PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

Cra-Gen, Inc. d/b/a Woodtek
1706 West Lusher Avenue
Elkhart, Indiana 46517

(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 in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-7471-00473	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) , and presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary wood door manufacturing operation with two (2) plants located on contiguous property.

Responsible Official:	Kenneth Roscoe
Source Address:	1706 West Lusher Avenue, Elkhart, Indiana 46517
Mailing Address:	P.O. Box 698, Elkhart, Indiana 46515
SIC Code:	2499
County Location:	Elkhart
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under Emission Offset Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

(a) Plant #1:

(1) One (1) surface coating booth, identified as EU-34A, coating wooden doors, with a maximum capacity of 138 doors per hour, utilizing an airless application system, with overspray emissions controlled by dry filters, and exhausting to Stack IDs SV-18 and SV-19.

(2) One (1) surface coating booth, identified as EU-35A, coating wooden doors, with a maximum capacity of 38 doors per hour, utilizing a high volume low pressure (HVLP) application system, with overspray emissions controlled by dry filters, and exhausting to Stack ID SV-20.

(3) Woodworking equipment, identified as EU-15A through EU-20A, controlled by one (1) cyclone/baghouse system, exhausting to Stack ID SV-15.

(4) Woodworking equipment, identified as EU-21A through EU-28A, controlled by one (1) cyclone/baghouse system, exhausting to Stack ID SV-16.

(5) Woodworking equipment, identified as EU-29A through EU-33A, controlled by one (1) cyclone/baghouse system, exhausting to Stack ID SV-17.

(b) Plant #2:

(1) One (1) surface coating booth, identified as EU-01B, coating wooden doors, with a maximum capacity of 125 doors per hour, utilizing a high volume low pressure (HVLP) application system, with overspray emissions controlled by dry filters, and exhausting to Stack ID SV-1.

(2) One (1) surface coating booth, identified as EU-03B, coating wooden doors, with a maximum capacity of 125 doors per hour, utilizing an air -assisted airless application system, with overspray emissions controlled by dry filters, and exhausting to Stack ID SV-3.

(3) One (1) surface coating booth, identified as EU-04B, coating wooden doors, with a maximum capacity of 125 doors per hour, utilizing an air -assisted airless application system, with overspray emissions controlled by dry filters, and exhausting to Stack ID SV-4.

(4) Woodworking equipment, identified as EU-5B through EU-21B, controlled by one (1) cyclone/baghouse system, exhausting to Stack ID SV-5.

(5) Woodworking equipment, identified as EU-22B through EU-35B, controlled by one (1) cyclone/baghouse system, exhausting to Stack ID SV-6.

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

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

(a) Woodworking equipment, identified as EU-38A through EU-45A, exhausting inside the building.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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

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

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

A.5 Prior Permit Conditions Superseded [326 IAC 2]

The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source, and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

(a) 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 Part 70 permit under 326 IAC 2-7.

(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15.

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

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

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

(a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM .

(b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source’s potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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

B.6 Severability [326 IAC 2-7-5(5)]

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

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

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

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, 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.

(c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, the Permittee shall furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or for

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

(a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

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

(b) The annual compliance certification report required by this permit shall be considered

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

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

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

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

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

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each:

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

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

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

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

B.13 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

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

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

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

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

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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

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

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

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

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

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAM may require that the Preventive Maintenance Plans required under 326 IAC

2-7-4-(c)(9) be revised in response to an emergency.

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

(g) Operations may continue during an emergency only if the following conditions are met:

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

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

(a) Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided either of the following:

(1) The applicable requirements are included and specifically identified in this permit;

(2) IDEM, OAM, in acting on the Part 70 permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 permit includes the determination or a concise summary thereof.

(b) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.

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

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

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

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

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

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

(b) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent.

(c) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]

(b) This permit shall be reopened and revised under any of the circumstances listed in IC

13-15-7-2 or if IDEM, OAM determines any of the following:

(1) That this permit contains a material mistake.

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

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

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

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

B.18 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

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

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

(B) 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, OAM, on or before the date it is due. [326 IAC 2-5-3]

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

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the

source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM **,** takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, **,** any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Administrative Permit Amendment [326 IAC 2-7-11]

(a) An administrative permit amendment is a Part 70 permit revision that makes changes of the type specified under 326 IAC 2-7-11(a).

(b) An administrative permit amendment may be made by IDEM, OAM , consistent with the procedures specified under 326 IAC 2-7-11(c).

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

B.20 Minor Permit Modification [326 IAC 2-7-12]

(a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-7-11.

(b) Minor modification to this permit shall follow the procedures specified under 326 IAC 2-7-12(b), except as provided by 326 IAC 2-7-12(c).

(c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-7-12(b) and shall include the information required in 326 IAC 2-7-12(b)(3)(A) through (E).

(d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application provided that the change has received any approval required by 326 IAC 2-1. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM takes any of the actions specified in 326 IAC 2-7-12(b)(6)(A) through (C), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-7-12(b)(7)]

B.21 Significant Permit Modification [326 IAC 2-7-12(d)]

(a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.

(b) Every significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.

(c) Nothing in 326 IAC 2-7-12(d) shall be construed to preclude the Permittee from making

changes consistent with 326 IAC 2-7 that would render existing permit compliance terms and conditions irrelevant.

(d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-7, including those for application, public participation, review by affected states, review by the U.S. EPA, and availability of the permit shield, as they apply to permit issuance and renewal.

B.22 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

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

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

B.23 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

(a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.24 Operational Flexibility [326 IAC 2-7-20]

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

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

(2) Any approval required by 326 IAC 2-1 has been obtained;

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

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

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

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

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, to public review.

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

(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

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

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

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.25 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.26 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of IDEM identification cards, credentials, and other documents as may be

required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]

B.27 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch , within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11.

(c) IDEM, OAM shall reserve the right to issue a new permit.

B.28 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing, or in a time period consistent with the fee schedule established in 326 IAC 2-7-19.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, the Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Major Source

Pursuant to 326 IAC 2-3 (Emission Offset), this source is a major source.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

(a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.

(b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

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

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

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

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

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit shall be operated at all times that the emission units vented to the control equipment are in operation, as described in Section D of this permit.

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

(a) The Permittee shall comply with the provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

(b) Any change in an applicable stack shall require prior approval from IDEM, OAM.

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

Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector be accredited is federally enforceable.

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

C.9 Performance Testing [326 IAC 3-2.1]

(a) All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

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

C.10 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

(a) Has certified that all facilities at this source are in compliance with all applicable requirements;

(b) Has submitted a statement that the Permittee will continue to comply with such requirements; and

(c) Will continue to comply with such requirements that become effective during the term of this permit.

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee shall notify:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, no more than ninety (90) days after receipt of this permit, with full justification of the reasons for the inability to meet this date and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.

The notification which shall be submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

C.12 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

(a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the requirements of this permit shall be performed according to the provisions of 326 IAC 3, or 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.14 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61.140]

(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

(3) 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
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory 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) Indiana Accredited 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 Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

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

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

(c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. If after this time, the Permittee does not submit an approvable ERP, then IDEM, OAM, shall supply such a plan.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

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

C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3) A verification to IDEM, OAM that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

C.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5(3)]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking

further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within “normal” parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.18 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 take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

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

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

(a) The Permittee shall submit a certified, annual emission statement that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate actual emissions of other regulated pollutants from the source, for

purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) The annual emission statement 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, OAM, on or before the date it is due.

C.20 Monitoring Data Availability

(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)(B)]

(a) Records of all required monitoring data and support information 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 kept at the source location and available within one (1) hour upon verbal request of an IDEM, OAM representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

(a) To affirm that the source has met all the requirements stated in this permit the source shall submit a Quarterly Compliance Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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

(d) Unless otherwise specified in this permit, any quarterly or semi-annual report shall be submitted within thirty (30) days of the end of the reporting period.

(e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.23 Compliance with 40 CFR 82 and 326 IAC 22-1

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

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Plant #1:

(a) One (1) surface coating booth, identified as EU-34A, coating wooden doors, with a maximum capacity of 138 doors per hour, utilizing an airless application system, with overspray emissions controlled by dry filters, and exhausting to Stack IDs SV-18 and SV-19.

(b) One (1) surface coating booth, identified as EU-35A, coating wooden doors, with a maximum capacity of 38 doors per hour, utilizing a high volume low pressure (HVLP) application system, with overspray emissions controlled by dry filters, and exhausting to Stack ID SV-20.

Plant #2:

(c) One (1) surface coating booth, identified as EU-01B, coating wooden doors, with a maximum capacity of 125 doors per hour, utilizing a high volume low pressure (HVLP) application system, with overspray emissions controlled by dry filters, and exhausting to Stack ID SV-1.

(d) One (1) surface coating booth, identified as EU-03B, coating wooden doors, with a maximum capacity of 125 doors per hour, utilizing an air -assisted airless application system, with overspray emissions controlled by dry filters, and exhausting to Stack ID SV-3.

(e) One (1) surface coating booth, identified as EU-04B, coating wooden doors, with a maximum capacity of 125 doors per hour, utilizing an air -assisted airless application system, with overspray emissions controlled by dry filters, and exhausting to Stack ID SV-4.

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

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

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets in booths EU-34A and EU-04B shall utilize one of the following application methods:

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

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

D.1.2 Emission Offset Minor Limit [326 IAC 2-3]

(a) Pursuant to CP-039-2878-00093, issued on November 18, 1993, this surface coating booth EU-04B shall use no more than 39 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 365 consecutive day period. This usage limit is required to limit the potential to emit of VOC to less than 39 tons per 365 consecutive

day period. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.

D.1.3 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

(a) Any change or modification which may increase potential emissions to 250 tons per year from surface coating booth EU-34A shall obtain a Prevention of Significant Deterioration permit pursuant to 326 IAC 2-2 before such change may occur.

(b) Any change or modification which may increase potential emissions to 250 tons per year from surface coating booths EU-01B and EU-03B shall obtain a Prevention of Significant Deterioration permit pursuant to 326 IAC 2-2 before such change may occur.

(c) Any change or modification which may increase potential emissions to 40 tons per year from surface coating booth EU-35A shall obtain a Prevention of Significant Deterioration permit pursuant to 326 IAC 2-2 before such change may occur.

D.1.4 Best Available Control Technology (BACT) [326 IAC 8-1-6]

Pursuant to OP-20-03-92-0677, issued on April 8, 1988, the spray booths EU-01B and EU-03B shall use the best available control technology (BACT). BACT for these booths is:

(a) using air assisted airless spray guns for surface coating,

(b) that the volatile organic solvent content in the lacquers shall be limited to 5.9 pounds per gallon of coating, excluding water, delivered to the applicators. These emissions shall be averaged on a daily basis.

(c) that the volatile organic solvent content in the stains shall be limited to 7.0 pounds per gallon of coating, excluding water, delivered to the applicators. These emissions shall be averaged on a daily basis.

The continued use of air assisted airless spray guns shall satisfy the requirements of 326 IAC 8-2-12 for these booths.

D.1.5 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the PM from the five (5) surface coating booths (EU-34A, EU-35A, EU-01B, EU-03B, and EU-04B) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.6 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

(a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of December 7, 1998.

(b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:

(1) Limit the volatile hazardous air pollutant (VHAP) emissions from finishing operations as follows:

(A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or

(B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or

(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or

(D) Use a combination of (A), (B), and (C).

(2) Limit VHAP emissions contact adhesives as follows:

(A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pounds VHAP per pound solids.

(B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.

(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.

(3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

A copy of the rule is enclosed.

D.1.7 Work Practice Standards [40 CFR 63.803]

The owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

(a) Operator training course.
(b) Leak inspection and maintenance plan.
(c) Cleaning and washoff solvent accounting system.
(d) Chemical composition of cleaning and washoff solvents.
(e) Spray booth cleaning.
(f) Storage requirements.
(g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
(h) Line Cleaning.

(i) Gun Cleaning.
(j) Washoff operations.
(k) Formulation assessment plan for finishing operations.

D.1.8 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.9 Testing Requirements [326 IAC 2-7-6(1)] [40 CFR 63, Subpart JJ]

(a) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-2.1.

(b) If the OAM requests, compliance with the PM limit specified in Condition D.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

D.1.10 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.2 and D.1.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.11 HAP Content

Pursuant to 40 CFR 63, Subpart JJ, an Initial Compliance Report must be submitted within sixty (60) calendar days following the compliance date specified in Condition D.1.6 and a Continuous Compliance Demonstration Report must be submitted within thirty (30) days following every six (6) month period, thereafter.

D.1.12 Particulate Matter (PM)

Pursuant to OP-20-03-92-0677, issued on April 7, 1988, OP-20-05-92-0680, issued on August 19, 1988, CP-039-2878-00093, issued on November 18, 1993, and CP-039-7093-00083, issued on November 20, 1996, the dry filters for PM control shall be in operation at all times when the five (5) paint booths (EU-34A, EU-35A, EU-01B, EU-03B, and EU-04B) are in operation.

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

D.1.13 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or more of the booths are in operation.

(b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.14 Record Keeping Requirements

(a) To document compliance with Conditions D.1.2, D.1.3 and D.1.4, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.2, D.1.3 and D.1.4.

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

(2) A log of the dates of use;

(3) The volume weighted VOC content of the coatings used for each day;

(4) The cleanup solvent usage for each day;

(5) The total VOC usage for each day; and

(6) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.1.6, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.1.4.

(1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.

(2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.

(3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.

(4) The VHAP content in weight percent of each thinner used.

(5) Copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.

(c) To document compliance with Condition D.1.7, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.

(d) To document compliance with Condition D.1.11, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.15 Reporting Requirements

(a) An Initial Compliance Report to document compliance with Condition D.1.6, and the Certification form, shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, within sixty (60) calendar days following the compliance date of December 7, 1998. The initial compliance report must include data from the entire month that the compliance date falls.

(b) A semi-annual Continuous Compliance Report to document compliance with Condition D.1.6, and the Certification form, shall be submitted to the address listed in Section C - General Reporting Requirements of this permit, within thirty (30) days after the end of the six (6) months being reported.

The six (6) month periods shall cover the following months:

(1) January 1 through June 30.

(2) July 1 through December 31.

(c) A quarterly summary of the information to document compliance with Conditions D.1.2 and D.1.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

Plant #1:

(a) Woodworking equipment, identified as EU-15A through EU-20A, controlled by one (1) cyclone/baghouse system, exhausting to Stack ID SV-15.

(b) Woodworking equipment, identified as EU-21A through EU-28A, controlled by one (1) cyclone/baghouse system, exhausting to Stack ID SV-16.

(c) Woodworking equipment, identified as EU-29A through EU-33A, controlled by one (1) cyclone/baghouse system, exhausting to Stack ID SV-17.

Plant #2:

(d) Woodworking equipment, identified as EU-5B through EU-21B, controlled by one (1) cyclone/baghouse system, exhausting to Stack ID SV-5.

(e) Woodworking equipment, identified as EU-22B through EU-35B, controlled by one (1) cyclone/baghouse system, exhausting to Stack ID SV-6.

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

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

(a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the woodworking equipment exhausting through Stack ID SV-15 shall not exceed 1.43 pounds per hour when operating at a process weight rate of 415 pounds per hour.

(b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the woodworking equipment exhausting through Stack ID SV-16 shall not exceed 1.43 pounds per hour when operating at a process weight rate of 415 pounds per hour.

(c) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the woodworking equipment exhausting through Stack ID SV-17 shall not exceed 1.43 pounds per hour when operating at a process weight rate of 415 pounds per hour.

(d) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the woodworking equipment exhausting through Stack ID SV-15 shall not exceed 0.22 pounds per hour when operating at a process weight rate of 26 pounds per hour.

(e) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the woodworking equipment exhausting through Stack ID SV-16 shall not exceed 0.33 pounds per hour when operating at a process weight rate of 47.5 pounds per hour.

(f) The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.2.2 Opacity

Pursuant to PC (20) 1679, visible emissions from the woodworking facilities shall not exceed ten percent (10%) opacity.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.2.4 Testing Requirements [326 IAC 2-7-6(1)]

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

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

D.2.5 Visible Emissions Notations

(a) Daily visible emission notations of each of the baghouse stacks (SV-5, SV-6, SV-15, SV-16, and SV-17) exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

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

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

D.2.6 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

D.2.7 Broken Bag or Failure Detection

In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced.

(b) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.

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

D.2.8 Record Keeping Requirements

(a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the baghouse stacks (SV-5, SV-6, SV-15, SV-16, and SV-17) exhaust.

(b) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6 and the dates the vents are redirected.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

The following insignificant activities:

Woodworking equipment, identified as EU-38A through EU-45A, exhausting inside the building.

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

D.3.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the woodworking equipment (EU-38A through EU-45A) shall not exceed allowable PM emission rate based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirement

D.3.2 Testing Requirements [326 IAC 2-7-6(1)]

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Cra-Gen, Inc. d/b/a Woodtek
Source Address: 1706 West Lusher Avenue, Elkhart, Indiana 46517
Mailing Address: P.O. Box 698, Elkhart, Indiana 46515
Part 70 Permit No.: T039-7471-00473

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

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Deviation Occurrence Reporting Form (For Control Equipment Monitoring)

9 Deviation Occurrence Reporting Form (For Material Usage, Quality, Etc.)

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

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

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Cra-Gen, Inc. d/b/a Woodtek
Source Address: 1706 West Lusher Avenue, Elkhart, Indiana 46517
Mailing Address: P.O. Box 698, Elkhart, Indiana 46515
Part 70 Permit No.: T039-7471-00473

This form consists of 2 pages **Page 1 of 2**

Check either No. 1 or No.2
9 1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) C The Permittee must submit notice in writing within ten (**10**) calendar days

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

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

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
(include local agency when applicable)

PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE REPORT

Source Name: Cra-Gen, Inc. d/b/a Woodtek
Source Address: 1706 West Lusher Avenue, Elkhart, Indiana 46517
Mailing Address: P.O. Box 698, Elkhart, Indiana 46515
Part 70 Permit No.: T039-7471-00473

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify zero in the column marked "No Deviations".

LIST EACH COMPLIANCE REQUIREMENT EXISTING FOR THIS SOURCE:

Requirement (e.g. Permit Condition D.1.3)	**Number of Deviations**	**Date of each Deviations**	**No Deviations**

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Cra-Gen, Inc. d/b/a Woodtek
Source Address: 1706 West Lusher Avenue, Elkhart, Indiana 46517
Mailing Address: P.O. Box 698, Elkhart, Indiana 46515
Part 70 Permit No.: T039-7471-00473
Facility: Plant #2 Surface Coating Booth EU-04B
Parameter: VOC
Limit: 39 tons per 365 consecutive day period

Month: _____ Year: _____

Day	VOC Usage Today (tons)	VOC Usage Previous 364 Days (tons)	Total VOC Usage for 365 day period (tons)	Day	VOC Usage Today (tons)	VOC Usage Previous 364 Days (tons)	Total VOC Usage for 365 day period (tons)
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16				no. of deviations			

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Cra-Gen, Inc. d/b/a Woodtek
Source Address: 1706 West Lusher Avenue, Elkhart, Indiana 46517
Mailing Address: P.O. Box 698, Elkhart, Indiana 46515
Part 70 Permit No.: T039-7471-00473
Facility: Surface coating booths EU-01B and EU-03B
Parameter: VOC content of coatings
Limit: Stains - 7.0 pounds VOC per gallon coating excluding water
Lacquers - 5.9 pounds VOC per gallon coating excluding water

Month: _____ Year: _____

Day	Daily Weighted Average of Stain VOC Content	Daily Weighted Average of Lacquers VOC Content	Day	Daily Weighted Average of Stain VOC Content	Daily Weighted Average of Lacquers VOC Content
1			17		
2			18		
3			19		
4			20		
5			21		
6			22		
7			23		
8			24		
9			25		
10			26		
11			27		
12			28		
13			29		
14			30		
15			31		
16			no. of deviations		

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Semi-Annual Report

Source Name: Cra-Gen, Inc. d/b/a Woodtek
Source Address: 1706 West Lusher Avenue, Elkhart, Indiana 46517
Mailing Address: P.O. Box 698, Elkhart, Indiana 46515
Part 70 Permit No.: T039-7471-00473
Facility: Surface Coating (EU-34A, EU-35A, EU-01B, EU-03B, and EU-04B)
Parameter: VOC and VHAPs - NESHAP
Limit:
(1) Finishing operations - 1.0 lbs VHAP/lb solids
(2) Thinners used for on-site formulation of washcoats, basecoats, and enamels - 3% VHAP content by weight
(3) All other solvent and thinner mixtures - 10% VHAP content by weight
(4) Foam adhesives meeting the upholstered seating flammability requirements - 1.8 lbs VHAP/lb solid
(5) All other contact adhesives - 1.0 lb VHAP/lb solid
(6) Strippable spray booth material - 0.8 lb VOC/lb solid

YEAR: _____

Month	Finishing Operations (lb VHAP/lb solid)	Thinners (% VHAP by weight)	Thinner/Solvent Mixtures (% VHAP by weight)	Foam Adhesives (upholstered) (lb VHAP/lb solid)	Contact Adhesives (lb VHAP/lb solid)	Strippable Spray Booth Material (lb VOC/lb solid)
1						
2						
3						
4						
5						
6						

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	Cra-Gen, Inc. d/b/a Woodtek
Source Location:	1706 Lusher Avenue, Elkhart, Indiana 46517
County:	Elkhart
SIC Code:	2499
Operation Permit No.:	T039-7471-00473
Permit Reviewer:	Bryan Sheets

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Cra-Gen, Inc. d/b/a Woodtek relating to the operation of a wood door manufacturing operation.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) Plant #1:

(1) One (1) surface coating booth, identified as EU-34A, coating wooden doors, with a maximum capacity of 138 doors per hour, utilizing an airless application system, with overspray emissions controlled by dry filters, and exhausting to Stack IDs SV-18 and SV-19.

(2) One (1) surface coating booth, identified as EU-35A, coating wooden doors, with a maximum capacity of 38 doors per hour, utilizing a high volume low pressure (HVLP) application system, with overspray emissions controlled by dry filters, and exhausting to Stack ID SV-20.

(3) Woodworking equipment, identified as EU-15A through EU-20A, controlled by one (1) cyclone/baghouse system, exhausting to Stack ID SV-15.

(4) Woodworking equipment, identified as EU-21A through EU-28A, controlled by one (1) cyclone/baghouse system, exhausting to Stack ID SV-16.

(5) Woodworking equipment, identified as EU-29A through EU-33A, controlled by one (1) cyclone/baghouse system, exhausting to Stack ID SV-17.

(b) Plant #2:

(1) One (1) surface coating booth, identified as EU-01B, coating wooden doors, with a maximum capacity of 125 doors per hour, utilizing an airless application system, with overspray emissions controlled by dry filters, and exhausting to Stack ID SV-1.

(2) One (1) surface coating booth, identified as EU-03B, coating wooden doors, with a maximum capacity of 125 doors per hour, utilizing an air -assisted airless application system, with overspray emissions controlled by dry filters, and exhausting to Stack ID SV-3.

(3) One (1) surface coating booth, identified as EU-04B, coating wooden doors, with a maximum capacity of 125 doors per hour, utilizing an air -assisted airless application system, with overspray emissions controlled by dry filters, and exhausting to Stack ID SV-4.

(4) Woodworking equipment, identified as EU-5B through EU-21B, controlled by one (1) cyclone/baghouse system, exhausting to Stack ID SV-5.

(5) Woodworking equipment, identified as EU-22B through EU-35B, controlled by one (1) cyclone/baghouse system, exhausting to Stack ID SV-6.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR)

There are no new facilities to be reviewed under the ENSR process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(20):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour (One (1) oven, identified as O-1, with a heat input capacity of 0.1 MMBtu per hour; space heaters, air make up units).

(b) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.

(c) Paved and unpaved roads and parking lots with public access.

(d) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(e) Other categories with emissions below insignificant thresholds:

(1) Woodworking equipment, identified as EU-38A through EU-45A, exhausting inside the building;

(2) Woodworking maintenance departments;

(3) One (1) glue spreader machine, identified as EU-46A, exhausting inside the building; and

(4) Seven (7) cold glue presses, identified as Unit IDs EU-47A through EU-53A, exhausting inside the building.

Existing Approvals

The source has been operating under the following approvals:

(a) Plant #1:

(1) OP 20-05-92-0680, issued on August 19, 1988; and

(2) Exemption letter CP-039-7093-00083, issued on November 20, 1996.

(b) Plant #2:

(1) OP 20-03-92-0677, issued on April 7, 1988;

(2) Registration letter CP-039-2494-00093, issued on June 1, 1992; and

(3) CP-039-2878-00093, issued on November 18, 1993.

Source Definition

This wood door manufacturing company consists of two (2) plants:

(a) Plant #1 is located at 1706 West Lusher Avenue, Elkhart, Indiana 46517; and

(b) Plant #2 is located at 1700 West Lusher Avenue, Elkhart, Indiana 46517.

Since the two (2) plants are located on contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source.

Enforcement Issue

There are no Enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit 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 administratively complete Part 70 permit application for the purposes of this review was received on December 11, 1996.

Emission Calculations

See Appendix A of this document for detailed emissions calculations.

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as “emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility.”

Pollutant	Potential Emissions (tons/year)
PM	> 100
PM-10	> 100
SO_2	< 100
VOC	> 100

CO	< 100
NO_x	< 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
Toluene	> 10
Xylenes	> 10
Methanol	> 10
Methyl Isobutyl Ketone	> 10
All Other HAPs	< 10
TOTAL	> 25

(a) The potential emissions (as defined in the Indiana Rule) of VOC and PM-10 are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential emissions (as defined in Indiana Rule) of any single HAP are equal to or greater than ten (10) tons per year and the potential emissions (as defined in Indiana Rule) of a combination HAPs are greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects 1995 emission data.

(a) Plant #1:

Pollutant	Actual Emissions (tons/year)
PM	negligible
PM-10	negligible
SO_2	0
VOC	21.63
CO	0
HAPs (total)	10.07
NO_x	0

(b) Plant #2:

Pollutant	Actual Emissions (tons/year)
PM	0.84
PM-10	0.01
SO_2	negligible
VOC	28.42
CO	0.03
HAPs (total)	10.32
NO_x	0.15

Limited Potential to Emit

The table below summarizes the total limited potential to emit of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/ facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Plant #1 Woodworking	18.8	18.8	--	--	--	--	--
Plant #1 Surface Coating	0.34	0.34	--	90.7	--	--	27.1
Plant #2 Woodworking	2.45	2.45	--	--	--	--	0
Plant #2 Surface Coating	0.29	0.29	--	288	--	--	43.5
Total Emissions	21.88	21.88	0	378.7	0	0	70.6

Attached Tables 1 to 9 summarize the permit conditions and requirements

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
TSP	attainment or unclassifiable
PM-10	attainment or unclassifiable
SO_2	attainment or unclassifiable
NO_2	attainment or unclassifiable
Ozone	attainment or unclassifiable
CO	attainment or unclassifiable
Lead	attainment or unclassifiable

(a) Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of

issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(a) There are no New Source Performance Standards (326 IAC 12) applicable to this source.

(b) The surface coating operation is subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, (40 CFR 60.800, Subpart JJ) because Woodtek operates a major source as defined in 40 CFR Part 63.2. The compliance date for their existing source is December 7, 1998 because actual HAP emissions for the source were less than 50 tons in 1996. A copy of this rule is enclosed.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC in Elkhart County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 4-1 (Open Burning)

Pursuant to 326 IAC 4-1-2, the applicant 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.

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

(a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,

(b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

Pursuant to 326 IAC 6-4, fugitive dust shall not be visibly crossing the property lines except as provided in 326 IAC 6-4-6 (Exceptions).

State Rule Applicability

All Booths:

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) overspray from the surface coating booth shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Plant #1 Surface Coating Booth EU-34A:

326 IAC 8-2-12 (Surface Coating Emission Limitations for Wood Furniture and Cabinet Coating)

Since this booth was constructed prior to July 1, 1990, is located in Elkhart County, and has actual emissions greater than 15 pounds per day, it was required to come into compliance with the 326 IAC 8-2 rules by July 1, 1991. Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), this booth shall utilize one of the following application methods:

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

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

326 IAC 2-3 (Emission Offset)

This booth was constructed while Elkhart County was nonattainment for ozone (prior to 1988) with potential emissions of 74 tons per year. The existing source potential to emit VOC at the time of construction was 0 tons per year. Therefore, this was minor construction and 326 IAC 2-3 did not apply.

326 IAC 2-2 (Prevention of Significant Deterioration)

In 1994 Elkhart County was redesignated as an attainment area for ozone. Therefore, any change or modification to this booth which increases potential VOC emissions to 250 tons per year or greater shall receive a PSD permit prior to making the change.

Plant #1 Surface Coating Booth EU-35A:

326 IAC 8-2-12 (Surface Coating Emission Limitations for Wood Furniture and Cabinet Coating)

Although this booth was constructed in Elkhart County after July 1, 1990 and coats wooden furnishings, the actual VOC emissions are less than 15 pounds per day. Therefore, this rule does not apply.

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

Although this booth was constructed after January 1, 1980, the potential VOC emissions are less than 25 tons per year. Therefore, this rule does not apply.

326 IAC 2-2 (Prevention of Significant Deterioration)

This booth was constructed in 1996 after Elkhart County was redesignated as attainment for ozone with potential emissions of 3 tons per year. Therefore, this was a minor modification to a major source and 326 IAC 2-2 did not apply. Any change or modification to this booth which increases potential VOC emissions to 40 tons per year or greater shall receive a PSD permit prior to making the change.

Plant #2 Surface Coating Booths EU-01B and EU-03B:

326 IAC 2-3 (Emission Offset)

These booths were constructed (1988) while Elkhart County was nonattainment for ozone with potential emissions of 52.5 tons per year. The existing source potential to emit VOC at the time of construction was 74 tons per year. Therefore, this was a natural minor modification to a minor source and 326 IAC 2-3 did not apply.

Pursuant to OP-20-03-92-0677, issued on April 7, 1988, these spray booths received a limit of 20.7 tons of VOC (249 tons per year), including coatings, dilution solvents, and cleaning solvents, per month. If a limit were required for these booths it should have been 99 tons per year at the time OP-20-03-92-0677 was issued. However, because this was a natural minor modification, the usage limit was not necessary to limit the potential to emit VOC. Therefore, this limit will be removed from the permit.

326 IAC 2-2 (Prevention of Significant Deterioration)

In 1994 Elkhart County was redesignated as an attainment area for ozone. Therefore, any change or modification to this booth which increases potential VOC emissions to 250 tons per year or greater shall receive a PSD permit prior to making the change.

326 IAC 8-1-6 (Best Available Control Technology)

At the time these booths were permitted, they did not fall into any category under the applicability section of 326 IAC 8-2. Since potential emissions from these booths were greater than 25 tons per year and they were constructed after January 1, 1980, the booths were reviewed pursuant to 326 IAC 8-1-6. Pursuant to OP-20-03-92-0677, issued on April 7, 1988, these spray booths were required to use the best available control technology (BACT). BACT for these spray booths is:

(a) using air assisted airless spray guns for surface coating,

(b) that the volatile organic solvent content in the lacquers shall be limited to 5.9 pounds per gallon of coating, excluding water, delivered to the applicators. These emissions shall be averaged on a daily basis.

(c) that the volatile organic solvent content in the stains shall be limited to 7.0 pounds per gallon of coating, excluding water, delivered to the applicators. These emissions shall be averaged on a daily basis.

The continued use of air assisted airless spray guns shall satisfy the requirements of 326 IAC 8-2-12.

Plant #2 Surface Coating Booth EU-04B:

326 IAC 2-3 (Emission Offset)

This booth was constructed (1993) while Elkhart County was nonattainment for ozone with potential emissions of 115.1 tons per year. The existing source potential to emit VOC at the time of construction was 126.5 tons per year. Therefore, pursuant to CP-039-2878-00093, issued on November 18, 1993, these spray booths were limited 39 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 365 consecutive day period. This usage limit was required to limit the potential to emit of VOC to less than 39 tons of VOC per 365 consecutive day period. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.

326 IAC 8-2-12 (Surface Coating Emission Limitations for Wood Furniture and Cabinet Coating)

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

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

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

State Rule Applicability - Woodworking Operations

Plant #1:

326 IAC 6-3-2 (Process Operations)

For the purposes of woodworking, a process will be considered the group of equipment exhausting to a control device. Therefore, a separate allowable emission rate will be determined for each baghouse exhaust.

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) emissions from the woodworking equipment exhausting through Stack ID SV-15 shall not exceed 1.43 pounds per hour when operating at a process weight rate of 415 pounds per hour. Since the potential controlled emissions are 0.31 pounds per hour, this process can comply with 326 IAC 6-3-2.

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) emissions from the woodworking equipment exhausting through Stack ID SV-16 shall not exceed 1.43 pounds per hour when operating at a process weight rate of 415 pounds per hour. Since the potential controlled emissions are 0.42 pounds per hour, this process can comply with 326 IAC 6-3-2.

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) emissions from the woodworking equipment exhausting through Stack ID SV-17 shall not exceed 1.43 pounds per hour when operating at a process weight rate of 415 pounds per hour. Since the potential

controlled emissions are 0.26 pounds per hour, this process can comply with 326 IAC 6-3-2.

Plant #2:

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) emissions from the woodworking equipment exhausting through Stack ID SV-15 shall not exceed 0.22 pounds per hour when operating at a process weight rate of 26 pounds per hour. Since the potential controlled emissions are 0.03 pounds per hour, this process can comply with 326 IAC 6-3-2.

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) emissions from the woodworking equipment exhausting through Stack ID SV-16 shall not exceed 0.33 pounds per hour when operating at a process weight rate of 47.5 pounds per hour. Since the potential controlled emissions are 0.05 pounds per hour, this process can comply with 326 IAC 6-3-2.

The pounds per hour limitations were calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

State Rule Applicability - Insignificant Woodworking Operations

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) emissions from the insignificant woodworking equipment shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

The compliance monitoring requirements applicable to this source are as follows:

The spray booths have applicable compliance monitoring conditions as specified below:

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or more of the booths are in operation. Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the filters for the spray booths must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

The significant woodworking equipment has applicable compliance monitoring conditions as specified below:

(a) Daily visible emissions notations of the woodworking stack exhausts (SV-15, SV-16 and SV-17) shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

(b) An inspection shall be performed each calender quarter of all bags controlling the woodworking operation. All defective bags shall be replaced.

These monitoring conditions are necessary because the baghouses for the woodworking processes must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

(a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the Clean Air Act.

Conclusion

The operation of this wood door manufacturing operation shall be subject to the conditions of the attached proposed **Part 70 Permit No. T039-7471-00473.**

Table 1

Description of facility: Plant #1 Surface Coating Booth EU-34A
Max Rating: 138 doors per hour
Construction Date: before 1988
Control Device (if any): Dry Filters for Overspray
Stack/Vent ID: SV-18 and SV-19

Facility class: **Description:** Surface coating: wood furniture

EMISSION LIMITATIONS	PM	VOC	HAPs
Numerical Emission Limit:	Use dry filters for overspray control	Use specified application methods	1.0 lb VHAP/lb solids
Regulation/Citation:	326 IAC 6-3-2	326 IAC 8-2-12	40 CFR 63.800 (NESHAP - Subpart JJ)
Compliance Demonstration:	Visible Emissions	NA	Volume Weighted Average
PERFORMANCE TESTING	NA		
COMPLIANCE MONITORING			
Monitoring Description:	Visible Emissions Notations	NA	NA
Monitoring Method:	NA	NA	NA
Monitoring Regulation/Citation:	326 IAC 2-7-5	NA	NA
Monitoring Frequency:	Daily and Weekly	NA	NA
RECORD KEEPING			
Parameter/Pollutant to be Recorded:	Abnormal Visible Emissions	NA	(1) A Certified Product Data Sheet for each finishing material and thinner. (2) VHAP content of each finishing material and thinner. (3) Copies of the averaging calculations and work practice implementation plan as required in 40 CFR 63.806(e).
Recording Frequency:	Daily and Weekly	NA	NA
REPORTING REQUIREMENTS			
Information in Report:	NA	NA	An Initial Compliance Report and a Continuous Compliance Demonstration.
Reporting Frequency/Submittal:	NA	NA	(1) The Initial Compliance Report must be submitted within 60 days following the compliance date of November 21, 1997. (2) The Continuous Compliance Demonstration Report must be submitted every six months.
Additional Comments:	NA	NA	NA

Table 2

Description of facility: Plant #1 Surface Coating Booth EU-35A
Max Rating: 38 doors per hour
Construction Date: 1996
Control Device (if any): Dry Filters for Overspray
Stack/Vent ID: SV-20

Facility class: **Description:** Surface coating: wood furniture

EMISSION LIMITATIONS	PM	HAPs
Numerical Emission Limit:	Use dry filters for overspray control	1.0 lb VHAP/lb solids
Regulation/Citation:	326 IAC 6-3-2	40 CFR 63.800 (NESHAP - Subpart JJ)
Compliance Demonstration:	Visible Emissions	Volume Weighted Average
PERFORMANCE TESTING	NA	
COMPLIANCE MONITORING		
Monitoring Description:	Visible Emissions Notations	NA
Monitoring Method:	NA	NA
Monitoring Regulation/Citation:	326 IAC 2-7-5	NA
Monitoring Frequency:	Daily and Weekly	NA
RECORD KEEPING		
Parameter/Pollutant to be Recorded:	Abnormal Visible Emissions	(1) A Certified Product Data Sheet for each finishing material and thinner. (2) VHAP content of each finishing material and thinner. (3) Copies of the averaging calculations and work practice implementation plan as required in 40 CFR 63.806(e).
Recording Frequency:	Daily and Weekly	NA
REPORTING REQUIREMENTS		
Information in Report:	NA	An Initial Compliance Report and a Continuous Compliance Demonstration.
Reporting Frequency/Submittal:	NA	(1) The Initial Compliance Report must be submitted within 60 days following the compliance date of November 21, 1997. (2) The Continuous Compliance Demonstration Report must be submitted every six months.
Additional Comments:	NA	NA

Table 3

Description of facility: Plant #2 Surface Coating Booths EU-01B and EU-03B
Max Rating: 125 doors per hour
Construction Date: before 1988
Control Device (if any): Dry Filters for Overspray Control
Stack/Vent ID: SV-1 and SV-3, respectively.

Facility class: **Description:** **Surface coating of wood furniture**

EMISSION LIMITATIONS	PM	VOC	HAPs
Numerical Emission Limit:	Use of dry filters for overspray control	(1) Use air assisted airless spray application (2) Stains - 7.0 lbs/gal coating less water (3) Lacquers - 5.9 lbs/gal coating less water	1.0 lb VHAP/lb solids
Regulation/Citation:	326 IAC 6-3-2	326 IAC 8-1-6	40 CFR 63.800 (NESHAP - Subpart JJ)
Compliance Demonstration:	Visible Emissions	Record Keeping	Volume Weighted Average
PERFORMANCE TESTING	NA		
COMPLIANCE MONITORING			
Monitoring Description:	Visible Emissions Notations	NA	NA
Monitoring Method:	NA	NA	NA
Monitoring Regulation/Citation:	326 IAC 2-7-5	NA	NA
Monitoring Frequency:	Daily and Weekly	NA	NA
RECORD KEEPING			
Parameter/Pollutant to be Recorded:	Abnormal Visible Emissions	Weighted average VOC content in lbs/gallon less water	(1) A Certified Product Data Sheet for each finishing material and thinner. (2) VHAP content of each finishing material and thinner. (3) Copies of the averaging calculations and work practice implementation plan as required in 40 CFR 63.806(e).
Recording Frequency:	Daily and Weekly	Daily	NA
REPORTING REQUIREMENTS			
Information in Report:	NA	VOC content	An Initial Compliance Report and a Continuous Compliance Demonstration.
Reporting Frequency/Submittal:	NA	Quarterly	(1) The Initial Compliance Report must be submitted within 60 days following the compliance date of November 21, 1997. (2) The Continuous Compliance Demonstration Report must be submitted every six months.
Additional Comments:	NA	NA	NA

Table 4

Description of facility: Plant #2 Surface Coating Booth EU-04B
Max Rating: 125 doors per hour
Construction Date: 1993
Control Device (if any): Dry Filters for Overspray Control
Stack/Vent ID: SV-4

Facility class: **Description:** **Surface coating of wood furniture**

EMISSION LIMITATIONS	PM	VOC	VOC	HAPs
Numerical Emission Limit:	Use of dry filters for overspray control	39 tons VOC per year	Use specified application methods	1.0 lb VHAP/lb solids
Regulation/Citation:	326 IAC 6-3-2	326 IAC 2-2	326 IAC 8-2-12	40 CFR 63.800 (NESHAP - Subpart JJ)
Compliance Demonstration:	Visible Emissions	Record Keeping	NA	Volume Weighted Average
PERFORMANCE TESTING	NA			
COMPLIANCE MONITORING				
Monitoring Description:	Visible Emissions Notations	NA	NA	NA
Monitoring Method:	NA	NA	NA	NA
Monitoring Regulation/Citation:	326 IAC 2-7-5	NA	NA	NA
Monitoring Frequency:	Daily and Weekly	NA	NA	NA
RECORD KEEPING				
Parameter/Pollutant to be Recorded:	Abnormal Visible Emissions	Total VOC Emissions	NA	(1) A Certified Product Data Sheet for each finishing material and thinner. (2) VHAP content of each finishing material and thinner. (3) Copies of the averaging calculations and work practice implementation plan as required in 40 CFR 63.806(e).
Recording Frequency:	Daily and Weekly	Daily	NA	NA
REPORTING REQUIREMENTS				
Information in Report:	NA	Total VOC Emissions	NA	An Initial Compliance Report and a Continuous Compliance Demonstration.
Reporting Frequency/Submittal:	NA	Quarterly	NA	(1) The Initial Compliance Report must be submitted within 60 days following the compliance date of November 21, 1997. (2) The Continuous Compliance Demonstration Report must be submitted every six months.
Additional Comments:	NA	NA	NA	NA

Table 5

Description of facility: Woodworking Equipment (EU-15A through EU-20A)
Max Rating: 414.24 pounds per hour
Construction Date: before 1988
Control Device (if any): One (1) baghouse/cyclone system
Stack/Vent ID: SV-15

Facility class: **Description:** **Woodworking**

EMISSION LIMITATIONS	PM	
Numerical Emission Limit:	1.43 pounds per hour	
Regulation/Citation:	326 IAC 6-3-2	
Compliance Demonstration:	Visible Emissions and Record Keeping	
PERFORMANCE TESTING	NA	
COMPLIANCE MONITORING		
Monitoring Description:	Visible Emissions Notations	Baghouse Inspections
Monitoring Method:	NA	NA
Monitoring Regulation/Citation:	326 IAC 2-7-5	326 IAC 2-7-5
Monitoring Frequency:	Daily and Weekly	Quarterly
RECORD KEEPING		
Parameter/Pollutant to be Recorded:	Abnormal Visible Emissions	Bag Integrity
Recording Frequency:	Daily and Weekly	Quarterly
REPORTING REQUIREMENTS		
Information in Report:	NA	NA
Reporting Frequency/Submittal:	NA	NA
Additional Comments:	NA	NA

Table 6

Description of facility: Woodworking Equipment (EU-21A through EU-28A)
Max Rating: 414.24 pounds per hour
Construction Date: before 1988
Control Device (if any): One (1) baghouse/cyclone system
Stack/Vent ID: SV-16

Facility class: **Description:** **Woodworking**

EMISSION LIMITATIONS	PM	
Numerical Emission Limit:	1.43 pounds per hour	
Regulation/Citation:	326 IAC 6-3-2	
Compliance Demonstration:	Visible Emissions and Record Keeping	
PERFORMANCE TESTING	NA	
COMPLIANCE MONITORING		
Monitoring Description:	Visible Emissions Notations	Baghouse Inspections
Monitoring Method:	NA	NA
Monitoring Regulation/Citation:	326 IAC 2-7-5	326 IAC 2-7-5
Monitoring Frequency:	Daily and Weekly	Quarterly
RECORD KEEPING		
Parameter/Pollutant to be Recorded:	Abnormal Visible Emissions	Bag Integrity
Recording Frequency:	Daily and Weekly	Quarterly
REPORTING REQUIREMENTS		
Information in Report:	NA	NA
Reporting Frequency/Submittal:	NA	NA
Additional Comments:	NA	NA

Table 7

Description of facility: Woodworking Equipment (EU-29A through EU-33A)
Max Rating: 414.24 pounds per hour
Construction Date: before 1988
Control Device (if any): One (1) baghouse/cyclone system
Stack/Vent ID: SV-17

Facility class: **Description:** **Woodworking**

EMISSION LIMITATIONS	PM	
Numerical Emission Limit:	1.43 pounds per hour	
Regulation/Citation:	326 IAC 6-3-2	
Compliance Demonstration:	Visible Emissions and Record Keeping	
PERFORMANCE TESTING	NA	
COMPLIANCE MONITORING		
Monitoring Description:	Visible Emissions Notations	Baghouse Inspections
Monitoring Method:	NA	NA
Monitoring Regulation/Citation:	326 IAC 2-7-5	326 IAC 2-7-5
Monitoring Frequency:	Daily and Weekly	Quarterly
RECORD KEEPING		
Parameter/Pollutant to be Recorded:	Abnormal Visible Emissions	Bag Integrity
Recording Frequency:	Daily and Weekly	Quarterly
REPORTING REQUIREMENTS		
Information in Report:	NA	NA
Reporting Frequency/Submittal:	NA	NA
Additional Comments:	NA	NA

Table 8

Description of facility: Woodworking Equipment (EU-05B through EU-21B)
Max Rating: 25.73 pounds per hour
Construction Date: before 1988
Control Device (if any): One (1) baghouse/cyclone system
Stack/Vent ID: SV-5

Facility class: **Description:** **Woodworking**

EMISSION LIMITATIONS	PM	
Numerical Emission Limit:	0.22 pounds per hour	
Regulation/Citation:	326 IAC 6-3-2	
Compliance Demonstration:	Visible Emissions and Record Keeping	
PERFORMANCE TESTING	NA	
COMPLIANCE MONITORING		
Monitoring Description:	Visible Emissions Notations	Baghouse Inspections
Monitoring Method:	NA	NA
Monitoring Regulation/Citation:	326 IAC 2-7-5	326 IAC 2-7-5
Monitoring Frequency:	Daily and Weekly	Quarterly
RECORD KEEPING		
Parameter/Pollutant to be Recorded:	Abnormal Visible Emissions	Bag Integrity
Recording Frequency:	Daily and Weekly	Quarterly
REPORTING REQUIREMENTS		
Information in Report:	NA	NA
Reporting Frequency/Submittal:	NA	NA
Additional Comments:	NA	NA

Table 9

Description of facility: Woodworking Equipment (EU-22B through EU-35B)
Max Rating: 47.5 pounds per hour
Construction Date: before 1988
Control Device (if any): One (1) baghouse/cyclone system
Stack/Vent ID: SV-6

Facility class: **Description:** **Woodworking**

EMISSION LIMITATIONS	PM	
Numerical Emission Limit:	0.33 pounds per hour	
Regulation/Citation:	326 IAC 6-3-2	
Compliance Demonstration:	Visible Emissions and Record Keeping	
PERFORMANCE TESTING	NA	
COMPLIANCE MONITORING		
Monitoring Description:	Visible Emissions Notations	Baghouse Inspections
Monitoring Method:	NA	NA
Monitoring Regulation/Citation:	326 IAC 2-7-5	326 IAC 2-7-5
Monitoring Frequency:	Daily and Weekly	Quarterly
RECORD KEEPING		
Parameter/Pollutant to be Recorded:	Abnormal Visible Emissions	Bag Integrity
Recording Frequency:	Daily and Weekly	Quarterly
REPORTING REQUIREMENTS		
Information in Report:	NA	NA
Reporting Frequency/Submittal:	NA	NA
Additional Comments:	NA	NA

HAP Emission Calculations

Company Name: Cra-Gen, Inc. d/b/a Woodtek
Plant Location: 1706 W. Lusher Ave., Elkhart, IN 46517
County: Elkhart
Permit Reviewer: Bryan Sheets
Date: 8/25/97

Material	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MEK	Weight % MIK	Weight % Ethylene Glycol	Weight % Methanol	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	MEK Emissions (ton/yr)	MIK Emissions (ton/yr)	Ethylene Glycol Emissions (ton/yr)	Methanol Emissions (ton/yr)
Unit ID EU-34:															
Oak 2948	6.5	0.00038	138.000	7.00%	25.00%	9.20%	4.30%	0.00%	0.00%	0.10	0.37	0.14	0.06	0.00	0.00
Brn 1350	9.2	0.00019	138.000	6.20%	22.00%	8.10%	3.80%	0.00%	0.00%	0.07	0.23	0.09	0.04	0.00	0.00
Wh 1349	9.8	0.00019	138.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Ash 3008	6.5	0.00025	138.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Oak 3366	6.6	0.00010	138.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Cherry 2750	6.5	0.00065	138.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
3070	6.5	0.00083	138.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Oak 2354	6.5	0.00310	138.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Natural 1978	6.4	0.00019	138.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Oak 2526	6.5	0.00019	138.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Vinyl Seal	7.3	0.00615	138.000	6.30%	25.50%	5.00%	11.10%	0.00%	0.00%	1.72	6.96	1.36	3.03	0.00	0.00
Topcoat	7.3	0.01310	138.000	5.00%	10.00%	0.00%	0.00%	0.00%	5.00%	2.88	5.76	0.00	0.00	0.00	2.88
Thinner	7.5	0.00210	138.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Retarder	7.5	0.00029	138.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Nelsonite	7.2	0.00042	138.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Subtotal										4.70	13.09	1.50	3.09	0.00	2.88
Unit ID EU-35:															
WB 347	9.7	0.01230	38.000	0.00%	0.00%	0.00%	0.00%	5.10%	0.00%	0.00	0.00	0.00	0.00	1.01	0.00
WB 369	10.0	0.01230	38.000	0.00%	0.00%	0.00%	0.00%	4.00%	0.00%	0.00	0.00	0.00	0.00	0.82	0.00
										0.00	0.00	0.00	0.00	1.82	0.00
Total State Potential Emissions										**4.70**	**13.09**	**1.50**	**3.09**	**1.82**	**2.88**

METHODOLOGY

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

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

Company Name: Cra-Gen, Inc. d/b/a Woodtek
Address City IN Zip: 1706 Lusher Ave., Elkhart, Indiana 46517
OP: T039-7471
Plt ID: 039-7471
Reviewer: Bryan Sheets
Date: 09/18/97

Material	Density (Lb/Gal)	Weight % Volatile (H20& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
Unit ID EU-34:																
Oak 2948	6.5	97.38%	0.0%	97.4%	0.0%	0.88%	0.00038	138.000	6.33	6.33	0.33	7.97	1.45	0.02	717.65	50%
Brn 1350	9.2	63.00%	0.0%	63.0%	0.0%	18.09%	0.00019	138.000	5.80	5.80	0.15	3.69	0.67	0.20	32.05	50%
Wh 1349	9.8	56.10%	0.0%	56.1%	0.0%	22.06%	0.00019	138.000	5.47	5.47	0.14	3.48	0.63	0.25	24.80	50%
Ash 3008	6.5	95.52%	0.0%	95.5%	0.0%	1.99%	0.00025	138.000	6.18	6.18	0.21	5.12	0.93	0.02	309.94	50%
Oak 3366	6.6	92.16%	0.0%	92.2%	0.0%	3.15%	0.00010	138.000	6.11	6.11	0.08	1.94	0.35	0.02	194.28	50%
Cherry 2750	6.5	94.92%	0.0%	94.9%	0.0%	2.25%	0.00065	138.000	6.17	6.17	0.55	13.28	2.42	0.06	273.73	50%
3070	6.5	98.30%	0.0%	98.3%	0.0%	0.60%	0.00083	138.000	6.35	6.35	0.73	17.46	3.19	0.03	1060.13	50%
Oak 2354	6.5	97.99%	0.0%	98.0%	0.0%	0.66%	0.00310	138.000	6.35	6.35	2.72	65.19	11.90	0.12	960.63	50%
Natural 1978	6.4	98.76%	0.0%	98.8%	0.0%	0.41%	0.00019	138.000	6.36	6.36	0.17	4.04	0.74	0.00	1562.69	50%
Oak 2526	6.5	95.82%	0.0%	95.8%	0.0%	1.93%	0.00019	138.000	6.19	6.19	0.16	3.94	0.72	0.02	320.72	50%
Vinyl Seal	7.3	67.17%	0.0%	67.2%	0.0%	17.00%	0.00615	138.000	4.93	4.93	4.18	100.42	18.33	4.48	29.00	50%
Topcoat	7.3	81.15%	0.0%	81.2%	0.0%	14.80%	0.01310	138.000	5.90	5.90	10.67	255.97	46.71	5.43	39.86	50%
Thinner	7.0	100.00%	0.0%	100.0%	0.0%	0.00%	0.00210	138.000	7.00	7.00	2.03	48.69	8.89	0.00	ERR	50%
Retarder	7.5	100.00%	0.0%	100.0%	0.0%	0.00%	0.00029	138.000	7.50	7.50	0.30	7.20	1.31	0.00	ERR	50%
Nelsonite	7.0	100.00%	0.0%	100.0%	0.0%	0.00%	0.00042	138.000	7.00	7.00	0.41	9.74	1.78	0.00	ERR	50%
Subtotal											20.30	487.21	88.92	10.15		
Unit ID EU-35:																
WB347	9.7	62.68%	57.6%	5.1%	66.8%	30.41%	0.01230	38.000	1.48	0.49	0.23	5.52	1.01	3.69	1.62	50%
WB369	10.0	71.00%	67.0%	4.0%	25.1%	25.08%	0.01230	38.000	0.53	0.40	0.19	4.48	0.82	2.96	1.59	50%
Subtotal											0.42	10.00	1.82	6.65		

State Potential Emissions **Add worst case coating to all solvents** **20.72** **497.21** **90.74** **16.80**
x (1- 0.98) **due to dry filters**
0.34

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emissions Calculations
Particulate Matter Emissions
from Plant #2 Woodworking

Company Name:	**Woodtek, Inc.**
Address City IN Zip:	**1706 W. Lusher Ave., Elkhart, IN 46517**
Part 70 Permit No.:	**T039-7471**
Plt ID:	**039-00473**
Reviewer:	**Bryan Sheets**
Date:	**8/25/97**

SV-6

Pursuant to 326 IAC 6-3-2, the PM emissions from the woodworking equipment shall not exceed an amount determined by the following equation:

E = 4.10 (P)^0.67 where E = allowable PM emissions (lbs/hr)
*P = process weight rate (tons/hr)

E = 4.10 (0.024)^0.67

= 0.33 lbs/hr

= 1.47 tons/yr

Since potential emissions after controls (0.22 tpy) are less than the allowable limit, this equipment can comply with 326 IAC 6-3-2.

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for Part 70 Operating Permit

Source Name:	**Cra-Gen, Inc. d/b/a Woodtek**
Source Location:	**1706 West Lusher Avenue, Elkhart, Indiana, 46517**
County:	**Elkhart**
SIC Code:	**2499**
Operation Permit No.:	**T039-7471-00473**
Permit Reviewer:	**Bryan Sheets**

On November 5, 1997, the Office of Air Management (OAM) had a notice published in the Truth Publishing, Elkhart, Indiana, stating that Cra-Gen, Inc. d/b/a Woodtek had applied for a Part 70 Operating Permit to operate their wood furniture manufacturing operation. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, OAM has made the following changes to the final Part 70 permit (changes are bolded for emphasis):

1. Subsection (b)(1) of Condition A.2 (Emission Units and Pollution Control Equipment Summary) lists the application system as airless. This should state high volume low pressure (HVLP) as the application method.

2. The following paragraph in subsection (c) of Condition B.8 (Duty to Supplement and Provide Information) was removed:

   > Such confidentiality claim shall meet the requirements of 40 CFR Part 2, Subpart B (when submitting to U.S. EPA) and 326 IAC 17 (when submitting to IDEM, OAM).

3. Subsection (a) of Condition B.11 (Annual Compliance Certification) has been changed from:

   (a) The Permittee shall annually certify that the source has complied with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

   to be as follows on page 8 of 43 of the final permit:

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

4. Subsection (c) of Condition B.28 (Annual Fee Payment) has had the phone number changed

from 233-5674 to 233-0425.

5. Condition C.2 (Opacity) has had the statement "This condition is not federally enforceable" removed.

6. Condition C.3 (Open Burning) has been changed from:

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

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

to be as follows on page 18 of 43 of the final permit:

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. **326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.**

7. Condition C.4 (Incineration) has had the statement "This condition is not federally enforceable" removed.

8. Condition C.5 (Fugitive Dust Emissions) has been changed from:

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

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

to be as follows on page 18 of 43 of the final permit:

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

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

9. Condition C.8 (Asbestos Abatement Projects - Accreditation) has been changed from:

C.8 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61, Subpart M]

Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector be Indiana accredited is not federally enforceable.

to be as follows on page 18 of 43 of the final permit:

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

Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. **The requirement that the inspector be accredited is federally enforceable.**

10. Subsection (b) of Condition C.9 (Performance Testing) has had the phrase "...with five (5) days..." changed to "...within five (5) days...".

11. In subsection (a)(1) and (a)(2) of Condition C.19 (Emission Statement) the word "Contain" was replaced with "Indicate".

12. Condition C.22 (General Reporting Requirements) has been changed from:

C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(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, OAM, on or before the date it is due.

(c) Unless otherwise specified in this permit, any quarterly or semi-annual report shall be submitted within thirty (30) days of the end of the reporting period.

(d) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) an excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) an emergency as defined in 326 IAC 2-7-1(12); or

(3) failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record

the required compliance monitoring is a deviation.

(e) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(f) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

to be as follows on page 25 of 43 of the final permit:

C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

(a) To affirm that the source has met all the requirements stated in this permit the source shall submit a Quarterly Compliance Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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

(d) Unless otherwise specified in this permit, any quarterly or semi-annual report shall be submitted within thirty (30) days of the end of the reporting period.

(e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

13. The description of booth EU-01B in Section D.1 lists the application system as airless. This should state high volume low pressure (HVLP) as the application method.

14. Conditions D.1.8 and D.2.3 (Preventive Maintenance Plan) have had the rule cite 326 IAC 2-7-4(c)(9) changed to 326 IAC 2-7-5(13).

15. Subsection (b)(1)(B) of Condition D.1.6 (Wood Furniture NESHAP) was changed from:

(B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. Solvent and thinner mixtures used for other purposes have a ten percent (10.0%) maximum VHAP content by weight; or

to be as follows on page 29 of 43 of the final permit:

(B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. **All other thinners have a ten percent (10.0%) maximum VHAP content by weight**; or

16. Condition D.1.9 (Testing Requirements) has been changed from:

D.1. 9 Testing Requirements [326 IAC 2-7-6(1)]

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the PM limit specified in Condition D.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

to be as follows on page 30 of 43 of the final permit:

D.1.9 Testing Requirements [326 IAC 2-7-6(1)] **[40 CFR 63, Subpart JJ]**

(a) **Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-2.1.**

(b) If **the OAM requests**, compliance with the PM limit specified in Condition D.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

17. Conditions from previous permits must be kept in the Title V permit unless the condition was erroneously added at the time of the original permit review. In PC (20) 1679, the woodworking equipment was given a 10% opacity limit to document compliance with 326 IAC 6-3-2. This will be added to the permit as follows:

D.2.2 Opacity

Pursuant to PC (20) 1679, visible emissions from the woodworking facilities shall not exceed ten percent (10%) opacity.

18. Condition D.2.6 (Baghouse Inspections) has been changed from:

D.2.6 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the woodworking operation. All defective bags shall be replaced.

to be as follows on page 34 of 43 of the final permit:

D.2.6 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the woodworking operation **when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors.** All defective bags shall be replaced.

19. Subsection (b) of Condition D.2.7 (Broken Bag or Failure Detection) has been changed from:

(b) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

to be as follows on page 34 of 43 of the final permit:

(b) **Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.**

20. Subsection (b) of Condition D.2.8 (Record Keeping Requirements) has been changed from:

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

to be as follows on page 34 of 43 of the final permit:

(b) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6 **and the dates the vents are redirected**.

21. The fax number at the top of the Emergency/Deviation Occurrence Form has been changed from 233-6865 to 233-5967.

22. The Table of Contents has been updated to reflect the above mentioned changes.