NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

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

for Kountry Wood Products, LLC in Elkhart County

Significant Source Modification No.: 039-38680-00714

The Indiana Department of Environmental Management (IDEM) has received an application from Kountry Wood Products, LLC, located at 352 Shawnee St, Nappanee, Indiana 46550, for a significant modification of its Part 70 Operating Permit issued on September 19, 2016. If approved by IDEM’s Office of Air Quality (OAQ), this proposed modification would allow Kountry Wood Products, LLC to make certain changes at its existing source. Kountry Wood Products, LLC has applied to replacing the pigmented sealer and topcoat DANSPEED KW-L122-0002 with DANSPEED L122-0006 in the automated cabinet finishing line, including the following equipment: the sealer line SL1, the topcoat line TL1, the touchup booth TB1, the topcoat line TL2, and the touchup booth TB2.

This draft significant source modification does not contain any new equipment that would emit air pollutants; however, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I. This notice fulfills the public notice procedures to which those conditions are subject. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow for these changes.

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

Nappanee Public Library
157 N Main St
Nappanee, IN 46550

and

IDEM Northern Regional Office
300 North Dr. Martin Luther King Jr. Boulevard, Suite 450
South Bend, IN 46601-1295

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

How can you participate in this process?

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

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

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM’s mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SSM 039-38680-00714 in all correspondence.

Comments should be sent to:

Natalie Moore  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for extension 3-8279  
Or dial directly: (317) 233-8279  
Fax: (317) 232-6749 attn: Natalie Moore  
E-mail: NMoore@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 Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens’ Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

What will happen after IDEM makes a decision?

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

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

Nathan C. Bell, Section Chief  
Permits Branch  
Office of Air Quality
Mr. Dan Mains  
Kountry Wood Products, LLC  
352 Shawnee St  
Nappanee, IN 46550

Re: 039-38680-00714  
Significant Source Modification

Dear Mr. Mains:

Kountry Wood Products, LLC was issued Part 70 Operating Permit Renewal No. T039-36799-00714 on September 19, 2016 for a stationary kitchen cabinet manufacturing plant located at 352 Shawnee St, Nappanee, Indiana 46550. An application to modify the source was received on June 12, 2017. Pursuant to the provisions of 326 IAC 2-7-10.5, a Significant Source Modification is hereby approved as described in the attached Technical Support Document.

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

(a) One (1) automated cabinet finishing line, constructed in 2011 and modified in 2016, including the following equipment:

(1) one (1) stain line, constructed in 2011 and modified in 2016, identified as STL1, with a maximum capacity of 500 cabinets per hour, utilizing computer controlled air-assisted airless spray method of application, controlled by dry filters, and exhausting through Stack ACL1.

(2) one (1) sealer line, constructed in 2011, modified in 2016, and approved for modification in 2017 to change coatings, identified as SL1, with a maximum capacity of 500 cabinets per hour, utilizing computer controlled air-assisted airless spray method of application, controlled by dry filters, and exhausting through Stack ACL5.

(3) one (1) topcoat line, constructed in 2011, modified in 2016, and approved for modification in 2017 to change coatings, identified as TL1, with a maximum capacity of 500 cabinets per hour, utilizing computer controlled air-assisted airless spray method of application, controlled by dry filters, and exhausting through Stack ACL11.

(4) one (1) touchup booth, constructed in 2011, modified in 2016, and approved for modification in 2017 to change coatings, identified as TB1, with a maximum capacity of 50 cabinets per hour, utilizing handheld HVLP method of application, controlled by dry filters, and exhausting through Stack TBS1.

(5) one (1) topcoat line, constructed in 2016 and approved for modification in 2017 to change coatings, identified as TL2, with a maximum capacity of 500 cabinets per hour, utilizing computer controlled air-assisted airless spray method of application, controlled by dry filters, and exhausting through Stack TL2S.

(6) one (1) touchup booth, constructed in 2016 and approved for modification in 2017 to change coatings, identified as TB2, with a maximum capacity of 50 cabinets per hour, utilizing handheld HVLP method of application, controlled by dry filters, and exhausting through Stack TB2S.
Acetone is used as a cleanup solvent, with the spent acetone recycled in the solvent recycling collection unit (SR1).

Under the Wood Furniture Manufacturing NESHAP (40 CFR 63 Subpart JJ), the automated cabinet finishing line, is considered part of the existing affected source.

The following construction conditions are applicable to the proposed modification:

**General Construction Conditions**

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

2. This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

**Effective Date of the Permit**

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

**Commenced Construction**

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(j), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

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

**Approval to Construct and Operate**

6. Pursuant to 326 IAC 2-7-10.5(h)(2) this Significant Source Modification authorizes the construction of the new emission unit(s) when the Significant Source Modification has been issued. Pursuant to 326 IAC 2-7-12, the application for the Minor Permit Modification authorizes the operation of the new emission unit(s) upon submittal.

Operating conditions shall be incorporated into the Part 70 Operating Permit as an Administrative Amendment in accordance with 326 IAC 2-7-10.5(m)(1) and 326 IAC 2-7-11 (Administrative Amendment).

A copy of the permit is available on the Internet at: [http://www.in.gov/ai/appfiles/idem-caats/](http://www.in.gov/ai/appfiles/idem-caats/). For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: [http://www.in.gov/idem/airquality/2356.htm](http://www.in.gov/idem/airquality/2356.htm); and the Citizens’ Guide to IDEM on the Internet at: [http://www.in.gov/idem/6900.htm](http://www.in.gov/idem/6900.htm).

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.
DRAFT

If you have any questions on this matter, please contact Natalie Moore of my staff, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, or call at (800) 451-6027, and ask for Natalie Moore or extension 3-8279 or dial (317) 233-8279.

Sincerely,

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

Attachments: Significant Source Modification and Technical Support Document

NB/NM

cc: File - Elkhart County
Elkhart County Health Department
U.S. EPA, Region 5
Compliance and Enforcement Branch
IDEM Northern Regional Office
Significant Source Modification
to a Part 70 Source

OFFICE OF AIR QUALITY

Kountry Wood Products, LLC
352 Shawnee Street
Nappanee, Indiana 46550

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

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

Significant Source Modification No.: 039-38680-00714

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

Issuance Date:
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Attachment B: National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines [40 CFR 63, Subpart ZZZZ]
SECTION A  SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1  General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary wood processing and finishing plant (kitchen cabinet manufacturing).

<table>
<thead>
<tr>
<th>Source Address:</th>
<th>352 Shawnee Street, Nappanee, Indiana 46550</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Source Phone Number:</td>
<td>574-773-5673</td>
</tr>
<tr>
<td>SIC Code:</td>
<td>2434, 2499</td>
</tr>
<tr>
<td>County Location:</td>
<td>Elkhart</td>
</tr>
<tr>
<td>Source Location Status:</td>
<td>Attainment for all criteria pollutants</td>
</tr>
<tr>
<td>Source Status:</td>
<td>Part 70 Operating Permit Program</td>
</tr>
<tr>
<td></td>
<td>Major Source, under PSD Rules</td>
</tr>
<tr>
<td></td>
<td>Major Source, Section 112 of the Clean Air Act</td>
</tr>
<tr>
<td></td>
<td>Not 1 of 28 Source Categories</td>
</tr>
</tbody>
</table>

A.2  Emission Units and Pollution Control Equipment Summary

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

(a) One (1) automated cabinet finishing line, constructed in 2011 and modified in 2016, including the following equipment:

(1) one (1) stain line, constructed in 2011 and modified in 2016, identified as STL1, with a maximum capacity of 500 cabinets per hour, utilizing computer controlled air-assisted airless spray method of application, controlled by dry filters, and exhausting through Stack ACL1.

(2) one (1) sealer line, constructed in 2011, modified in 2016, and approved for modification in 2017 to change coatings, identified as SL1, with a maximum capacity of 500 cabinets per hour, utilizing computer controlled air-assisted airless spray method of application, controlled by dry filters, and exhausting through Stack ACL5.

(3) one (1) topcoat line, constructed in 2011, modified in 2016, and approved for modification in 2017 to change coatings, identified as TL1, with a maximum capacity of 500 cabinets per hour, utilizing computer controlled air-assisted airless spray method of application, controlled by dry filters, and exhausting through Stack ACL11.

(4) one (1) touchup booth, constructed in 2011, modified in 2016, and approved for modification in 2017 to change coatings, identified as TB1, with a maximum capacity of 50 cabinets per hour, utilizing handheld HVLP method of application, controlled by dry filters, and exhausting through Stack TBS1.

(5) one (1) topcoat line, constructed in 2016 and approved for modification in 2017 to change coatings, identified as TL2, with a maximum capacity of 500 cabinets per hour, utilizing computer controlled air-assisted airless spray method of application, controlled by dry filters, and exhausting through Stack TL2S.
(6) one (1) touchup booth, constructed in 2016 and approved for modification in 2017 to change coatings, identified as TB2, with a maximum capacity of 50 cabinets per hour, utilizing handheld HVLP method of application, controlled by dry filters, and exhausting through Stack TB2S.

Acetone is used as a cleanup solvent, with the spent acetone recycled in the solvent recycling collection unit (SR1).

Under the Wood Furniture Manufacturing NESHAP (40 CFR 63 Subpart JJ), the automated cabinet finishing line, is considered part of the existing affected source.

(b) Woodworking operations, identified as WW1, constructed in 2011 and approved in 2016 for modification, consisting of various woodworking equipment, with a combined maximum process weight rate of 2500 pounds of wood per hour, with particulate matter emissions controlled by one (1) cyclone in series with a baghouse, identified as DC1, one (1) cyclone in series with a baghouse, identified as DC2, and baghouses DC3, DC4, and DC5, and each exhausting indoors or through stacks DC1S through DC5S, respectively.

A.3 Specifically Regulated Insignificant Activities

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

(a) One (1) cold cleaner degreaser parts washing tank, approved in 2016 for construction, identified as PW1, not utilizing a remote solvent reservoir, using a maximum of no more than 145 gallons of degreasing solvent per year, uncontrolled, and exhausting to the atmosphere. [326 IAC 8-3]

(b) One (1) spent acetone solvent recycling collection unit, approved in 2016 for construction, identified as SR1, with a maximum rated capacity of 58,035 gallons per year, uncontrolled, and exhausting to the atmosphere. The waste from the unit is shipped offsite for waste processing with the clean solvent returning to the process. [326 IAC 2-2]

(c) Ten (10) natural gas-fired hot water heaters, constructed in 2011, identified as HW1 through HW10, with a combined total heat input capacity of 4.062 MMBtu/hr. [326 IAC 6-2]

(d) One (1) natural gas-fired hot water heater, approved for construction in 2016, identified as HW11, with a total heat input capacity of 1.75 MMBtu/hr. [326 IAC 6-2]

(e) One (1) panel brush cleaner (scuffer/denibber), constructed in 2011, associated with the stain line, with a maximum capacity of 500 parts/hr, controlled by a cyclone in series with a baghouse (DC1), and exhausting through stack DCS1. [326 IAC 2-2]

(f) One (1) panel brush cleaner (scuffer/denibber), constructed in 2011, associated with the sealer line, with a maximum capacity of 500 parts/hr, controlled by a cyclone in series with a baghouse (DC1), and exhausting through stack DCS1. [326 IAC 2-2]

(g) One (1) panel brush cleaner (scuffer/denibber), approved in 2016 for construction, identified as PBC1, with a maximum capacity of 500 parts/hr, controlled by a cyclone in series with a baghouse (DC1), and exhausting through stack DCS1. [326 IAC 2-2]

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

This stationary source also includes the following other insignificant activities which are not specifically regulated, as defined in 326 IAC 2-7-1(21):
(a) One (1) natural gas-fired air make-up unit, constructed in 2011, identified as AM1, with total heat input capacity of 5.775 MMBtu/hr.

(b) One (1) natural gas-fired air make-up unit, approved in 2016 for construction, identified as AM2, with a total heat input capacity of 1.925 MMBtu/hr.

(c) Three (3) natural gas-fired radiant space heaters, constructed in 2011, identified as RH1 through RH3, with a combined total heat input capacity of 0.455 MMBtu/hr.

(d) Three (3) natural gas-fired thermocycler space heaters, approved in 2016 for construction, identified as TC1 through TC3, with a combined total heat input capacity of 1.6 MMBtu/hr.

(e) One (1) aqueous adhesive application operation, approved in 2016 for construction, identified as AA1, using flow coating for application, with a maximum capacity to coat 500 wood panels/cabinets per hour, uncontrolled, and exhausting to the atmosphere.

(f) One (1) panel brush cleaner (scuffer/denibber), approved in 2016 for construction, identified as PBC2, with a maximum capacity of 500 parts/hr, using dry fabric filters as control, and exhausting to the atmosphere.

(g) One (1) natural gas-fired emergency generator, manufactured in 1987, approved for installation in 2014, identified as EG1, with a maximum capacity of 160 hp, using no controls, and exhausting to the atmosphere.

Under 40 CFR 63, NESHAP Subpart ZZZZ, this is an existing affected unit.

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

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

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

(c) It is an affected source under Title IV (Acid Deposition Control) of the Clean Air Act, as defined in 326 IAC 2-7-1(3);
SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, T039-36799-00714, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit or of permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control).

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

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

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

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

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

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

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

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

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

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U.S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.
B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:

(1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and

(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) A "responsible official" is defined at 326 IAC 2-7-1(35).

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

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source’s compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

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

and

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

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.
The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

1. Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

2. A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

3. Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

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

1. Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

2. A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

3. Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation
Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the
PMP requirements of 326 IAC 1-6-3 for that unit.

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

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an
action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an
action brought for noncompliance with a technology-based emission limitation if the
affirmative defense of an emergency is demonstrated through properly signed,
contemporaneous operating logs or other relevant evidence that describe the following:

1. An emergency occurred and the Permittee can, to the extent possible, identify
   the causes of the emergency;

2. The permitted facility was at the time being properly operated;

3. During the period of an emergency, the Permittee took all reasonable steps to
   minimize levels of emissions that exceeded the emission standards or other
   requirements in this permit;

4. For each emergency lasting one (1) hour or more, the Permittee notified IDEM,
   OAQ or Northern Regional Office within four (4) daytime business hours after
   the beginning of the emergency, or after the emergency was discovered or
   reasonably should have been discovered;

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

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

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

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

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

   A description of the emergency;

   Any steps taken to mitigate the emissions; and

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

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

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

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

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to
be false, or in the exercise of reasonable care should have been known to be false, at the
time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including
the authority of the U.S. EPA under Section 303 of the Clean Air Act;
(2) The liability of the Permittee for any violation of applicable requirements prior to
or at the time of this permit’s issuance;
(3) The applicable requirements of the acid rain program, consistent with Section
408(a) of the Clean Air Act; and
(4) The ability of U.S. EPA to obtain information from the Permittee under Section
114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2)
(Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading
based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until
after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM,
OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

(a) All terms and conditions of permits established prior to T039-36799-00714 and issued
pursuant to permitting programs approved into the state implementation plan have been
either:
(1) incorporated as originally stated,
(2) revised under 326 IAC 2-7-10.5, or
(3) deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this permit, all previous
registrations and permits are superseded by this Part 70 operating permit, except for
permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition
Control)

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

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

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

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause.
The filing of a request by the Permittee for a Part 70 Operating Permit modification,
revocation and reissuance, or termination, or of a notification of planned changes or
anticipated noncompliance does not stay any condition of this permit.
[326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that
meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by
326 IAC 2-7-1(35).
(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

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

Request for renewal shall be submitted to:

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

(b) A timely renewal application is one that is:

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

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

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source’s failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.
B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12] [40 CFR 72]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Pursuant to 326 IAC 2-7-11(b) and 326 IAC 2-7-12(a), administrative Part 70 operating permit amendments and permit modifications for purposes of the acid rain portion of a Part 70 permit shall be governed by regulations promulgated under Title IV of the Clean Air Act. [40 CFR 72]

(c) Any application requesting an amendment or modification of this permit shall be submitted to:

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

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

(d) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

(a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (c) without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:
(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(37)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

1. A brief description of the change within the source;
2. The date on which the change will occur;
3. Any change in emissions; and
4. Any permit term or condition that is no longer applicable as a result of the change.

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

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.
(f) This condition does not apply to emission trades of SO₂ or NOₓ under 326 IAC 21 or 326 IAC 10-4.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]
A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]
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 Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]
(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

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

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

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

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Advanced Source Modification Approval [326 IAC 2-7-5(15)] [326 IAC 2-7-10.5]

(a) The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.

(b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

B.25 Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314] [326 IAC 1-1-6]

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

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

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

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

C.2 Opacity  [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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

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

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

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

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

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

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

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

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

2. If there is a change in the following:
   (A) Asbestos removal or demolition start date;
   (B) Removal or demolition contractor; or
   (C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

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

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

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.
Testing Requirements [326 IAC 2-7-6(1)]

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

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

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

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

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

(a) For new units:

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.

(b) For existing units:

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

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

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

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

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

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

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

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(11)] [40 CFR 68]

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

C.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

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.
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.15 Actions Related to Noncompliance Demonstrated by a Stack Test \[326 \text{ IAC } 2-7-5\][326 \text{ IAC } 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.

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

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

Record Keeping and Reporting Requirements  \[326 \text{ IAC } 2-7-5(3)\] [326 \text{ IAC } 2-7-19]

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

Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

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

The statement must be submitted to:

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

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2][326 IAC 2-3]

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

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

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

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

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

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

(c) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A), 326 IAC 2-2-8 (b)(6)(B), 326 IAC 2-3-2 (l)(6)(A), and/or 326 IAC 2-3-2 (l)(6)(B)) that a “project” (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a “major modification” (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(yy)) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:

(1) Before beginning actual construction of the “project” (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, document and maintain the following records:

(A) A description of the project.

(B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.

(C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:

(i) Baseline actual emissions;
(ii) Projected actual emissions;
(iii) Amount of emissions excluded under section
(d) If there is a reasonable possibility (as defined in 326 IAC 2-2-8(b)(6)(A) and/or 326 IAC 2-3-2(l)(6)(A)) that a "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:

1. Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and

2. Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

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

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(b) The address for report submittal is:

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

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.
(e) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (oo) and/or 326 IAC 2-3-1 (jj)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:

1. The annual emissions, in tons per year, from the project identified in (c)(1) in Section C - General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (ww) and/or 326 IAC 2-3-1 (pp), for that regulated NSR pollutant, and

2. The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).

(f) The report for project at an existing emissions unit shall be submitted no later than sixty (60) days after the end of the year and contain the following:

1. The name, address, and telephone number of the major stationary source.

2. The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.

3. The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).

4. Any other information that the Permittee wishes to include in this report such as an explanation as to why the emissions differ from the preconstruction projection.

Reports required in this part 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

(g) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C - General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

**Stratospheric Ozone Protection**

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

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with applicable standards for recycling and emissions reduction.
SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-7-5(15)]: Automated Cabinet Finishing Line

(a) One (1) automated cabinet finishing line, constructed in 2011 and modified in 2016, including the following equipment:

(1) one (1) stain line, constructed in 2011 and modified in 2016, identified as STL1, with a maximum capacity of 500 cabinets per hour, utilizing computer controlled air-assisted airless spray method of application, controlled by dry filters, and exhausting through Stack ACL1.

(2) one (1) sealer line, constructed in 2011, modified in 2016, and approved for modification in 2017 to change coatings, identified as SL1, with a maximum capacity of 500 cabinets per hour, utilizing computer controlled air-assisted airless spray method of application, controlled by dry filters, and exhausting through Stack ACL5.

(3) one (1) topcoat line, constructed in 2011, modified in 2016, and approved for modification in 2017 to change coatings, identified as TL1, with a maximum capacity of 500 cabinets per hour, utilizing computer controlled air-assisted airless spray method of application, controlled by dry filters, and exhausting through Stack ACL11.

(4) one (1) touchup booth, constructed in 2011, modified in 2016, and approved for modification in 2017 to change coatings, identified as TB1, with a maximum capacity of 50 cabinets per hour, utilizing handheld HVLP method of application, controlled by dry filters, and exhausting through Stack TBS1.

(5) one (1) topcoat line, constructed in 2016 and approved for modification in 2017 to change coatings, identified as TL2, with a maximum capacity of 500 cabinets per hour, utilizing computer controlled air-assisted airless spray method of application, controlled by dry filters, and exhausting through Stack TL2S.

(6) one (1) touchup booth, constructed in 2016 and approved for modification in 2017 to change coatings, identified as TB2, with a maximum capacity of 50 cabinets per hour, utilizing handheld HVLP method of application, controlled by dry filters, and exhausting through Stack TB2S.

Acetone is used as a cleanup solvent, with the spent acetone recycled in the solvent recycling collection unit (SR1).

Under the Wood Furniture Manufacturing NESHAP (40 CFR 63 Subpart JJ), the automated cabinet finishing line, is considered part of the existing affected source.

The following specifically regulated insignificant activities, as defined in 326 IAC 2-7-1(21):

(b) One (1) spent acetone solvent recycling collection unit, approved in 2016 for construction, identified as SR1, with a maximum rated capacity of 58,035 gallons per year, uncontrolled, and exhausting to the atmosphere. The waste from the unit is shipped offsite for waste processing with the clean solvent returning to the process. [326 IAC 2-2]

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)
Emission Limitations and Standards [326 IAC 2-7-5(1)]

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

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), when applying surface coatings to wood furniture and cabinets in the automated cabinet finishing line, 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.1.2 Prevention of Significant Deterioration (PSD) Minor Limit for Volatile Organic Compound (VOC) [326 IAC 2-2]

(a) In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the total input of volatile organic compounds (VOC), including coatings, dilution solvents, and cleaning solvents, at the stain line (STL1), sealer line (SL1), topcoat line (TL1), touchup booth (TB1), and the solvent recycling collection unit (SR1) shall not exceed 249 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The amount of VOC in waste shipped offsite may be deducted from the reported monthly VOC input.

Compliance with this emission limit shall limit VOC emissions from the stain line (STL1), sealer line (SL1), topcoat line (TL1), touchup booth (TB1), and the solvent recycling collection unit (SR1) to less than 250 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to the stain line (STL1), sealer line (SL1), topcoat line (TL1), touchup booth (TB1), and the solvent recycling collection unit (SR1).

(b) In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the total input of volatile organic compounds (VOC), including coatings, dilution solvents, and cleaning solvents, at the topcoat line (TL2) and the touchup booth (TB2) shall not exceed 248 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The amount of VOC in waste shipped offsite may be deducted from the reported monthly VOC input.

Compliance with this emission limit shall limit VOC emissions from the topcoat line (TL2) and touchup booth (TB2) to less than 250 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to the topcoat line (TL2) and the touchup booth (TB2).

D.1.3 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the automated cabinet finishing line shall be controlled by dry particulate filters, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

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

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

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

(b) If the amount of VOC in the waste collected by the spent acetone solvent recycling collection unit or other waste material that is shipped offsite for recycling or disposal is deducted from the monthly VOC input reported, the Permittee shall determine the VOC content of the waste shipped offsite using one or a combination of the following methods:

(1) On-Site Sampling

(A) VOC content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

(B) An initial representative sample of the VOC containing waste to be shipped offsite shall be collected just prior to being shipped offsite, and the sample shall be analyzed for VOC content within 30 days of collection.

(C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.

(D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the VOC content of the VOC containing waste. Such change could include, but is not limited to, the following:

   (i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or

   (ii) An operational change in the coating application or cleanup operations.

(2) Certified Waste Report: The VOC reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of VOC in the waste.

(3) Minimum Assumed VOC content: The VOC content of the waste shipped offsite may be assumed to be equal to the VOC content of the material with the lowest VOC content that could be present in the waste, as determined using the as supplied" and "as applied" VOC data sheets, for each month.
(c) IDEM reserves the right to request a representative sample of the VOC containing waste stream and conduct an analysis for VOC content.

(d) Compliance with the VOC input limitations contained in Condition D.1.2(a) and (b) shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compound input for the previous month, minus the amount VOC in the waste shipped out for recycling or disposal, and adding it to previous 11 months total VOC input, minus the amount VOC in the waste shipped out for recycling or disposal, so as to arrive at VOC input for the most recent twelve (12) consecutive month period.

(e) The VOC input for a month shall be calculated using the following equation:

\[
VOC_{\text{input}} = SCL - SR
\]

Where:

- \( SCL \) = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents, at the coating booths; and
- \( SR \) = The total amount of VOC, in tons, shipped out for either recycling or disposal, including coatings, dilution solvents, and cleaning solvents, from the coating booths.

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

D.1.6 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the automated cabinet finishing line stacks (ACL1, ACL5, ACL11, TBS1, TL2S, and TB2S) while one or more of the facilities are in operation. If a condition exists which should result in a response, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

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

D.1.7 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.2(a) and (b), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC limitations established in Condition D.1.2(a) and (b), and to document the quantity of any VOC shipped offsite and deducted from total reported VOC usage. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The VOC content of each coating material and solvent used.
(2) The amount of coating material and solvent less water used on monthly basis.
   (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
   (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(3) The cleanup solvent usage for each month;

(4) The total VOC input for each month and each compliance period; and

(5) If the amount of VOC in waste material is being deducted from the VOC input as allowed in paragraph (b) of Condition D.1.5, then the following records shall be maintained:
   (A) The amount of VOC containing waste shipped out to be recycled or disposed each month. If multiple cleanup solvent waste streams are collected and drummed separately, the amount shipped out shall be recorded separately for each used solvent stream.
   (B) The VOC content of the waste and all records necessary to verify the amount and VOC content of the VOC containing waste shipped out for recycling or disposal.
   (C) The weight of VOC input, minus the weight of VOC shipped out to be recycled or disposed, for each compliance period.

(b) To document the compliance status with Condition D.1.6, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.

(c) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

D.1.8 Reporting Requirements

Quarterly summaries of the information to document the compliance status with Condition D.1.2(a) and (b) shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no later than (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The reports submitted by the Permittee do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
SECTION D.2  EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-7-5(15)]:

(b) Woodworking operations, identified as WW1, constructed in 2011 and approved in 2016 for modification, consisting of various woodworking equipment, with a combined maximum process weight rate of 2500 pounds of wood per hour, with particulate matter emissions controlled by one (1) cyclone in series with a baghouse, identified as DC1, one (1) cyclone in series with a baghouse, identified as DC2, and baghouses DC3, DC4, and DC5, and each exhausting indoors or through stacks DC1S through DC5S, respectively.

The following specifically regulated insignificant activities, as defined in 326 IAC 2-7-1(21):

(e) One (1) panel brush cleaner (scuffer/denibber), constructed in 2011, associated with the stain line, with a maximum capacity of 500 parts/hr, controlled by a cyclone in series with a baghouse (DC1), and exhausting through stack DCS1. [326 IAC 2-2]

(f) One (1) panel brush cleaner (scuffer/denibber), constructed in 2011, associated with the sealer line, with a maximum capacity of 500 parts/hr, controlled by a cyclone in series with a baghouse (DC1), and exhausting through stack DCS1. [326 IAC 2-2]

(g) One (1) panel brush cleaner (scuffer/denibber), approved in 2016 for construction, identified as PBC1, with a maximum capacity of 500 parts/hr, controlled by a cyclone in series with a baghouse (DC1), and exhausting through stack DCS1. [326 IAC 2-2]

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

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

D.2.1  PSD Minor Limitations [326 IAC 2-2]

(a) In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the PM, PM10, and PM2.5 emissions after control from the woodworking operations and three (3) panel brush cleaners shall be less than the following emission limitations:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Control Device</th>
<th>PM Limit (lbs/hr)</th>
<th>PM10 Limit (lbs/hr)</th>
<th>PM2.5 Limit (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>WW1 and 3 Panel Brush Cleaners</td>
<td>DC1</td>
<td>5.87</td>
<td>5.87</td>
<td>5.87</td>
</tr>
<tr>
<td>WW1</td>
<td>DC2</td>
<td>5.87</td>
<td>5.87</td>
<td>5.87</td>
</tr>
<tr>
<td>WW1</td>
<td>DC3</td>
<td>5.87</td>
<td>5.87</td>
<td>5.87</td>
</tr>
</tbody>
</table>

Compliance with these limits shall limit the potential to emit of PM, PM10, and PM2.5 from woodworking operations and three (3) panel brush cleaners controlled by DC1 through DC3 to less than 250 tons per year and shall render 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to the woodworking units and three (3) panel brush cleaners controlled by DC1 through DC3.

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

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Control Device</th>
<th>PM Limit (lbs/hr)</th>
<th>PM10 Limit (lbs/hr)</th>
<th>PM2.5 Limit (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>WW1</td>
<td>DC4</td>
<td>16.15</td>
<td>16.15</td>
<td>16.15</td>
</tr>
<tr>
<td></td>
<td>DC5</td>
<td>2.35</td>
<td>2.35</td>
<td>2.35</td>
</tr>
</tbody>
</table>
Compliance with these limits shall limit the potential to emit of PM, PM10, and PM2.5 from woodworking operations controlled by DC4 and DC5 to less than 250 tons per year and shall render 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to the woodworking units controlled by DC4 and DC5.

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

Pursuant to 326 IAC 6-3-2(e)(2) (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the woodworking operations shall not exceed 4.76 pounds per hour when operating at a process weight rate of 1.25 tons of wood per hour (2500 pounds of wood per hour).

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

\[ E = 4.10 \times P^{0.67} \]

where \( E \) = rate of emission in pounds per hour; and

\( P \) = process weight rate in tons per hour

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

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

D.2.4 Particulate Control

(a) In order to comply with conditions D.2.1(a) and (b) and D.2.2, the baghouses for particulate control shall be in operation and control emissions from the woodworking operations and three (3) panel brush cleaners at all times the woodworking operations and three (3) panel brush cleaners are in operation.

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

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

D.2.5 Visible Emissions Notations

(a) Visible emission notations of the baghouse stack exhausts associated with the woodworking operations shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.2.6 Baghouse Inspections

Semi-annual inspections shall be performed on all bags controlling the woodworking operations when venting indoors. All defective bags shall be replaced.

D.2.7 Broken or Failed Bag Detection

(a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

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

D.2.8 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.5, the Permittee shall maintain daily records of the visible emission notations of the baghouse stack exhausts associated with the woodworking operations when venting to the atmosphere. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).

(b) To document the compliance status with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6 when venting indoors.

(c) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.
SECTION D.3  EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-7-5(15)]: Insignificant Activities

(c) Ten (10) natural gas-fired hot water heaters, constructed in 2011, identified as HW1 through HW10, with a combined total heat input capacity of 4.062 MMBtu/hr. [326 IAC 6-2]

(d) One (1) natural gas-fired hot water heater, approved for construction in 2016, identified as HW11, with a total heat input capacity of 1.75 MMBtu/hr. [326 IAC 6-2]

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

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

D.3.1 Particulate Matter Limitation (PM) [326 IAC 6-2]

Pursuant to 326 IAC 6-2-4(a), the particulate emissions from the natural gas-fired hot water heaters (HW1 through HW11) shall not exceed 0.6 lb/MMBtu.
### EMISSIONS UNIT OPERATION CONDITIONS

#### Emissions Unit Description [326 IAC 2-7-5(15)]: Insignificant Activities

(a) One (1) cold cleaner degreaser parts washing tank, approved in 2016 for construction, identified as PW1, not utilizing a remote solvent reservoir, using a maximum of no more than 145 gallons of degreasing solvent per year, uncontrolled, and exhausting to the atmosphere. [326 IAC 8-3]

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

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

### D.4.1 Cold Cleaner Degreaser Control Equipment and Operating Requirements [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements), for the cold cleaner degreaser parts washing tank (PW1), the Permittee shall:

(a) Ensure the following control equipment and operating requirements are met:

1. Equip the degreaser with a cover.
2. Equip the degreaser with a device for draining cleaned parts.
3. Close the degreaser cover whenever parts are not being handled in the degreaser.
4. Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
5. Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
6. Store waste solvent only in closed containers.
7. Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.

(b) Ensure the following additional control equipment and operating requirements are met:

1. Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
   - A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
   - A water cover when solvent used is insoluble in, and heavier than, water.
   - A refrigerated chiller.
   - Carbon adsorption.
   - An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.
2. Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
If used, solvent spray:

(A) must be a solid, fluid stream; and
(B) shall be applied at a pressure that does not cause excessive splashing.

D.4.2 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), the Permittee shall not operate a cold cleaning degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

D.4.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

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

D.4.4 Record Keeping Requirements

(a) To document the compliance status with Condition D.4.1, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

(1) The name and address of the solvent supplier.

(2) The date of purchase (or invoice/bill dates of contract servicer indicating service date).

(3) The type of solvent purchased.

(4) The total volume of the solvent purchased.

(5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

(b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.
SECTION E.1  NESHAP

Emissions Unit Description: Automated Cabinet Finishing Line

(a) One (1) automated cabinet finishing line, constructed in 2011 and modified in 2016, including the following equipment:

(1) one (1) stain line, constructed in 2011 and modified in 2016, identified as STL1, with a maximum capacity of 500 cabinets per hour, utilizing computer controlled air-assisted airless spray method of application, controlled by dry filters, and exhausting through Stack ACL1.

(2) one (1) sealer line, constructed in 2011, modified in 2016, and approved for modification in 2017 to change coatings, identified as SL1, with a maximum capacity of 500 cabinets per hour, utilizing computer controlled air-assisted airless spray method of application, controlled by dry filters, and exhausting through Stack ACL5.

(3) one (1) topcoat line, constructed in 2011, modified in 2016, and approved for modification in 2017 to change coatings, identified as TL1, with a maximum capacity of 500 cabinets per hour, utilizing computer controlled air-assisted airless spray method of application, controlled by dry filters, and exhausting through Stack ACL11.

(4) one (1) touchup booth, constructed in 2011, modified in 2016, and approved for modification in 2017 to change coatings, identified as TB1, with a maximum capacity of 50 cabinets per hour, utilizing handheld HVLP method of application, controlled by dry filters, and exhausting through Stack TBS1.

(5) one (1) topcoat line, constructed in 2016 and approved for modification in 2017 to change coatings, identified as TL2, with a maximum capacity of 500 cabinets per hour, utilizing computer controlled air-assisted airless spray method of application, controlled by dry filters, and exhausting through Stack TL2S.

(6) one (1) touchup booth, constructed in 2016 and approved for modification in 2017 to change coatings, identified as TB2, with a maximum capacity of 50 cabinets per hour, utilizing handheld HVLP method of application, controlled by dry filters, and exhausting through Stack TB2S.

Acetone is used as a cleanup solvent, with the spent acetone recycled in the solvent recycling collection unit (SR1).

Under the Wood Furniture Manufacturing NESHAP (40 CFR 63 Subpart JJ), the automated cabinet finishing line, is considered part of the existing affected source.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements

[326 IAC 2-7-5(1)]


(a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart JJ.
(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

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


<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>(1)</td>
<td>40 CFR 63.800(a) through (f)</td>
</tr>
<tr>
<td>(2)</td>
<td>40 CFR 63.801</td>
</tr>
<tr>
<td>(3)</td>
<td>40 CFR 63.802(a) and (b)</td>
</tr>
<tr>
<td>(4)</td>
<td>40 CFR 63.803</td>
</tr>
<tr>
<td>(5)</td>
<td>40 CFR 63.804(a)(1), (2), and (4), (b), (c)(1), (d)(1), (2), and (4), (e)(1), (f)(1), (2), (3), (5), (7), and (8), (f)(1), (2), (3), (5), (7), and (8), and (g)(1), (2), (3), (5), (7), and (8)</td>
</tr>
<tr>
<td>(6)</td>
<td>40 CFR 63.805(a)</td>
</tr>
<tr>
<td>(7)</td>
<td>40 CFR 63.806(a), (b), (c), (d), (e), (h), (i), and (j)</td>
</tr>
<tr>
<td>(8)</td>
<td>40 CFR 63.807(a), (b), (c) and (e)</td>
</tr>
<tr>
<td>(9)</td>
<td>40 CFR 63.808</td>
</tr>
<tr>
<td>(10)</td>
<td>Tables 1 through 6</td>
</tr>
</tbody>
</table>
SECTION E.2  NESHAP

Emissions Unit Description: Emergency Generator

(g) One (1) natural gas-fired emergency generator, manufactured in 1987, approved for installation in 2014, identified as EG1, with a maximum capacity of 160 hp, using no controls, and exhausting to the atmosphere.

Under 40 CFR 63, NESHAP Subpart ZZZZ, this is an existing affected unit.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]


(a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission unit listed above, except as otherwise specified in 40 CFR Part 63, Subpart ZZZZ.

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

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

E.2.2 Stationary Reciprocating Internal Combustion Engines NESHAP [326 IAC 20-82] [40 CFR 63, Subpart ZZZZ]

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

(1) 40 CFR 63.6580
(2) 40 CFR 63.6585
(3) 40 CFR 63.6590(a)(1)(ii) and (iv)
(4) 40 CFR 63.6595(a)(1) and (c)
(5) 40 CFR 63.6602
(6) 40 CFR 63.6605
(7) 40 CFR 63.6612(a) and (b)
(8) 40 CFR 63.6615
(9) 40 CFR 63.6620(a), (d), (e), (f), (g), (h), and (i)
(10) 40 CFR 63.6625(e)(2), (f), (h), and (j)
(11) 40 CFR 63.6630(a), (b), (c), and (d)
(12) 40 CFR 63.6635
(13) 40 CFR 63.6640(a), (b), (e), and (f)
(14) 40 CFR 63.6645(a)(5)
(15) 40 CFR 63.6650
(16) 40 CFR 63.6655
(17) 40 CFR 63.6660
(18) 40 CFR 63.6665
(19) 40 CFR 63.6670
(20) 40 CFR 63.6675
(21) Table 2c (item 6)
(22) Table 4 (item 2)
(23) Table 6 (item 9)
(24) Table 8
This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify) ____________________________.

☐ Report (specify) ____________________________.

☐ Notification (specify) ____________________________.

☐ Affidavit (specify) ____________________________.

☐ Other (specify) ____________________________.

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

Signature: ____________________________

Printed Name: ____________________________

Title/Position: ____________________________

Phone: ____________________________

Date: ____________________________
This is an emergency as defined in 326 IAC 2-7-1(12):

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

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

- Facility/Equipment/Operation:

- Control Equipment:

- Permit Condition or Operation Limitation in Permit:

- Description of the Emergency:

- Describe the cause of the Emergency:
<table>
<thead>
<tr>
<th>Date/Time Emergency started:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date/Time Emergency was corrected:</td>
</tr>
<tr>
<td>Was the facility being properly operated at the time of the emergency?</td>
</tr>
<tr>
<td>Type of Pollutants Emitted: TSP, PM-10, SO$_2$, VOC, NO$_x$, CO, Pb, other:</td>
</tr>
<tr>
<td>Estimated amount of pollutant(s) emitted during emergency:</td>
</tr>
<tr>
<td>Describe the steps taken to mitigate the problem:</td>
</tr>
<tr>
<td>Describe the corrective actions/response steps taken:</td>
</tr>
<tr>
<td>Describe the measures taken to minimize emissions:</td>
</tr>
</tbody>
</table>

If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____________________________
Title / Position: __________________________________
Date: _____________________________
Phone: _____________________________
**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**COMPLIANCE AND ENFORCEMENT BRANCH**

**Part 70 Quarterly Report**

Source Name: Kountry Wood Products, LLC  
Source Address: 352 Shawnee Street, Nappanee, Indiana 46550  
Part 70 Permit No.: T039-36799-00714  
Facility: Stain line (STL1), sealer line (SL1), topcoat line (TL1), and touchup booth (TB1)  
Parameter: Volatile Organic Compound (VOC) input  
Limit: The total input of volatile organic compounds (VOC), including coatings, dilution solvents, and cleaning solvents, at the stain line (STL1), sealer line (SL1), topcoat line (TL1), touchup booth (TB1), and the solvent recycling collection unit (SR1) shall not exceed 249 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The amount of VOC in waste shipped offsite may be deducted from the reported monthly VOC input.

Compliance with this limit shall be determined using the equation in Condition D.1.5(d).

<table>
<thead>
<tr>
<th>QUARTER:</th>
<th>YEAR:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 1 + Column 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>This Month</td>
<td>Previous 11 Months</td>
<td>12 Month Total</td>
<td></td>
</tr>
</tbody>
</table>

- [ ] No deviation occurred in this quarter.
- [ ] Deviation/s occurred in this quarter.
  
  Deviation has been reported on: ___________________

Submitted by: _____________________________________________________

Title / Position: ____________________________________________________

Signature: ________________________________________________________

Date: ____________________________________________________________

Phone: ___________________________________________________________
## Part 70 Quarterly Report

**Source Name:** Kountry Wood Products, LLC  
**Source Address:** 352 Shawnee Street, Nappanee, Indiana 46550  
**Part 70 Permit No.:** T039-36799-00714  
**Facility:** Topcoat Line (TL2) and touchup booth (TB2)  
**Parameter:** Volatile Organic Compound (VOC) input  
**Limit:** The total input of volatile organic compounds (VOC), including coatings, dilution solvents, and cleaning solvents, at the topcoat line (TL2) and the touchup booth (TB2) shall not exceed 248 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The amount of VOC in waste shipped offsite may be deducted from the reported monthly VOC input.

Compliance with this limit shall be determined using the equation in Condition D.1.5(d).

<table>
<thead>
<tr>
<th>QUARTER:</th>
<th>YEAR:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 1 + Column 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>This Month</td>
<td>Previous 11 Months</td>
<td>12 Month Total</td>
<td></td>
</tr>
</tbody>
</table>

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

Submitted by: ________________________________  
**Title / Position:** ________________________________  
**Signature:** ________________________________  
**Date:** ________________________________  
**Phone:** ________________________________
This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C- General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

<table>
<thead>
<tr>
<th>Permit Requirement</th>
<th>Date of Deviation</th>
<th>Duration of Deviation</th>
<th>Number of Deviations</th>
<th>Probable Cause of Deviation</th>
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<th>Probable Cause of Deviation</th>
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<tbody>
<tr>
<td>Permit Requirement (specify permit condition #)</td>
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<td>Date of Deviation:</td>
<td>Duration of Deviation:</td>
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<tr>
<td>Probable Cause of Deviation:</td>
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<td>Response Steps Taken:</td>
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<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
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<tr>
<td>Response Steps Taken:</td>
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<td>Probable Cause of Deviation:</td>
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<tr>
<td>Response Steps Taken:</td>
<td></td>
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</table>

Form Completed by: _______________________________________________________
Title / Position: ___________________________________________________________
Date: ___________________________________________________________________
Phone: _________________________________________________________________
The following source determination was made under Part 70 Operating Permit T039-30933-00714 on December 8, 2011, and minor updates were made as part of Part 70 Operating Permit Renewal T039-36799-00714, issued September 19, 2016.

Kountry Wood Products, LLC owns a kitchen cabinet manufacturing plant at 500 E. Wabash Ave. in Nappanee. Kountry Wood Products, LLC has opened a second plant at 352 Shawnee St. in Nappanee, approximately two miles away. IDEM, OAQ has examined whether these two plants are part of the same major source. The term “major source” is defined at 326 IAC 2-7-1(22). In order for two plants to be considered one major source, they must meet all three of the following criteria:

1. the plants must be under common ownership or common control;
2. the plants must have the same two-digit Standard Industrial Classification (SIC) Code or one must serve as a support facility for the other; and,
3. the plants must be located on contiguous or adjacent properties.

Both plants will be owned and operated directly by Kountry Wood Products, LLC. IDEM’s Nonrule Policy Document Air-005 states that if two or more plants have common corporate officers or if one entity has ownership of fifty-one percent (51%) or more of two or more plants, then common ownership exists. Since Kountry Wood Products, LLC owns 100% of both plants, common ownership exists. Air-005 also states that if the activities are owned by the same person or entity, common control exists. Therefore the first part of the major source definition is met.


A plant is a support facility to another plant if it dedicates 50% or more of its output to the other plant. Under Kountry Wood Products, LLC’s business plan, it is the company's intent that both plants are designed to be run as separate businesses with no output going from either plant to the other. However, one style of cabinet door is built at the Wabash Avenue plant and sent to the Shawnee Street plant for installation in cabinets built at the Shawnee Street plant. The Shawnee Street plant will build the majority of the doors used in the cabinets it produces. All of the doors and other parts used at the Wabash Avenue plant will be built on site. Under this scenario, the Shawnee Street plant will receive less than 7% of its doors (less than 1% of its total output) from the Wabash Avenue plant. The Shawnee Street plant will send none of its output to the Wabash Avenue plant. Therefore, neither plant will be a support facility to the other plant. However, since the plants have the same two-digit SIC Code, the second part of the major source definition is met.
The last part of the definition is whether the plants are on contiguous or adjacent properties. The plants are located on separate properties that are approximately two miles apart. Since the plants are not on contiguous properties, IDEM examined whether the two plants are on adjacent properties.

The term “adjacent” is not defined in Indiana’s air permitting rules. IDEM, OAQ has located a May 21, 1988 letter from U.S. EPA Region VIII to the Utah Division of Air Quality regarding the term “adjacent”. This letter is in no way binding on IDEM, OAQ, but it is persuasive. Region VIII stated that any evaluation of what is “adjacent” must relate the guiding principal of a common sense notion of “source”. The evaluation should look at whether the distance between the plants is sufficiently small that it enables them to operate as a single source. Some sample questions are:

1. Are materials routinely transferred between the plants?
2. Do managers or other workers frequently shuttle back and forth to be involved actively in the plants?
3. Is the production process itself split in any way between the plants?

An intermediate product, one style of cabinet door, will be sent from the Wabash Avenue plant to the Shawnee Street plant. The two plants will have separate managers and separate staff with no shared staff. The Shawnee Street plant produces all of its own cabinets so that no part of the production process will be split between the plants. The plants are therefore not adjacent and do not meet the third part of the major source definition.

Since the Kountry Wood Products plants do not meet all three parts of the definition, IDEM, OAQ has determined that they are not part of the same major source. IDEM, OAQ will review this determination if the Wabash Avenue plant sends any output to the new Shawnee Street plant on a regular (i.e. not temporary) basis or if other material facts change regarding the operation of the two plants.

This conclusion was initially determined under Part 70 Operating Permit T039-30933-00714 on December 8, 2011. Minor updates to this determination were made as part of Part 70 Operating Permit Renewal T039-36799-00714 on September 19, 2016 to provide clarification.

### Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. T039-36799-00714 on September 19, 2016. There have been no subsequent approvals issued.

### County Attainment Status

The source is located in Elkhart County.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO₂</td>
<td>Better than national standards.</td>
</tr>
<tr>
<td>CO</td>
<td>Unclassifiable or attainment effective November 15, 1990.</td>
</tr>
<tr>
<td>O₃</td>
<td>Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard.¹</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective April 5, 2005, for the annual PM₂.₅ standard.</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>Unclassifiable attainment effective November 15, 1990.</td>
</tr>
<tr>
<td>NO₂</td>
<td>Cannot be classified or better than national standards.</td>
</tr>
<tr>
<td>Pb</td>
<td>Unclassifiable or attainment effective December 31, 2011.</td>
</tr>
</tbody>
</table>

¹Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including Elkhart County, and is a maintenance area for the 1-hour National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005.

(a) **Ozone Standards**

Volatile organic compounds (VOC) and Nitrogen Oxides (NOₓ) 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 NOₓ emissions are considered when evaluating the rule applicability relating to ozone. Elkhart County has been designated as attainment or unclassifiable.
for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM$_{2.5}$
Elkhart County has been classified as attainment for PM$_{2.5}$. Therefore, direct PM$_{2.5}$, SO$_2$, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Other Criteria Pollutants
Elkhart County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants 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.

Greenhouse Gas (GHG) Emissions

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 GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

Source Status - Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>PM</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}$</th>
<th>SO$_2$</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP*</th>
<th>Combined HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total for Source</td>
<td>39.64</td>
<td>40.03</td>
<td>40.03</td>
<td>0.04</td>
<td>7.36</td>
<td>497.86</td>
<td>6.75</td>
<td>263.42 (Toluene)</td>
<td>515.45</td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>--</td>
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</tr>
</tbody>
</table>

*aSingle highest source-wide HAP.
greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

(c) These emissions are based on the TSD of Part 70 Operating Permit Renewal No.: T039-36799-00714, issued on September 19, 2016.

Description of Proposed Modification and Amendment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Kountry Wood Products, LLC on June 12, 2017, relating to replacing the pigmented sealer and topcoat DANSPEED KW-L122-0002 with DANSPEED L122-0006 in the automated cabinet finishing line, including the following equipment: the sealer line SL1, the topcoat line TL1, the touchup booth TB1, the topcoat line TL2, and the touchup booth TB2. The following is a list of the modified emission units and pollution control devices:

(a) One (1) automated cabinet finishing line, constructed in 2011 and modified in 2016, including the following equipment:

(1) one (1) stain line, constructed in 2011 and modified in 2016, identified as STL1, with a maximum capacity of 500 cabinets per hour, utilizing computer controlled air-assisted airless spray method of application, controlled by dry filters, and exhausting through Stack ACL1.

(2) one (1) sealer line, constructed in 2011, modified in 2016, and approved for modification in 2017 to change coatings, identified as SL1, with a maximum capacity of 500 cabinets per hour, utilizing computer controlled air-assisted airless spray method of application, controlled by dry filters, and exhausting through Stack ACL5.

(3) one (1) topcoat line, constructed in 2011, modified in 2016, and approved for modification in 2017 to change coatings, identified as TL1, with a maximum capacity of 500 cabinets per hour, utilizing computer controlled air-assisted airless spray method of application, controlled by dry filters, and exhausting through Stack ACL11.

(4) one (1) touchup booth, constructed in 2011, modified in 2016, and approved for modification in 2017 to change coatings, identified as TB1, with a maximum capacity of 50 cabinets per hour, utilizing handheld HVLP method of application, controlled by dry filters, and exhausting through Stack TBS1.

(5) one (1) topcoat line, constructed in 2016 and approved for modification in 2017 to change coatings, identified as TL2, with a maximum capacity of 500 cabinets per hour, utilizing computer controlled air-assisted airless spray method of application, controlled by dry filters, and exhausting through Stack TL2S.

(6) one (1) touchup booth, constructed in 2016 and approved for modification in 2017 to change coatings, identified as TB2, with a maximum capacity of 50 cabinets per hour, utilizing handheld HVLP method of application, controlled by dry filters, and exhausting through Stack TB2S.

Acetone is used as a cleanup solvent, with the spent acetone recycled in the solvent recycling collection unit (SR1).

Under the Wood Furniture Manufacturing NESHAP (40 CFR 63 Subpart JJ), the automated cabinet finishing line, is considered part of the existing affected source.

“Integral Part of the Process” Determination

In October 1993 a Final Order Granting Summary Judgment was signed by Administrative Law Judge ("ALJ") Garrettson resolving an appeal filed by Kimball Hospitality Furniture Inc. (Cause Nos. 92-A-J-730 and 92-A-J-833) related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls are necessary for the facility to produce its normal product and are integral to the normal operation of the facility, and therefore, potential
emissions should be calculated after controls. Based on this ruling, 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 Issues**

There are no pending enforcement actions related to this modification.

**Emission Calculations**

See Appendix A of this Technical Support Document for detailed emission calculations.

**Permit Level Determination –Part 70 Modification and Administrative Amendment at an Existing Source**

Pursuant to 326 IAC 2-1.1-1(12), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5 and 326 IAC 2-7-11. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit. If the control equipment has been determined to be integral, the table reflects the PTE after consideration of the integral control device.

<table>
<thead>
<tr>
<th>PTE of the Modified Emission Units (ton/year)</th>
<th>PM</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}$</th>
<th>SO$_2$</th>
<th>NO$_x$</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP</th>
<th>Combined HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Automated Sealer Line 1 PTE Before Modification</td>
<td>167.90</td>
<td>167.90</td>
<td>167.90</td>
<td>-</td>
<td>-</td>
<td>497.33</td>
<td>-</td>
<td>82.32 Toluene</td>
<td>158.56</td>
</tr>
<tr>
<td>Automated Sealer Line 1 PTE After Modification</td>
<td>167.90</td>
<td>167.90</td>
<td>167.90</td>
<td>-</td>
<td>-</td>
<td>443.77</td>
<td>-</td>
<td>122.47 Xylene</td>
<td>152.28</td>
</tr>
<tr>
<td>Automated Topcoat Line 1 PTE Before Modification</td>
<td>167.90</td>
<td>167.90</td>
<td>167.90</td>
<td>-</td>
<td>-</td>
<td>497.33</td>
<td>-</td>
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</tr>
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<td>167.90</td>
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<td>-</td>
<td>-</td>
<td>443.77</td>
<td>-</td>
<td>122.47 Xylene</td>
<td>152.28</td>
</tr>
<tr>
<td>Touch-up Booth 1 PTE Before Modification</td>
<td>11.99</td>
<td>11.99</td>
<td>11.99</td>
<td>-</td>
<td>-</td>
<td>49.73</td>
<td>-</td>
<td>8.23 Toluene</td>
<td>15.86</td>
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<tr>
<td>Touch-up Booth 1 PTE After Modification</td>
<td>11.99</td>
<td>11.99</td>
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<td>-</td>
<td>44.38</td>
<td>-</td>
<td>12.25 Xylene</td>
<td>15.23</td>
</tr>
<tr>
<td>Automated Topcoat Line 2 PTE Before Modification</td>
<td>167.90</td>
<td>167.90</td>
<td>167.90</td>
<td>-</td>
<td>-</td>
<td>497.33</td>
<td>-</td>
<td>82.32 Toluene</td>
<td>158.56</td>
</tr>
<tr>
<td>Automated Topcoat Line 2 PTE After Modification</td>
<td>167.90</td>
<td>167.90</td>
<td>167.90</td>
<td>-</td>
<td>-</td>
<td>443.77</td>
<td>-</td>
<td>122.47 Xylene</td>
<td>152.28</td>
</tr>
<tr>
<td>Touch-up Booth 2 PTE Before Modification</td>
<td>11.99</td>
<td>11.99</td>
<td>11.99</td>
<td>-</td>
<td>-</td>
<td>49.73</td>
<td>-</td>
<td>8.23 Toluene</td>
<td>15.86</td>
</tr>
<tr>
<td>Touch-up Booth 2 PTE After Modification</td>
<td>11.99</td>
<td>11.99</td>
<td>11.99</td>
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<td>44.38</td>
<td>-</td>
<td>12.25 Xylene</td>
<td>15.23</td>
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<tr>
<td>PTE Increase Due to the Modification</td>
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<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>128.48</td>
<td>0.00</td>
</tr>
</tbody>
</table>

Appendix A of this TSD reflects the potential emissions of the modification in detail.
Pursuant to 326 IAC 2-7-10.5(g)(6), a Significant Source Modification is required because this modification has a potential to emit greater than or equal to ten (10) tons per year of a single HAP or twenty-five (25) tons per year of any combination of HAPs.

Pursuant to 326 IAC 2-7-11(a)(7), this change to the permit is considered an administrative amendment because the permit is amended to change the descriptive information where the revision will not trigger a new applicable requirement or violate a permit term.

**PSD Evaluation – Actual to Potential (ATP) and Actual to Projected Actual (ATPA) Emissions Test**

(a) "Hybrid" Applicability Test: ATP and ATPA

The source opted to use a Hybrid applicability test, specified in 326 IAC 2-2-2(d)(5), to demonstrate that the modification is not subject to PSD major review. A Hybrid applicability test uses both the Actual to Potential (ATP) for new emissions units and Actual to Projected Actual (ATPA) for existing emissions units affected by the modification.

The source has provided information and emission calculations as part of the application for this Hybrid test. IDEM, OAQ reviewed the emission calculations provided by the source to verify the emissions factors and methodology used, but has not made any determination regarding the validity and accuracy of certain information such as actual throughput, actual usage and actual hours of operation.

The source will be required to keep records and report in accordance with the requirements of 326 IAC 2-2-8 (Prevention of Significant Deterioration (PSD) Requirements: Source Obligation).

(b) New Emissions Units and Existing Emissions Units Affected by the Modification

This project involves both new emissions units and existing emission units affected by the modification.

(1) New Emissions Unit

Pursuant to 326 IAC 2-2-1(t)(1), a new emissions unit is any emissions unit that is, or will be, newly constructed and that has existed for less than two (2) years from the date the emissions unit first operated.

(2) Existing Emissions Unit Affected by the Modification

The following emissions units will be considered existing for the purpose of ATPA:

(A) The new emission units, which are replacing existing emissions units, which are nearly equal capacity that serves the same purpose without increasing the emissions. A replacement emissions unit is an existing emissions unit. [326 IAC 2-2-1(t)(2)].

(B) Modified emissions units.

(C) Emissions Units that will not be modified; however, they will experience increased or decreased utilization as part of this project.

The following emissions units are considered as new emissions units for this evaluation, since each unit has existed for less than two (2) years from the date that the emissions unit first operated.

(1) one (1) topcoat line, constructed in 2016 and approved for modification in 2017 to change coatings, identified as TL2, with a maximum capacity of 500 cabinets per hour, utilizing computer controlled air-assisted airless spray method of application, controlled by dry filters, and exhausting through Stack TL2S.

(2) one (1) touchup booth, constructed in 2016 and approved for modification in 2017 to change coatings, identified as TB2, with a maximum capacity of 50 cabinets per hour, utilizing handheld HVLP method of application, controlled by dry filters, and exhausting through Stack TB2S.
The following emissions units will be considered as existing emissions units for this evaluation.

(3) one (1) sealer line, constructed in 2011, modified in 2016, and approved for modification in 2017 to change coatings, identified as SL1, with a maximum capacity of 500 cabinets per hour, utilizing computer controlled air-assisted airless spray method of application, controlled by dry filters, and exhausting through Stack ACL5.

(4) one (1) topcoat line, constructed in 2011, modified in 2016, and approved for modification in 2017 to change coatings, identified as TL1, with a maximum capacity of 500 cabinets per hour, utilizing computer controlled air-assisted airless spray method of application, controlled by dry filters, and exhausting through Stack ACL11.

(5) one (1) touchup booth, constructed in 2011, modified in 2016, and approved for modification in 2017 to change coatings, identified as TB1, with a maximum capacity of 50 cabinets per hour, utilizing handheld HVLP method of application, controlled by dry filters, and exhausting through Stack TBS1.

c) Baseline Actual Emissions

(1) New Emissions Unit

For a new emissions unit, the baseline actual emissions for purposes of determining the emissions increase that will result from the initial construction and operation of the unit shall equal zero (0) and thereafter, for all other purposes, shall equal the unit's potential to emit.

Since the topcoat line (TL2) and the touchup booth (TB2) were already constructed and operated in 2016, the baseline actual emissions for each unit shall equal the unit's potential to emit before the modification.

(2) Existing Emissions Unit

The baseline actual emissions from the existing emission units involved in this ATPA applicability test are based on their emissions from December 2014 through November 2016.

d) Hybrid Test: ATP and ATPA Summary

Since this project involves both new emissions units and existing emission units, pursuant to 326 IAC 2-2-2(d)(5), an Hybrid applicability test has been conducted. The emissions increase of the project is the sum of the emissions increase for each emissions unit, calculated using the Actual to Potential (ATP) evaluation for the new units and the Actual to Projected Actual (ATPA) evaluation for each existing emissions unit.

Pursuant to 326 IAC 2-2-1(pp)(A)(iii), the source may exclude, in calculating any increase in emissions that result from the particular project, that portion of the unit's emissions following the project that an existing unit could have accommodated during the consecutive 24-month period used to establish the baseline actual emissions and that are also unrelated to the particular project, including any increased utilization due to product demand growth.

Hybrid Applicability Test = ATP(new unit) + ATPA (existing unit)

Where:

\[
\text{ATP}_{\text{new unit}} = \text{PTE After Project} - \text{PTE Before Project}
\]

\[
\text{ATPA (existing unit)} = \text{Projected Actual Emissions} - \text{Baseline Emissions} - \text{Could Have Accommodated Emissions/Demand Growth Exclusions}
\]

See Appendix A of this Technical Support Document for detailed emission calculations.
### New Emissions Units (tons/year)

<table>
<thead>
<tr>
<th>Process/Emission Unit</th>
<th>PM</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}$</th>
<th>SO$_2$</th>
<th>NO$_x$</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Automated Topcoat Line 2 (TL2)</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Projected Emissions*</td>
<td>8.40</td>
<td>8.40</td>
<td>8.40</td>
<td>0</td>
<td>0</td>
<td>443.77</td>
<td>0</td>
</tr>
<tr>
<td>Baseline Actual Emissions*</td>
<td>8.40</td>
<td>8.40</td>
<td>8.40</td>
<td>0</td>
<td>0</td>
<td>497.33</td>
<td>0</td>
</tr>
<tr>
<td>ATP</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>-53.56</td>
<td>0</td>
</tr>
<tr>
<td><strong>Touch-up Booth (TB2)</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Projected Emissions*</td>
<td>0.60</td>
<td>0.60</td>
<td>0.60</td>
<td>0</td>
<td>0</td>
<td>44.38</td>
<td>0</td>
</tr>
<tr>
<td>Baseline Actual Emissions*</td>
<td>0.60</td>
<td>0.60</td>
<td>0.60</td>
<td>0</td>
<td>0</td>
<td>49.73</td>
<td>0</td>
</tr>
<tr>
<td>ATP</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>-5.35</td>
<td>0</td>
</tr>
</tbody>
</table>

*The PM/PM$_{10}$/PM$_{2.5}$ emissions represent the unlimited emissions after dry filter control. The VOC emissions represent the unlimited emissions. As part of Part 70 Permit Renewal T039-36799-00714, issued September 19, 2016, the total VOC input to the topcoat line (TL2) and the touchup booth (TB2) were limited to 248 tons per twelve (12) consecutive month period, in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to these units.

### Existing Emissions Unit ATPA (tons/year)

<table>
<thead>
<tr>
<th>Process/Emission Unit</th>
<th>PM</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}$</th>
<th>SO$_2$</th>
<th>NO$_x$</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Automated Sealer Line (SL1)</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Projected Actual Emissions</td>
<td>1.73</td>
<td>1.73</td>
<td>1.73</td>
<td>0</td>
<td>0</td>
<td>87.99</td>
<td>0</td>
</tr>
<tr>
<td>Baseline Actual Emissions</td>
<td>1.36</td>
<td>1.36</td>
<td>1.36</td>
<td>0</td>
<td>0</td>
<td>69.09</td>
<td>0</td>
</tr>
<tr>
<td>Additional Emissions that could have been accommodated/Demand Growth Exclusions</td>
<td>0.37</td>
<td>0.37</td>
<td>0.37</td>
<td>0</td>
<td>0</td>
<td>18.91</td>
<td>0</td>
</tr>
<tr>
<td>ATP</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td><strong>Automated Topcoat Line (TL1)</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Projected Actual Emissions</td>
<td>1.73</td>
<td>1.73</td>
<td>1.73</td>
<td>0</td>
<td>0</td>
<td>87.99</td>
<td>0</td>
</tr>
<tr>
<td>Baseline Actual Emissions</td>
<td>1.36</td>
<td>1.36</td>
<td>1.36</td>
<td>0</td>
<td>0</td>
<td>69.09</td>
<td>0</td>
</tr>
<tr>
<td>Additional Emissions that could have been accommodated/Demand Growth Exclusions</td>
<td>0.37</td>
<td>0.37</td>
<td>0.37</td>
<td>0</td>
<td>0</td>
<td>18.91</td>
<td>0</td>
</tr>
<tr>
<td>ATP</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td><strong>Touch-up Booth (TB1)</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Projected Actual Emissions</td>
<td>0.035</td>
<td>0.035</td>
<td>0.035</td>
<td>0</td>
<td>0</td>
<td>1.78</td>
<td>0</td>
</tr>
<tr>
<td>Baseline Actual Emissions</td>
<td>0.027</td>
<td>0.027</td>
<td>0.027</td>
<td>0</td>
<td>0</td>
<td>1.40</td>
<td>0</td>
</tr>
<tr>
<td>Additional Emissions that could have been accommodated/Demand Growth Exclusions</td>
<td>0.008</td>
<td>0.008</td>
<td>0.008</td>
<td>0</td>
<td>0</td>
<td>0.38</td>
<td>0</td>
</tr>
<tr>
<td>ATP</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>
### Project Emissions (ton/year)

<table>
<thead>
<tr>
<th>Process/Emission Unit</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5*</th>
<th>SO2</th>
<th>NOX</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Automated Topcoat Line 2 (TL2) (ATP)</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>-53.56</td>
<td>0</td>
</tr>
<tr>
<td>Touch-up Booth 2 (TB2) (ATP)</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>-5.35</td>
<td>0</td>
</tr>
<tr>
<td>Automated Sealer Line 1 (SL1) (ATPA)</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Automated Topcoat Line 1 (TL1) (ATPA)</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Touch-up Booth 1 (TB1) (ATPA)</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Project Emissions**</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

**Significant Levels**

- PM: 25
- PM10: 15
- PM2.5*: 10
- SO2: 40
- NOX: 40
- VOC: 40
- CO: 100

*PM2.5 listed is direct PM2.5.

**If the sum of the differences for all units evaluated (project emissions) results in a negative value, then the project emissions will be expressed as zero (0) to determine if there is an increase above the significance level.

### Conclusion

Based on this Hybrid applicability test, this proposed modification is not subject to PSD major review under 326 IAC 2-2-1, because the project emissions are less than the significant levels (i.e., the modification does not cause a significant emissions increase).

---

### Source-Wide Emissions after Issuance (ton/year)

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

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5*</th>
<th>SO2</th>
<th>NOX</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Automated Stain Line (STL1)**</td>
<td>0.03</td>
<td>0.03</td>
<td>0.03</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Automated Sealer Line (SL1)**</td>
<td>8.40</td>
<td>8.40</td>
<td>8.40</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>249.00</td>
</tr>
<tr>
<td>Automated Topcoat Line (TL1)**</td>
<td>8.40</td>
<td>8.40</td>
<td>8.40</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Touch-up Booth (TB1)**</td>
<td>0.60</td>
<td>0.60</td>
<td>0.60</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Solvent Recycling Unit (SR1)</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Automated Topcoat Line (TL2)**</td>
<td>8.40</td>
<td>8.40</td>
<td>8.40</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>248.00</td>
</tr>
<tr>
<td>Touch-up Booth (TB2)**</td>
<td>0.60</td>
<td>0.60</td>
<td>0.60</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>PBC2</td>
<td>0.22</td>
<td>0.22</td>
<td>0.22</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Natural Gas Combustion Units</td>
<td>0.13</td>
<td>0.51</td>
<td>0.51</td>
<td>0.04</td>
<td>6.68</td>
<td>0.37</td>
<td>5.62</td>
</tr>
<tr>
<td>Woodworking and 3 Panel Brush Cleaners</td>
<td>6.33</td>
<td>6.33</td>
<td>6.33</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Emergency Generator (EG1)</td>
<td>2.9E-3</td>
<td>0.01</td>
<td>0.01</td>
<td>1.8E-4</td>
<td>0.67</td>
<td>0.01</td>
<td>1.13</td>
</tr>
<tr>
<td>Cold Clean Degreaser (PW1)</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.49</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Adhesive Application (AA)</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Total for Source</td>
<td>33.10</td>
<td>33.48</td>
<td>33.48</td>
<td>0.04</td>
<td>7.36</td>
<td>497.86</td>
<td>6.75</td>
</tr>
</tbody>
</table>

**PSD Major Source Thresholds**

- PM: 250
- PM10: 250
- PM2.5: 250
- SO2: 250
- NOX: 250
- VOC: 250
- CO: 250

*PM2.5 listed is direct PM2.5.

**Pursuant to 326 IAC 6-3-2(d), the particulate emissions from surface coating operations shall be controlled by dry particulate filters and the Permittee shall operate the control devices in accordance with the manufacturer's specifications. Compliance with this standard, in conjunction with a conservative assumption of 95% capture and control, shall limit PM, PM10, and PM2.5 emissions from the surface coating operations to the values shown.
(a) This existing major PSD stationary source will continue to be major under 326 IAC 2-2 because at least one pollutant, VOC, has emissions equal to or greater than the PSD major source threshold. Therefore, pursuant to 326 IAC 2-2, the PSD requirements apply.

**PSD Minor Limits**

(a) The following limits were established in Part 70 Operating Permit No. T039-30933-00714, issued December 8, 2011, and modified as part of Significant Permit Modification No. 039-36589-00714 and Part 70 Operating Permit Renewal No. T039-36799-00714:

(1) In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the total input of volatile organic compounds (VOC), including coatings, dilution solvents, and cleaning solvents, at the stain line (STL1), sealer line (SL1), topcoat line (TL1), touchup booth (TB1), and the solvent recycling collection unit (SR1) shall not exceed 249 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The amount of VOC in waste shipped offsite may be deducted from the reported monthly VOC input.

Compliance with this emission limit shall limit VOC emissions from the stain line (STL1), sealer line (SL1), topcoat line (TL1), touchup booth (TB1), and the solvent recycling collection unit (SR1) to less than 250 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to the stain line (STL1), sealer line (SL1), topcoat line (TL1), touchup booth (TB1), and the solvent recycling collection unit (SR1).

(2) In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the PM, PM10, and PM2.5 emissions after control from the woodworking operations and three (3) panel brush cleaners shall be less than the following emission limitations:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Control Device</th>
<th>PM Limit (lbs/hr)</th>
<th>PM10 Limit (lbs/hr)</th>
<th>PM2.5 Limit (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>WW1 and 3 Panel Brush Cleaners</td>
<td>DC1</td>
<td>5.87</td>
<td>5.87</td>
<td>5.87</td>
</tr>
<tr>
<td>WW1</td>
<td>DC2</td>
<td>5.87</td>
<td>5.87</td>
<td>5.87</td>
</tr>
<tr>
<td>WW1</td>
<td>DC3</td>
<td>5.87</td>
<td>5.87</td>
<td>5.87</td>
</tr>
</tbody>
</table>

Compliance with these limits shall limit the potential to emit of PM, PM10, and PM2.5 from woodworking operations and three (3) panel brush cleaners controlled by DC1 through DC3 to less than 250 tons per year and shall render 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to the woodworking units and three (3) panel brush cleaners controlled by DC1 through DC3.

(b) The following limits were established in Significant Permit Modification No. T039-36589-00714 and modified as part of Part 70 Operating Permit Renewal No. T039-36799-00714:

(1) In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the total input of volatile organic compounds (VOC), including coatings, dilution solvents, and cleaning solvents, at the topcoat line (TL2) and the touchup booth (TB2) shall not exceed 248 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The amount of VOC in waste shipped offsite may be deducted from the reported monthly VOC input.

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

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Control Device</th>
<th>PM Limit (lbs/hr)</th>
<th>PM10 Limit (lbs/hr)</th>
<th>PM2.5 Limit (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>WW1</td>
<td>DC4</td>
<td>16.15</td>
<td>16.15</td>
<td>16.15</td>
</tr>
<tr>
<td></td>
<td>DC5</td>
<td>2.35</td>
<td>2.35</td>
<td>2.35</td>
</tr>
</tbody>
</table>

Compliance with these limits will assure that the potential to emit from this modification is less than 250 tons of VOC, PM, PM10, and PM2.5 per twelve (12) consecutive month period, each and shall render the requirements of 326 IAC 2-2 not applicable.

**Federal Rule Applicability Determination**

Due to the modification at this source, federal rule applicability has been reviewed as follows:

**New Source Performance Standards (NSPS):**

(a) The requirements of the New Source Performance Standards of Performance for Surface Coating of Metal Furniture, 40 CFR 60, Subpart EE, and 326 IAC 12, are not included in the permit, since this source does not perform surface coating of metal furniture as defined in §60.310(a).

(b) The requirements of the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60, Subpart MM, and 326 IAC 12, are not included in the permit, since this source does not coat automobiles or light duty trucks as defined in §60.390(a).

(c) The requirements of the New Source Performance Standard for Pressure Sensitive Tape and Label Surface Coating Operations, 40 CFR 60, Subpart RR, and 326 IAC 12, are not included in the permit, since this source does not coat sensitive tape or label materials as defined in §60.440(a).

(d) The requirements of the New Source Performance Standards for Industrial Surface Coating: Large Appliances, 40 CFR 60, Subpart SS, and 326 IAC 12, are not included in the permit, since this source does not apply surface coatings to large appliances as defined in §60.451.

(e) The requirements of the New Source Performance Standards for Metal Coil Surface Coating, 40 CFR 60, Subpart TT, and 326 IAC 12, are not included in the permit, since this source does not apply surface coating to metal coils as defined in §60.461.

(f) The requirements of the New Source Performance Standards for the Beverage Can Surface Coating Industry, 40 CFR 60, Subpart WW, and 326 IAC 12, are not included in the permit, since this source does not apply surface coating to beverage cans as defined in §60.491.

(g) The requirements of the New Source Performance Standard for Magnetic Tape Coating Facilities, 40 CFR 60, Subpart SSS, and 326 IAC 12, are not included in the permit, since this source does not coat magnetic tape as defined in §60.711(a)(13).

(h) The requirements of the New Source Performance Standard for Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines, 40 CFR 60, Subpart TTT, and 326 IAC 12, are not included in the permit, since this source does not coat plastic parts for business machines as defined in §60.721(a).

(i) There are no New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included in the permit for this proposed modification.

**National Emission Standards for Hazardous Air Pollutants (NESHAP):**

(a) This source is still subject to the National Emissions Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations, 40 CFR 63, Subpart JJ, which is incorporated by reference as 326 IAC 20-14, since this source is engaged, either in part or in whole, in the
manufacture of wood furniture or wood furniture components as defined in §63.801, and this source is located at a major source of HAPs as defined in §63.2.

The facilities subject to this rule include the following:

(1) One (1) automated cabinet finishing line, constructed in 2011 and modified in 2016, including the following equipment:

(A) one (1) stain line, constructed in 2011 and modified in 2016, identified as STL1, with a maximum capacity of 500 cabinets per hour, utilizing computer controlled air-assisted airless spray method of application, controlled by dry filters, and exhausting through Stack ACL1.

(B) one (1) sealer line, constructed in 2011, modified in 2016, and approved for modification in 2017 to change coatings, identified as SL1, with a maximum capacity of 500 cabinets per hour, utilizing computer controlled air-assisted airless spray method of application, controlled by dry filters, and exhausting through Stack ACL5.

(C) one (1) topcoat line, constructed in 2011, modified in 2016, and approved for modification in 2017 to change coatings, identified as TL1, with a maximum capacity of 500 cabinets per hour, utilizing computer controlled air-assisted airless spray method of application, controlled by dry filters, and exhausting through Stack ACL11.

(D) one (1) touchup booth, constructed in 2011, modified in 2016, and approved for modification in 2017 to change coatings, identified as TB1, with a maximum capacity of 50 cabinets per hour, utilizing handheld HVLP method of application, controlled by dry filters, and exhausting through Stack TBS1.

(E) one (1) topcoat line, constructed in 2016 and approved for modification in 2017 to change coatings, identified as TL2, with a maximum capacity of 500 cabinets per hour, utilizing computer controlled air-assisted airless spray method of application, controlled by dry filters, and exhausting through Stack TL2S.

(F) one (1) touchup booth, constructed in 2016 and approved for modification in 2017 to change coatings, identified as TB2, with a maximum capacity of 50 cabinets per hour, utilizing handheld HVLP method of application, controlled by dry filters, and exhausting through Stack TB2S.

Under the Wood Furniture Manufacturing NESHAP (40 CFR 63 Subpart JJ), the automated cabinet finishing line is considered an existing affected source.

Nonapplicable portions of the NESHAP will not be included in the permit. The entire rule is included as Attachment A of the permit. These units are subject to the following portions of Subpart JJ:

1. 40 CFR 63.800(a) through (f)
2. 40 CFR 63.801
3. 40 CFR 63.802(a) and (b)
4. 40 CFR 63.803
5. 40 CFR 63.804(a)(1), (2), and (4), (b), (c)(1), (d)(1), (2), and (4), (e)(1), (f)(1), (2), (3), (5), (7), and (8), (f)(1), (2), (3), (5), (7), and (8), and (g)(1), (2), (3), (5), (7), and (8)
6. 40 CFR 63.805(a)
7. 40 CFR 63.806(a), (b), (c), (d), (e), (h), (i), and (j)
8. 40 CFR 63.807(a), (b), (c) and (e)
9. 40 CFR 63.808
10. Tables 1 through 6

The provisions of 40 CFR 63, Subpart A -- General Provisions, which are incorporated as 326 IAC 20-1, apply to the above listed facilities when otherwise specified in 40 CFR 63, Subpart JJ.
(b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Automobiles and Light-Duty Trucks, 40 CFR 63, Subpart III, and 326 IAC 20-85, are not included in the permit, since, although this source is a major source of HAPs as defined in §63.2, this source does not coat new automobile or new light-duty truck bodies or body parts for new automobiles or new light-duty trucks.

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Metal Cans, 40 CFR 63, Subpart KKKK, and 326 IAC 20-86, are not included in the permit, since, although this source is a major source of HAPs as defined in §63.2, this source does not coat metal cans as defined in §63.3561.

(d) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart MMMM, and 326 IAC 20-80, are not included in the permit, since, although this source is a major source of HAPs as defined in §63.2, this source does not coat miscellaneous metal parts and products as defined in §63.3881.

(e) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Large Appliances, 40 CFR 63, Subpart NNNN, and 326 IAC 20-63, are not included in the permit, since, although this source is a major source of HAPs as defined in §63.2, this source does not coat large appliances as defined in §63.4181.

(f) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products, 40 CFR 63, Subpart PPPP, and 326 IAC 20-81, are not included in the permit, since, although this source is a major source of HAPs as defined in §63.2, this source does not coat plastic parts and products as defined in §63.4481.

(g) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Wood Building Products, 40 CFR 63, Subpart QQQQ, and 326 IAC 20-79, are not included in the permit, since, although this source is a major source of HAPs as defined in §63.2, this source does not coat wood building products as defined in §63.4781.

(h) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Metal Furniture, 40 CFR 63, Subpart RRRR, 326 IAC 20-78, are not included in the permit, since, although this source is a major source of HAPs as defined in §63.2, this source does not coat metal furniture as defined in §63.4981.

(i) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Metal Coil, 40 CFR 63, Subpart SSSS, and 326 IAC 20-64, are not included in the permit, since, although this source is a major source of HAPs as defined in §63.2, this source does not coat metal coil as defined in §63.5110.

(j) The requirements of the National Emission Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH, and 326 IAC 20, are not included in the permit, since this source is not an area source of HAPs, this source does not have paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl) in paint removal processes, the source does not have autobody refinishing operations, and the source does not spray apply coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), collectively referred to as the target HAP to any part or product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment.

(k) There are no other National Emission Standards for Hazardous Air Pollutants under 40 CFR 63, 326 IAC 14 and 326 IAC 20 included for this proposed modification.
Compliance Assurance Monitoring (CAM):

(a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing pollutant-specific emission unit that meets the following criteria:

1. has a potential to emit before controls equal to or greater than the major source threshold for the regulated pollutant involved;
2. is subject to an emission limitation or standard for that pollutant (or a surrogate thereof); and
3. uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

(b) Pursuant to 40 CFR 64.2(b)(1)(i), emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act are exempt from the requirements of CAM. Therefore, an evaluation was not conducted for any emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act.

(c) Pursuant to 40 CFR 64.2(b)(1)(iii), Acid Rain requirements pursuant to Sections 404, 405, 406, 407(a), 407(b), or 410 of the Clean Air Act are exempt emission limitations or standards. Therefore, CAM was not evaluated for emission limitations or standards for SO2 and NOx under the Acid Rain Program.

(d) Pursuant to 40 CFR 64.3(d), if a continuous emission monitoring system (CEMS) is required pursuant to other federal or state authority, the owner or operator shall use the CEMS to satisfy the requirements of CAM according to the criteria contained in 40 CFR 64.3.

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

<table>
<thead>
<tr>
<th>Emission Unit/Pollutant</th>
<th>Control Device</th>
<th>Applicable Emission Limitation</th>
<th>Uncontrolled PTE (tons/year)</th>
<th>Controlled PTE (tons/year)</th>
<th>CAM Applicable (Y/N)</th>
<th>Large Unit (Y/N)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Woodworking and 3 Panel Brush Cleaners (PM10/PM2.5)</td>
<td>C &amp; BH DC1</td>
<td>Y</td>
<td>102.92*</td>
<td>1.03</td>
<td>N²</td>
<td>N</td>
</tr>
<tr>
<td>Woodworking (PM10/PM2.5)</td>
<td>C &amp; BH DC2</td>
<td>Y</td>
<td>102.92*</td>
<td>1.03</td>
<td>N²</td>
<td>N</td>
</tr>
<tr>
<td>Woodworking (PM10/PM2.5)</td>
<td>BH DC3</td>
<td>Y</td>
<td>102.92*</td>
<td>1.03</td>
<td>N²</td>
<td>N</td>
</tr>
<tr>
<td>Woodworking (PM10/PM2.5)</td>
<td>BH DC4</td>
<td>Y</td>
<td>283.02*</td>
<td>2.83</td>
<td>N²</td>
<td>N</td>
</tr>
<tr>
<td>Woodworking (PM10/PM2.5)</td>
<td>BH DC5</td>
<td>Y</td>
<td>41.14*</td>
<td>0.41</td>
<td>N²</td>
<td>N</td>
</tr>
<tr>
<td>Topcoat Line 2 Panel Brush Cleaner PBC2 (PM10/PM2.5)</td>
<td>DF</td>
<td>Y</td>
<td>2.15</td>
<td>0.49</td>
<td>N¹</td>
<td>N</td>
</tr>
</tbody>
</table>

Uncontrolled PTE (tpy) and controlled PTE (tpy) are evaluated against the Major Source Threshold for each pollutant. Major Source Threshold for criteria pollutants (PM10, PM2.5, SO2, NOX, VOC and CO) is 100 tpy, for a single HAP ten (10) tpy, and for total HAPs twenty-five (25) tpy.

Under the Part 70 Permit program (40 CFR 70), PM is not a regulated pollutant.

N¹ CAM does not apply for PM10/PM2.5 because the uncontrolled PTE of PM10/PM2.5 is less than the major source threshold.

N² Pursuant to 40 CFR Part 64.1, the control devices are considered to be inherent process equipment. Therefore, based on the evaluation, the requirements of 40 CFR Part 64, CAM, are not applicable.

Controls: BH = Baghouse, C = Cyclone, DC = Dust Collection System, DF = Dry Filter, RTO = Regenerative or Recuperative Thermal Oxidizer, WS = Wet Scrubber, ESP = Electrostatic Precipitator

Emission units without air pollution controls are not subject to CAM. Therefore, they are not listed.
Inherent Process Equipment (Woodworking)

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

The woodworking baghouse controls are determined to be necessary for the normal and proper operation of the woodworking operations (see the "Integral Part of the Process" Determination" section above for more detail). Therefore, the woodworking baghouses meet the criteria for inherent to the process for the purpose of determining CAM applicability, and are not considered control devices. Therefore, the requirements of 40 CFR Part 64.2, CAM, do not apply to the woodworking operations.

The Automated Cabinet Finishing Line, including the stain line (STL1), sealer line (SL1), two (2) topcoat lines (TL1 and TL2), and two (2) touchup booths (TB1 and TB2), at this source is subject to 40 CFR 63, Subpart JJ, National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Wood Furniture Manufacturing Operations, which was promulgated after November 15, 1990. Therefore, pursuant to 40 CFR 64.2(b)(1)(i), the requirements of 40 CFR Part 64, CAM are not applicable to the Automated Cabinet Finishing Line, including any of the stain line (STL1), sealer line (SL1), two (2) topcoat lines (TL1 and TL2), and two (2) touchup booths (TB1 and TB2).

Based on this evaluation, the requirements of 40 CFR Part 64, CAM, are not applicable to any of the modified units as part of this modification.

### State Rule Applicability Determination

Due to the modification at this source, state rule applicability has been reviewed as follows:

- **326 IAC 2-2 (PSD)**
  PSD applicability is discussed under the Permit Level Determination – PSD section.

- **326 IAC 2-6 (Emission Reporting)**
  Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially. The first report is due no later than July 1, 2020, and subsequent reports are due every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

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

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

- **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 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 (PM Limitations Except Lake County)
The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year.

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.

Surface Coating

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The operation of the automated cabinet finishing line will emit greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs; however, pursuant to 326 IAC 2-4.1-1(b)(2), because the units in the line are specifically regulated by NESHAP 40 CFR 63, Subpart JJ, which was issued pursuant to Section 112(d) of the CAA, these units are exempt from the requirements of 326 IAC 2-4.1.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to the automated cabinet finishing line, because it applies surface coating using methods not specifically exempted in 326 IAC 6-3-1(b) and uses more than five (5) gallons of coatings per day. Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the automated cabinet finishing line shall be controlled by dry particulate filters, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)
Pursuant to 326 IAC 8-1-6(3)(A), the requirement to reduce VOC emissions using the Best Available Control Technology (BACT) does not apply to the automated cabinet finishing line, because it is subject to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating).

326 IAC 8-2-9 (VOC Rules: Miscellaneous Metal and Plastic Parts Coating)
Pursuant to 326 IAC 8-2-9(a), the automated cabinet finishing line is not subject to the requirements of 326 IAC 8-2-9, since it does not perform metal and plastic surface coating of the types listed in 326 IAC 8-2-9(a)(2). This source performs surface coating of wood kitchen cabinets.

326 IAC 8-2-10 (VOC Rules: Flat Wood Panels; Manufacturing Operations)
Pursuant to 326 IAC 8-2-10(a), the requirements of 326 IAC 8-2-10 are not applicable to the automated cabinet finishing line, since the source does not manufacture flat wood panels.

326 IAC 8-2-12 (VOC Rules: Wood Furniture and Cabinet Coating)
This rule applies to facilities located in any county, constructed after July 1, 1990, that perform surface coating of wood furniture (or wood furniture components), including cabinets (kitchen, bath, and vanity), tables, beds, chairs, sofas (nonupholstered), art objects, and any other coated furnishings made of solid wood, wood composition, or simulated wood material and which have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls. The automated cabinet finishing line is subject to the requirements of 326 IAC 8-2-12, since it will apply coatings to wood furniture (or wood furniture components) and has potential VOC emissions of greater than fifteen (15) pounds of VOC per day.

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

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

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

The source utilizes High Volume Low Pressure (HVLP) spray applications or Air Assisted Airless Spray application methods for all surface coating operations; therefore, the source is able to comply with 326 IAC 8-2-12.

326 IAC 8-6 (Organic Solvent Emission Limitations)
The automated cabinet finishing line is not subject to the requirements of 326 IAC 8-6 since it is subject to the requirements of 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating).

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)
The automated cabinet finishing line is not subject to the requirements of 326 IAC 8-7, since this source is not located in Lake, Porter, Clark, or Floyd Counties. This source is located in Elkhart County.

326 IAC 8-11 (VOC Rules: Wood Furniture Coatings)
Pursuant to 326 IAC 8-11(1), the automated cabinet finishing line is not subject to the requirements of 326 IAC 8-11 since the source is not located in Lake, Porter, Clark, or Floyd Counties. This source is located in Elkhart County.

Compliance Determination and Monitoring Requirements

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

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

(a) The Compliance Determination Requirements applicable to this modification are as follows:

1. Compliance with the Prevention of Significant Deterioration Minor Limit for Volatile Organic Compounds shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets or Certified Product Data Sheets. IDEM, OAQ, reserves the
authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(2) If the amount of VOC in the waste collected by the spent acetone solvent recycling collection unit or other waste material that is shipped offsite for recycling or disposal is deducted from the monthly VOC input reported, the Permittee shall determine the VOC content of the waste shipped offsite using one or a combination of the following methods:

(A) On-Site Sampling

(i) VOC content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

(ii) An initial representative sample of the VOC containing waste to be shipped offsite shall be collected just prior to being shipped offsite, and the sample shall be analyzed for VOC content within 30 days of collection.

(iii) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.

(iv) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the VOC containing waste. Such change could include, but is not limited to, the following:

   (AA) A change in the coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or

   (BB) An operational change in the coating application or cleanup operations.

(B) Certified Waste Report: The VOC reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of VOC in the waste.

(C) Minimum Assumed VOC content: The VOC content of the waste shipped offsite may be assumed to be equal to the VOC content of the material with the lowest VOC content that could be present in the waste, as determined using the "as supplied" and "as applied" VOC data sheets, for each month.

(3) IDEM reserves the right to request a representative sample of the VOC containing waste stream and conduct an analysis for VOC content.

(4) Compliance with the VOC input limitations that render the requirements of 326 IAC 2-2 (PSD) not applicable shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compound input for the previous month, minus the amount VOC in the waste shipped out for recycling or disposal, and adding it to previous 11 months total VOC input, minus the amount VOC in the waste shipped out for recycling or disposal, so as to arrive at VOC input for the most recent twelve (12) consecutive month period.

(5) The VOC input for a month shall be calculated using the following equation:

\[
\text{VOC input} = \text{SCL} - \text{SR}
\]
Where:

\[ SCL = \text{The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents, at the coating booths; and} \]

\[ SR = \text{The total amount of VOC, in tons, shipped out for either recycling or disposal, including coatings, dilution solvents, and cleaning solvents, from the coating booths.} \]

(b) The Compliance Monitoring Requirements applicable to this proposed modification are as follows:

<table>
<thead>
<tr>
<th>Emission Units</th>
<th>Control</th>
<th>Parameter</th>
<th>Frequency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Automated Cabinet Finishing Line</td>
<td>Dry Filters</td>
<td>Filter inspection</td>
<td>Daily</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Overspray observation</td>
<td>Weekly</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Overspray on the rooftops and the nearby ground</td>
<td>Monthly</td>
</tr>
<tr>
<td>Woodworking Operations and 3 Panel Brush Cleaners</td>
<td>Cyclone in series with Baghouse: DC1 and DC2</td>
<td>Visible emission notations (when exhausting to the atmosphere)</td>
<td>Daily</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Baghouse inspections (when exhausting indoors)</td>
<td>Semi-Annually</td>
</tr>
<tr>
<td>Woodworking Operations</td>
<td>Baghouse DC3, DC4, and DC5</td>
<td>Visible emission notations (when exhausting to the atmosphere)</td>
<td>Daily</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Baghouse inspections (when exhausting indoors)</td>
<td>Semi-Annually</td>
</tr>
</tbody>
</table>

These monitoring conditions are necessary because the dry filters and baghouses for the Automated Cabinet Finishing Line, Woodworking Operations and the 3 Panel Brush Cleaners (Cyclone in series with Baghouses DC1 and DC2), and the Woodworking Operations (Baghouses DC3 - DC5) must operate properly to assure compliance with PM/PM10/PM2.5 PSD Minor limits, the PM limits under 326 IAC 6-3-2, and the requirements of 326 IAC 2-7 (Part 70).

**Proposed Changes**

The following changes listed below are due to the proposed modification and administrative amendment. Deleted language appears as strikethrough text and new language appears as **bold** text:

(1) The permit has been revised to include the updated descriptions for the automated cabinet finishing line.

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

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

(a) One (1) automated cabinet finishing line, constructed in 2011 and modified in 2016, including the following equipment:

(1) one (1) stain line, constructed in 2011 and modified in 2016, identified as STL1, with a maximum capacity of 500 cabinets per hour, utilizing computer controlled air-assisted airless spray method of application, controlled by dry filters, and exhausting through Stack ACL1.

(2) one (1) sealer line, constructed in 2011, and modified in 2016, and approved for modification in 2017 to change coatings, identified as SL1, with a maximum capacity of 500 cabinets per hour, utilizing computer controlled air-assisted airless spray method of application, controlled by dry filters, and exhausting through Stack ACL5.

(3) one (1) topcoat line, constructed in 2011, and modified in 2016, and approved for modification in 2017 to change coatings, identified as TL1, with a maximum capacity of 500 cabinets per hour, utilizing computer controlled air-assisted airless spray method of application, controlled by dry filters, and exhausting through Stack ACL11.
one (1) touchup booth, constructed in 2011, and modified in 2016, and approved for modification in 2017 to change coatings, identified as TB1, with a maximum capacity of 50 cabinets per hour, utilizing handheld HVLP method of application, controlled by dry filters, and exhausting through Stack TBS1.

one (1) topcoat line, approved in 2016 for construction constructed in 2016 and approved for modification in 2017 to change coatings, identified as TL2, with a maximum capacity of 500 cabinets per hour, utilizing computer controlled air-assisted airless spray method of application, controlled by dry filters, and exhausting through Stack TL2S.

one (1) touchup booth, approved in 2016 for construction constructed in 2016 and approved for modification in 2017 to change coatings, identified as TB2, with a maximum capacity of 50 cabinets per hour, utilizing handheld HVLP method of application, controlled by dry filters, and exhausting through Stack TB2S.

Acetone is used as a cleanup solvent, with the spent acetone recycled in the solvent recycling collection unit (SR1).

Under the Wood Furniture Manufacturing NESHAP (40 CFR 63 Subpart JJ), the automated cabinet finishing line, is considered part of the existing affected source.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

<table>
<thead>
<tr>
<th>Emissions Unit Description [326 IAC 2-7-5(15)]: Automated Cabinet Finishing Line</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>(a)</strong> One (1) automated cabinet finishing line, constructed in 2011 and modified in 2016, including the following equipment:</td>
</tr>
<tr>
<td><strong>(1)</strong> one (1) stain line, constructed in 2011 and modified in 2016, identified as STL1, with a maximum capacity of 500 cabinets per hour, utilizing computer controlled air-assisted airless spray method of application, controlled by dry filters, and exhausting through Stack ACL1.</td>
</tr>
<tr>
<td><strong>(2)</strong> one (1) sealer line, constructed in 2011, and modified in 2016, and approved for modification in 2017 to change coatings, identified as SL1, with a maximum capacity of 500 cabinets per hour, utilizing computer controlled air-assisted airless spray method of application, controlled by dry filters, and exhausting through Stack ACL5.</td>
</tr>
<tr>
<td><strong>(3)</strong> one (1) topcoat line, constructed in 2011, and modified in 2016, and approved for modification in 2017 to change coatings, identified as TL1, with a maximum capacity of 500 cabinets per hour, utilizing computer controlled air-assisted airless spray method of application, controlled by dry filters, and exhausting through Stack ACL11.</td>
</tr>
<tr>
<td><strong>(4)</strong> one (1) touchup booth, constructed in 2011, and modified in 2016, and approved for modification in 2017 to change coatings, identified as TB1, with a maximum capacity of 50 cabinets per hour, utilizing handheld HVLP method of application, controlled by dry filters, and exhausting through Stack TBS1.</td>
</tr>
<tr>
<td><strong>(5)</strong> one (1) topcoat line, approved in 2016 for construction constructed in 2016 and approved for modification in 2017 to change coatings, identified as TL2, with a maximum capacity of 500 cabinets per hour, utilizing computer controlled air-assisted airless spray method of application, controlled by dry filters, and exhausting through Stack TL2S.</td>
</tr>
</tbody>
</table>
**SECTION E.1 NESHAP**

**Emissions Unit Description: Automated Cabinet Finishing Line**

(a) One (1) automated cabinet finishing line, constructed in 2011 and modified in 2016, including the following equipment:

1. one (1) stain line, constructed in 2011 and modified in 2016, identified as STL1, with a maximum capacity of 500 cabinets per hour, utilizing computer controlled air-assisted airless spray method of application, controlled by dry filters, and exhausting through Stack ACL1.

2. one (1) sealer line, constructed in 2011, modified in 2016, and approved for modification in 2017 to change coatings, identified as SL1, with a maximum capacity of 500 cabinets per hour, utilizing computer controlled air-assisted airless spray method of application, controlled by dry filters, and exhausting through Stack ACL5.

3. one (1) topcoat line, constructed in 2011, modified in 2016, and approved for modification in 2017 to change coatings, identified as TL1, with a maximum capacity of 500 cabinets per hour, utilizing computer controlled air-assisted airless spray method of application, controlled by dry filters, and exhausting through Stack ACL11.

4. one (1) touchup booth, constructed in 2011, modified in 2016, and approved for modification in 2017 to change coatings, identified as TB1, with a maximum capacity of 50 cabinets per hour, utilizing handheld HVLP method of application, controlled by dry filters, and exhausting through Stack TBS1.

5. one (1) topcoat line, approved in 2016 for construction constructed in 2016 and approved for modification in 2017 to change coatings, identified as TL2, with a maximum capacity of 500 cabinets per hour, utilizing computer controlled air-assisted airless spray method of application, controlled by dry filters, and exhausting through Stack TL2S.

6. one (1) touchup booth, approved in 2016 for construction constructed in 2016 and approved for modification in 2017 to change coatings, identified as TB2, with a maximum capacity of 50 cabinets per hour, utilizing handheld HVLP method of application, controlled by dry filters, and exhausting through Stack TB2S.

Acetone is used as a cleanup solvent, with the spent acetone recycled in the solvent recycling collection unit (SR1).

Under the Wood Furniture Manufacturing NESHAP (40 CFR 63 Subpart JJ), the automated cabinet finishing line, is considered part of the existing affected source.

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

**Additional Changes**

IDEM, OAQ made additional changes to the permit as described below in order to update the language to match the most current version of the applicable rule, to eliminate redundancy within the permit, and to provide clarification regarding the requirements of these conditions.
(1) Sections D.1 and D.2 have been revised to include the current model language.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

*****

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

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

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), when applying surface coatings to wood furniture and/or wood cabinets in the automated cabinet finishing line, 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 systems:

*****

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

D.1.6 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the automated cabinet finishing line stacks (ACL1, ACL5, ACL11, TBS1, TL2S, and TB2S) while one or more of the facilities are in operation. If abnormal emissions are observed a condition exists which should result in a response, the Permittee shall take a reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

*****

D.1.7 Record Keeping Requirements

*****

(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

*****

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

*****

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

Pursuant to 326 IAC 6-3-2(e)(2) (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions rate from the woodworking operations shall not exceed 4.76 pounds per hour when operating at a process weight rate of equal to or less than 1.25 tons of wood per hour (2500 pounds of wood per hour).
Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]

D.2.5 Visible Emissions Notations

*****

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

*****

D.2.7 Broken or Failed Bag Detection

*****

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

*****

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

D.2.8 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.5, the Permittee shall maintain daily records of the daily visible emission notations of the baghouse stack exhausts associated with the woodworking operations when venting to the atmosphere. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that 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.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on June 12, 2017. Additional information was received on June 20, 2017.

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 039-38680-00714. The operation of this proposed modification shall be subject to the conditions of the attached Administrative Amendment.

The staff recommends to the Commissioner that the Part 70 Significant Source Modification and Administrative Amendment be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Natalie Moore at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-8279 or toll free at 1-800-451-6027, extension 3-8279.

(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 Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.
Uncontrolled/Unlimited Emissions (Before Integral Woodworking Controls)

<table>
<thead>
<tr>
<th>Emission Units</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Highest Single HAP</th>
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</table>

**Acetone is used as a cleanup solvent in the Automated Cabinet Finishing Line, with the spent acetone recycled in the solvent recycling collection unit (SR1). Potential VOC and HAP emissions from the solvent recycling collection unit (SR1) are assumed to be emitted in the Automated Cabinet Finishing Line (i.e., 100% flash off of VOC/HAP in coatings during application).**

Limited Emissions (Before Integral Woodworking Controls)

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<tr>
<th>Emission Units</th>
<th>PM</th>
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<th>PM2.5</th>
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<th>NOx</th>
<th>VOC</th>
<th>CO</th>
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<td><strong>Total</strong></td>
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<td>6.75</td>
<td>497.16</td>
<td>396.82</td>
<td>Xylene</td>
</tr>
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</table>

**VOC PTE based on the PSD Minor limits taken by the source. Pursuant to 326 IAC 6-3-2(d), the particulate emissions from surface coating operations shall be controlled by dry particulate filters and the Permittee shall operate the control devices in accordance with the manufacturer’s specifications. Compliance with this standard, in conjunction with a conservative assumption of 95% capture and control, shall limit PM, PM10, and PM2.5 emissions from the surface coating operations to the values shown.**

**PM/PM10/PM2.5 PTE based on the PSD Minor limits taken by the source.**

**Acetone is used as a cleanup solvent in the Automated Cabinet Finishing Line, with the spent acetone recycled in the solvent recycling collection unit (SR1). Potential VOC and HAP emissions from the solvent recycling collection unit (SR1) are assumed to be emitted in the Automated Cabinet Finishing Line (i.e., 100% flash off of VOC/HAP in coatings during application).**

Limited Emissions (After Integral Woodworking Controls)

<table>
<thead>
<tr>
<th>Emission Units</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Highest Single HAP</th>
</tr>
</thead>
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<tr>
<td>Automated Stain Line (STL1)*</td>
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<td>Natural Gas Combustion Units</td>
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**VOC PTE based on the PSD Minor limits taken by the source. Pursuant to 326 IAC 6-3-2(d), the particulate emissions from surface coating operations shall be controlled by dry particulate filters and the Permittee shall operate the control devices in accordance with the manufacturer’s specifications. Compliance with this standard, in conjunction with a conservative assumption of 95% capture and control, shall limit PM, PM10, and PM2.5 emissions from the surface coating operations to the values shown.**

**PM/PM10/PM2.5 PTE of woodworking operations is after integral woodworking controls.**

**Acetone is used as a cleanup solvent in the Automated Cabinet Finishing Line, with the spent acetone recycled in the solvent recycling collection unit (SR1). Potential VOC and HAP emissions from the solvent recycling collection unit (SR1) are assumed to be emitted in the Automated Cabinet Finishing Line (i.e., 100% flash off of VOC/HAP in coatings during application).**
Appendix A: Emissions Calculations

Modification Summary

Company Name: Kountry Wood Products, LLC
Source Address: 352 Shawnee Street, Nappanee, IN 46550
Significant Source Modification No.: 039-38680-00714
Administrative Amendment: 039-38682-00714
Reviewer: Natalie Moore

Uncontrolled/Unlimited Emissions

<table>
<thead>
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<th>Emission Units Before Modification</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
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<td>1591.44</td>
<td>0.00</td>
<td>507.40</td>
<td>263.42</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Emission Units After Modification</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Highest Single HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Automated Sealer Line (SL1)</td>
<td>167.90</td>
<td>167.90</td>
<td>167.90</td>
<td>-</td>
<td>-</td>
<td>443.77</td>
<td>-</td>
<td>152.28</td>
<td>122.47</td>
</tr>
<tr>
<td>Automated Topcoat Line (TL1)</td>
<td>167.90</td>
<td>167.90</td>
<td>167.90</td>
<td>-</td>
<td>-</td>
<td>443.77</td>
<td>-</td>
<td>154.10</td>
<td>122.47</td>
</tr>
<tr>
<td>Automated Topcoat Line (TL2)</td>
<td>167.90</td>
<td>167.90</td>
<td>167.90</td>
<td>-</td>
<td>-</td>
<td>443.77</td>
<td>-</td>
<td>152.28</td>
<td>122.47</td>
</tr>
<tr>
<td>Total After Modification</td>
<td>527.70</td>
<td>527.70</td>
<td>527.70</td>
<td>0.00</td>
<td>0.00</td>
<td>1420.07</td>
<td>0.00</td>
<td>489.12</td>
<td>391.90</td>
</tr>
</tbody>
</table>

Total PTE Increase Due to Modification: 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 128.48 |

*Acetone is used as a cleanup solvent in the Automated Cabinet Finishing Line, with the spent acetone recycled in the solvent recycling collection unit (SR1). Potential VOC and HAP emissions from the solvent recycling collection unit (SR1) are assumed to be emitted in the Automated Cabinet Finishing Line (i.e., 100% flash off of VOC/HAP in coatings during application).

Controlled/Limited Emissions

<table>
<thead>
<tr>
<th>Emission Units Before Modification</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Highest Single HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Automated Sealer Line (SL1)*</td>
<td>8.40</td>
<td>8.40</td>
<td>8.40</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>158.56</td>
<td>82.32</td>
</tr>
<tr>
<td>Automated Topcoat Line (TL1)*</td>
<td>8.40</td>
<td>8.40</td>
<td>8.40</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>158.56</td>
<td>82.32</td>
</tr>
<tr>
<td>Touch-up Booth (TB1)*</td>
<td>0.60</td>
<td>0.60</td>
<td>0.60</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>15.86</td>
<td>8.23</td>
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<tr>
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<td>8.40</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>158.56</td>
<td>82.32</td>
</tr>
<tr>
<td>Touch-up Booth (TB2)*</td>
<td>0.60</td>
<td>0.60</td>
<td>0.60</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>15.86</td>
<td>8.23</td>
</tr>
<tr>
<td>Total Before Modification</td>
<td>26.38</td>
<td>26.38</td>
<td>26.38</td>
<td>0.00</td>
<td>0.00</td>
<td>497.00</td>
<td>0.00</td>
<td>507.40</td>
<td>263.42</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Emission Units After Modification</th>
<th>PM</th>
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<th>PM2.5</th>
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<td>-</td>
<td>-</td>
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<td>-</td>
<td>-</td>
<td>-</td>
<td>154.10</td>
<td>122.47</td>
</tr>
<tr>
<td>Touch-up Booth (TB1)*</td>
<td>0.60</td>
<td>0.60</td>
<td>0.60</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>15.23</td>
<td>12.25</td>
</tr>
<tr>
<td>Automated Topcoat Line (TL2)*</td>
<td>8.40</td>
<td>8.40</td>
<td>8.40</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>152.28</td>
<td>122.47</td>
</tr>
<tr>
<td>Touch-up Booth (TB2)*</td>
<td>0.60</td>
<td>0.60</td>
<td>0.60</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>15.23</td>
<td>12.25</td>
</tr>
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<td>0.00</td>
<td>497.00</td>
<td>0.00</td>
<td>489.12</td>
<td>391.90</td>
</tr>
</tbody>
</table>

Total PTE Increase Due to Modification: 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 263.42 |

*VOC PTE based on the PSD Minor limits taken by the source. PM/PM10/PM2.5 PTE based on the PSD Minor limits taken by the source.
**Acetone is used as a cleanup solvent in the Automated Cabinet Finishing Line, with the spent acetone recycled in the solvent recycling collection unit (SR1). Potential VOC and HAP emissions from the solvent recycling collection unit (SR1) are assumed to be emitted in the Automated Cabinet Finishing Line (i.e., 100% flash off of VOC/HAP in coatings during application).
<table>
<thead>
<tr>
<th>Operation</th>
<th>Material</th>
<th>Product Number</th>
<th>Tons/hour (units/hr)</th>
<th>Pounds VOC per Gallon coating (lb/gal)</th>
<th>Gal of Material (gal/unit)</th>
<th>Maximum Pounds VOC per day</th>
<th>Subtotal PTE (ton/yr)</th>
<th>Total PTE (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Clear Sealer/Topcoat Application</td>
<td>New White Sealer/Topcoat Application</td>
<td>T122-001</td>
<td>0.40</td>
<td>99.0%</td>
<td>0.0%</td>
<td>99.0%</td>
<td>0.0%</td>
<td>0.0%</td>
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<td>0.0%</td>
<td>99.0%</td>
<td>0.0%</td>
<td>0.0%</td>
</tr>
</tbody>
</table>
### Appendix A: Emission Calculations

<table>
<thead>
<tr>
<th>Operation</th>
<th>Material</th>
<th>Product/Place</th>
<th>Density</th>
<th>Volatile of Material (g)</th>
<th>Maximum Emission (g)</th>
<th>Weight %</th>
<th>Weight % Formulation (g)</th>
<th>Weight % Material Emission (g)</th>
<th>Weight % Material Emission (g)</th>
<th>Emissions (g)</th>
<th>Emissions (g) Material (g)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Automated Sealer Line (SL1)</td>
<td>HAPs</td>
<td>Touch-up Booth (TB1)</td>
<td>7.1</td>
<td>0.005</td>
<td>88.00</td>
<td>2.1%</td>
<td>0.0%</td>
<td>0.08</td>
<td>1.25%</td>
<td>0.0%</td>
<td>0.08</td>
</tr>
<tr>
<td>Automated Sealer Line (SL1)</td>
<td>HAPs</td>
<td>Touch-up Booth (TB1)</td>
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<td>0.08</td>
<td>1.25%</td>
<td>0.0%</td>
<td>0.08</td>
</tr>
</tbody>
</table>

**Operating Scenario:**

1. Special Booth = Special Booth or Clear Booth + Touch-up Booth or Clear Touch-up
2. Special Booth = Special Booth or White Touch-up + Touch-up Booth or White Touch-up
3. Special Booth = Special Booth or White Touch-up + Touch-up Booth or Clear Touch-up

**Emission Data:**

- Touch-up Booth (TB1): 2,47 g
- Special Booth: 16.82 g

**Methodology:**

HAPs emission rate (g/hr) = Density (g/cm³) x Emissions (g) x Material (g) / 1,000,000

<table>
<thead>
<tr>
<th>Operation</th>
<th>Material</th>
<th>Product/Place</th>
<th>Density</th>
<th>Volatile of Material (g)</th>
<th>Maximum Emission (g)</th>
<th>Weight %</th>
<th>Weight % Formulation (g)</th>
<th>Weight % Material Emission (g)</th>
<th>Weight % Material Emission (g)</th>
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<th>Emissions (g) Material (g)</th>
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<td>0.08</td>
<td>1.25%</td>
<td>0.0%</td>
<td>0.08</td>
</tr>
</tbody>
</table>

**Operating Scenario:**

1. Special Booth = Special Booth or Clear Booth + Touch-up Booth or Clear Touch-up
2. Special Booth = Special Booth or White Touch-up + Touch-up Booth or White Touch-up
3. Special Booth = Special Booth or White Touch-up + Touch-up Booth or Clear Touch-up

**Emission Data:**

- Touch-up Booth (TB1): 2,47 g
- Special Booth: 16.82 g

**Methodology:**

HAPs emission rate (g/hr) = Density (g/cm³) x Emissions (g) x Material (g) / 1,000,000
### Table: Woodworking Operation - Panel Brush Cleaner (PBC2) Operation

<table>
<thead>
<tr>
<th>Operation</th>
<th>Control Efficiency</th>
<th>PTE of PM/PM10/PM2.5 Before Controls (lbs/hr)</th>
<th>PTE of PM/PM10/PM2.5 Before Controls (tons/yr)</th>
<th>PTE of PM/PM10/PM2.5 After Controls (lbs/hr)</th>
<th>PTE of PM/PM10/PM2.5 After Controls (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Topcoat Line 2 Panel Brush Cleaner (PBC2)*</td>
<td>70.00%</td>
<td>0.051</td>
<td>0.224</td>
<td>0.015</td>
<td>0.067</td>
</tr>
</tbody>
</table>

**METHODOLOGY**

Potential Emissions After Controls (lbs/hr) = PTE of PM/PM10/PM2.5 Before Controls (lbs/hr) x (1 - Control Efficiency)

Potential Emissions Before Controls (lbs/hr) = Potential Emissions After Controls (lbs/hr) / (1 - Collection Efficiency)

Potential Emissions (tons/year) = Potential Emissions (lbs/hr) x 8760 hrs/year x 1 ton/2000 lbs

*Based on information provided by the source, the PTE Before Controls (lbs/hr) is calculated as follows based upon the actual total amount of dust collected from both topcoat lines:

<table>
<thead>
<tr>
<th>Calculation</th>
<th>yd3 dust/year</th>
<th>x</th>
<th>ft³/yd³ =</th>
<th>lb/ft³</th>
<th>lb/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>0.625</td>
<td></td>
<td>27</td>
<td>16.875</td>
<td></td>
</tr>
<tr>
<td>B</td>
<td>18.875</td>
<td></td>
<td>8.5</td>
<td>143.4375</td>
<td></td>
</tr>
<tr>
<td>C</td>
<td>143.4375</td>
<td>/</td>
<td>2000</td>
<td>0.072</td>
<td></td>
</tr>
<tr>
<td>D</td>
<td>0.072</td>
<td>/</td>
<td>70.00%</td>
<td>0.102</td>
<td>0.051</td>
</tr>
</tbody>
</table>

Topcoat Line 2 Panel Brush Cleaner (50% of dust) 50% 0.051 lb/hr uncontrolled

The PTE of the two (2) panel brush cleaners (scuffer/denibber) associated with the stain and sealer lines and the one (1) panel brush cleaner (scuffer/denibber) associated with the topcoat line (PBC1) are included in the PTE of the woodworking operations.
Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: Kountry Wood Products, LLC
Source Address: 352 Shawnee Street, Nappanee, IN 46550
Significant Source Modification No.: 039-38680-00714
Administrative Amendment: 039-38682-00714
Reviewer: Natalie Moore

Natural Gas Combustion Only

<table>
<thead>
<tr>
<th>Heat Input Capacity</th>
<th>HHV</th>
<th>Potential Throughput</th>
</tr>
</thead>
<tbody>
<tr>
<td>MMBtu/hr</td>
<td>mmBtu</td>
<td>MMCF/yr</td>
</tr>
<tr>
<td>15.567</td>
<td>1020</td>
<td>133.7</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>PM*</th>
<th>PM10*</th>
<th>direct PM2.5*</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMCF</td>
<td>1.9</td>
<td>7.6</td>
<td>7.6</td>
<td>0.6</td>
<td></td>
<td>100</td>
<td>5.5</td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>0.13</td>
<td>0.51</td>
<td>0.51</td>
<td>0.04</td>
<td>6.88</td>
<td>0.37</td>
<td>5.62</td>
</tr>
</tbody>
</table>

**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**

### HAPs - Organics

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</th>
</tr>
</thead>
<tbody>
<tr>
<td>Benzene</td>
</tr>
<tr>
<td>---------</td>
</tr>
<tr>
<td>2.1E-03</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Emission Factor in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.4E-04</td>
</tr>
</tbody>
</table>

### HAPs - Metals

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lead</td>
</tr>
<tr>
<td>------</td>
</tr>
<tr>
<td>5.0E-04</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Emission Factor in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.3E-05</td>
</tr>
</tbody>
</table>

### 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/1,000 MMBtu

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

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.
### Appendix A: Emissions Calculations

#### Woodworking

**Company Name:** Kountry Wood Products, LLC  
**Source Address:** 352 Shawnee Street, Nappanee, IN 46550  
**Significant Source Modification No.:** 039-38680-00714  
**Administrative Amendment:** 039-38682-00714  
**Reviewer:** Natalie Moore

<table>
<thead>
<tr>
<th>Operations</th>
<th>Unit ID</th>
<th>Manufacture</th>
<th>Outlet Grain Loading (grains/dscf)</th>
<th>Gas or Air Flow Rate (dscf/min)</th>
<th>PTE of PM/PM10/PM2.5 After Controls (lbs/hr)</th>
<th>PTE of PM/PM10/PM2.5 Before Controls (lbs/hr)</th>
<th>Control Efficiency (%)</th>
<th>PTE of PM/PM10/PM2.5 Before Controls (tons/yr)</th>
<th>PTE of PM/PM10/PM2.5 After Controls (tons/yr)</th>
<th>Equivalent Limited Efficiency (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Woodworking and 3 Panel Brush Cleaners</td>
<td>DC1</td>
<td>Honeyville</td>
<td>0.001370639</td>
<td>20,000</td>
<td>0.23</td>
<td>1.03</td>
<td>99.00%</td>
<td>23.50</td>
<td>102.92</td>
<td>5.87</td>
</tr>
<tr>
<td>Woodworking</td>
<td>DC2</td>
<td>Honeyville</td>
<td>0.001370639</td>
<td>20,000</td>
<td>0.23</td>
<td>1.03</td>
<td>99.00%</td>
<td>23.50</td>
<td>102.92</td>
<td>5.87</td>
</tr>
<tr>
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<td>DC3</td>
<td>Donaldson Torit</td>
<td>0.001713542</td>
<td>16,000</td>
<td>0.24</td>
<td>1.03</td>
<td>99.00%</td>
<td>23.50</td>
<td>102.93</td>
<td>5.87</td>
</tr>
<tr>
<td>Woodworking</td>
<td>DC4</td>
<td>Pneumafil</td>
<td>0.001370639</td>
<td>55,000</td>
<td>0.65</td>
<td>2.83</td>
<td>99.00%</td>
<td>64.62</td>
<td>283.02</td>
<td>16.15</td>
</tr>
<tr>
<td>Woodworking</td>
<td>DC5</td>
<td>Honeyville</td>
<td>0.001370639</td>
<td>8,000</td>
<td>0.09</td>
<td>0.41</td>
<td>99.00%</td>
<td>9.40</td>
<td>41.17</td>
<td>2.35</td>
</tr>
</tbody>
</table>

**Totals**  
1.45  
6.33  
144.51  
632.94  
36.11  
158.16

**Methodology**

- PM10 and PM2.5 emissions assumed equal to PM emissions  
- PTE of PM/PM10/PM2.5 After Controls (lbs/hr) = (grains/dscf)/(dscf/min)*(60 min/hr)/(lb/7000 grains)  
- PTE of PM/PM10/PM2.5 After Controls (lbs/hr) * [8760 hrs/yr] * [ton/2000 lbs]  
- PTE of PM/PM10/PM2.5 Before Controls (lbs/hr) = PTE of PM/PM10/PM2.5 After Controls (lbs/hr) / (1 - control efficiency)  
- PTE of PM/PM10/PM2.5 Before Controls (tons/yr) = [PTE of PM/PM10/PM2.5 Before Controls (lbs/hr)] * [8760 hrs/yr] * [ton/2000 lbs]  
- Equivalent Limited Efficiency (%) = 1 - [ (Limited PTE of PM/PM10/PM2.5 (lbs/hr)) / (PTE of PM/PM10/PM2.5 Before Controls (lbs/hr))]  

326 IAC 6-3-2 Allowable Particulate Emission Rate

<table>
<thead>
<tr>
<th>Process Rate (Lbs/Hr)</th>
<th>Process Weight Rate (Tons/Hr)</th>
<th>Allowable PM Emissions (Lbs/Hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2500.00</td>
<td>1.25</td>
<td>4.76</td>
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</tbody>
</table>

**Methodology**

- Allowable Emission = 4.10(Process Weight Rate)*0.67
### Emission Calculations

#### Reciprocating Internal Combustion Engines - Natural Gas

#### 4-Stroke Rich-Burn (4SRB) Engines

#### Emergency Generator (EG1)

**Company Name:** Kountry Wood Products, LLC  
**Source Address:** 352 Shawnee Street, Nappanee, IN 46550  
**Significant Source Modification No.:** 039-38680-00714  
**Administrative Amendment:** 039-38682-00714  
**Reviewer:** Natalie Moore

| Maximum Output Horsepower Rating (hp) | 160 | Emergency Generator (EG1) |
| Brake Specific Fuel Consumption (Btu/hp-hr) | 7600 |
| Maximum Hours Operated per Year (hr/yr) | 500 |
| Potential Fuel Usage (MMBtu/yr) | 608 |
| High Heat Value (MMBtu/MMscf) | 1020 |
| Potential Fuel Usage (MMcf/yr) | 0.60 |

#### Significant Pollutants

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Criteria Pollutants</th>
<th>Potential Emissions (tons/yr)</th>
<th>Emission Factor (lb/MMBtu)</th>
<th>Emission Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM*</td>
<td>9.5E-03</td>
<td>0.0029</td>
<td>1.94E-02</td>
<td>PM</td>
</tr>
<tr>
<td>PM10*</td>
<td>1.94E-02</td>
<td>0.01</td>
<td>1.94E-02</td>
<td>PM10</td>
</tr>
<tr>
<td>PM2.5*</td>
<td>1.94E-02</td>
<td>0.01</td>
<td>5.88E-04</td>
<td>PM2.5</td>
</tr>
<tr>
<td>SO2</td>
<td>2.21E+00</td>
<td>0.0002</td>
<td>2.98E-02</td>
<td>SO2</td>
</tr>
<tr>
<td>NOx</td>
<td>3.72E+00</td>
<td>0.0002</td>
<td>3.72E+00</td>
<td>NOx</td>
</tr>
</tbody>
</table>

*PM emission factor is for filterable PM-10. PM10 emission factor is filterable PM10 + condensable PM. PM2.5 emission factor is filterable PM2.5 + condensable PM.*

#### Hazardous Air Pollutants (HAPs)

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor (lb/MMBtu)</th>
<th>Potential Emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Acetaldehyde</td>
<td>2.79E-03</td>
<td>0.0008482</td>
</tr>
<tr>
<td>Acrolein</td>
<td>2.63E-03</td>
<td>0.0007995</td>
</tr>
<tr>
<td>Benzene</td>
<td>1.58E-03</td>
<td>0.0004803</td>
</tr>
<tr>
<td>1,3 Butadiene</td>
<td>6.63E-04</td>
<td>0.0002016</td>
</tr>
<tr>
<td>Formaldehyde</td>
<td>2.05E-02</td>
<td>0.00062320</td>
</tr>
<tr>
<td>Methanol</td>
<td>3.06E-03</td>
<td>0.0009302</td>
</tr>
<tr>
<td>Total PAH**</td>
<td>1.41E-04</td>
<td>0.0000429</td>
</tr>
<tr>
<td>Toluene</td>
<td>5.58E-04</td>
<td>0.0001698</td>
</tr>
<tr>
<td>Xylene</td>
<td>1.95E-04</td>
<td>0.0000593</td>
</tr>
</tbody>
</table>

**Total 0.01**  

HAP pollutants consist of the nine highest HAPs included in AP-42 Table 3.2-3.  
**PAH = Polyaromatic Hydrocarbons (PAHs are considered HAPs, since they are considered Polycyclic Organic Matter)**

#### Methodology

**Emission Factors are from AP-42 (Supplement F, July 2000), Table 3.2-3**

Potential Fuel Usage (MMBtu/yr) = \[
\text{Maximum Output Horsepower Rating (hp)} \times \text{Brake Specific Fuel Consumption (Btu/hp-hr)} \times \frac{\text{Maximum Hours Operated per Year (hr/yr)}}{1000000 \text{ Btu/MMBtu}}
\]

Potential Emissions (tons/yr) = \[
\text{Potential Fuel Usage (MMBtu/yr)} \times \text{Emission Factor (lb/MMBtu)} \times \frac{2000 \text{ lb/ton}}{1000000 \text{ Btu/MMBtu}}
\]
## Appendix A: Emissions Calculations

### Emissions Summary

**Company Name:** Kountry Wood Products, LLC  
**Source Address:** 352 Shawnee Street, Nappanee, IN 46550  
**Significant Source Modification No.:** 039-38680-00714  
**Administrative Amendment:** 039-38682-00714  
**Reviewer:** Natalie Moore

<table>
<thead>
<tr>
<th>Operation</th>
<th>Density (lb/gal)</th>
<th>Gal. of Solvent (gal/yr)*</th>
<th>PTE for VOC (tons/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cold Cleaner Degreaser (PW1)</td>
<td>6.7</td>
<td>145</td>
<td>0.49</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td></td>
<td><strong>0.49</strong></td>
</tr>
</tbody>
</table>

*Based on information provided by the source. The source uses 32 gallons/year but requests that a conservative estimate is used instead.

### METHODOLOGY

PTE = Density of solvent (lb/gal) x Gallons of Solvent (gal/year) x 1 ton/2000 lbs
## Appendix A: Emissions Calculations

### VOC and Particulate

#### Adhesive Application for Assembly Operations (AA1)

| Company Name: | Kountry Wood Products, LLC |
| Source Address: | 352 Shawnee Street, Nappanee, IN 46550 |
| Significant Source Modification No.: | 039-38680-00714 |
| Administrative Amendment: | 039-38682-00714 |
| Reviewer: | Natalie Moore |

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Weight % Volatile (H2O &amp; Organics)</th>
<th>Weight % Water</th>
<th>Weight % Organics</th>
<th>Volume % Solvent</th>
<th>Volume % Non-Volatiles (solids)</th>
<th>Gal of Mat. (gal/unit)</th>
<th>Maximum (units/unit)</th>
<th>Pounds VOC per gallon of coating less water</th>
<th>Pounds VOC per gallon of coating</th>
<th>Potential VOC pounds per hour</th>
<th>Potential VOC pounds per day</th>
<th>Potential VOC tons per year</th>
<th>Particulate Potential (ton/yr)</th>
<th>lb VOC/gal solids</th>
<th>Transfer Efficiency</th>
</tr>
</thead>
</table>
| Klebit 303 Aqueous Adhesive | 9.17 | 50.00% | 50.00% | 0.00% | 54.98% | 45.02% | 0.0015 | 500.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 100%

Note: Material is flow coat applied.

### METHODOLOGY

- **Pounds of VOC per Gallon Coating less Water** = \(\frac{\text{Density (lb/gal)} \times \text{Weight % Organics}}{(1-\text{Volume % water})}\)
- **Pounds of VOC per Gallon Coating** = \(\text{Density (lb/gal)} \times \text{Weight % Organics}\)
- **Potential VOC Pounds per Hour** = \(\text{Pounds of VOC per Gallon coating (lb/gal)} \times \text{Gal of Material (gal/unit)} \times \text{Maximum (units/hr)}\)
- **Potential VOC Pounds per Day** = \(\text{Pounds of VOC per Gallon coating (lb/gal)} \times \text{Gal of Material (gal/unit)} \times \text{Maximum (units/hr)} \times (24 \text{ hr/day})\)
- **Potential VOC Tons per Year** = \(\text{Pounds of VOC per Gallon coating (lb/gal)} \times \text{Gal of Material (gal/unit)} \times \text{Maximum (units/hr)} \times (8760 \text{ hr/yr}) \times (1 \text{ ton/2000 lbs})\)
- **Particulate Potential Tons per Year** = \(\text{units/hour} \times \text{gal/unit} \times \text{lb/gal} \times (1-\text{Weight % Volatiles}) \times (1-\text{Transfer efficiency}) \times (8760 \text{ hrs/yr}) \times (1 \text{ ton/2000 lbs})\)
- **Pounds VOC per Gallon of Solids** = \(\frac{\text{Density (lbs/gal)} \times \text{Weight % Organics}}{(\text{Volume % solids})}\)
August 14, 2017

Mr. Dan Mains
Kountry Wood Products, LLC
352 Shawnee Street
Nappanee, IN  46550

Re:  Public Notice
Kountry Wood Products, LLC
Permit Level:Title V-Significant Source Modification
Permit Number: 039-38680-00714

Dear Mr. Mains:

Enclosed is a copy of your draft Title V – Significant Source Modification, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM’s website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Elkhart Truth in Elkhart, Indiana publish the abbreviated version of the public notice no later than August 15, 2017. 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 Nappanee Public Library, 157 N. Main Street in Nappanee, 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 Natalie Moore, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-8279 or dial (317) 233-8279.

Sincerely,

Vicki Biddle

Vicki Biddle
Permits Branch
Office of Air Quality
ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

August 11, 2017

Elkhart Truth
421 S. Second St.
Elkhart, Indiana 46515

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Kountry Wood Products, LLC. Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than August 15, 2017.

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 Vicki Biddle at 800-451-6027 and ask for extension 3-6867 or dial 317-233-6867.

Sincerely,

Vicki Biddle

Vicki Biddle
Permit Branch
Office of Air Quality

Permit Level: Title V - Renewal
 Permit Number: 039-38680-00714

Enclosure
August 14, 2017

To: Nappanee Public Library

From: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Subject: Important Information to Display Regarding a Public Notice for an Air Permit

Applicant Name: Kountry Wood Products, LLC
Permit Number: 039-38680-00714

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 Smiddle-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 1/9/2017
Notice of Public Comment

August 14, 2017
Kountry Wood Products, LLC
039-38680-00714

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 1/9/2017
AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD
DRAFT INDIANA AIR PERMIT

August 14, 2017

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

**Permit Number:** 039-38680-00714  
**Applicant Name:** Kountry Wood Products, LLC  
**Location:** Nappanee, Elkhart County, Indiana

The public notice, draft permit and technical support documents can be accessed via the [IDEM Air Permits Online](http://www.in.gov/ai/appfiles/idem-caats/) site at:

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

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

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

Questions or comments regarding this email notification or access to this information from the EPA Internet site can be directed to Chris Hammack at chammack@idem.IN.gov or (317) 233-2414.
## Mail Code 61-53

### Name and address of Sender

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<th>Line</th>
<th>Article Number</th>
<th>Name, Address, Street and Post Office Address</th>
<th>Postage</th>
<th>Handing Charges</th>
<th>Act. Value (If Registered)</th>
<th>Insured Value</th>
<th>Due Send if COD</th>
<th>R.R. Fee</th>
<th>S.D. Fee</th>
<th>S.H. Fee</th>
<th>Rest. Del. Fee</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td>Dan Mains, Kountry Wood Products, LLC 352 Shawnee St Nappanee, IN 46550 (Source CAATS)</td>
<td></td>
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<td></td>
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<td>2</td>
<td></td>
<td>Virgil Yoder, VP, Kountry Wood Products, LLC 352 Shawnee St Nappanee, IN 46550 (RO CAATS)</td>
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<td>3</td>
<td></td>
<td>Elkhart City Council and Mayors Office 229 South Second Street, Elkhart, IN 46516 (Local Official)</td>
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<td>4</td>
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<td>Elkhart County Health Department 608 Oakl</td>
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<td>5</td>
<td></td>
<td>Nappanee Public Library 157 N Main St, Nappanee, IN 46550-1956 (Library)</td>
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<td>6</td>
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<td>Elkhart County Board of Commissioners 117 North Second St, Goshen, IN 46526 (Local Official)</td>
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<td>7</td>
<td></td>
<td>Mr. Kevin Parks, D &amp; B Environmental Services, Inc. 401 Lincoln Way West, Osceola, IN 46561 (Consultant)</td>
<td></td>
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Total number of pieces Listed by Sender: 7

### Remarks

The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50,000 per occurrence. The maximum indemnity payable on Express mail merchandise insurance is $500. The maximum indemnity payable is $25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on insured and COD mail. See International Mail Manual for limitations of coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.