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Eric J. Holcomb Governor Bruno L. Pigott

Commissioner

## NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

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

for M & V Finishing, LLC in LaGrange County

MSOP Renewal No.: M 087-40640-00027

The Indiana Department of Environmental Management (IDEM) has received an application from M & V Finishing, LLC, located at 1185 US 20 West, LaGrange, IN 46761, for a renewal of its MSOP issued on March 4, 2009. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow M & V Finishing, LLC to make certain changes at its existing source. M & V Finishing, LLC has applied to install one (1) Air Makeup Unit, identified as AM-2, with a maximum capacity of 0.75 MMBtu/hr, two (2) Air Makeup Units, identified as AM-3 and AM-4, with a maximum capacity of 0.50 MMBtu/hr, each, one (1) Radiant Heat Water Heater, identified as B-4, with a maximum capacity of 0.23 MMBtu/hr, and two (2) Portable Hand Sanders, identified as HS1 and HS2, with a maximum production rate fo 2.2 units per hour, each, uncontrolled. M & V Finishing, LLC requested the removal of two (2) stationary sanding tables, identified as SST1 and SST2, from the permit

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

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

La Grange County Library 203 W. Spring Street La Grange, IN 46761

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/.

A copy of the preliminary findings is also available via IDEM's Virtual File Cabinet (VFC.) Please go to: <a href="http://www.in.gov/idem/">http://www.in.gov/idem/</a> and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

### How can you participate in this process?

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





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

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number M 087-40640-00027 in all correspondence.

### Comments should be sent to:

Ghassan Shalabi IDEM, Office of Air Quality 100 North Senate Avenue MC 61-53 IGCN 1003 Indianapolis, Indiana 46204-2251 (800) 451-6027, ask for Ghassan Shalabi or (317) 233-7622 Or dial directly: (317) 233-7622 Fax: (317) 232-6749 attn: Ghassan Shalabi

E-mail: gshalabi@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: <a href="http://www.in.gov/idem/airquality/2356.htm">http://www.in.gov/idem/airquality/2356.htm</a>; and the Citizens' Guide to IDEM on the Internet at: <a href="http://www.in.gov/idem/6900.htm">http://www.in.gov/idem/6900.htm</a>.

### **Air Permit Legal Notices**

On November 14, 2018, the State of Indiana Environmental Rules Board adopted rule amendments to 326 IAC 2-1.1-6, 326 IAC 2-7-13, 326 IAC 2-7-17, 326 IAC 2-8-13, 326 IAC 2-8-18, and 326 IAC 2-12-1 (LSA #17-395), concerning legal notice provisions for air permits issued under the NSR and Title V permit programs and other air permits for which newspaper notices are published by IDEM OAQ. The adopted rule amendments require that IDEM OAQ provide electronic public notices on IDEM's website as the primary and consistent method for communicating air permit notices to the public. IDEM anticipates that the final (effective) rule amendments will be promulgated on or about March 14, 2019. The status of these rule amendments (LSA #17-395) and the final effective date will be posted on the following website: <a href="https://www.in.gov/idem/legal/2351.htm">https://www.in.gov/idem/legal/2351.htm</a>.

Until the rule amendments to 326 IAC 2-1.1-6, 326 IAC 2-7-13, 326 IAC 2-7-17, 326 IAC 2-8-13, 326 IAC 2-8-18, and 326 IAC 2-12-1 are promulgated final (effective), IDEM OAQ will publish both newspaper public notices and electronic public notices on IDEM's website. Once the rule amendments are promulgated final (effective), IDEM OAQ will no longer publish newspaper public notices and will only publish electronic public notices on IDEM's website.

Electronic public notices, including permitting, rulemaking, meeting, and hearing notices, are posted on IDEM's website at: <a href="https://www.in.gov/idem/5474.htm">https://www.in.gov/idem/5474.htm</a>. Public notices posted on IDEM's webpage will be accessible for the duration of the public comment period.

IDEM OAQ provides alternative methods for receiving public notices, such as the interested parties mailing list. The IDEM OAQ interested parties mailing list consists of people who have asked to be notified by email list or direct mail delivery of air permit actions related to a specific source or multiple sources, or for all air permit actions in a certain county or multiple counties. If you would like to be added to the IDEM OAQ interested parties mailing list, call Patty Pear at (317) 233-6875 or call (800) 451-6027, select option 4, and ask for the "Permits Administration Section".

Citizens and interested parties can also subscribe to IDEM's regional public notice pages and receive an e-mail or text message to your phone every time IDEM adds information to a subscribed region at the following website: <a href="https://public.govdelivery.com/accounts/INDEM/subscriber/new?qsp=INDEM\_3">https://public.govdelivery.com/accounts/INDEM/subscriber/new?qsp=INDEM\_3</a>

### 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 12<sup>th</sup> floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

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

Josiah K. Balogun, Section Chief

Permits Branch
Office of Air Quality



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Eric J. Holcomb Governor



Bruno L. Pigott Commissioner

# Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

## M & V Finishing, LLC 1185 US 20 West LaGrange, Indiana 46761

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

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

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

Operation Permit No.: M 087-40640-00027									
Master Agency Interest ID: 47427									
Issued by:	Issuance Date:								
Josiah K. Balogun, Section Chief	Expiration Date:								
Permits Branch Office of Air Quality									





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La Grange, Indiana Permit Reviewer: Ghassan Shalabi

M & V Finishing, LLC

### SECTION A SOURCE SUMMARY

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

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

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

Source Address: 1185 US 20 West, La Grange, Indiana 46761

General Source Phone Number: 260-463-5253

SIC Code: 2511 County Location: LaGrange

Source Location Status: Attainment for all criteria pollutants
Source Status: Minor Source Operating Permit Program

Minor Source, under PSD Rule

Minor Source, Section 112 of the Clean Air Act

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Not 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) spray booth, and its associated cleanup operations, consisting of one (1) stain HVLP spray gun, identified as SG1, constructed in 1996 and modified in 2003, equipped with dry filters for overspray control, exhausting to Stack S1, capacity: 8.82 furniture parts per hour.
- (b) One (1) spray booth, and its associated cleanup operations, consisting of one (1) sealer HVLP spray gun, identified as SG2, constructed in 1996 and modified in 2003, equipped with dry filters for overspray control, exhausting to Stack S2, capacity: 8.82 furniture parts per hour.
- (c) One (1) spray booth, and its associated cleanup operations, consisting of one (1) topcoat HVLP spray gun, identified as SG3, constructed in 1996 and modified in 2003, equipped with dry filters for overspray control, exhausting to Stack S3, capacity: 8.82 furniture parts per hour.
- (d) One (1) spray booth, and its associated cleanup operations, consisting of one (1) topcoat HVLP spray gun, identified as SG4, to be constructed in 2009, equipped with dry filters for overspray control, exhausting to Stack S4, capacity: 8.82 furniture parts per hour.
- (e) One backup HVLP spray gun, identified as SG4, constructed in 1996 and modified in 2003, capacity: 8.82 furniture parts per hour.
- (f) One (1) natural gas-fired radiant heat water heater, identified as B-1, constructed in 1996, exhausting to stack B1, rated at 0.15 million British thermal units per hour.
- (g) One (1) natural gas-fired radiant heat water heater, identified as B-2, constructed in 2000, exhausting to stack B2, rated at 0.15 million British thermal units per hour.
- (h) One (1) natural gas-fired radiant heat water heater, identified as B-3, to be constructed in 2009, exhausting to stack B3, rated at 0.15 million British thermal units per hour.
- (i) One (1) natural gas-fired radiant heat water heater, identified as B-4, permitted in 2019, exhausting to stack B-4S, with a maximum capacity of 0.23 MMBtu/hr, and uncontrolled;

- (j) One (1) air makeup unit, identified as AM-1, constructed in 1996, with a maximum capacity of 1.32 MMBtu/hr, and uncontrolled;
- (k) One (1) air makeup unit, identified as AM-2, permitted in 2019, with a maximum capacity of 0.75 MMBtu/hr, and uncontrolled;
- (I) Two (2) air makeup units, identified as AM-3 and AM-4, permitted in 2019, with a maximum capacity of 1.00 MMBtu/hr, each, and uncontrolled;
- (m) Two (2) portable hand sanders, identified as HS1 and HS2, permitted in 2019, with a maximum production rate of 2.2 units per hour, each, uncontrolled.

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### **SECTION B**

### **GENERAL CONDITIONS**

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

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

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

- (a) This permit, M 087-40640-00027, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

### B.4 Enforceability

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

### B.5 Severability

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

### B.6 Property Rights or Exclusive Privilege

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

### B.7 Duty to Provide Information

- 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.

M & V Finishing, LLC La Grange, Indiana Permit Reviewer: Ghassan Shalabi

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

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

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

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

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

- A 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.

- If required by specific condition(s) in Section D of this permit where no PMP was (b) 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;
  - A description of the items or conditions that will be inspected and the inspection (2) schedule for said items or conditions; and
  - Identification and quantification of the replacement parts that will be maintained (3) in inventory for quick replacement.

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

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

The Permittee shall implement the PMPs.

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

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

- (a) All terms and conditions of permits established prior to M 087-40640-00027 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

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

Request for renewal shall be submitted to:

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

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

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

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

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

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

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

### B.14 Source Modification Requirement

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

### B.15 Inspection and Entry

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

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

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

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

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

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

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

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

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

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

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

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

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

### **SECTION C**

### **SOURCE OPERATION CONDITIONS**

### **Entire Source**

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

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

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

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

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

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

### C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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

- (e) Procedures for Asbestos Emission Control
  The Permittee shall comply with the applicable emission control procedures in
  326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control
  requirements are applicable for any removal or disturbance of RACM greater than three
  (3) linear feet on pipes or three (3) square feet on any other facility components or a total
  of at least 0.75 cubic feet on all facility components.
- (f) Demolition and Renovation
  The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

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

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

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

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

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

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

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

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

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

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

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

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

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

M & V Finishing, LLC La Grange, Indiana Permit Reviewer: Ghassan Shalabi

### **Corrective Actions and Response Steps**

### C.12 Response to Excursions or Exceedances

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

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

### C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

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

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

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

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

(a) A record of all malfunctions, startups or shutdowns of any emission unit or emission control equipment, that results in violations of applicable air pollution control regulations



or applicable emission limitations must be kept and retained for a period of three (3) years and be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

- (b) When a malfunction of any emission unit or emission control equipment occurs that lasts more than one (1) hour, the condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification must be made by telephone or other electronic means, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of the occurrence.
- (c) Failure to report a malfunction of any emission unit or emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information on the scope and expected duration of the malfunction must be provided, including the items specified in 326 IAC 1-6-2(c)(3)(A) through (E).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

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

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

### C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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

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

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

### SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### **Emissions Unit Description:**

- (a) One (1) spray booth, and its associated cleanup operations, consisting of one (1) stain HVLP spray gun, identified as SG1, constructed in 1996 and modified in 2003, equipped with dry filters for overspray control, exhausting to Stack S1, capacity: 8.82 furniture parts per hour.
- (b) One (1) spray booth, and its associated cleanup operations, consisting of one (1) sealer HVLP spray gun, identified as SG2, constructed in 1996 and modified in 2003, equipped with dry filters for overspray control, exhausting to Stack S2, capacity: 8.82 furniture parts per hour.
- (c) One (1) spray booth, and its associated cleanup operations, consisting of one (1) topcoat HVLP spray gun, identified as SG3, constructed in 1996 and modified in 2003, equipped with dry filters for overspray control, exhausting to Stack S3, capacity: 8.82 furniture parts per hour.
- (d) One (1) spray booth, and its associated cleanup operations, consisting of one (1) topcoat HVLP spray gun, identified as SG4, to be constructed in 2009, equipped with dry filters for overspray control, exhausting to Stack S4, capacity: 8.82 furniture parts per hour.

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

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

### D.1.1 Wood Furniture and Cabinet Coating (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to the wood furniture and wood furniture components in each of the surface coating booths (SG1 through SG4) shall perform surface coating of wood furniture and cabinets, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one or more of the following applications methods:

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

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

### D.1.2 Particulate Emission Limitations for Work Practices and Control Technologies [326 IAC 6-3-2(d)]

- (a) Particulate from the four (4) spray booths, identified as SG1, SG2, SG3, and SG4, shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

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- (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

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

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities.

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

### D.1.4 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.2, if overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.
- (b) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

Permit Reviewer: Ghassan Shalabi

### SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS - Boilers

### **Emissions Unit Description:**

- (g) One (1) natural gas-fired radiant heat water heater, identified as B-1, constructed in 1996, exhausting to stack B1, rated at 0.15 million British thermal units per hour.
- (h) One (1) natural gas-fired radiant heat water heater, identified as B-2, constructed in 2000, exhausting to stack B2, rated at 0.15 million British thermal units per hour.
- (i) One (1) natural gas-fired radiant heat water heater, identified as B-3, to be constructed in 2009, exhausting to stack B3, rated at 0.15 million British thermal units per hour.
- (i) One (1) natural gas-fired radiant heat water heater, identified as B-4, to be constructed in 2010, exhausting to stack B-4S, rated at 0.23 million British thermal units per hour.

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

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

### D.2.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, particulate emissions from the four (4) natural gas fired radiant heat water heaters, identified as B-1, B-2, B-3, and B-4 shall not exceed 0.6 pounds of particulate matter per million Btu (lb/MMBtu) heat input.

### D.2.2 Preventative Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities.

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

# MINOR SOURCE OPERATING PERMIT ANNUAL NOTIFICATION

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

Company Name:	M & V Finishing, LLC										
Address:	1185 US 20 West										
City:	La Grange, Indiana 46761										
Phone #:	260-463-5253										
MSOP #:	M 087-40640-00027										
I hereby certify that M & I hereby certify that M &	-	<ul> <li>□ still in operation.</li> <li>□ no longer in operation.</li> <li>□ in compliance with the requirements of MSOP M 087-40640-00027.</li> </ul>									
		<ul> <li>not in compliance with the requirements of MSOP M 087-40640-00027.</li> </ul>									
Authorized Individua	Authorized Individual (typed):										
Title:											
Signature:											
Date:											
		source is not in compliance, provide a narrative nce and the date compliance was, or will be									
Noncompliance:											

\*SEE PAGE 2

DRAFT

### **MALFUNCTION REPORT**

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

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4. THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER?\_\_\_\_, 25 TONS/YEAR SULFUR DIOXIDE?\_\_\_\_, 25 TONS/YEAR NITROGEN OXIDES?\_\_\_, 25 TONS/YEAR VOC?\_\_\_, 25 TONS/YEAR HYDROGEN SULFIDE?\_\_\_\_, 25 TONS/YEAR TOTAL REDUCED SULFUR ?\_\_\_\_, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS?\_\_\_\_, 25 TONS/YEAR FLUORIDES?\_\_\_\_, 100 TONS/YEAR CARBON MONOXIDE?\_\_\_\_, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT?\_\_\_\_, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT?\_\_\_\_, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD?\_\_\_, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2)?\_\_\_\_. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC \_\_\_\_\_\_ OR, PERMIT CONDITION # \_\_\_\_\_ AND/OR PERMIT LIMIT OF THIS INCIDENT MEETS THE DEFINITION OF "MALFUNCTION" AS LISTED ON REVERSE SIDE? Y THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT? Y \_\_\_\_\_PHONE NO. ( )\_\_\_\_\_ COMPANY: LOCATION: (CITY AND COUNTY) AFS PLANT ID: AFS POINT ID: \_\_\_\_\_ INSP: PERMIT NO. CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON:\_\_\_\_\_ DATE/TIME MALFUNCTION STARTED: \_\_\_\_/ 20\_\_\_\_\_/ 20\_\_\_\_\_ ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE\_\_\_\_\_/ 20\_\_\_\_ AM/PM ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_\_ MEASURES TAKEN TO MINIMIZE EMISSIONS: REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS: CONTINUED OPERATION REQUIRED TO PROVIDE **ESSENTIAL\*** SERVICES: CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: INTERIM CONTROL MEASURES: (IF APPLICABLE)\_ MALFUNCTION REPORTED BY:\_\_\_\_\_\_TITLE:\_\_\_\_\_ (SIGNATURE IF FAXED) MALFUNCTION RECORDED BY: DATE: TIME:

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

### 326 IAC 1-6-1 Applicability of rule

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

### 326 IAC 1-2-39 "Malfunction" definition

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

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


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

### **Indiana Department of Environmental Management**

Office of Air Quality

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

Renewal with New Source Review (NSR)

### **Source Description and Location**

Source Name: M & V Finishing, LLC

Source Location: 1185 US 20 West, LaGrange, IN 46761

County: LaGrange

SIC Code: 2511 (Wood Household Furniture, Except Upholstered)

Permit Renewal No.: M 087-40640-00027 Permit Reviewer: Ghassan Shalabi

On October 29, 2018, M & V Finishing, LLC submitted an application to the Office of Air Quality (OAQ) requesting to renew its operating permit. OAQ has reviewed the operating permit renewal application from M & V Finishing, LLC relating to the operation of a stationary wood furniture surface coating source. M & V finishing, LLC was issued its first MSOP Renewal (M 087-27117-0027) on March 4, 2009.

### **Existing Approvals**

The source was issued MSOP Renewal No. M 087-27117-00027 onMarch 4, 2009. There have been no subsequent approvals issued.

### **Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units:

- (a) One (1) spray booth, and its associated cleanup operations, consisting of one (1) stain HVLP spray gun, identified as SG1, constructed in 1996 and modified in 2003, equipped with dry filters for overspray control, exhausting to Stack S1, capacity: 8.82 furniture parts per hour.
- (b) One (1) spray booth, and its associated cleanup operations, consisting of one (1) sealer HVLP spray gun, identified as SG2, constructed in 1996 and modified in 2003, equipped with dry filters for overspray control, exhausting to Stack S2, capacity: 8.82 furniture parts per hour.
- (c) One (1) spray booth, and its associated cleanup operations, consisting of one (1) topcoat HVLP spray gun, identified as SG3, constructed in 1996 and modified in 2003, equipped with dry filters for overspray control, exhausting to Stack S3, capacity: 8.82 furniture parts per hour.
- (d) One (1) spray booth, and its associated cleanup operations, consisting of one (1) topcoat HVLP spray gun, identified as SG4, to be constructed in 2009, equipped with dry filters for overspray control, exhausting to Stack S4, capacity: 8.82 furniture parts per hour.
- (e) One backup HVLP spray gun, identified as SG4, constructed in 1996 and modified in 2003, capacity: 8.82 furniture parts per hour.
- (f) One (1) natural gas-fired radiant heat water heater, identified as B-1, constructed in 1996, exhausting to stack B1, rated at 0.15 million British thermal units per hour.
- (g) One (1) natural gas-fired radiant heat water heater, identified as B-2, constructed in 2000, exhausting to stack B2, rated at 0.15 million British thermal units per hour.

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One (1) natural gas-fired radiant heat water heater, identified as B-3, to be constructed in 2009, (h) exhausting to stack B3, rated at 0.15 million British thermal units per hour.

One (1) air makeup unit, identified as AM-1, constructed in 1996, with a maximum capacity of (i) 1.32 MMBtu/hr. and uncontrolled:

The following is a list of the new emission units:

- One (1) air makeup unit, identified as AM-2, permitted in 2019, with a maximum capacity of 0.75 (a) MMBtu/hr, and uncontrolled;
- (b) Two (2) air makeup units, identified as AM-3 and AM-4, permitted in 2019, with a maximum capacity of 0.50 MMBtu/hr, each, and uncontrolled;
- One (1) natural gas-fired radiant heat water heater, identified as B-4, permitted in 2019, with a (c) maximum capacity of 0.23 MMBtu/hr, and uncontrolled;
- Two (2) portable hand sanders, identified as HS1 and HS2, permitted in 2019, with a maximum (d) production rate fo 2.2 units per hour, each, uncontrolled.

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

The source has removed the following emission units:

Two (2) stationary sanding tables, identified as SST1 and SST2, constructed in 1996, each (a) equipped with dry filters for PM control, capacity: 4.41 furniture parts per hour, each.

### **Enforcement Issue**

There are no enforcement actions pending.

### **Emission Calculations**

See Appendix A of this document for detailed emission calculations.

### **County Attainment Status**

The source is located in LaGrange County.

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

effective June 15, 2005.

### (a) Ozone Standards

Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality

M & V Finishing, LLC Page 3 of 9 LaGrange, Indiana TSD for MSOP Renewal 087-40640-00027

Permit Reviewer: Ghassan Shalabi

Standards (NAAQS) for ozone. Therefore, VOC and  $NO_x$  emissions are considered when evaluating the rule applicability relating to ozone. LaGrange County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and  $NO_x$  emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b)  $PM_{2.5}$ 

LaGrange County has been classified as attainment for PM<sub>2.5</sub>. Therefore, direct PM<sub>2.5</sub>, SO<sub>2</sub>, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Other Criteria Pollutants

LaGrange County has been classified as attainment or unclassifiable in Indiana for all 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**

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

Since this type of operation is not one (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 <a href="http://www.supremecourt.gov/opinions/13pdf/12-1146">http://www.supremecourt.gov/opinions/13pdf/12-1146</a> 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.

### **Unrestricted Potential Emissions**

This table reflects the unrestricted potential emissions of the source.

		Unrestricted Potential Emissions (ton/year)												
	PM <sup>1</sup>	PM <sub>10</sub> <sup>1</sup>	PM <sub>2.5</sub> <sup>1, 2</sup>	SO <sub>2</sub>	NOx	voc	со	Total HAPs						
Spray Booths SG1, SG2, SG3, SG4	3.77	3.77	3.77	0.00	0.00	31.70	0.00	4.49						
Hand Sanders	0.08	0.08	0.08	0.00	0.00	0.00	0.00	0.00						
NG Combustion	0.03	0.12	0.12	0.01	1.61	0.09	1.35	0.03						
Total PTE of Entire Source Excluding Fugitive Emissions*	3.88	3.97	3.97	0.01	1.61	31.79	1.35	4.52						
Unpaved Roads	0.72	0.18	0.02	0.00	0.00	0.00	0.00	0.00						
Total PTE of Entire Source Including Source-Wide Fugitives*	4.60	4.16	3.99	0.01	1.61	31.79	1.35	4.52						
MSOP Thresholds	25	25	25	25	25	25	< 100	< 25						

<sup>&</sup>lt;sup>1</sup>Under the Part 70 Permit program (40 CFR 70), PM<sub>10</sub> and PM<sub>2.5</sub>, not particulate matter (PM), are each considered as a "regulated air pollutant."

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

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

<sup>&</sup>lt;sup>2</sup>PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.

<sup>\*</sup>Fugitive HAP emissions are always included in the source-wide emissions.

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### Potential to Emit After Issuance

The table below summarizes the uncontrolled/unlimited potential to emit of the entire source. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year) (Uncontrolled/Unlimited)												
	PM <sup>1</sup>	PM <sub>10</sub> <sup>1</sup>	PM <sub>2.5</sub> <sup>1, 2</sup>	SO <sub>2</sub>	NOx	voc	со	Total HAPs					
Spray Booths SG1, SG2, SG3, SG4	3.77	3.77	3.77	0.00	0.00	31.70	0.00	4.49					
Hand Sanders	0.08	0.08	0.08	0.00	0.00	0.00	0.00	0.00					
NG Combustion	0.03	0.12	0.12	0.01	1.61	0.09	1.35	0.03					
Total PTE of Entire Source Excluding Fugitive Emissions*	3.88	3.97	3.97	0.01	1.61	31.79	1.35	4.52					
Unpaved Roads	0.72	0.18	0.02	0.00	0.00	0.00	0.00	0.00					
Total PTE of Entire Source Including Source-Wide Fugitives*	4.60	4.16	3.99	0.01	1.61	31.79	1.35	4.52					
MSOP Thresholds	25	25	25	25	25	25	< 100	< 25					
PSD Major Source Thresholds	250	250	250	250	250	250	250						

 $<sup>^{1}</sup>$ Under the Part 70 Permit program (40 CFR 70), PM $_{10}$  and PM $_{2.5}$ , not particulate matter (PM), are each considered as a "regulated air pollutant."

Appendix A of this TSD reflects the detailed unlimited/uncontrolled emissions of the source.

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

### **Federal Rule Applicability**

Federal rule applicability for this source has been reviewed as follows:

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

The requirements of the New Source Performance Standard for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971, 40 CFR 60.40, Subpart D, are not included in the permit for the natural gas-fired radiant heat water heaters, identified as B-1, B-2, B-3, and B-4. The heat input capacities of these heaters, are each less than 250 million

<sup>&</sup>lt;sup>2</sup>PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.

<sup>\*</sup>Fugitive HAP emissions are always included in the source-wide emissions.

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British thermal units per hour. Thus, NSPS Subpart D does not apply.

(b) The requirements of the New Source Performance Standard for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978, 40 CFR 60.40, Subpart Da, are not included in the permit for the natural gas-fired radiant heat water heaters, identified as B-1, B-2, B-3, and B-4. The heat input capacities of these heaters, are each less than 250 million British thermal units per hour. Thus, NSPS Subpart Da does not apply.

- (c) The requirements of the New Source Performance Standard for Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60.40, Subpart Db, are not included in the permit for the natural gas-fired radiant heat water heaters, identified as B-1, B-2, B-3, and B-4. The heat input capacities of these heaters, are each less than 100 million British thermal units per hour. Thus NSPS Subpart Db does not apply.
- (d) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, Subpart Dc, are not included in the permit for the four (4) natural gas-fired radiant heat water heaters, identified as B-1, B-2, B-3, and B-4, even though they were constructed after the applicability date of June 9, 1989 because the heat input capacity for each heater is less than ten (10) MMBtu/hr.
- (e) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

### National Emission Standards for Hazardous Air Pollutants (NESHAPs)

- (a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD (5D) (326 IAC 20), are not included in the permit for the four (4) natural gas-fired radiant heat water heaters, identified as B-1, B-2, B-3, and B-4, since M & V Finishing, LLC is not a major source of HAPs, and is not located at, nor is a part of, a major source of HAP emissions, as defined under 40 CFR 63.2.
- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ (6J), are not included in the permit for the four (4) natural gas-fired radiant heat water heaters, identified as B-1, B-2, B-3, and B-4, because each unit only combusts natural gas and gas-fired boilers, as defined in 40 CFR 63.11237, are specifically exempted from this rule as indicated in 40 CFR 63.11195(e).
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Wood Furniture Manufacturing Operations, 40 CFR 63, Subpart JJ are not included in the permit for the four (4), spray booths, identified as SG1, SG2, SG3 and SG4 because the source is not a major source as defined by 40 CFR Part 63.2, and this source does not manufacture wood furniture. Wood furniture is shipped to the source where it is painted or stained. There are no woodworking operations at the source.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NEHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH, are not included in the permit for the four (4) spray booths, identified as SG1, SG2, SG3 and SG4 because these facilities do not conduct paint stripping operations, autobody refinishing operations, or spray applications of coatings containing the target HAPs specified in this NESHAP: chromium, lead, manganese, nickel, or cadmium.
- (e) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

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

### State Rule Applicability - Entire Source

### 326 IAC 1-6-3 (Preventive Maintenance Plan)

**Compliance Assurance Monitoring (CAM):** 

The source is subject to 326 IAC 1-6-3.

### 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))

MSOP applicability is discussed under the Unrestricted Potential Emissions section of this document.

### 326 IAC 2-2 (PSD)

PSD applicability is discussed under the Potential to Emit After Issuance section of this document.

### 326 IAC 2-6 (Emission Reporting)

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

### 326 IAC 5-1 (Opacity Limitations)

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

### 326 IAC 6-4 (Fugitive Dust Emissions)

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 6.5 PM Limitations Except Lake County

Pursuant to 326 IAC 6.5-1-1(a), this source (located in LaGrange County) is not subject to the requirements of 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 (Particulate Matter Limitations for Lake County)

Pursuant to 326 IAC 6.8-1-1(a), this source (located in LaGrange County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.

### State Rule Applicability - Individual Facilities

### **Spray Booths**

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

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

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(2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

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

### 326 IAC 8-1-6

326 IAC 8-1-6 applies to new facilities that have potential emissions of twenty-five (25) tons per year and are not otherwise regulated by other 326 IAC 8 rules. The four (4) spray booths, identified as booths SG1 and SG4 are subject to 326 IAC 8-2-12. Therefore, they are not subject to 326 IAC 8-1-6.

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

The four (4) spray booths, identified as booths SG1 through SG4, were constructed after 1990 and the actual VOC emissions from each booth is greater than 15 pounds per day. Therefore, the four (4) spray booths, identified as booths SG1 through SG4, are subject to the requirements of 326 IAC 8-2-12.

### **Natural Gas-Fired Radiant Heat Water Heaters**

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

The four (4) natural gas-fired radiant heat water heaters, identified as B-1, B-2, B-3, and B-4 are subject to 326 IAC 6-2-4 because they were was constructed after September 21, 1983. Pursuant to 326 IAC 6-2-4(a), particulate emissions from the four (4) natural gas-fired radiant heat water heaters, identified as B-1, B-2, B-3, and B-4 shall not exceed 0.6 pounds of particulate matter per million Btu (lb/MMBtu) heat input because the total source maximum capacity rating is less than 10 MMBtu/hr.

### Air Makeup Units

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

The four (4) air make-up units, identified as AM-1, AM-2, AM-3, and AM-4 are not subject to the requirements of 326 IAC 6-2-4 (Emission Limitations for Sources of Indirect Heating), because these units are not a source of indirect heating.

### **Portable Hand Sanders**

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

The two (2) portable hand sanders, identified as HS1 and HS2, each has potential PM emissions less than 0.551 pounds per hour. Therefore, pursuant to 326 IAC 6-3-1(b)(14), these emission units are exempt from the requirements of 326 IAC 6-3-2.

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

- (a) There are no compliance determination requirements applicable to this source.
- (b) There are no testing requirements applicable to this source.

### **Conclusion and Recommendation**

The staff recommends to the Commissioner that the MSOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on October 29, 2018.

The operation of this stationary wood furniture surface coating source shall be subject to the conditions of the attached MSOP Renewal No. 087-40640-00027.

### **IDEM Contact**

- (a) If you have any questions regarding this permit, please contact Ghassan Shalabi, 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) 233-7622 or (800) 451-6027, and ask for Ghassan Shalabi or (317) 233-7622.
- (b) A copy of the findings is available on the Internet at: <a href="http://www.in.gov/ai/appfiles/idem-caats/">http://www.in.gov/ai/appfiles/idem-caats/</a>
- (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:

  <a href="http://www.in.gov/idem/airquality/2356.htm">http://www.in.gov/idem/airquality/2356.htm</a>; and the Citizens' Guide to IDEM on the Internet at: <a href="http://www.in.gov/idem/6900.htm">http://www.in.gov/idem/6900.htm</a>.

### **Appendix A: Emissions Calculations**

Company Name: M & V Finishing, LLC

Address City IN Zip: 1185 US 20 West, La Grange, Indiana 46761

Permit Number: M087-27117-00027 Permit Reviewer: Ghassan Shalabi

### **Uncontrolled Potential Emissions**

									Single Highest	
Emission Units	PM	PM-10	PM-2.5	SO2	NOx	VOC	CO	Total HAPs	HAP	<b>HAP Name</b>
	(tons/yr)	(tons/yr)	(tons/yr)							
Spray Booths SG1, SG2, SG3, SG4	3.77	3.77	3.77	0.00	0.00	31.70	0.00	4.49	1.99	Xylene
Hand Sanders HS1 and HS2	0.08	0.08	0.08	0.00	0.00	0.00	0.00	0.00	0.00	N/A
Natural Gas Combustion	0.03	0.12	0.12	0.01	1.61	0.09	1.35	0.03	0.03	n-Hexane
Total PTE excluding fugitives	3.88	3.97	3.97	0.01	1.61	31.79	1.35	4.52	1.99	Xylene
Unpaved Roads	0.72	0.18	0.02	0.00	0.00	0.00	0.00	0.00	0.00	N/A
Total	4.60	4.16	3.99	0.01	1.61	31.79	1.35	4.52	1.99	Xylene

### Appendix A: Emissions Calculations VOC and Particulate Emissions from Surface Coating Operations

Company Name: M & V Finishing, LLC

Address: 1185 US 20 West, La Grange, Indiana 46761

Permit Number: M087-27117-00027 Permit Reviewer: Ghassan Shalabi

### Spray Booths SG1, SG2, SG3, SG4

Material	Density (lb/gal)	Weight % Volatile (H <sub>2</sub> 0 & Organics)	Weight % Water and Exempt	Weight % Organics	Volume % Water and Exempt	Volume % Solids	Maximum Usage (gal/unit)		Pounds VOC per gallon of coating less water	per gallon of	PTE VOC (lbs/hour)	PTE VOC (lbs/day)	PTE VOC (ton/yr)	Transfer Efficiency	PTE PM/PM10 (tons/year)	PTE PM/PM10 (lb/hr)	Control Efficiency	PTE PM/PM10 Controlled (ton/yr)	Pounds VOC/Gal Coating Solids
Spray Booth SG1																			
81LS28-239 Michaels Cherry Stain	7.70	59.35%	22.08%	37.27%	37.20%	39.07%	0.0407	8.82	4.57	2.87	1.03	24.72	4.51	75%	1.23	0.28	80%	0.25	7.35
Spray Booth SG2																			
1M.430X NF Sealer	7.98	62.06%	1.04%	61.02%	1.69%	30.69%	0.0055	8.82	4.95	4.87	0.24	5.67	1.03	75%	0.16	0.04	80%	0.03	15.87
Spray Booth SG3																			
1D.31X Topcoat	7.55	79.21%	5.80%	73.41%	6.62%	15.12%	0.0974	8.82	5.94	5.54	4.76	114.27	20.85	75%	1.48	0.34	80%	0.30	36.66
Spray Booth SG4																			
1C.800 White Paint	9.07	58.91%	2.60%	56.31%	3.57%	23.34%	0.0250	8.82	5.30	5.11	1.13	27.03	4.93	75%	0.90	0.21	80%	0.18	21.88
Cleanup All Booths					·	•													
S-0170B Thinner	6.95	100.00%	8.56%	91.44%	9.00%	0.00%	0.0015	8.82	6.98	6.36	0.08	2.02	0.37	100%	0.00	0.00	80%	0.00	#DIV/0!
							To	tals			7.24	173.71	31.70		3.77	0.86		0.75	

Coatings are applied with HVLP equipment and controlled by dry filters. Cleanup solvents manually used. Assume transfer efficiency of 75% for HVLP spray guns and control efficiency of 80% for dry filters. Assume all VOC volatilizes and is emitted.

### METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (Ib/gal) \* Weight % Organics)

Pounds of VOC per Gallon Coating Solids = Pounds VOC per Gallon Coating / Volume % Solids

PTE VOC (pounds/hour) = Pounds of VOC/Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

PTE VOC (pounds/day) = Pounds of VOC/Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)

PTE VOC (tons/year) = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)

PTE PM/PM10 (tons/year) = Max. (units/hour) \* Gal of Mat (gal/unit) \* Density (lbs/gal) \* (1-Weight % Volatile) \* (1-Transfer efficiency) \*8760 hours/year \*1ton/2000 lbs

PTE PM/PM10 (lbs/hour) = Max. (units/hour) \* Gal of Mat (gal/unit) \* Density (lbs/gal) \* (1- Weight % Volatile) \* (1-Transfer efficiency)

PTE PM/PM10 Controlled (tons/year) = PTE PM/PM10 (tons/year) \* (1 - %Control Efficiency)

## Appendix A: Emission Calculations HAP Emissions From Surface Coating Operations

Company Name: M & V Finishing, LLC

Address: 1185 US 20 West, La Grange, Indiana 46761

Permit Number: M087-27117-00027 Permit Reviewer: Ghassan Shalabi

### Spray Booths SG1, SG2, SG3, SG4

Material	Density (lb/gal)	Max. Usage (gal/unit)	Maximum Throughput (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Methyl Isobutyl Ketone	Weight % Naphtha- lene	Weight % Ethyl- benzene	Weight % Methanol
81LS28-239 Michaels Cherry Stain	7.70	0.0407	8.82	0.00%	0.00%	0.00%	5.00%	0.00%	0.00%
1M.430X NF Sealer	7.98	0.0055	8.82	0.00%	9.66%	0.00%	0.00%	0.22%	0.00%
1D.31X Topcoat	7.55	0.0974	8.82	7.00%	1.50%	0.00%	0.00%	1.30%	0.00%
1C.800 White Paint	9.07	0.0250	8.82	0.00%	7.38%	0.00%	0.00%	0.00%	0.00%
S-0170B Thinner	6.95	0.0015	8.82	0.00%	50.00%	10.00%	0.00%	0.00%	10.00%

						PTE Methyl	PTE			
		Max.	Maximum	PTE	PTE	Isobutyl	Naphtha-	PTE Ethyl-		PTE Total
Material	Density	Usage	Throughput	Xylene	Toluene	Ketone	lene	benzene	Methanol	HAP
	(lb/gal)	(gal/unit)	(unit/hour)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)
81LS28-239										
Michaels Cherry										
Stain		(see above	e)	0.00	0.00	0.00	0.61	0.00	0.00	0.61
1M.430X NF Sealer		(see above	e)	0.00	0.16	0.00	0.00	0.004	0.00	0.17
1D.31X Topcoat		(see above	e)	1.99	0.43	0.00	0.00	0.37	0.00	2.78
1C.800 White Paint		(see above	e)	0.00	0.65	0.00	0.00	0.00	0.00	0.65
S-0170B Thinner		(see above	e)	0.00	0.20	0.04	0.00	0.00	0.04	0.28

Totals for all Booths	1.99	1.44	0.04	0.61	0.37	0.04	4.49

### **METHODOLOGY**

PTE HAPS (tons/yr) = Density (lb/gal) x Max. Usage (gal/unit) x Max. Throughput (unit/hr) x Weight % HAP x 8760 (hrs/yr) x 1/2000 (ton/lbs)

### Appendix A: Emissions Calculations **Natural Gas Combustion**

Company Name: M & V Finishing, LLC

Address: 1185 US 20 West, La Grange, Indiana 46761

Permit Number: M087-27117-00027 Permit Reviewer: Ghassan Shalabi

Emission Unit ID	Number of Units	lumber of Units		Total Maximum Capacity (MMBtu/hr)
AM-1	1	Air Makeup Unit	1.32	1.32
AM-2	1	Air Makeup Unit	0.75	0.75
AM-3 AM-4	2	Air Makeup Unit	0.50	1.00
B-1 B-2 B-3	3	Hot Water Heaters for Radiant Heat	0.15	0.45
B-4	1	Hot Water Heaters for Radiant Heat	0.23	0.23
<u> </u>	•		Total:	3.75

	HHV	
Heat Input Capacity	mmBtu	Potential Throughput
MMBtu/hr	mmscf	MMCF/yr
3.75	1020	32.2

	Pollutant								
Emission Factor in lb/MMCF	PM* 1.9	PM10* 7.6	direct PM2.5* 7.6	SO2 0.6	NOx 100	VOC 5.5	CO 84		
Potential Emission in tons/yr	0.03	0.12	0.12	0.01	**see below 1.61	0.09	1.35		

<sup>\*</sup>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.

### Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

### Hazardous Air Pollutants (HAPs)

	HAPs - Organics								
	Benzene	Dichlorobenzene	Hexane	Toluene	Total - Organics				
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03				
Potential Emission in tons/yr	3.4E-05	1.9E-05	1.2E-03	2.9E-02	5.5E-05	0.03			

		HAPs - Metals									
	Lead	Cadmium	Nickel	Total - Metals							
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03						
Potential Emission in tons/yr	tential Emission in tons/yr 8.1E-06 1.8E-05 2.3E-05 6.1E-06										
Methodology is the same as above.		Total HAPs	0.03								
The five highest organic and metal HAPs emission factor	Worst HAP	0.03									

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

<sup>\*\*</sup>Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

## Appendix A: Emission Calculations Particulate Emissions - Woodworking Operations

Company Name: M & V Finishing, LLC

Address: 1185 US 20 West, La Grange, Indiana 46761

Permit Number: M087-27117-00027 Permit Reviewer: Ghassan Shalabi

### 1. PTE From Woodworking Operations - Two (2) Handheld Sanders HS1, HS2

									Material	
			Material Input	Depth					Loss	Material Loss
			(lb/hour)	Removed	Sander	Process	Material	Material Density	Emissions	Emissions
Process	Units	ID	,	(in)	Width (in)	Rate (in/hr)	Loss (in <sup>3</sup> /hr)	(lb/in <sup>3</sup> )	(lb/hr)	(ton/year)
	Two (2)									
	Hand									
Woodworking	Sanders	HS1, HS2	106	0.002	4	100	0.80	0.024	0.02	0.08
	_			_			_	<b>Total Emissions</b>	0.02	0.08

### Methodology

Wood Material Density (lb/in³) = 42 lb/ft³ / 1728 in³/ft³

Material Loss (in³/hr) = Depth Removed (in) \* Sander Width (in) \* Process Rate (in/hr)

Material Loss Emissions (lb/hr) = Material Loss (in3/hr) \* Material Density(lb/in3)

Emissions (ton/year) = Material Loss Emissions (lb/hr) \* 8760 (hr/year) / 2000 (lb/ton)

### Appendix A: Emissions Calculations **Unpaved Roads**

Company Name: M & V Finishing, LLC

Address: 1185 US 20 West, La Grange, Indiana 46761

Permit Number: M087-27117-00027 Permit Reviewer: Ghassan Shalabi

### **Unpaved Roads at Industrial Site**

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

Vehicle Information (provided by source)

Semi Tractor Delivery - Departure	4.25	1.0	4.3 8.5	40.0	170.0	295	0.056	0.2	86.7 173.3
Semi Tractor Delivery - Entry	4.25	1.0	4.3	40.0	170.0	295	0.056	0.2	86.7
Туре	vehicles	per vehicle	(trip/day)	(tons/trip)	(ton/day)	(feet/trip)	(mi/trip)	(miles/day)	(miles/yr)
	number of	trips per day	trips per day	Loaded	day	distance	distance	miles	miles
	Maximum	one-way	Maximum	Weight	driven per	one-way	one-way	one-way	one-way
		Number of		Maximum	Weight	Maximum	Maximum	Maximum	Maximum
					Total				

Average Vehicle Weight Per Trip = tons/trip Average Miles Per Trip = 0.06 miles/trip

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

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	4.8	4.8	4.8	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Sand/Gravel Processing Plant)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)
W =	40.0	40.0	40.0	tons = average vehicle weight (provided by source)
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)

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

Mitigated Emission Factor, Eext = E \* [(365 - P)/365]

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

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	8.28	2.11	0.21	lb/mile
Mitigated Emission Factor, Eext =	8.09	2.06	0.21	lb/mile
Dust Control Efficiency =	0%	0%	0%	(pursuant to control measures outlined in fugitive dust control plan)

		Unmitigated	Unmitigated		Mitigated	Mitigated		Controlled	Controlled
	Unmitigated	PTE of	PTE of	Mitigated	PTE of	PTE of	Controlled	PTE of	PTE of
	PTE of PM	PM10	PM2.5	PTE of PM	PM10	PM2.5	PTE of PM	PM10	PM2.5
Process	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
Vehicle (entering plant) (one-way trip)	0.36	0.09	0.01	0.35	0.09	0.01	0.35	0.09	0.01
Vehicle (leaving plant) (one-way trip)	0.36	0.09	0.01	0.35	0.09	0.01	0.35	0.09	0.01
Totals	0.72	0.18	0.02	0.70	0.18	0.02	0.70	0.18	0.02

### Methodology

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] \* [Maximum trips per day (trip/day)]

Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip) / [5280 ft/mile]

Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] \* [Maximum one-way distance (mi/trip)]

Average Vehicle Weight Per Trip (ton/tri = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)] Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)] Unmitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) \* (Unmitigated Emission Factor (lb/mile)) \* (ton/2000 lbs)

Mitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) \* (Mitigated Emission Factor (lb/mile)) \* (ton/2000 lbs) Controlled PTE (tons/yr)

= (Mitigated PTE (tons/yr)) \* (1 - Dust Control Efficiency)

### **Abbreviations**

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



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Eric J. Holcomb

Governor

Bruno L. Pigott

Commissioner

December 14, 2018

Merv Beechy M & V Finishing, LLC 1185 US Hwy 20 W Lagrange, IN 46761

Re: Public Notice

M & V Finishing, LLC

Permit Level: MSOP Renewal Permit Number: 087-40640-00027

Dear Mr. Beechy:

Enclosed is a copy of your draft MSOP Renewal, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the LaGrange Standard in LaGrange, IN publish the abbreviated version of the public notice no later than December 17, 2018. You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper.

OAQ has submitted the draft permit package to the LaGrange County Public Library, 203 W Spring Street in LaGrange, IN. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Ghassan Shalabi, 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 3-7622 or dial (317) 233-7622.

Sincerely,

Theresa Weaver

Theresa Weaver Permits Branch Office of Air Quality

Enclosures PN Applicant Cover Letter 1/9/2017







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Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

December 13, 2018

LaGrange Standard P.O. Box 148 LaGrange, Indiana 46761

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for M & V Finishing, LLC, LaGrange County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than December 17, 2018.

Please send the invoice, notarized form, clippings showing the date of publication to Bo Liu, at the Indiana Department of Environmental Management, Accounting, Room N1340, 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 Theresa Weaver at 800-451-6027 and ask for extension 4-5256 or dial 317-234-5256.

Sincerely,

Theresa Weaver

Theresa Weaver Permit Branch Office of Air Quality

Permit Level: MSOP Renewal Permit Number: 087-40640-00027

Enclosure

PN Newspaper Letter 8/22/2018





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Eric J. Holcomb

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Commissioner

December 14, 2018

To: LaGrange County Public Library

From: Jenny Acker, Branch Chief

Permits Branch
Office of Air Quality

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

**Permit** 

Applicant Name: M & V Finishing, LLC Permit Number: 087-40640-00027

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

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

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

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

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

Enclosures PN Library 1/9/2017







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Eric J. Holcomb

Governor

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Commissioner

### Notice of Public Comment

December 14, 2018 M & V Finishing, LLC 087-40640-00027

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 Letter 1/9/2017





# Mail Code 61-53

IDEM Staff	TAWEAVER 12/	13/2018		
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address of		Management		USED AS
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		100 N. Senate	MAILING ONLY	OF MAILING
		Indianapolis, IN 46204	III) WEITTO OTTET	

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											Remarks
1		Merv Beechy M & V FINISHING LLC 1185 US Hwy 20 W Lagrange IN 46761 (Source	CAATS)								
2		Mr. Steve Roosz NISWMD 2320 W 800 S, P.O. Box 370 Ashley IN 46705 (Affected Party)									
3		LaGrange County Public Library 203 W Spring St Lagrange IN 46761-1899 (Library)									
4		LaGrange County Health Dept. 304 B Townline Road Lagrange IN 46761 (Health Department)									
5		LaGrange Town Council 1201 N Townline Road LaGrange IN 46761 (Local Official)									
6		LaGrange County Commissioners 114 W. Michigan St. LaGrange IN 46761 (Local Official)									
7		Mr. Kevin Parks D & B Environmental Services, Inc. 401 Lincoln Way West Oscecola IN 46561 (Consultant)									
8		Dustin & Muranda Hall 401 N Townline Road LaGrange IN 46761 (Affected Party)									
9		Mr. Roger Schneider The Goshen News 114 S. Main St Goshen IN 46526 (Affected F	Party)								
10											
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