206	10.0	1483.2	4.26	4.26	8.77	210.55	38.42	23.43	10.30	50%
14	FP-19190 Buckwheat, Product Code: E29N00513+K	9.40	45.27%	0.00%	45.27%	0.00%	41.29%	0.206	10.0	1483.2	4.26	4.26	8.77	210.50	38.42	23.22	10.31	50%
15	FP-19191 pearl white, Product Code: E29CW10109+K	9.39	45.32%	0.00%	45.32%	0.00%	41.29%	0.206	10.0	1483.2	4.26	4.26	8.77	210.43	38.40	23.17	10.31	50%
16	FP-19192 Black, Product Code: P69R00019+K	9.19	45.12%	0.00%	45.09%	0.00%	41.61%	0.206	10.0	1483.2	4.14	4.14	8.53	204.78	37.37	22.74	9.85	50%
17	FP-19193 linen white, Product Code: E29CW10105+K	9.74	43.04%	0.00%	43.04%	0.00%	42.25%	0.206	10.0	1483.2	4.19	4.19	8.63	207.20	37.81	25.02	9.92	50%
18	FP-19194 antique white, Product Code: E29CW101052+K	9.40	45.27%	0.00%	45.27%	0.00%	41.30%	0.206	10.0	1483.2	4.26	4.26	8.77	210.45	38.41	23.22	10.31	50%
19	FP-19195 chiffon, Product Code: E29CW101053+K	9.39	45.31%	0.00%	45.31%	0.00%	41.29%	0.206	10.0	1483.2	4.26	4.26	8.77	210.43	38.40	23.18	10.31	50%
20	FP-19196 Buttercream, Product Code: E29Y00212+K	9.40	45.28%	0.00%	45.28%	0.00%	41.33%	0.206	10.0	1483.2	4.26	4.26	8.77	210.40	38.40	23.20	10.30	50%
21	FP-19197 canvas, Product Code: E29N00514+K	9.76	42.88%	0.00%	42.88%	0.00%	42.38%	0.206	10.0	1483.2	4.18	4.18	8.62	206.82	37.74	25.14	9.87	50%
22	FP-19198 eggshell, Product Code: E29CW101054+K	9.39	45.27%	0.00%	45.27%	0.00%	41.36%	0.206	10.0	1483.2	4.25	4.25	8.76	210.27	38.37	23.19	10.28	50%
23	FP-19199 red, Product Code: P69R00027+K	9.12	45.88%	0.02%	45.85%	0.02%	41.30%	0.206	10.0	1483.2	4.18	4.18	8.61	206.66	37.72	22.26	10.12	50%
24	FP-19200 florentine, Product Code: E29Y00213+K	9.43	45.16%	0.00%	45.16%	0.00%	41.32%	0.206	10.0	1483.2	4.26	4.26	8.77	210.51	38.42	23.32	10.31	50%
25	FP-19332 P-9355, Product Code: E29A00526+K	9.71	41.94%	0.02%	41.91%	0.02%	42.70%	0.206	10.0	1483.2	4.07	4.07	8.38	201.14	36.71	25.43	9.53	50%
26	FP-19813 white penny, Product Code: E29CW101088+K	9.50	44.57%	0.00%	44.57%	0.00%	41.60%	0.206	10.0	1483.2	4.23	4.23	8.72	209.36	38.21	23.76	10.18	50%
27	FP-19978 extra white 700g, Product Code: E29CW101175+K	8.39	45.31%	0.00%	45.31%	0.00%	41.29%	0.206	10.0	1483.2	4.26	4.26	8.77	210.44	38.41	23.18	10.31	50%
28	FPR-19541 gray primer, Product Code: P69A00058+K	10.20	43.47%	0.00%	43.47%	0.00%	37.69%	0.206	10.0	1483.2	4.43	4.43	9.13	219.21	40.00	26.01	11.77	50%
29	HC #46 stain base, Product Code: D22C009t	6.46	89.32%	0.01%	89.32%	0.01%	8.09%	0.206	10.0	1483.2	5.77	5.77	11.88	285.23	52.05	3.11	71.34	50%
30	HC 20 sheen white RTS classic-coat, Product Code: E29W00159+K	9.39	45.32%	0.00%	45.32%	0.00%	41.29%	0.206	10.0	1483.2	4.26	4.26	8.77	210.43	38.40	23.16	10.31	50%
31	HC 60 sheen white lacquer, Product Code: E29W013t	8.24	69.07%	0.02%	69.05%	0.02%	17.31%	0.206	10.0	1483.2	5.69	5.69	11.73	281.40	51.36	11.50	32.89	50%
32	HC 844 stain base, Product Code: B10C001t	6.80	98.92%	19.08%	79.57%	19.08%	0.90%	0.206	10.0	1483.2	6.81	5.51	11.34	272.26	48.69	0.34	615.22	50%
33	HC acrylic glaze BS, Product Code: C37I000t	8.39	61.97%	0.30%	61.68%	0.30%	20.12%	0.206	10.0	1483.2	5.18	5.17	10.65	255.55	46.64	14.38	25.69	50%
34	HC Aristoccat catalyst, Product Code: M58C003t	7.55	78.93%	1.14%	77.79%	1.14%	13.40%	0.206	10.0	1483.2	5.94	5.88	12.11	290.53	53.02	7.18	43.85	50%
35	HC Aristoccat premium #10, Product Code: E29C6810+K	7.87	58.77%	4.39%	54.38%	4.39%	32.16%	0.206	10.0	1483.2	4.48	4.28	8.82	211.56	38.61	14.64	13.30	50%
36	HC Aristoccat premium #20, Product Code: E29C6820+K	7.87	58.39%	2.77%	55.62%	2.77%	32.64%	0.206	10.0	1483.2	4.50	4.38	9.02	216.60	39.51	14.78	13.42	50%
37	HC Aristoccat premium #40, Product Code: E29C6840+K	7.82	59.12%	2.81%	56.31%	2.81%	32.22%	0.206	10.0	1483.2	4.53	4.41	9.08	217.80	39.75	14.43	13.67	50%
38	HC Aristoccat premium #60, Product Code: E29C6860+K	7.81	59.33%	2.81%	56.51%	2.81%	32.11%	0.206	10.0	1483.2	4.54	4.41	9.09	218.21	39.82	14.33	13.75	50%
39	HC Aristovar plus 20, Product Code: E29C8720+K	7.87	61.80%	0.08%	61.73%	0.08%	36.14%	0.206	10.0	1483.2	4.86	4.85	10.00	240.02	43.80	13.55	16.11	50%
40	HC Aristovar plus 5, Product Code: E29C8705+K	7.93	61.91%	0.07%	61.84%	0.07%	29.67%	0.206	10.0	1483.2	4.91	4.90	10.10	242.46	44.25	13.63	16.53	50%
41	HC black veiling lacquer, Product Code: E31K011t	7.16	78.16%	18.10%	61.06%	18.10%	16.94%	0.206	10.0	1483.2	5.34	4.37	9.01	216.18	39.45	6.73	25.81	50%
42	HC burnt umber dispersion anti settle, Product Code: E29N100	12.76	18.51%	0.00%	18.51%	0.00%	63.55%	0.206	10.0	1483.2	2.36	2.36	4.87	116.79	21.31	46.90	3.72	50%
43	HC clear crackle lacquer, Product Code: L46C072t	7.26	87.83%	2.14%	85.69%	2.14%	7.69%	0.206	10.0	1483.2	6.36	6.22	12.82	307.70	56.16	3.99	80.95	50%
44	HC lawn breakaway glaze, Product Code: G36CW05	10.48	44.12%	0.00%	44.12%	0.00%	25.29%	0.206	10.0	1483.2	4.62	4.62	9.52	228.57	41.71	26.42	18.28	50%
45	HC gloss con varn, Product Code: E29C0729+K	7.88	63.69%	1.11%	62.58%	1.11%	28.97%	0.206	10.0	1483.2	4.98	4.93	10.15	243.64	44.47	12.90	17.01	50%
46	HC ivory breakaway glaze, Product Code: G36W003	10.60	43.66%	0.00%	43.66%	0.00%	25.41%	0.206	10.0	1483.2	4.63	4.63	9.54	228.85	41.76	26.95	18.22	50%
47	HC natural glaze, Product Code: G37I000t	7.14	73.73%	0.18%	73.55%	0.18%	18.95%	0.206	10.0	1483.2	5.26	5.25	10.82	259.62	47.38	8.46	27.71	50%
48	HC R66 antioctac enamel clear tint base #20, Product Code: P69C0008+K	9.21	44.80%	0.03%	44.77%	0.03%	41.47%	0.206	10.0	1483.2	4.13	4.12	8.50	203.91	37.21	22.94	9.95	50%
49	HC R66 HS classic-coat white prim, Product Code: P69W0050+K	10.84	25.05%	0.04%	25.01%	0.04%	45.25%	0.206	10.0	1483.2	3.91	3.90	8.04	192.98	35.22	31.28	8.63	50%
50	HC radiant stain base, Product Code: D22C014t	7.24	82.17%	0.02%	82.14%	0.02%	4.61%	0.206	10.0	1483.2	5.95	5.95	12.25	293.94	53.64	5.82	129.06	50%
51	HC 40 sheen WW lacquer, Product Code: L41C046t	7.52	78.36%	0.00%	78.36%	0.00%	15.15%	0.206	10.0	1483.2	5.89	5.89	12.14	291.27	53.16	7.34	38.88	50%
52	HC RIC 18 pad stain, Product Code: S79N031t	6.75	99.18%	4.25%	94.93%	4.25%	0.48%	0.206	10.0	1483.2	6.69	6.41	13.21	316.93	57.84	0.25	1333.26	50%
53	HC silver enamel, Product Code: L50Z006t	7.33	79.19%	0.08%	79.12%	0.08%	14.92%	0.206	10.0	1483.2	5.80	5.80	11.94	286.57	52.30	6.88	38.86	50%
54	HC trans red oxide dispersion anti settle, Product Code: E29R1014	9.91	23.98%	0.00%	23.98%	0.00%	63.50%	0.206	10.0	1483.2	2.38	2.38	4.89	117.45	21.43	33.98	3.74	50%
55	HC trans yellow oxide dispersion anti settle, Product Code: E29Y1000t	10.18	26.00%	0.00%	26.00%	0.00%	45.24%	0.206	10.0	1483.2	2.58	2.55	5.24	125.86	22.97	34.45	4.18	50%
56	HC VDB/1271 disp., Product Code: E29N100t	10.52	21.82%	0.13%	21.69%	0.13%	64.76%	0.206	10.0	1483.2	2.29	2.28	4.70	112.83	20.59	37.11	3.52	50%
57	rustic red SW 2175-30, Product Code: P69R00028+K	9.39	43.84%	0.02%	43.82%	0.02%	42.08%	0.206	10.0	1483.2	4.12	4.12	8.48	203.45	37.13	23.79	9.78	50%

Maximum PTE per booth **1483.2**  
 Maximum PTE for 14 booths\* **20,765**  
 Dry Filter Control Efficiency **4,437**  
 Potential to Emit After Controls per booth **57.84**  
 Potential to Emit After Controls for 14 booths **32.83**  
 Potential to Emit After Controls per booth **657**  
 Potential to Emit After Controls for 14 booths **95.0%**  
 Potential to Emit After Controls per booth **2.35**  
 Potential to Emit After Controls for 14 booths **32.83**

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal)

**Appendix A: Emissions Calculations  
Hazardous Air Pollutants (HAPs)  
From Surface Coating Operations  
Fourteen (14) Surface Coating and Laminating Booths (SB-1 through SB-12, and SB-14, SB-15)**

Company Name: **Grabill Cabinet**  
Source Address: **13844 Sawmill Road, Grabill, Indiana, 46741**  
Part 70 Permit Renewal No.: **T003-36722-00038**  
Significant Source Modification #: **003-3717-00038**  
Reviewer: **Clinton McCrowey/Adam Wheat**

Material Number*	Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum Throughput (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Benzene	Weight % Hexane	Weight % Glycol Ethers	Weight % Methanol	Weight % Ethylbenzene	Weight % Cumene	Weight % Methanol	Weight % Methyl isobutyl ketone (Hexone)	Weight % Methymethylacrylate	Weight % Naphthalene	Weight % Diethylene glycol monomethyl ether	Weight % Styrene	Weight % Triethylamine	Weight % Diethylene glycol
1	Cemcolor bright yellow colorant, Product Code: C31Y0010	9.0962	0.206	10.00	2.55%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.32%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2	Cemcolor mon azo red, Product Code: C31R001	9.0027	0.206	10.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.10%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
3	Cemcolor black dye stain concentrate, Product Code: S75K002	6.8539	0.206	10.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
4	Enduragreen brushmark boardwalk, Product Code: A60B000	11.606	0.206	10.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.08%	0.00%	0.00%
5	Enduragreen brushmark mint, Product Code: A60G000	11.5982	0.206	10.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.08%	0.00%	0.00%
6	Enduragreen white brushmark, Product Code: A60W000	11.6126	0.206	10.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.12%	0.00%	0.75%
7	FC-7740 baywood (S5310), Product Code: D22N0202	7.3302	0.206	10.00	0.33%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.06%	0.92%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
8	FC-7756 glenwood (S5201), Product Code: D22N0265f	7.8097	0.206	10.00	0.95%	3.38%	0.00%	0.02%	0.00%	0.00%	0.00%	0.09%	0.08%	0.00%	0.00%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%
9	FP-18419 glacier, Product Code: E29A00358+K	9.3916	0.206	10.00	9.90%	0.00%	0.12%	0.00%	0.00%	0.00%	0.00%	2.05%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10	FP-19186 white dove, Product Code: E29CW01011+K	9.3945	0.206	10.00	9.83%	0.00%	0.12%	0.00%	0.00%	0.00%	0.00%	2.11%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
11	FP-19187 cameo, Product Code: E29CW1049+K	9.399	0.206	10.00	9.81%	0.00%	0.12%	0.00%	0.00%	0.00%	0.00%	2.11%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
12	FP-19188 super white, Product Code: E29CW1007+K	9.3923	0.206	10.00	9.83%	0.00%	0.12%	0.00%	0.00%	0.00%	0.00%	2.12%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
13	FP-19189 Cashmere, Product Code: E29N00512+K	9.4526	0.206	10.00	9.62%	0.00%	0.12%	0.00%	0.00%	0.00%	0.00%	2.07%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
14	FP-19190 Buckwheat, Product Code: E29N00513+K	9.4042	0.206	10.00	9.78%	0.00%	0.12%	0.00%	0.00%	0.00%	0.00%	2.10%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
15	FP-19191 pearl white, Product Code: E29CW01050+K	9.3922	0.206	10.00	9.83%	0.00%	0.12%	0.00%	0.00%	0.00%	0.00%	2.11%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
16	FP-19192 Black, Product Code: P69N00018+K	9.1851	0.206	10.00	1.41%	5.18%	0.09%	0.00%	0.00%	0.00%	0.43%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
17	FP-19193 linen white, Product Code: E29CW1051+K	9.7379	0.206	10.00	9.03%	0.00%	0.11%	0.00%	0.00%	0.00%	0.00%	1.94%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
18	FP-19194 antique white, Product Code: E29CW1052+K	9.4025	0.206	10.00	9.80%	0.00%	0.12%	0.00%	0.00%	0.00%	0.00%	2.11%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
19	FP-19195 chiffon, Product Code: E29CW1053+K	9.3938	0.206	10.00	9.83%	0.00%	0.12%	0.00%	0.00%	0.00%	0.00%	2.11%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
20	FP-19196 Buttercream, Product Code: E29Y00212+K	9.3985	0.206	10.00	0.00%	0.00%	0.12%	0.00%	0.00%	9.76%	0.00%	2.10%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
21	FP-19197 canvas, Product Code: E29N00514+K	9.7562	0.206	10.00	8.92%	0.00%	0.11%	0.00%	0.00%	0.00%	0.00%	1.92%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
22	FP-19198 anagshell, Product Code: E29CW1054+K	9.3942	0.206	10.00	9.75%	0.00%	0.12%	0.00%	0.00%	0.00%	0.00%	2.10%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
23	FP-19199 red, Product Code: P69R00027+K	9.1159	0.206	10.00	1.27%	5.60%	0.09%	0.00%	0.00%	0.00%	0.00%	0.39%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
24	FP-19200 florentine, Product Code: E29Y00213+K	9.4278	0.206	10.00	9.71%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
25	FP-19332 P-9355, Product Code: E29A00526+K	9.7061	0.206	10.00	1.29%	5.65%	0.09%	0.00%	0.00%	0.00%	0.00%	0.39%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
26	FP-19813 white peony, Product Code: E29CW1088+K	9.5016	0.206	10.00	9.58%	0.00%	0.11%	0.00%	0.00%	0.00%	0.00%	2.06%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
27	FP-19978 extra white 7006, Product Code: E29CW01175+K	9.3945	0.206	10.00	9.89%	0.00%	0.12%	0.00%	0.00%	0.00%	0.00%	2.05%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
28	FR-19541 gray primer, Product Code: P69A00056+K	10.1998	0.206	10.00	12.73%	0.13%	0.00%	0.00%	0.00%	0.00%	0.00%	4.82%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
29	HC #46 stain base, Product Code: D22C009z	6.4593	0.206	10.00	0.13%	0.05%	0.00%	0.00%	0.00%	0.00%	0.00%	0.03%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.33%	0.33%	0.00%
30	HC 20 sheen white RTS classic-coat, Product Code: E29W00159+K	9.3909	0.206	10.00	9.91%	0.00%	0.12%	0.00%	0.00%	0.00%	0.00%	2.05%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
31	HC 60 sheen white lacquer, Product Code: E28W013f	8.2431	0.206	10.00	2.56%	4.02%	0.00%	0.00%	0.00%	0.00%	0.00%	0.53%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
32	HC 844 stain base, Product Code: B10C001f	6.8979	0.206	10.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.35%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
33	HC acrylic glaze BS, Product Code: G371000f	9.3924	0.206	10.00	0.01%	7.71%	0.00%	0.01%	0.00%	0.00%	0.00%	0.07%	0.05%	0.00%	0.00%	0.00%	0.01%	0.00%	0.00%	0.00%	0.00%
34	HC Aristoccat catalyst, Product Code: M59C003z	7.5539	0.206	10.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
35	HC Aristoccat premium #10, Product Code: E29C6810+K	7.8692	0.206	10.00	1.37%	0.01%	0.11%	0.00%	0.00%	0.00%	0.00%	0.35%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
36	HC Aristoccat premium #20, Product Code: E29C6820+K	7.8731	0.206	10.00	1.40%	0.01%	0.12%	0.00%	0.00%	0.00%	0.00%	0.36%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
37	HC Aristoccat premium #40, Product Code: E29C6840+K	7.8237	0.206	10.00	1.42%	0.00%	0.12%	0.00%	0.00%	0.00%	0.00%	0.36%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
38	HC Aristoccat premium #60, Product Code: E29C6860+K	7.8099	0.206	10.00	1.42%	0.01%	0.12%	0.00%	0.00%	0.00%	0.00%	0.36%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
39	HC Aristovar plus 20, Product Code: E29C8720+K	7.865	0.206	10.00	1.11%	11.65%	0.11%	0.00%	0.00%	0.00%	0.00%	0.37%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
40	HC Aristovar plus 5, Product Code: E29C8705+K	7.9304	0.206	10.00	1.04%	10.97%	0.10%	0.00%	0.00%	0.00%	0.00%	0.35%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
41	HC black veiling lacquer, Product Code: E31K011-	7.161	0.206	10.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
42	HC burnt umber dispersion anti settle, Product Code: E29N100	12.7593	0.206	10.00	0.30%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.05%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
43	HC clear crackle lacquer, Product Code: L48C072z	7.2634	0.206	10.00	2.77%	4.77%	0.00%	0.00%	0.00%	0.00%	0.00%	0.57%	0.00%	0.00%	0.04%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
44	HC lawn breakaway glaze, Product Code: G36CW05	10.4794	0.206	10.00	1.47%	0.04%	0.00%	0.00%	0.00%	0.00%	0.00%	0.31%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
45	HC glass cowr vatin, Product Code: E29C0729+K	7.875	0.206	10.00	1.14%	9.04%	0.10%	0.01%	0.00%	0.00%	0.00%	0.30%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
46	HC ivory breakaway glaze, Product Code: G36W003	10.6021	0.206	10.00	1.44%	0.04%	0.00%	0.00%	0.00%	0.00%	0.00%	0.27%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
47	HC natural glaze, Product Code: G371000f	7.1398	0.206	10.00	0.92%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.17%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
48	HC R66 aristoccat enamel clear tint base #20, Product Code: P69C0008+K	9.2115	0.206	10.00	2.02%	6.80%	0.10%	0.00%	0.00%	0.00%	0.00%	0.45%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
49	HC R66 HS classic-coat white pmr, Product code: P69W0050+K	10.8412	0.206	10.00	2.73%	4.01%	0.07%	0.00%	0.00%	0.00%	0.00%	0.70%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
50	HC radiant stain base, Product Code: D22C014-	7.2378	0.206	10.00	0.33%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.06%	1.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
51	HC 40 sheen WW lacquer, Product Code: L41C046c	7.5186	0.206	10.00	4.40%	8.69%	0.00%	0.00%	0.00%	0.00%	0.00%	0.86%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
52	HC RIC 18 pad stain, Product Code: S79N031f	6.7525	0.206	10.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
53	HC silver enamel, Product Code: L50Z006f	7.3263	0.206	10.00	0.00%	2.58%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.15%	0.01%	0.00%	0.00%	0.00%		

**Appendix A: Emissions Calculations  
Hazardous Air Pollutants (HAPs)  
From Surface Coating Operations  
Fourteen (14) Surface Coating and Laminating Booths (SB-1 through SB-12, and SB-14, SB-15)**

Company Name: **Grabill Cabinet**  
Source Address: **13844 Sawmill Road, Grabill, Indiana, 46741**  
Part 70 Permit Renewal No.: **1003-36722-00038**  
Significant Source Modification No.: **003-37217-00038**  
Reviewer: **Clinton McCrowey/Adam Wheat**

Material Number	Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum Throughput (unit/hour)	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Methanol Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Cumene (ton/yr)	Methanol (ton/yr)	Methyl isobutyl ketone (Hexone) (ton/yr)	Methylmethacrylate (ton/yr)	Naphthalene (ton/yr)	Diethylene glycol monomethyl ether Emissions (ton/yr)	Styrene Emissions (ton/yr)	Triethylamine Emissions (ton/yr)	Diethylene glycol Emissions (ton/yr)	Total HAPs from material
1	Cemcolor bright yellow colorant, Product Code: C31Y0010	9.0962	0.206	10	2.09	0.00	0.00	0.00	0.00	0.00	0.00	0.26	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.36
2	Cemcolor mon azo red, Product Code: C31R001	9.0027	0.206	10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.08	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.08
3	Cemlogg black dye stain concentrate, Product Code: S79K002	6.8539	0.206	10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
4	Enduragreen brushmark boardwalk, Product Code: A60B000	11.606	0.206	10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.08	0.00	0.00	0.08
5	Enduragreen brushmark mint, Product Code: A60G000	11.6982	0.206	10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.06	0.08	0.00	0.00	0.14
6	Enduragreen white brushmark, Product Code: A60W000	11.6126	0.206	10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.13	0.00	0.00	0.91
7	FC-7740 baywood (S5310), Product Code: D22N0202	7.3302	0.206	10	0.22	0.00	0.00	0.00	0.00	0.00	0.00	0.04	0.61	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.86
8	FC-7756 greenwood (S5201), Product Code: D22N0265f	7.8097	0.206	10	0.67	2.38	0.00	0.01	0.00	0.00	0.00	0.06	0.06	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	3.19
9	FP-18419 glacier, Product Code: E29A00358+H	9.3916	0.206	10	8.39	0.00	0.10	0.00	0.00	0.00	0.00	1.74	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	10.23
10	FP-19186 white dove, Product Code: E29CW01011+K	9.3945	0.206	10	8.33	0.00	0.10	0.00	0.00	0.00	0.00	1.79	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	10.22
11	FP-19187 cameo, Product Code: E29CW1049+K	9.398	0.206	10	8.32	0.00	0.10	0.00	0.00	0.00	0.00	1.79	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	10.21
12	FP-19188 super white, Product Code: E29CW1007+K	9.3923	0.206	10	8.33	0.00	0.10	0.00	0.00	0.00	0.00	1.79	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	10.23
13	FP-19189 Cashmere, Product Code: E29N00512+K	9.4526	0.206	10	8.20	0.00	0.10	0.00	0.00	0.00	0.00	1.76	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	10.07
14	FP-19190 Buckwheat, Product Code: E29N00513+K	9.4042	0.206	10	8.30	0.00	0.10	0.00	0.00	0.00	0.00	1.79	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	10.19
15	FP-19191 pearl white, Product Code: E29CW1050+H	9.3922	0.206	10	8.33	0.00	0.10	0.00	0.00	0.00	0.00	1.79	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	10.23
16	FP-19192 Black, Product Code: P69K00018+K	9.1851	0.206	10	1.17	5.12	0.08	0.00	0.00	0.00	0.00	0.38	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	8.73
17	FP-19193 linen white, Product Code: E29CW1051+K	9.7379	0.206	10	7.94	0.00	0.09	0.00	0.00	0.00	0.00	1.71	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	9.74
18	FP-19194 antique white, Product Code: E29CW1052+K	9.4025	0.206	10	8.31	0.00	0.10	0.00	0.00	0.00	0.00	1.79	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	10.20
19	FP-19195 chiffon, Product Code: E29CW1053+K	9.3938	0.206	10	8.33	0.00	0.10	0.00	0.00	0.00	0.00	1.79	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	10.22
20	FP-19196 Buttercream, Product Code: E29Y00212+H	9.3985	0.206	10	0.00	0.00	0.10	0.00	8.27	0.00	0.00	1.78	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	10.15
21	FP-19197 canvas, Product Code: E29N00514+K	9.2562	0.206	10	7.86	0.00	0.09	0.00	0.00	0.00	0.00	1.69	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	9.64
22	FP-19198 eggshell, Product Code: E29CW1054+K	9.3942	0.206	10	8.27	0.00	0.10	0.00	0.00	0.00	0.00	1.78	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	10.14
23	FP-19199 red, Product Code: P69R00027+K	9.1159	0.206	10	1.05	4.60	0.07	0.00	0.00	0.00	0.00	0.32	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	6.04
24	FP-19200 florentine, Product Code: E29Y00213+H	9.4278	0.206	10	8.26	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	8.26
25	FP-19332 P-9355, Product Code: E29A00526+K	9.7061	0.206	10	1.13	4.95	0.08	0.00	0.00	0.00	0.00	0.35	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	6.50
26	FP-19813 white peony, Product Code: E29CW1088+K	9.5016	0.206	10	8.21	0.00	0.10	0.00	0.00	0.00	0.00	1.77	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	10.07
27	FP-19979 extra white 7006, Product Code: E29CW1175+H	9.3945	0.206	10	8.38	0.00	0.10	0.00	0.00	0.00	0.00	1.74	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	10.22
28	FPR-19541 gray primer, Product Code: P69A00058+H	10.1998	0.206	10	11.71	0.12	0.00	0.00	0.00	0.00	0.00	4.44	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	16.27
29	HC #46 stain base, Product Code: D22C009f	6.4593	0.206	10	0.07	0.03	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.19	0.19	0.00	0.50
30	HC 20 sheen white RTS classic-coat, Product Code: E29W00159+H	9.3909	0.206	10	8.39	0.00	0.10	0.00	0.00	0.00	0.00	1.74	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	10.23
31	HC 60 sheen white lacquer, Product Code: E28W013f	8.2431	0.206	10	1.91	2.99	0.00	0.00	0.00	0.00	0.00	0.39	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	5.29
32	HC 844 stain base, Product Code: B10C001f	6.8979	0.206	10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.22	0.00	0.00	0.00	0.00	0.00	0.22
33	HC acrylic glaze BS, Product Code: G371000f	8.3824	0.206	10	0.01	5.83	0.00	0.01	0.00	0.00	0.00	0.05	0.04	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	5.86
34	HC Aristoccat catalyst, Product Code: M59C003f	7.5539	0.206	10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
35	HC Aristoccat premium #10, Product Code: E29C6810+H	7.8692	0.206	10	0.97	0.01	0.08	0.00	0.00	0.00	0.00	0.25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.31
36	HC Aristoccat premium #20, Product Code: E29C6820+H	7.8731	0.206	10	0.99	0.01	0.08	0.00	0.00	0.00	0.00	0.25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.34
37	HC Aristoccat premium #40, Product Code: E29C6840+H	7.8237	0.206	10	1.00	0.00	0.08	0.00	0.00	0.00	0.00	0.26	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.34
38	HC Aristoccat premium #60, Product Code: E29C6860+H	7.8099	0.206	10	1.00	0.01	0.08	0.00	0.00	0.00	0.00	0.26	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.35
39	HC Aristovar plus 20, Product Code: E29C8720+H	7.865	0.206	10	0.78	8.27	0.07	0.00	0.00	0.00	0.00	0.27	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	9.39
40	HC Aristovar plus 5, Product Code: E29C8705+H	7.9304	0.206	10	0.74	7.85	0.07	0.00	0.00	0.00	0.00	0.25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	8.91
41	HC black veiling lacquer, Product Code: E31K011f	7.161	0.206	10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
42	HC burnt umber dispersion anti settle, Product Code: E29N100	12.7593	0.206	10	0.34	0.00	0.00	0.00	0.00	0.00	0.00	0.06	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.41
43	HC clear crackle lacquer, Product Code: L46C032f	7.2634	0.206	10	1.82	3.13	0.00	0.00	0.00	0.00	0.00	0.37	0.00	0.00	0.03	0.00	0.00	0.00	0.00	0.00	0.00	3.35
44	HC lawn breakaway glaze, Product Code: G36CW05	10.4794	0.206	10	1.39	0.04	0.00	0.00	0.00	0.00	0.00	0.29	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.72
45	HC gloss conv varn, Product Code: E29C0729+H	7.875	0.206	10	0.81	6.43	0.07	0.01	0.00	0.00	0.00	0.21	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	7.53
46	HC ivory breakaway glaze, Product Code: G36W003	10.6021	0.206	10	1.38	0.04	0.00	0.00	0.00	0.00	0.00	0.26	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.67
47	HC natural glaze, Product Code: G371000f	7.1398	0.206	10	0.59	0.00	0.00	0.00	0.00	0.00	0.00	0.11	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.71
48	HC R66 aristoccat enamel clear tint base #20, Product Code: P69C0008+K	9.2115	0.206	10	1.68	5.65	0.09	0.00	0.00	0.00	0.00	0.38	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	7.79
49	HC R66 HS classic-coat white prmr, Product Code: P69W0050+H	10.8412	0.206	10	2.67	3.92	0.07	0.00	0.00	0.00	0.00	0.68	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	7.35
50	HC radiant stain base, Product Code: D22C014f	7.2378	0.206	10	0.22	0.00	0.00	0.00	0.00	0.00	0.00	0.04	0.65	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.91
51	HC 40 sheen WW lacquer, Product Code: L41C0466f	7.5186	0.206	10	2.98	5.90	0.00	0.00	0.00	0.00	0.00	0.59	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	9.47
52	HC RIC 18 pad stain, Product Code: S79N031f																					

**Appendix A: Emission Calculations**  
**Fourteen (14) surface coating and laminating booths and one (1) research and development booth (SB-1 through SB-15)**  
**Laminating Materials**

**Company Name: Grabill Cabinet**  
**Source Address: 13844 Sawmill Road, Grabill, Indiana, 46741**  
**Part 70 Permit Renewal No.: T003-36722-00038**  
**Significant Source Modification No.: 003-37217-00038**  
**Reviewer: Clinton Mccrowey/Adam Wheat**

Material	Usage Rate (lb/unit)	Maximum Throughput (unit/hour)*	% MDI	% Other VOC	Potential to Emit (tons/year)			
					MDI**	Other VOC	Uncontrolled Total VOC	Total HAPs
3M™ Polyurethane Multi-Purpose Adhesive 5010 Cream	1.58	140	15.0%	0.0%	2.2E-06	0.0E+00	2.2E-06	2.2E-06
<b>Maximum PTE per booth</b>					<b>2.2E-06</b>		<b>2.2E-06</b>	<b>2.2E-06</b>
<b>Maximum PTE for 14 booths*</b>					<b>3.1E-05</b>		<b>3.1E-05</b>	<b>3.1E-05</b>

**Methodology:**

\*\* MDI emission factor is 0.015 lb emitted per million pounds of material used (0.000000015 lb/lb). Source: Polyurethane Division of the Society of the Plastics Industr

Tons MDI/yr= Usage Rate (lb/unit) \*maximum throughput (unit/hr) \* MDI emission factor \* 8760 hr/yr \* 1 ton/2000 lb

Tons Other VOC/yr = Usage Rate (lb/unit) \* maximum throughput (unit/hr) \* wt % Other VOC \* 8760 hr/yr \* 1 ton/2000 lb

MDI is a hazardous air pollutants (HAPs) and a Volatile Organic Compound (VOC);

MDI = p,p'-Methylenebis(phenyl Isocyanate)

\*Source uses 14 surface coating and laminating booths. Maximum Throughput based on 10 units/hr/booth x 14 booths = 140 units/h

**Appendix A: Emissions Calculation  
VOC and Particulate  
From Surface Coating Operations  
Research and Development Booth (SB-13)**

Company Name: **Grabill Cabinet**  
Source Address: **13844 Sawmill Road, Grabill, Indiana, 4674\***  
Part 70 Permit Renewal No.: **T003-36722-00038**  
Significant Source Modification No.: **003-37217-00038**  
Reviewer: **Clinton Mccrowey/Adam Wheat**

Number*	Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water + Exempt-VOC	Weight % VOC	Volume % Water + Exempt-VOC	Volume % Non-Volatiles (solids)	Vol of Mat (gal/unit)	Maximum (unit/hour)	Vol of Material per month (gal/Month)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
1	Cemcolor bright yellow colorant, Product Code: C31Y001	9.10	45.40%	0.00%	45.40%	0.00%	46.54%	0.10	5.0	360.0	4.13	4.13	2.06	49.56	9.04	5.44	8.87	50%
2	Cemcolor mon.azo red, Product Code: C31R001	9.00	51.60%	0.00%	51.60%	0.00%	41.27%	0.10	5.0	360.0	4.65	4.65	2.32	55.74	10.17	4.77	11.25	50%
3	Cemoglo black dye stain concentrate, Product Code: S75K002	6.85	96.52%	18.75%	77.77%	18.75%	2.12%	0.10	5.0	360.0	6.56	5.33	2.67	63.96	11.67	0.26	251.63	50%
4	Enduragreen brushmark boardwalk, Product Code: A60B000	11.61	41.83%	34.63%	7.20%	34.63%	40.75%	0.10	5.0	360.0	1.28	0.84	0.42	10.02	1.83	7.39	2.05	50%
5	Enduragreen brushmark mint, Product Code: A60G000	11.60	41.86%	34.75%	7.11%	34.75%	40.74%	0.10	5.0	360.0	1.26	0.82	0.41	9.90	1.81	7.38	2.02	50%
6	Enduragreen white brushmark, Product Code: A60W000*	11.61	41.73%	34.66%	7.08%	34.66%	40.82%	0.10	5.0	360.0	1.26	0.82	0.41	9.86	1.80	7.41	2.01	50%
7	FC-7740 baywood (S5310), Product Code: D22N020*	7.33	79.89%	0.17%	79.73%	0.17%	17.04%	0.10	5.0	360.0	5.85	5.84	2.92	70.13	12.80	1.61	34.29	50%
8	FC-7756 glenwood (S5201), Product Code: D22N026*	7.81	69.62%	0.05%	69.57%	0.05%	22.51%	0.10	5.0	360.0	5.44	5.43	2.72	65.20	11.90	2.60	24.13	50%
9	FP-18419 glacier, Product Code: E29A00358+	9.39	45.32%	0.00%	45.32%	0.00%	41.29%	0.10	5.0	360.0	4.26	4.26	2.13	51.07	9.32	5.62	10.31	50%
10	FP-19186 white dove, Product Code: E29CW01011+	9.39	45.31%	0.00%	45.31%	0.00%	41.29%	0.10	5.0	360.0	4.26	4.26	2.13	51.08	9.32	5.63	10.31	50%
11	FP-19187 cameo, Product Code E29CW01049+	9.40	45.28%	0.00%	45.28%	0.00%	41.31%	0.10	5.0	360.0	4.26	4.26	2.13	51.07	9.32	5.63	10.30	50%
12	FP-19188 super white, Product Code: E29CW01007+	9.39	45.32%	0.00%	45.32%	0.00%	41.29%	0.10	5.0	360.0	4.26	4.26	2.13	51.08	9.32	5.62	10.31	50%
13	FP-19189 Cashmere, Product Code: E29N00512+	9.45	45.05%	0.00%	45.05%	0.00%	41.34%	0.10	5.0	360.0	4.26	4.26	2.13	51.07	9.32	5.63	10.30	50%
14	FP-19190 Buckwheat, Product Code: E29N00513+	9.40	45.27%	0.00%	45.27%	0.00%	41.29%	0.10	5.0	360.0	4.26	4.26	2.13	51.09	9.32	5.64	10.31	50%
15	FP-19191 pearl white, Product Code: E29CW01050+	9.39	45.32%	0.00%	45.32%	0.00%	41.29%	0.10	5.0	360.0	4.26	4.26	2.13	51.08	9.32	5.62	10.31	50%
16	FP-19192 Black, Product Code: P69K00018+	9.19	45.12%	0.02%	45.09%	0.02%	41.61%	0.10	5.0	360.0	4.14	4.14	2.07	49.70	9.07	5.52	9.95	50%
17	FP-19193 linen white, Product Code: E29CW01051+	9.74	43.04%	0.00%	43.04%	0.00%	42.25%	0.10	5.0	360.0	4.19	4.19	2.10	50.29	9.18	6.07	9.92	50%
18	FP-19194 antique white, Product Code: E29CW01052+	9.40	45.27%	0.00%	45.27%	0.00%	41.30%	0.10	5.0	360.0	4.26	4.26	2.13	51.08	9.32	5.63	10.31	50%
19	FP-19195 chiffon, Product Code: E29CW01053+	9.39	45.31%	0.00%	45.31%	0.00%	41.29%	0.10	5.0	360.0	4.26	4.26	2.13	51.07	9.32	5.63	10.31	50%
20	FP-19196 Buttercream, Product Code E29Y00212+	9.40	45.28%	0.00%	45.28%	0.00%	41.33%	0.10	5.0	360.0	4.26	4.26	2.13	51.07	9.32	5.63	10.30	50%
21	FP-19197 canvas, Product Code: E29N00514+	9.76	42.88%	0.00%	42.88%	0.00%	42.38%	0.10	5.0	360.0	4.18	4.18	2.09	50.20	9.16	6.10	9.87	50%
22	FP-19198 eggshell, Product Code: E29CW01054+	9.39	45.27%	0.00%	45.27%	0.00%	41.36%	0.10	5.0	360.0	4.25	4.25	2.13	51.04	9.31	5.63	10.28	50%
23	FP-19199 red, Product Code: P69R00027+	9.12	45.88%	0.02%	45.85%	0.02%	41.30%	0.10	5.0	360.0	4.18	4.18	2.09	50.16	9.15	5.40	10.12	50%
24	FP-19200 florentine, Product Code: E29Y00213+	9.43	45.16%	0.00%	45.16%	0.00%	41.32%	0.10	5.0	360.0	4.26	4.26	2.13	51.10	9.32	5.66	10.31	50%
25	FP-19332 P-9355, Product Code: E29A00526+	9.71	41.94%	0.02%	41.91%	0.02%	42.70%	0.10	5.0	360.0	4.07	4.07	2.03	48.82	8.91	6.17	9.53	50%
26	FP-19813 white peony, Product Code: E29CW01088+	9.50	44.57%	0.00%	44.57%	0.00%	41.69%	0.10	5.0	360.0	4.23	4.23	2.12	50.82	9.27	5.77	10.18	50%
27	FP-19978 extra white 7006, Product Code: E29CW01175+	9.39	45.31%	0.00%	45.31%	0.00%	41.29%	0.10	5.0	360.0	4.26	4.26	2.13	51.08	9.32	5.63	10.31	50%
28	FPR-19541 gray primer, Product Code: P69A00058+	10.20	43.47%	0.00%	43.47%	0.00%	37.69%	0.10	5.0	360.0	4.43	4.43	2.22	53.21	9.71	6.31	11.77	50%
29	HC #46 stain base, Product Code: D22C009;	6.46	89.32%	0.01%	89.32%	0.01%	8.09%	0.10	5.0	360.0	5.77	5.77	2.88	69.23	12.63	0.76	71.34	50%
30	HC 20 sheen white RTS classic-coat, Product Code: E29W00159+	9.39	45.32%	0.00%	45.32%	0.00%	41.29%	0.10	5.0	360.0	4.26	4.26	2.13	51.07	9.32	5.62	10.31	50%
31	HC 60 sheen white lacquer, Product Code: E29W0103;	8.24	69.07%	0.02%	69.05%	0.02%	17.31%	0.10	5.0	360.0	5.69	5.69	2.85	68.30	12.47	2.78	32.89	50%
32	HC 844 stain base, Product Code: E10C0011	6.90	98.92%	19.08%	79.83%	19.08%	0.90%	0.10	5.0	360.0	6.81	5.51	2.75	66.08	12.06	0.08	615.22	50%
33	HC acrylic glaze BS, Product Code: G371000;	8.38	61.97%	0.30%	61.66%	0.30%	20.12%	0.10	5.0	360.0	5.18	5.17	2.58	62.03	11.32	3.49	25.69	50%
34	HC Aristoccat catalyst, Product Code: M95C003;	7.55	78.93%	1.14%	77.79%	1.14%	13.40%	0.10	5.0	360.0	5.94	5.88	2.94	70.52	12.87	1.74	43.85	50%
35	HC Aristoccat premium #10, Product Code: E29C6810+	7.87	58.77%	4.39%	54.38%	4.39%	32.16%	0.10	5.0	360.0	4.48	4.28	2.14	51.35	9.37	3.55	13.30	50%
36	HC Aristoccat premium #20, Product Code: E29C6820+	7.87	58.39%	2.77%	55.62%	2.77%	32.64%	0.10	5.0	360.0	4.50	4.38	2.19	52.55	9.59	3.59	13.42	50%
37	HC Aristoccat premium #40, Product Code: E29C6840+	7.82	59.12%	2.81%	56.31%	2.81%	32.22%	0.10	5.0	360.0	4.53	4.41	2.20	52.86	9.65	3.50	13.67	50%
38	HC Aristoccat premium #60, Product Code: E29C6860+	7.81	59.33%	2.81%	56.51%	2.81%	32.11%	0.10	5.0	360.0	4.54	4.41	2.21	52.96	9.67	3.48	13.75	50%
39	HC Aristovar plus 20, Product Code: E29C8720+	7.87	61.80%	0.08%	61.73%	0.08%	30.14%	0.10	5.0	360.0	4.86	4.85	2.43	58.26	10.63	3.29	16.11	50%
40	HC Aristovar plus 5, Product Code: E29C8705+	7.93	61.91%	0.07%	61.84%	0.07%	29.67%	0.10	5.0	360.0	4.91	4.90	2.45	58.85	10.74	3.31	16.53	50%
41	HC black veiling lacquer, Product Code: E31K011;	7.16	79.16%	18.10%	61.06%	18.10%	16.94%	0.10	5.0	360.0	5.34	4.37	2.19	52.47	9.58	1.63	25.81	50%
42	HC burnt umber dispersion anti settle, Product Code: E29N100	12.76	18.51%	0.00%	18.51%	0.00%	63.55%	0.10	5.0	360.0	2.36	2.36	1.18	28.35	5.17	11.38	3.72	50%
43	HC clear crackle lacquer, Product Code: L46C072;	7.26	87.83%	2.14%	85.69%	2.14%	7.69%	0.10	5.0	360.0	6.36	6.22	3.11	74.69	13.63	0.97	80.95	50%
44	HC lawn breakaway glaze, Product Code: G36C0705	10.48	44.12%	0.00%	44.12%	0.00%	25.23%	0.10	5.0	360.0	4.62	4.62	2.31	55.48	10.12	6.41	18.28	50%
45	HC gloss conw vam, Product Code: E29C0729+	7.88	63.69%	1.11%	62.58%	1.11%	28.97%	0.10	5.0	360.0	4.98	4.93	2.46	59.14	10.79	3.13	17.01	50%
46	HC ivory breakaway glaze, Product Code: G36W003;	10.60	43.66%	0.00%	43.66%	0.00%	25.41%	0.10	5.0	360.0	4.63	4.63	2.31	55.55	10.14	6.54	18.22	50%
47	HC natural glaze, Product Code: G371000;	7.14	73.73%	0.18%	73.55%	0.18%	18.95%	0.10	5.0	360.0	5.26	5.25	2.63	63.01	11.50	2.05	27.71	50%
48	HC R66 aristoccat enamel clear tint base #20, Product Code: P69C0008+	9.21	44.80%	0.03%	44.77%	0.03%	41.47%	0.10	5.0	360.0	4.13	4.12	2.06	49.49	9.03	5.57	9.95	50%
49	HC R66 HS classic-coat white prmr, Product Code: P69W0050+*	10.84	36.05%	0.04%	36.01%	0.04%	45.29%	0.10	5.0	360.0	3.91	3.90	1.95	46.84	8.55	7.59	8.63	50%
50	HC radiant stain base, Product Code: D22C014	7.24	82.17%	0.02%	82.14%	0.02%	4.61%	0.10	5.0	360.0	5.95	5.95	2.97	71.35	13.02	1.41	129.06	50%
51	HC 40 sheen WW lacquer, Product Code: L41C046;	7.52	78.36%	0.00%	78.36%	0.00%	15.15%	0.10	5.0	360.0	5.89	5.89	2.95	70.70	12.90	1.78	38.88	50%
52	HC RIC 18 pad stain, Product Code: S79N031*	6.75	99.18%	4.25%	94.93%	4.25%	0.48%	0.10	5.0	360.0	6.69	6.41	3.21	76.92	14.04	0.06	1333.26	50%
53	HC silver enamel, Product Code: L50Z006;	7.33	79.19%	0.08%	79.12%	0.08%	14.92%	0.10	5.0	360.0	5.80	5.80	2.90	69.55	12.69	1.67	38.86	50%
54	HC trans red oxide dispersion anti settle, Product Code: E29RI014	9.91	23.98%	0.00%	23.98%	0.00%	63.50%	0.10	5.0	360.0	2.38	2.38	1.19	28.51	5.20	8.25	3.74	50%
55	HC trans yellow oxide dispersion anti settle, Product Code: E29YI000*	10.18	25.00%	0.00%	25.00%	0.00%	60.86%	0.10	5.0	360.0	2.55	2.55	1.27	30.55	5.57	8.36	4.18	50%
56	HC VDB/1271 dsp, Product Code: E29N100;	10.52	21.82%	0.13%	21.69%	0.13%	64.76%	0.10	5.0	360.0	2.29	2.28	1.14	27.38	5.00	9.01	3.52	50%
57	rustic red SW 2175-30, Product Code: P69R00028+*	9.39	43.84%	0.02%	43.82%	0.02%	42.08%	0.10	5.0	360.0	4.15	4.12	2.06	49.38	9.01	5.77	9.78	50%

Maximum PTE per booth: **76.92**  
Dry Filter Control Efficiency Potential to Emit After Control: **14.04**  
**95.00%**  
**0.57**

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % VOC) / (1-Volume % water + exempt-VOC)  
Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % VOC)  
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr)  
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lb)  
Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1-Transfer efficiency) \* (8760 hrs/yr) \* (1 ton/2000 lb)  
Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % VOC) / (Volume % solids)  
Total = Worst Coating + Sum of all solvents used  
Source uses a mixture of HVLP (75% transfer efficiency) and Low Pressure Spray Application (50% transfer efficiency) methods for surface coating materials, worst case transfer efficiency assumed for all surface coating applical  
Gal of Material per month (gal/Month) = Gal of Mat. (gal/unit) \* Maximum (unit/hour) \* 24 \* ;  
\*Source uses 14 surface coating and laminating booth

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations  
Research and Development Booth (SB-13)**

**Company Name: Grabill Cabinet  
Source Address: 13844 Sawmill Road, Grabill, Indiana, 46741  
Part 70 Permit Renewal No.: T003-36722-00038  
Significant Source Modification No.: 003-37217-00038  
Reviewer: Clinton McCrewey/Adam Wheat**

Material Number*	Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum Throughput (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Benzene	Weight % Hexane	Weight % Glycol Ethers	Weight % Methanol	Weight % Ethylbenzene	Weight % Cumene	Weight % Methanol	Weight % Methyl isobutyl ketone (Hexone)	Weight % Methylmethacrylate	Weight % Naphthalene	Weight % Diethylene glycol monomethyl ether	Weight % Styrene	Weight % Triethylamine	Weight % Diethylene glycol
1	Cemcolor bright yellow colorant, Product Code: C31Y0010	9.10	0.10	5.0	2.55%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.32%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2	Cemcolor mon azo red, Product Code: C31R001	9.00	0.10	5.0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.10%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
3	Cemcolor black dye stain concentrate, Product Code: S75K002	6.85	0.10	5.0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
4	Enduragreen brushmark boardwalk, Product Code: A60B000	11.61	0.10	5.0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
5	Enduragreen brushmark mint, Product Code: A60G000	11.60	0.10	5.0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
6	Enduragreen white brushmark, Product Code: A60W000	11.61	0.10	5.0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.12%	0.00%
7	FC-7740 baywood (S5310), Product Code: D22N0202	7.33	0.10	5.0	0.33%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.06%	0.92%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
8	FC-7756 glenwood (S5201), Product Code: D22N0265	7.81	0.10	5.0	0.95%	3.38%	0.00%	0.02%	0.00%	0.00%	0.00%	0.09%	0.00%	0.00%	0.00%	0.00%	0.01%	0.00%	0.00%	0.00%	0.00%
9	FP-18419 glacier, Product Code: E29A00358+	9.39	0.10	5.0	9.90%	0.00%	0.12%	0.00%	0.00%	0.00%	0.00%	2.05%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10	FP-19186 white dove, Product Code: E29CW1011+	9.39	0.10	5.0	9.83%	0.00%	0.12%	0.00%	0.00%	0.00%	0.00%	2.11%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
11	FP-19187 cameo, Product Code: E29CW10149+	9.40	0.10	5.0	9.81%	0.00%	0.12%	0.00%	0.00%	0.00%	0.00%	2.11%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
12	FP-19188 super white, Product Code: E29CW10074+	9.39	0.10	5.0	9.83%	0.00%	0.12%	0.00%	0.00%	0.00%	0.00%	2.12%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
13	FP-19189 Cashmere, Product Code: E29N005124+	9.45	0.10	5.0	9.62%	0.00%	0.11%	0.00%	0.00%	0.00%	0.00%	2.07%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
14	FP-19190 Buckwheat, Product Code: E29N005134+	9.40	0.10	5.0	9.78%	0.00%	0.12%	0.00%	0.00%	0.00%	0.00%	2.10%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
15	FP-19191 pearl white, Product Code: E29CW101054+	9.39	0.10	5.0	9.83%	0.00%	0.12%	0.00%	0.00%	0.00%	0.00%	2.11%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
16	FP-19192 Black, Product Code: P69K00018+	9.19	0.10	5.0	1.41%	6.18%	0.09%	0.00%	0.00%	0.00%	0.00%	0.43%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
17	FP-19193 linen white, Product Code: E29CW1010514+	9.74	0.10	5.0	9.03%	0.00%	0.11%	0.00%	0.00%	0.00%	0.00%	1.94%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
18	FP-19194 antique white, Product Code: E29CW1010524+	9.40	0.10	5.0	9.80%	0.00%	0.12%	0.00%	0.00%	0.00%	0.00%	2.11%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
19	FP-19195 chiffon, Product Code: E29CW1010534+	9.39	0.10	5.0	9.83%	0.00%	0.12%	0.00%	0.00%	0.00%	0.00%	2.11%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
20	FP-19196 Buttercream, Product Code: E29V002124+	9.40	0.10	5.0	0.00%	0.00%	0.12%	0.00%	9.76%	0.00%	0.00%	2.10%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
21	FP-19197 canvas, Product Code: E29N005144+	9.76	0.10	5.0	8.92%	0.00%	0.11%	0.00%	0.00%	0.00%	0.00%	1.92%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
22	FP-19198 eggshell, Product Code: E29CW1010544+	9.39	0.10	5.0	9.75%	0.00%	0.12%	0.00%	0.00%	0.00%	0.00%	2.10%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
23	FP-19199 red, Product Code: P69R003274+	9.12	0.10	5.0	1.27%	5.60%	0.09%	0.00%	0.00%	0.00%	0.00%	0.39%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
24	FP-19200 florentine, Product Code: E29Y002134+	9.43	0.10	5.0	9.71%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
25	FP-19332 P-9355, Product Code: E29A005264+	9.71	0.10	5.0	1.29%	5.66%	0.09%	0.00%	0.00%	0.00%	0.00%	0.39%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
26	FP-19813 white peony, Product Code: E28CW1010884+	9.50	0.10	5.0	9.58%	0.00%	0.11%	0.00%	0.00%	0.00%	0.00%	2.06%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
27	FP-19878 extra white 7006, Product Code: E29CW1011754+	9.39	0.10	5.0	9.89%	0.00%	0.12%	0.00%	0.00%	0.00%	0.00%	2.05%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
28	FP-19541 gray primer, Product Code: P69A000584+	10.20	0.10	5.0	12.73%	0.13%	0.00%	0.00%	0.00%	0.00%	0.00%	4.82%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
29	HC #46 stain base, Product Code: D22C0002	6.46	0.10	5.0	0.13%	0.56%	0.00%	0.00%	0.00%	0.00%	0.00%	0.03%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.33%	0.33%
30	HC 20 sheen white RTS classic-coat, Product Code: E29W001594+	9.39	0.10	5.0	9.91%	0.00%	0.12%	0.00%	0.00%	0.00%	0.00%	2.05%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
31	HC 60 sheen white lacquer, Product Code: E28W013	8.24	0.10	5.0	2.56%	4.02%	0.00%	0.00%	0.00%	0.00%	0.00%	0.53%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
32	HC #44 stain base, Product Code: B10C0011	6.90	0.10	5.0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.35%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
33	HC acrylic glaze BS, Product Code: G37I0004	9.39	0.10	5.0	0.01%	7.71%	0.00%	0.01%	0.00%	0.00%	0.00%	0.07%	0.05%	0.00%	0.00%	0.00%	0.01%	0.00%	0.00%	0.00%	0.00%
34	HC Aristoccat catalyst, Product Code: M59C003	7.55	0.10	5.0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
35	HC Aristoccat premium #10, Product Code: E29C68104+	7.87	0.10	5.0	1.37%	0.01%	0.11%	0.00%	0.00%	0.00%	0.00%	0.35%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
36	HC Aristoccat premium #20, Product Code: E29C68204+	7.87	0.10	5.0	1.40%	0.01%	0.12%	0.00%	0.00%	0.00%	0.00%	0.36%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
37	HC Aristoccat premium #40, Product Code: E29C68404+	7.82	0.10	5.0	1.42%	0.00%	0.12%	0.00%	0.00%	0.00%	0.00%	0.36%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
38	HC Aristoccat premium #60, Product Code: E29C68604+	7.81	0.10	5.0	1.42%	0.01%	0.12%	0.00%	0.00%	0.00%	0.00%	0.36%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
39	HC Aristovar plus 20, Product Code: E29C87204+	7.87	0.10	5.0	1.11%	11.65%	0.11%	0.00%	0.00%	0.00%	0.00%	0.37%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
40	HC Aristovar plus 5, Product Code: E29C87054+	7.93	0.10	5.0	1.04%	10.97%	0.10%	0.00%	0.00%	0.00%	0.00%	0.35%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
41	HC black veiling lacquer, Product Code: E31K0011	7.16	0.10	5.0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
42	HC burnt umber dispersion anti settle, Product Code: E29N100	12.76	0.10	5.0	0.30%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.05%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
43	HC clear crackle lacquer, Product Code: L46C0072	7.26	0.10	5.0	2.77%	4.77%	0.00%	0.00%	0.00%	0.00%	0.00%	0.57%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
44	HC fawn breakaway glaze, Product Code: G36C005	10.48	0.10	5.0	1.47%	0.04%	0.00%	0.00%	0.00%	0.00%	0.00%	0.31%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
45	HC gloss con varn, Product Code: E29C07294+	7.88	0.10	5.0	1.14%	9.04%	0.10%	0.01%	0.00%	0.00%	0.00%	0.30%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
46	HC ivory breakaway glaze, Product Code: G36W003	10.60	0.10	5.0	1.44%	0.04%	0.00%	0.00%	0.00%	0.00%	0.00%	0.27%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
47	HC natural glaze, Product Code: G37I000	7.14	0.10	5.0	0.92%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.17%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
48	HC R66 aristoccat enamel clear tint base #20, Product Code: P69C0006+	9.21	0.10	5.0	2.02%	6.80%	0.19%	0.00%	0.00%	0.00%	0.00%	0.45%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
49	HC R66 HS classic-coat white pmr, Product Code: P69W00504+	10.84	0.10	5.0	2.73%	4.01%	0.07%	0.00%	0.00%	0.00%	0.00%	0.70%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
50	HC radiant stain base, Product Code: D22C014	7.24	0.10	5.0	0.33%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.06%	1.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
51	HC 40 sheen WW lacquer, Product Code: L41C046C	7.52	0.10	5.0	4.40%	8.69%	0.00%	0.00%	0.00%	0.00%	0.00%	0.86%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
52	HC RIC 18 pad stain, Product Code: S79N0311	6.75	0.10	5.0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
53	HC silver enamel, Product Code: L59Z006	7.33	0.10	5.0	0.00%	2.56%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.15%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%
54	HC trans red oxide dispersion anti settle, Product Code: E29R1014	9.91	0.10	5.0	2.08%	0.22%	0.00%	0.02%	0.00%	0.00%	0.00%	0.28%	0.02%	0.00%	0.00%	0.00%	0.02%	0.00%	0.00%	0.00%	0.00%
55	HC trans yellow oxide dispersion anti settle, Product Code: E29Y1000C	10.18	0.10	5.0	2.08%	0.02%	0.00%	0.02%	0.00%												



**Appendix A: Emissions Calculations  
VOC From Spray Gun Cleaning Operation**

**Company Name: Grabill Cabinet**  
**Source Address: 13844 Sawmill Road, Grabill, Indiana, 46741**  
**Part 70 Permit Renewal No.: T003-36722-00038**  
**Significant Source Modification No.: 003-37217-00038**  
**Reviewer: Clinton Mccrowey/Adam Wheat**

Product	Density (lbs/gal)	Material Throughput (gal/yr)*	Material Throughput (lbs/yr)	Weight % VOC	Weight % MIBK	PTE of VOC (lbs/day)	PTE of VOC (tons/yr)	PTE of MIBK (tons/yr)
Safety-Kleen Heavy Duty Lacquer Thinner	6.90	450	3,105	100.00%	60.00%	8.51	1.55	0.93

\*Based on purchase information provided by the source.

**METHODOLOGY**

Material Throughput (lbs/yr) = Density (lbs/gal) \* Material Throughput (gal/yr)

PTE of VOC (lbs/day) = Material Throughput (lbs/yr) \* Weight % VOC / 365 (days/yr)

PTE of VOC (tons/yr) = PTE of VOC (lbs/day) \* 365 (days/yr) / 2000 (tons/yr)



# Indiana Department of Environmental Management

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**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

## Notice of Public Comment

**July 29, 2016**  
**Grabill Cabinet**  
**003-36722-00038 & 003-37217-00038**

Dear Concerned Citizen(s):

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

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

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

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

Enclosure  
PN AAA Cover.dot 2/17/2016



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*Governor*

**Carol S. Comer**  
*Commissioner*

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

July 29, 2016

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

**Permit Number: 003-36722-00038 & 003-37217-00038**  
**Applicant Name: Grabill Cabinet**  
**Location: Grabill, Allen County, Indiana**

The public notice, draft permit and technical support documents can be accessed via the **IDEM Air Permits Online** site at:

<http://www.in.gov/ai/appfiles/idem-caats/>

Questions or comments on this draft permit should be directed to the person identified in the public notice by telephone or in writing to:

Indiana Department of Environmental Management  
Office of Air Quality, Permits Branch  
100 North Senate Avenue  
Indianapolis, IN 46204

Questions or comments regarding this email notification or access to this information from the EPA Internet site can be directed to Chris Hammack at [chammack@idem.IN.gov](mailto:chammack@idem.IN.gov) or (317) 233-2414.

Affected States Notification.dot 2/17/2016



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**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

July 29, 2016

Mr. Martin Heiny  
Grabill Cabinet  
13844 Sawmill Road  
Grabill, IN, 46741

Re: Public Notice  
Grabill Cabinet  
Permit Level: Part 70 Operating Permit Renewal &  
Significant Source Modification  
Permit Number: 003-36722-00038 &  
003-37217-00038

Dear Mr. Heiny:

Enclosed is a copy of your draft Part 70 Operating Permit Renewal, Significant Source Modification, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Journal Gazette in Fort Wayne, Indiana publish the abbreviated version of the public notice no later than August 2, 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 Allen County Library (Grabill Branch), 13521 State Street in Grabill, Indiana. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Adam Wheat, 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 3-8397 or dial (317) 233-8397.

Sincerely,

***Greg Hotopp***

Greg Hotopp  
Permits Branch  
Office of Air Quality

Enclosures  
PN Applicant Cover letter 2/17/2016



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**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

July 29, 2016

To: Allen County Public Library (Grabill Branch)

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: Grabill Cabinet**  
**Permit Number: 003-36722-00038 & 003-37217-00038**

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

If you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures  
PN Library.dot 2/16/2016



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**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

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

July 29, 2016

Journal Gazette  
600 W Main Street  
PO Box 100  
Fort Wayne, IN 46801

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Grabill Cabinet, Allen 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 August 2, 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 Greg Hotopp at 800-451-6027 and ask for extension 4-3493 or dial 317-234-3493.

Sincerely,

*Greg Hotopp*

Greg Hotopp  
Permit Branch  
Office of Air Quality

Permit Level: Part 70 Operating Permit Renewal & Significant Source Modification

Permit Number: 003-36722-00038 & 033-37217-00038

Enclosure

PN Newspaper.dot 2/17/2016

# Mail Code 61-53

IDEM Staff	GHOTOPP 7/29/2016 Grabill Cabinet 003-37217&36722-00038 Draft		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	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		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Martin Heiny Grabill Cabinet 13844 Sawmill Dr Grabill IN 46741 (Source CAATS)										
2		Daniel & Sandy Trimmer 15021 Yellow River Road Columbia City IN 46725 (Affected Party)										
3		Duane & Deborah Clark Clark Farms 6973 E. 500 S. Columbia City IN 46725 (Affected Party)										
4		Mr. Jeff Coburn Plumbers & Steamfitters, Local 166 2930 W Ludwig Rd Fort Wayne IN 46818-1328 (Affected Party)										
5		Grabill Town Council P.O. Box 321, 13717 First Street Grabill IN 46741 (Local Official)										
6		Allen Co. Board of Commissioners 200 E Berry Street Ste 410 Fort Wayne IN 46802 (Local Official)										
7		Fort Wayne-Allen County Health Department 200 E Berry St Suite 360 Fort Wayne IN 46802 (Health Department)										
8		Grabill Library Allen County Public Library 13521 State Street Grabill IN 46741 (Library)										
9		Peter Keck Compliance Consulting Service, Inc.. 207 Hoosier Drive, Suite #4 Angola IN 46703 (Consultant)										
10												
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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 <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> 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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