



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

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

Michael R. Pence
Governor

Carol S. Comer
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal of a
Minor Source Operating Permit (MSOP)

for Graber Cabinetry, LLC in Allen County

MSOP Renewal No.: M003-37344-00304

The Indiana Department of Environmental Management (IDEM) has received an application from Graber Cabinetry, LLC located at 15210 Grabill Rd., Grabill, Indiana 46741 for a renewal of its MSOP issued on November 2, 2006. If approved by IDEM's Office of Air Quality (OAQ), this proposed renewal would allow Graber Cabinetry, LLC to continue to operate its existing source.

This draft MSOP Renewal does not contain any new equipment that would emit air pollutants, and no conditions from previously issued permits/approvals have been changed.

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

Allen County Public Library - Grabill Branch
13521 Grabill Rd.
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 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

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

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number M003-37344-00304 in all correspondence.

Comments should be sent to:

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

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

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

What will happen after IDEM makes a decision?

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

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



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



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Carol S. Comer
Commissioner

Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

Graber Cabinetry, LLC
15210 Grabill Rd.
Grabill, Indiana 46741

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

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

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No. M003-37344-00304	
Issued by: Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:

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SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary wooden cabinet surface coating and manufacturing operation.

Source Address:	15210 Grabill Rd., Grabill, Indiana 46741
General Source Phone Number:	260-627-2243
SIC Code:	2434 (Wood Kitchen Cabinets)
County Location:	Allen
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program
	Minor Source, under PSD and Emission Offset Rules
	Minor Source, Section 112 of the Clean Air Act
	Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) Four (4) paint booths, identified as PB1, PB2 and PB3, constructed in October 1999, and PB4, constructed in April 2003, each equipped with airless spray guns, each coating a maximum of 350 square feet of wood units per hour, utilizing dry filters for particulate overspray control, and each exhausting from one stack respectively identified as P1, P2, P3, and P4;
- (b) One (1) paint booth, identified as PB5, constructed in 2006, equipped with air assisted airless spray application, coating a maximum of 0.69 wood units per hour, utilizing dry filters for particulate overspray control, and exhausting from one stack P5;
- (c) Miscellaneous saws/sanders/wood trimming equipment, with a maximum capacity of 100 pounds per hour of wood, utilizing a baghouse and cyclone collection system for particulate control and exhausting to the interior of the building;
- (d) One (1) propane unit heater with a maximum heat input rate of 0.175 MMBtu/hr;
- (e) One (1) natural gas fired air make-up unit with a maximum heat input rating of 2.9 MMBtu/hr; and
- (f) Seven (7) natural gas fired radiant tube heaters each having a maximum heat input rating of 0.15 MMBtu/hr.
- (g) One (1) natural gas fired air make-up unit with a maximum heat input rating of 1.10 MMBtu/hr.
- (h) Unpaved roads.

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, M003-37344-00304, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

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

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

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

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

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

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

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

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

The Permittee shall implement the PMPs.

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

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

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

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

The Permittee shall implement the PMPs.

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

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

- (a) All terms and conditions of permits established prior to M003-37344-00304 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

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

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the

deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

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

B.15 Inspection and Entry

[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

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

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.18 Credible Evidence [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

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

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

C.2 Permit Revocation [326 IAC 2-1.1-9]

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

C.7 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the attached plan as in Attachment A.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

(e) Procedures for Asbestos Emission Control

The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

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

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

C.9 Performance Testing [326 IAC 3-6]

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

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

no later than thirty-five (35) days prior to the intended test date.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

C.12 Instrument Specifications [326 IAC 2-1.1-11]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.

- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.13 Response to Excursions or Exceedances

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

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

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test

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

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

C.15 Malfunctions Report [326 IAC 1-6-2]

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

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

C.16 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

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

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or 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) 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.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Four (4) paint booths, identified as PB1, PB2 and PB3, constructed in October 1999, and PB4, constructed in April 2003, each equipped with airless spray guns, each coating a maximum of 350 square feet of wood units per hour, utilizing dry filters for particulate overspray control, and each exhausting from one stack respectively identified as P1, P2, P3, and P4;
- (b) One (1) paint booth, identified as PB5, constructed in 2006, equipped with air assisted airless spray application, coating a maximum of 0.69 wood units per hour, utilizing dry filters for particulate overspray control, and exhausting from one stack P5;

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

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

- (a) Pursuant to 326 IAC 6-3-2(d), particulate from paint booths PB3 through PB5 shall each be controlled by dry particulate filters and the Permittee shall operate the filters in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-10][326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), when coating wood furniture and cabinets in paint booths PB1 through PB5, the Permittee shall apply all coating material, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) or more of the following application methods:

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

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between

one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

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

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

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

D.1.4 Particulate Matter (PM)

In order to comply with Condition D.1.1, the dry particulate filters associated with each of the paint booths (PB3 through PB5) shall be in operation and control particulate emissions from the respective paint booth at all times that the respective paint booth is in operation.

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

D.1.5 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.1(b), the Permittee shall maintain a record of any actions taken if overspray is visibly detected.
- (b) To document the compliance status with Condition D.1.2, the Permittee shall maintain records of the amount coating used for touch-up and repair operations per day.
- (c) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (c) Miscellaneous saws/sanders/wood trimming equipment, with a maximum capacity of 100 pounds per hour of wood, utilizing a baghouse and cyclone collection system for particulate control and exhausting to the interior of the building;

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.2.1 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.2.2 Particulate Control

In order to assure that the woodworking operation is exempt from the requirements of 326 IAC 6-3-2, the baghouse and cyclone for particulate control shall be in operation and control emissions from the woodworking operation at all times that the woodworking operation is in operation.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	Graber Cabinetry, LLC
Address:	15210 Grabill Rd.
City:	Grabill, Indiana 46741
Phone #:	260-627-2243
MSOP #:	M003-37344-00304

I hereby certify that Graber Cabinetry, LLC is :

still in operation.

no longer in operation.

I hereby certify that Graber Cabinetry, LLC is :

in compliance with the requirements of MSOP M003-37344-00304.

not in compliance with the requirements of MSOP M003-37344-00304.

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

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a
Minor Source Operating Permit Renewal

Source Background and Description

Source Name:	Graber Cabinetry, LLC
Source Location:	15210 Grabill Rd., Grabill, IN 46741
County:	Allen
SIC Code:	2434 (Wood Kitchen Cabinets)
Permit Renewal No.:	003-37344-00304
Permit Reviewer:	Brian Wright

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Graber Cabinetry, LLC relating to the operation of a stationary wooden cabinet surface coating and manufacturing operation. On June 24, 2016, Graber Cabinetry, LLC submitted an application to the OAQ requesting to renew its operating permit. Graber Cabinetry, LLC was issued its first MSOP Renewal M003-18539-00304 on November 2, 2016.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

- (a) Four (4) paint booths, identified as PB1, PB2 and PB3, constructed in October 1999, and PB4, constructed in April 2003, each equipped with airless spray guns, each coating a maximum of 350 square feet of wood units per hour, utilizing dry filters for particulate overspray control, and each exhausting from one stack respectively identified as P1, P2, P3, and P4;
- (b) One (1) paint booth, identified as PB5, constructed in 2006, equipped with air assisted airless spray application, coating a maximum of 0.69 wood units per hour, utilizing dry filters for particulate overspray control, and exhausting from one stack P5;
- (c) Miscellaneous saws/sanders/wood trimming equipment, with a maximum capacity of 100 pounds per hour of wood, utilizing a baghouse and cyclone collection system for particulate control and exhausting to the interior of the building;
- (d) One (1) propane unit heater with a maximum heat input rate of 0.175 MMBtu/hr;
- (e) One (1) natural gas fired air make-up unit with a maximum heat input rating of 2.9 MMBtu/hr; and
- (f) Seven (7) natural gas fired radiant tube heaters each having a maximum heat input rating of 0.15 MMBtu/hr.
- (g) One (1) natural gas fired air make-up unit with a maximum heat input rating of 1.10 MMBtu/hr.
- (h) Unpaved roads.

Emission Units and Pollution Control Equipment Removed From the Source

The source has removed the following emission units:

- (b) One (1) counter top manufacturing operation, consisting of the following:
 - (1) six (6) forming tables for pouring resins;
 - (2) sanding and trimming area, utilizing an air purifier for particulate control.

- (c) Three (3) No. 1 distillate oil fuel fired heaters, identified as H1, H2, and H3, each rated at 0.125 MMBtu/hr, each exhausting at one (1) stack, identified as H1, H2, and H3, respectively;
- (d) One (1) No. 1 distillate oil fuel fired dryer, identified as D4, rated at 0.165 MMBtu/hr, exhausting at one (1) stack, identified as D4;

Existing Approvals

Since the issuance of the MSOP Renewal No. M003-37344-00304 on November 2, 2006, the source has constructed or has been operating under the following additional approvals:

- (a) Notice Only Change No. 003-26035-00304 issued on February 8, 2008.

Air Pollution Control Justification as an Integral Part of the Process

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

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

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

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

- (b) **PM_{2.5}**
Allen County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**
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

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

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.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	37.14
PM ₁₀	37.19
PM _{2.5}	37.17
SO ₂	0.01
NO _x	2.28
VOC	63.58
CO	1.88
Single HAP	9.96 Xylene
Total HAP	21.14

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

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

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is

invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHGs emissions to determine operating permit applicability or PSD applicability to a source or modification.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of all regulated pollutants is less than 100 tons per year. However, VOC is equal to or greater than twenty-five (25) tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source will be issued an MSOP Renewal.

Federal Rule Applicability

Compliance Assurance Monitoring (CAM)

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

New Source Performance Standards (NSPS)

- (b) The requirements of the New Source Performance Standard for Surface Coating of Metal Furniture, 40 CFR 60, Subpart EE (326 IAC 12), are not included in the permit, since the source does not coat metal furniture.
- (c) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Wood Furniture Manufacturing Operations, 40 CFR 63, Subpart JJ (326 IAC 20-14), are not included for this permit, since is not located at a major source for HAPs.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Plywood and Composite Wood Products, 40 CFR 63, Subpart DDDD (63.2230 through 63.2292), are not included in this permit, because the source does not engage in the manufacturing of plywood and/or composite wood products as defined in 40 CFR 63.2292. The source manufactures wood cabinets and/or wood cabinet components.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart MMMM (326 IAC 20-80), are not included in this permit, since this source is not a major source of HAPs as defined in 40 CFR 63.2 and does not perform surface coating of miscellaneous metal parts and products. The source manufactures wood cabinets and/or wood cabinet components.
- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for (Surface Coating of Plastic Parts and Products), 40 CFR 63, Subpart PPPP 326 IAC 20-81, are not included in the permit, since this source does not coat plastic parts and products and is not a major source of HAPs as defined in 40 CFR Part 63, Subpart A, §63.2. The source manufactures wood cabinets and/or wood cabinet components.
- (h) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Metal Furniture, 40 CFR 63, Subpart RRRR (326 IAC 20-78), are not included in the permit, since this source does not coat metal furniture and is not located at a plant

- site that is a major source of HAPs as defined in 40 CFR Part 63, Subpart A, §63.2. The source manufactures wood cabinets and/or wood cabinet components.
- (i) The requirements of the National Emissions Standards for Hazardous Air Pollutants (NESHAPs): Surface Coating of Wood Building Products, 40 CFR 63, Subpart QQQQ (326 IAC 20-79), are not included in the permit, since the facility does not surface coat wood building products and is not located at a major source of HAP.
 - (j) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD (326 IAC 20-95), are not included in the permit, since this source is not a major source of HAPs.
 - (k) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ (40 CFR 63.11193 through 63.11237), are not included in the permit, since the combustion units are each not considered an industrial, commercial, or institutional boiler, as defined by 40 CFR 63.11237.
 - (l) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations, 40 CFR 63, Subpart HHHHHH (63.11169 through 63.11180), are not included in the permit, since this source does not perform paint stripping using chemical strippers that contain methylene chloride in the removal of dried paint, does not perform spray application of coatings to motor vehicles or mobile equipment, and does not perform spray application of coating that contains chromium, lead, manganese, nickel, or cadmium to a plastic and/or metal substrates. The source only surface coats wood cabinets and cabinet parts.
 - (m) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)
The source is subject to 326 IAC 1-6-3.

326 IAC 2-6 (Emission Reporting)
This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, or LaPorte County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

326 IAC 5-1 (Opacity Limitations)
This source is subject to the opacity limitations specified in 326 IAC 5-1-2(1).

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

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, because the unpaved roads have potential fugitive particulate emissions less than 25 tons per year.

326 IAC 6.5 PM Limitations Except Lake County
This source is not subject to 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

326 IAC 6.8 PM Limitations for Lake County

This source is not subject to 326 IAC 6.8 because it is not located in Lake County.

326 IAC 12 (New Source Performance Standards)

See Federal Rule Applicability Section of this TSD.

326 IAC 20 (Hazardous Air Pollutants)

See Federal Rule Applicability Section of this TSD.

State Rule Applicability – Individual Facilities

Surface Coating

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

Pursuant to 326 IAC 6-3-1(b)(15), paint booths PB1 and PB2 are not subject to the requirements of 326 IAC 6-3 since the booths use less than five (5) gallons per day of surface coatings.

Pursuant to 326 IAC 6-3-1, paint booths PB3 through PB5 are each subject to the requirements of 326 IAC 6-3, since they each have the potential to use equal to or greater than five (5) gallons per day of surface coatings.

- (a) Pursuant to 326 IAC 6-3-2(d)(1), each of the paint booths (PB1 through PB5) shall be controlled by dry particulate filters, and the Permittee shall operate the filters in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

The paint booths (PB1 through PB5) are not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each of the paint booths (PB1 through PB5) are less than twenty-five (25) tons per year and each of the paint booths (PB1 through PB5) is subject to the requirements of 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating),

326 IAC 8-2-9 (Miscellaneous Metal and Plastic Coating Operations)

This source does not coat any metal surfaces. Therefore, the requirements of 326 IAC 8-2-9 are not applicable.

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

Pursuant to 326 IAC 8-2-12(a)(4), each of the paint booths (PB1 through PB5) are subject to 326 IAC 8-2-12, because each of these facilities was constructed after July 1, 1990, has potential VOC emissions before controls are greater than fifteen (15) pounds per day, and apply surface coatings to wood furnishings as defined in 326 IAC 8-2-12(a).

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), when coating wood furniture and cabinets in paint booths (PB1 through PB5), 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

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 coatings to a 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.

Each of the paint booths (PB1 through PB5) utilizes Airless Spray Application or Air Assisted Airless (air atomized) Spray Application. Therefore, the paint booths comply with this rule.

326 IAC 8-11-3 (VOC Rules: Wood Furniture Coatings)

The requirements of 326 IAC 8-11-3 are not applicable to this source, since this source is not located in Lake, Porter, Clark, or Floyd County.

There are no other 326 IAC 8 Rules that are applicable to the paint booths.

Woodworking Operation

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

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

In order to assure that the woodworking operation is exempt from the requirements of 326 IAC 6-3-2, the baghouse and cyclone for particulate control shall be in operation and control emissions from the woodworking operation at all times that the woodworking operation is in operation.

Propane and Natural Gas-Fired Combustion Units

326 IAC 6-2-1 (Particulate Emission Limitations for Sources of Indirect Heating)

The propane fired heater, and natural gas fired units are each not subject to the requirements of 326 IAC 6-2-4, since each unit is a not source of indirect heat.

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

Each of the propane fired heater, and natural gas fired units at this source are exempt from the requirements of 326 IAC 6-3, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight. In addition, pursuant to 326 IAC 6-3-1(b)(14), each of the propane fired heater and natural gas fired units at this source are also exempt from the requirements of 326 IAC 6-3, because they each have potential particulate emissions of less than five hundred fifty one thousandths (0.551) pound per hour.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

Pursuant to 326 IAC 7-1.1-1, the propane fired heater and natural gas fired units are each not subject to the requirements of 326 IAC 7-1, since each has unlimited sulfur dioxide (SO₂) emissions less than twenty-five (25) tons per year and ten (10) pounds per hour respectively.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

The propane fired heater and natural gas fired units are each not subject to the requirements of 326 IAC 8-1-6, since each has unlimited VOC potential emissions of less than twenty-five (25) tons per year.

Compliance Determination and Monitoring Requirements

- (a) The compliance determination and monitoring requirements applicable to this source are as follows:

Emission Unit	Control	Operating Parameters	Frequency
Paint Booths PB3 through PB5	Dry Filters	Visible overspray	Ongoing

The overspray monitoring is necessary because the dry filters associated with the spray booths (PB3 through PB5) must operate properly to ensure compliance with 326 IAC 6-3-2.

Recommendation

The staff recommends to the Commissioner that the MSOP 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.

An application for the purposes of this review was received on June 24, 2016.

Conclusion

The operation of this stationary wooden cabinet surface coating and manufacturing operation shall be subject to the conditions of the attached MSOP Renewal No M003-37344-00304.

IDEM Contact

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

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

**Company Name: Graber Cabinetry, LLC
Source Address: 15202 Grabill Road, Grabill, Indiana 46741
MSOP No.: M003-37344-00304
Reviewer: Brian Wright**

Uncontrolled Potential Before Integral Woodworking Controls										
Emission Units/ID	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	HAP	Worst Single HAP	
Surface Coating	36.86	36.86	36.86	0.00	0.00	63.45	0.00	21.09	9.96	Xylene
Woodworking Operation*	27.03	27.03	27.03	0.00	0.00	0.00	0.00	0.00	0.00	N/A
NG Combustion Units	0.04	0.16	0.16	0.01	2.17	0.12	1.82	0.04	0.04	Hexane
Propane Combustion Units	0.002	0.006	0.006	4.2E-05	0.11	0.008	0.06	0.00	0.00	N/A
Unpaved Roads	0.10	0.03	0.003	0.00	0.00	0.00	0.00	0.00	0.00	N/A
Total	64.03	64.09	64.06	0.01	2.28	63.58	1.88	21.14	9.96	Xylene

Uncontrolled Potential After Integral Woodworking Controls*										
Emission Units/ID	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	HAP	Worst Single HAP	
Surface Coating	36.86	36.86	36.86	0.00	0.00	63.45	0.00	21.09	9.96	Xylene
Woodworking Operation*	0.14	0.14	0.14	0.00	0.00	0.00	0.00	0.00	0.00	N/A
NG Combustion Units	0.04	0.16	0.16	0.01	2.17	0.12	1.82	0.04	0.04	Hexane
Propane Combustion Units	0.002	0.006	0.006	4.2E-05	0.11	0.008	0.06	0.00	0.00	N/A
Unpaved Roads	0.10	0.03	0.003	0.00	0.00	0.00	0.00	0.00	0.00	N/A
Total	37.14	37.19	37.17	0.01	2.28	63.58	1.88	21.14	9.96	Xylene

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

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

**Company Name: Graber Cabinetry, LLC
Source Address: 15202 Grabill Road, Grabill, Indiana 46741
MSOP No.: M003-37344-00304
Reviewer: Brian Wright**

Material	Chemical Name	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water & Exempt	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/hr)	Gal of Mat. (gal/day)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
PB1																	
Stain	Kendall Charcoal Primer	10.62	64.50%	0.0%	64.5%	0.0%	35.50%	0.20	4.80	6.85	6.85	1.37	32.88	6.00	1.65	19.30	50%
Stain	Brushmark Chiflon	11.56	13.83%	0.0%	13.8%	0.0%	86.17%	0.20	4.80	1.60	1.60	0.32	7.67	1.40	4.36	1.86	50%
PTE of Worst Case Coating									4.80			1.37	32.88	6.00	4.36		
PB2																	
Stain	Kendall Charcoal Primer	10.62	64.50%	0.0%	64.5%	0.0%	35.50%	0.20	4.80	6.85	6.85	1.37	32.88	6.00	1.65	19.30	50%
Stain	Brushmark Chiflon	11.56	13.83%	0.0%	13.8%	0.0%	86.17%	0.20	4.80	1.60	1.60	0.32	7.67	1.40	4.36	1.86	50%
PTE of Worst Case Coating									4.80			1.37	32.88	6.00	4.36		
PB3																	
Sealer	Kingsport Gray Primer	10.65	64.98%	0.0%	65.0%	0.0%	35.02%	0.62	14.78	6.92	6.92	4.26	102.31	18.67	5.03	19.76	50%
Sealer	HC R66 White	10.67	36.55%	0.0%	36.6%	0.0%	63.45%	0.62	14.78	3.90	3.90	2.40	57.66	10.52	9.13	6.15	50%
PTE of Worst Case Coating									14.78			4.26	102.31	18.67	9.13		
PB4																	
Finish	Kingsport Gray HC-86	8.08	60.27%	0.0%	60.3%	0.0%	39.73%	0.74	17.76	4.87	4.87	3.60	86.49	15.78	5.20	12.26	50%
Finish	White Dispersion	12.40	24.27%	0.0%	24.3%	0.0%	75.73%	0.74	17.76	3.01	3.01	2.23	53.45	9.75	15.22	3.97	50%
Catalyst	Aristocrat Catalyst	7.58	77.48%	0.0%	77.5%	0.0%	22.52%	0.16	3.72	5.87	5.87	0.91	21.85	3.99	0.58	26.08	50%
Catalyst	PreCat 20	7.73	75.16%	0.0%	75.2%	0.0%	24.84%	0.16	3.72	5.81	5.81	0.90	21.61	3.94	0.65	23.39	50%
PTE of Worst Case Coatings									21.48			4.51	108.34	19.77	15.87		
Solvent Usage																	
Solvent	Aristocoat Reducer	7.37	100.00%	0.0%	100.0%	0.0%	0.00%	0.09	2.14	7.37	7.37	0.66	15.74	2.87	0.00	0.00	50%
PB5																	
Glaze	Natural Clear Glaze	7.14	73.67%	0.0%	73.7%	0.0%	26.33%	0.44	10.56	5.26	5.26	2.31	55.55	10.14	1.81	19.98	50%
Glaze	Burnt Umber Glaze	7.93	59.02%	0.0%	59.02%	0.0%	40.98%	0.44	10.56	4.68	4.68	2.06	49.42	9.02	3.13	11.42	50%
PTE of Worst Case Coating									10.56			2.31	55.55	10.14	3.13		
Total PTE (all paint booths)												14.49	347.69	63.45	36.86		

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used
*Acetone is not a VOC or HAP

**TSD Appendix A: Emissions Calculations
HAP Emission Calculations
From Surface Coating Operations**

**Company Name: Graber Cabinetry, LLC
Source Address: 15202 Grabill Road, Grabill, Indiana 46741
MSOP No.: M003-37344-00304
Reviewer: Brian Wright**

Material	Chemical Name	Density (Lb/Gal)	Gallons of Material (gal/hr)	Weight % Xylene	Weight % Toluene	Weight % Ethyl Benzene	Weight % Formaldehyde	Weight % Methanol	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Methanol Emissions (ton/yr)	Total HAPs (ton/yr)
PB1														
Stain	Kendall Charcoal Primer	10.62	0.20	22.50%	1.00%	10.00%	0.00%	0.00%	2.09	0.09	0.93	0.00	0.00	3.12
Stain	Linen White	9.47	0.20	3.50%	0.00%	1.00%	1.00%	0.00%	0.29	0.00	0.08	0.08	0.00	0.46
PTE of Worst Case Coating									2.09	0.09	0.93	0.08	0.00	3.12
PB2														
Stain	Kendall Charcoal Primer	10.62	0.20	22.50%	1.00%	10.00%	0.00%	0.00%	2.09	0.09	0.93	0.00	0.00	3.12
Stain	Linen White	9.47	0.20	3.50%	0.00%	1.00%	1.00%	0.00%	0.29	0.00	0.08	0.08	0.00	0.46
PTE of Worst Case Coating									2.09	0.09	0.93	0.08	0.00	3.12
PB3														
Sealer	Caliente Primer	10.10	0.62	13.50%	1.00%	10.00%	0.00%	0.00%	3.70	0.27	2.74	0.00	0.00	6.72
Sealer	HC R66 HS	10.85	0.62	3.50%	10.00%	1.00%	0.00%	0.00%	1.03	2.95	0.29	0.00	0.00	4.27
PTE of Worst Case Coating									3.70	2.95	2.74	0.00	0.00	6.72
PB4														
Finish	Peacock Blue	11.77	0.74	0.00%	10.00%	1.00%	1.00%	0.00%	0.00	3.81	0.38	0.38	0.00	4.58
Finish	Softer Tan	11.77	0.74	3.50%	0.00%	0.00%	1.00%	0.00%	1.34	0.00	0.00	0.38	0.00	1.72
Catalyst	PreCat 20	7.73	0.16	13.50%	10.00%	1.00%	0.00%	0.00%	0.73	0.54	0.05	0.00	0.00	1.33
PTE of Worst Case Coatings									2.07	4.36	0.44	0.38	0.00	5.91
Solvent Usage														
Solvent	HC Wash Thinner	7.05	0.09	0.00%	10.00%	0.00%	0.00%	10.00%	0.00	0.28	0.00	0.00	0.28	0.56
PB5														
Glaze	Burnt Umber Glaze	7.93	0.44	0.00%	0.00%	1.00%	0.00%	10.00%	0.00	0.00	0.15	0.00	1.53	1.68
Total PTE (all paint booths)									9.96	7.77	5.19	0.55	1.81	21.09

Methodology

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

"Worst Case" Individual HAP (ton/yr) = Worst Case coating for Booth 1 (tons/year) + Worst Case Coating for Booth 2 (tons/year)

*Acetone is not a VOC or HAP

**TSD Appendix A: Emissions Calculations
Woodworking Operation (WO1)**

**Company Name: Graber Cabinetry, LLC
Source Address: 15202 Grabill Road, Grabill, Indiana 46741
MSOP No.: M003-37344-00304
Reviewer: Brian Wright**

Process Throughput Weight (tons/hr)	Design Maximum Air Flow Rate (acfm)	Overall Control Efficiency Rating	Design Outlet Grain Loading (gr/acf)	Potential Particulate After Controls (lb/hr)*	Potential Particulate After Controls (tons/year)*	Potential Particulate Before Controls (lb/hr)*	Potential Particulate Before Controls (tons/year)*
0.1	1200	99.50%	0.003	0.03	0.14	6.17	27.03

Methodology

Potential Particulate After Controls (lb/hr) = Air Flow Rate (acfm) x Grain Loading (gr/acf) x 60 (minutes/hour) x (1 lb/7000 grains)
 Potential Particulate After Controls (tons/year) = Potential Particulate After Controls (lb/hr) x 8760 (hr/year) x (1 ton/2000 lbs)
 Potential Particulate Before Controls (lb/hr) = Potential Particulate After Controls (lb/hr) x (1 - control efficiency)
 Potential Particulate Before Controls (tons/year) = Potential Particulate Before Controls (lb/hr) x 8760 (hr/year) x (1 ton/2000 lbs)

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

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

Company Name: Graber Cabinetry, LLC
Source Address: 15202 Grabill Road, Grabill, Indiana 46741
MSOP No.: M003-37344-00304
Reviewer: Brian Wright

Unit	# of units	Heat Input Capacity MMBtu/hr per unit	Total MMBtu/hr
air make-up unit	1	2.9	2.9
tube heater	7	0.15	1.05
air make-up unit	1	1.1	1.1
Total:			5.05

HHV mmscf	Potential Throughput (MMCF/yr)
1020	43.4

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	0.04	0.16	0.16	0.01	2.17	0.12	1.82

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

Methodology

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

Hazardous Air Pollutants (HAPs)	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.80	3.4E-03
Potential Emission in tons/yr	4.6E-05	2.6E-05	1.6E-03	0.04	7.4E-05

Hazardous Air Pollutants (HAPs)	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.1E-05	2.4E-05	3.0E-05	8.2E-06	4.6E-05

Total: 0.04

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
LPG-Propane - Industrial Boilers
(Heat input capacity: > 10 MMBtu/hr and < 100 MMBtu/hr)

Company Name: Graber Cabinetry, LLC
Source Address: 15202 Grabill Road, Grabill, Indiana 46741
MSOP No.: M003-37344-00304
Reviewer: Brian Wright

Heat Input Capacity Potential Throughput
MMBtu/hr kgals/year
0.175 16.8

SO₂ Emission factor = 0.10 x S
S = Sulfur Content = 0.05 grains/100ft³

	Pollutant						
	PM*	PM10*	direct PM2.5**	SO ₂	NO _x	VOC	CO
Emission Factor in lb/kgal	0.2	0.7	0.7	0.0 (0.10S)	13.0	1.0 **TOC value	7.5
Potential Emission in tons/yr	0.002	0.006	0.006	4.2E-05	0.11	0.01	0.06

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

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

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

Methodology

1 gallon of LPG has a heating value of 94,000 Btu

1 gallon of propane has a heating value of 91,500 Btu (use this to convert emission factors to an energy basis for propane)

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

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

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

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

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

TSD Appendix A: Emissions Calculations
Fugitive Dust Emissions - Unpaved Roads

Company Name: Graber Cabinetry, LLC
 Source Address: 15202 Grabill Road, Grabill, Indiana 46741
 MSOP No.: M003-37344-00304
 Reviewer: Brian Wright

Unpaved Roads at Industrial Site

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

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
16 ft. delivery truck (entering plant) (one-way trip)	1.0	1.0	1.0	1.0	1.0	500	0.095	0.1	34.6
16 ft. delivery truck (leaving plant) (one-way trip)	1.0	1.0	1.0	1.0	1.0	500	0.095	0.1	34.6
24 ft. delivery truck (entering plant) (one-way trip)	1.0	1.0	1.0	2.0	2.0	500	0.095	0.1	34.6
24 ft. delivery truck (leaving plant) (one-way trip)	1.0	1.0	1.0	2.0	2.0	500	0.095	0.1	34.6
Totals			4.0		6.0			0.4	138.3

Average Vehicle Weight Per Trip = $\frac{1.5}{0.09}$ tons/trip
 Average Miles Per Trip = $\frac{0.09}{1.5}$ miles/trip

Unmitigated Emission Factor, Ef = $k \left[\frac{s}{12} \right]^a \left[\frac{W}{3} \right]^b$ (Equation 1a from AP-42 13.2.2)

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	6.0	6.0	6.0	
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)
W =	1.5	1.5	1.5	tons = average vehicle weight (provided by source)
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = $E * \left[\frac{365 - P}{365} \right]$ (Equation 2 from AP-42 13.2.2)

Mitigated Emission Factor, Eext = $E * \left[\frac{365 - P}{365} \right]$
 where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	2.21	0.59	0.06	lb/mile
Mitigated Emission Factor, Eext =	1.45	0.39	0.04	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
16 ft. delivery truck (entering plant) (one-way trip)	0.04	0.01	0.001	0.03	0.01	0.001
16 ft. delivery truck (leaving plant) (one-way trip)	0.04	0.01	0.001	0.03	0.01	0.001
24 ft. delivery truck (entering plant) (one-way trip)	0.04	0.01	0.001	0.03	0.01	0.001
24 ft. delivery truck (leaving plant) (one-way trip)	0.04	0.01	0.001	0.03	0.01	0.001
Totals	0.15	0.04	0.004	0.10	0.03	0.003

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
 Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
 Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
 Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
 Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
 Unmitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Unmitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
 Mitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Mitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
 Controlled PTE (tons/yr) = (Mitigated PTE (tons/yr)) * (1 - Dust Control Efficiency)

Abbreviations

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



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

Notice of Public Comment

October 3, 2016
Graber Cabinetry, LLC
003-37344-00304

Dear Concerned Citizen(s):

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

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

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

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

Enclosure
PN AAA Cover.dot 2/17/2016



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Michael R. Pence
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Carol S. Comer
Commissioner

October 3, 2016

Mr. Solomon Graber
Graber Cabinetry, LLC
15210 Grabill Road
Grabill, IN 46471

Re: Public Notice
Graber Cabinetry, LLC
Permit Level: MSOP Renewal
Permit Number: 003-37344-00304

Dear Mr. Graber:

Enclosed is a copy of your draft Minor Source Operating Permit Renewal, 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 October 5, 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 Public Library – Grabill Branch, 13521 Grabill Road 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 Brian Wright, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-6544 or dial (317) 234-6544.

Sincerely,

Greg Hotopp

Greg Hotopp
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 2/17/2016



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October 3, 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: Graber Cabinetry, LLC
Permit Number: 003-37344-00304

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

October 3, 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 Graber Cabinetry, LLC, 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 October 5, 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: Minor Source Operating Permit Renewal
Permit Number: 003-37344-00304

Enclosure

PN Newspaper.dot 2/17/2016

Mail Code 61-53

IDEM Staff	GHOTOPP 10/3/2016 Graber Cabinetry LLC 003-37344-00304 Draft		Type of Mail: CERTIFICATE OF MAILING ONLY	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		Solomon Graber Graber Cabinetry LLC 15210 Grabill Rd Grabill IN 46471 (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 Grabill Road Grabill IN 46741 (Library)										
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