

# Indiana Department of Environmental Management

We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan Governor

Lori F. Kaplan Commissioner

May 27, 2004

100 North Senate Avenue P.O. Box 6015 Indianapolis, Indiana 46206-6015 (317) 232-8603 (800) 451-6027 www.in.gov/idem

TO: Interested Parties / Applicant

RE: The Oak Hole / 039-18480-00593

Paul Dubenetzky FROM:

Chief, Permits Branch Office of Air Quality

# Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication. 100 North Senate Avenue. Government Center North, Room 1049, Indianapolis, IN 46204, within eighteen (18) calendar days of the mailing of this notice. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- the date the document is delivered to the Office of Environmental Adjudication (OEA); (1)
- (2)the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- The date on which the document is deposited with a private carrier, as shown by receipt issued by (3) the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- the issues, with particularity, proposed for considerations at any hearing; and (5)
- identification of the terms and conditions which, in the judgment of the person making the request, (6)would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

> Enclosures FNPER.dot 9/16/03





# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Joseph E. Kernan Governor

Lori F. Kaplan Commissioner 100 North Senate Avenue P.O. Box 6015 Indianapolis, Indiana 46206-6015 (317) 232-8603 (800) 451-6027 www.in.gov/idem

# NEW SOURCE CONSTRUCTION PERMIT AND MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

# The Oak Hole 901 Nelson Parkway Wakarusa, Indiana 46573

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, (326 IAC 2-5.1 if new source), 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 039-18480-00593	
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:May 27, 2004 Expiration Date:May 27, 2009



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### **SECTION A**

### **SOURCE SUMMARY**

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

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

The Permittee owns and operates a stationary wood furniture manufacturing plant.

Authorized Individual: Owner

Source Address: 901 Nelson Parkway, Wakarusa, Indiana 46573

Mailing Address: P.O. Box 526, Wakarusa, Indiana 46573

General Source Phone: (574) 862-4615 SIC Code: 2511, 2431 County Location: Elkhart

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

Minor Source, under PSD;

Minor Source, Section 112 of the Clean Air Act

Not 1 of 28 Source Categories

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

This stationary source is approved to construct and operate the following emission units and pollution control devices:

- (a) One (1) woodworking operation, identified as EP-01, constructed in 2004, with a maximum throughput rate of 67.2 pounds of wood per hour, controlled by a dust collector.
- (b) One (1) spray booth, identified as EP-02, constructed in 2004, using HVLP spray guns, controlled by dry filters, and exhausting through stacks V-1 and V-2.
- (c) Two (2) natural gas-fired boilers, identified as B1 and B2, constructed in 2004, each with a maximum heat input capacity of 0.2 MMBtu/hr.
- (d) One (1) assembling area, constructed in 2004, applying glues to wooden chairs, and exhausting inside the building.
- (e) One (1) air make-up unit, constructed in 2004, using natural gas as fuel, with a maximum heat input capacity of 5.0 MMBtu/hr.

### SECTION B GENERAL CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

### B.1 Permit No Defense [IC 13]

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

### B.2 Definitions

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

### B.3 Effective Date of the Permit [IC13-15-5-3]

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

### B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

### B.5 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

### B.6 Modification to Permit [326 IAC 2]

Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

### B.7 Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section.
  - (1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
  - (2) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2-6.1-6 and 326 IAC 2-2 or 326 IAC 2-3 and an Operation Permit Validation Letter is issued.

- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.
- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).

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

- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

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

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days (this time frame is determined on a case by case basis but no more than ninety (90) days) after issuance of this permit, including the following information on each emissions unit:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices:
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

Indiana Department of Environmental Management Compliance Branch, Office of Air Quality

100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMP's shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ,. IDEM, OAQ, may require the Permittee to revise its PMP whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

## B.10 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

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

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

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a non-road engine, as defined in 40 CFR 89.2.

# B.11 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2] [IC13-17-3-2][IC 13-30-3-1]

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control

- equipment), practices, or operations regulated or required under this permit or any operating permit revisions:
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

### B.12 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)]:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

### B.13 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

### **SECTION C**

### **SOURCE OPERATION CONDITIONS**

### **Entire Source**

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

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

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

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

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

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

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

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

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

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

### C.5 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using good engineering practices (GEP) pursuant to 326 IAC 1-7-3.

### C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-7-1(34).

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

  The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) Indiana 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 to use an
  Indiana Accredited Asbestos inspector is not federally enforceable.

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

## C.7 Compliance Requirements [326 IAC 2-1.1-11]

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

### **Compliance Monitoring Requirements**

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

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

## C.9 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

### C.10 Compliance Response Plan - Preparation and Implementation

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
  - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.

- (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and 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 a minor permit modification to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

### **Record Keeping and Reporting Requirements**

### C.11 Malfunctions Report [326 IAC 1-6-2]

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

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

### C.12 General Record Keeping Requirements [326 IAC 2-6.1-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the

Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

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

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

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 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, OAQ, on or before the date it is due.
- (c) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) 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. Reporting periods are based on calendar years.

### **SECTION D.1**

### **FACILITY OPERATION CONDITIONS**

### Facility Description [326 IAC 2-6.1]:

(a) One (1) woodworking operation, identified as EP-01, constructed in 2004, with a maximum throughput rate of 67.2 pounds of wood per hour, controlled by a dust collector.

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

### Emission Limitations and Standards [326 IAC 2-6.1]

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

Pursuant to 326 IAC 6-3-2(e)(2) (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the woodworking operation EP-01 shall not exceed 0.551 pounds per hour.

# **Compliance Determination Requirements**

### D.1.2 Particulate Control

In order to comply with Condition D.1.1, the dust collector for particulate emission control shall be in operation and control emissions from the woodworking operation at all times that the woodworking operation EP-01 is in operation.

### **SECTION D.2**

### **FACILITY OPERATION CONDITIONS**

### Facility Description [326 IAC 2-6.1]:

(b) One (1) spray booth, identified as EP-02, constructed in 2004, using HVLP spray guns, controlled by dry filters, and exhausting through stacks V-1 and V-2.

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

# **Emission Limitations and Standards [326 IAC 2-6.1]**

### D.2.1 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 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.2.2 Particulate [326 IAC 6-3-2 (d)]

- (a) Particulate from the spray booth EP-02 shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
  - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
  - Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

### D.2.3 HAPs Emissions [326 IAC 2-7] [40 CFR 63, Subpart JJ]

(a) The potential to emit a single HAP from spray booth EP-02 is less than 10 tons/yr. Therefore, the requirements of 326 IAC 2-7 (Part 70 Program) and 40 CFR 63, Subpart JJ are not applicable. Any change or modification which may increase a single HAP usage for the spray

booth EP-02 to greater than 10 tons per year must be approved by the Office of Air Quality before any such change may occur.

(b) The potential to emit total HAP from spray booth EP-02 is less than 25 tons/yr. Therefore, the requirements of 326 IAC 2-7 (Part 70 Program) and 40 CFR 63, Subpart JJ are not applicable. Any change or modification which may increase the total HAP usage for spray booth EP-02 to greater than 25 tons per year must be approved by the Office of Air Quality before any such change may occur.

### **Compliance Determination Requirements**

### D.2.4 Hazardous Air Pollutants (HAP) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the HAP usage limitations contained in Condition D.2.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VHAP data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4

### Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

### D.2.5 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.3, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits established in Condition D.2.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
  - (1) The HAP content of each coating material and solvent used.
  - (2) The amount of coating material and solvent used on monthly basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) The HAP usage for each month; and
  - (4) The weight of HAP emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

### **SECTION D.3**

### **FACILITY OPERATION CONDITIONS**

### Facility Description [326 IAC 2-6.1]:

(c) Two (2) natural gas-fired boilers, identified as B1 and B2, constructed in 2004, each with a maximum heat input capacity of 0.2 MMBtu/hr.

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

# **Emission Limitations and Standards [326 IAC 2-6.1]**

# D.3.1 PM Emissions [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a) (PM Emissions for Sources of Indirect Heating), PM emissions from each of the boilers B1 and B2 shall not exceed 0.6 lbs/MMBtu.

### **SECTION D.4**

### **FACILITY OPERATION CONDITIONS**

### Facility Description [326 IAC 2-6.1]:

- (d) One (1) assembling area, constructed in 2004, applying glues to wooden chairs, and exhausting inside the building.
- (e) One (1) air make-up unit, constructed in 2004, using natural gas as fuel, with a maximum heat input capacity of 5.0 MMBtu/hr.

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

### Emission Limitations and Standards [326 IAC 2-6.1]

There are no specifically applicable requirements for these units.

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

# MINOR SOURCE OPERATING PERMIT ANNUAL NOTIFICATION

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

Company Name:	The Oak Ho	le					
Address:	901 Nelson Parkway						
City:	Wakarusa, I	ndiana 46573					
Phone #:	(574) 862-46	15					
MSOP #:	039-18480-0	00593					
I hereby certify that The	Oak Hole is	☐ still in operation. ☐ no longer in operation.					
I hereby certify that The	Oak Hole is	<ul> <li>□ in compliance with the requirements of MSOP 039-18480-00593.</li> <li>□ not in compliance with the requirements of MSOP 039-18480-00593.</li> </ul>					
Authorized Individua	l (typed):						
Title:							
Signature:							
Date:							
If there are any condition of how the source did on Noncompliance:	ns or requirem r will achieve c	ents for which the source is not in compliance, provide a narrative descript ompliance and the date compliance was, or will be achieved.					
Noncompliance.							

# **MALFUNCTION REPORT**

### INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY FAX NUMBER - 317 233-5967

	ed to report malfunctions y for the exemption unde	s applicable to Rule 326 IAC 1 er 326 IAC 1-6-4.	<u>-6</u>
THIS FACILITY MEETS THE APPLICABILITY REQU PARTICULATE MATTER?, 25 TONS/YEAR 25 TONS/YEAR VOC?, 25 TONS/YEAR HYD ?, 25 TONS/YEAR REDUCED SULFUR COM CARBON MONOXIDE?, 10 TONS/YEAR AN' COMBINATION HAZARDOUS AIR POLLUTANT?_ ELEMENTAL LEAD?, OR IS A SOURCE LIS' MALFUNCTIONING CONTROL EQUIPMENT OR PILIMITATION	SULFUR DIOXIDE ? DROGEN SULFIDE ? MPOUNDS ?, 25 TO Y SINGLE HAZARDOUS / , 1 TON/YEAR LEAD TED UNDER 326 IAC 2-5.	_, 25 TONS/YEAR NITROGEN _, 25 TONS/YEAR TOTAL RED NS/YEAR FLUORIDES ?AIR POLLUTANT ?, 25 TO OR LEAD COMPOUNDS MEA 1-3(2) ? EMISSIONS FF	OXIDES?, DUCED SULFUR , 100TONS/YEAR ONS/YEAR ANY SURED AS ROM
THIS MALFUNCTION RESULTED IN A VIOLATION LIMIT OF	OF: 326 IAC OF	R, PERMIT CONDITION #	AND/OR PERMI
THIS INCIDENT MEETS THE DEFINITION OF 'MAL	FUNCTION' AS LISTED	ON REVERSE SIDE ? Y	N
THIS MALFUNCTION IS OR WILL BE LONGER TH.	AN THE ONE (1) HOUR F	REPORTING REQUIREMENT?	Y N
COMPANY: LOCATION: (CITY AND COUNTY) PERMIT NO. AFS PLANT ID:	AFS F	OINT ID:	INSP:
CONTROL/PROCESS DEVICE WHICH MALFUNCTION	ONED AND REASON:		
DATE/TIME MALFUNCTION STARTED:/			AM / PM
ESTIMATED HOURS OF OPERATION WITH MALFO	NCTION CONDITION		
DATE/TIME CONTROL EQUIPMENT BACK-IN SER	?VICE/ 19_	AM/PI	M
TYPE OF POLLUTANTS EMITTED: TSP, PM-10,	SO2, VOC, OTHER:		<del></del>
ESTIMATED AMOUNT OF POLLUTANT EMITTED D	URING MALFUNCTION: _		
MEASURES TAKEN TO MINIMIZE EMISSIONS:			
REASONS WHY FACILITY CANNOT BE SHUTDOWN	N DURING REPAIRS:		
CONTINUED OPERATION REQUIRED TO PROVIDE CONTINUED OPERATION NECESSARY TO PREVE CONTINUED OPERATION NECESSARY TO PREVE INTERIM CONTROL MEASURES: (IF APPLICABLE)	NT INJURY TO PERSON: NT SEVERE DAMAGE TO	S:	
MALFUNCTION REPORTED BY:(SIGNATURE IF FAXED)	TI	TLE:	
MALFUNCTION RECORDED BY:*SEE PAGE 2	DATE:	TIME:	

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

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

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

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

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

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

 _

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

# Indiana Department of Environmental Management Office of Air Quality

# Addendum to the Technical Support Document for a Minor Source Operating Permit

### **Source Background and Description**

Source Name: The Oak Hole

Source Location: 901 Nelson Parkway, Wakarusa, Indiana 46573

County: Elkhart SIC Code: 2511, 2431

Operation Permit No.: 039-18480-00593

Permit Reviewer: ERG/YC

On April 19, 2004, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that The Oak Hole had applied for a Minor Source Operating Permit to construct and operate a wood furniture manufacturing plant. The notice also stated that OAQ 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.

On April 29, 2004, The Oak Hole submitted comments on the proposed Minor Source Operating Permit. The summary of the comments is as follows (bolded language has been added; the language with a line through has been deleted):

### Comment 1:

In order to have the flexibility to manufacture various items of furniture beyond chairs and window sills, the source requested IDEM revise the description of this source to a wood furniture manufacturing plant.

### **Response to Comment 1:**

Condition A.1 has been revised as follows as the result of this comment:

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

The Permittee owns and operates a stationary wooden chairs and windows wood furniture manufacturing plant.

# Indiana Department of Environmental Management Office of Air Quality

# Technical Support Document (TSD) for a New Source Construction and Minor Source Operating Permit

### **Source Background and Description**

Source Name: The Oak Hole

Source Location: 901 Nelson Parkway, Wakarusa, Indiana 46573

County: Elkhart SIC Code: 2511, 2431

Operation Permit No.: 039-18480-00593

Permit Reviewer: ERG/YC

The Office of Air Quality (OAQ) has reviewed an application from the Oak Hole relating to the construction and operation of a wooden chairs and windows manufacturing plant.

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

There are no permitted emissions units or control equipment at this source.

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

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

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

The source consists of the following new emission units and pollution control equipment:

- (a) One (1) woodworking operation, identified as EP-01, constructed in 2004, with a maximum throughput rate of 67.2 pounds of wood per hour, controlled by a dust collector.
- (b) One (1) spray booth, identified as EP-02, constructed in 2004, using HVLP spray guns, controlled by dry filters, and exhausting through stacks V-1 and V-2.
- (c) Two (2) natural gas-fired boilers, identified as B1 and B2, constructed in 2004, each with a maximum heat input capacity of 0.2 MMBtu/hr.
- (d) One (1) assembling area, constructed in 2004, applying glues to wooden chairs, and exhausting inside the building.
- (e) One (1) air make-up unit, constructed in 2004, using natural gas as fuel, with a maximum heat input capacity of 5.0 MMBtu/hr.

### **Existing Approvals**

This is the first air approval issued to this source.

### **Enforcement Issue**

There are no enforcement actions pending.

The Oak Hole Page 2 of 7 Wakarusa, Indiana MSOP: 039-18480-00593

Permit Reviewer: ERG/YC

### **Stack Summary**

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
V-1	Spray Booth	14-15	0.25	3,000	90-100
V-2	Spray Booth	14-15	0.25	3,000	90-100

### Recommendation

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

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on February 4, 2004. Additional information was received on March 29, 2004 and April 6, 2004.

#### **Emission Calculations**

See Appendix A of this document for detailed emission calculations (pages 1 through 5).

### Potential to Emit of the Source Before Controls

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

Pollutant	Potential to Emit (tons/yr)
PM	54.3
PM10	54.3
SO <sub>2</sub>	0.01
VOC	18.3
CO	1.99
NO <sub>x</sub>	2.37

HAPs	Potential to Emit (tons/yr)
Toluene	2.18
Ethyl-benzene	0.17
Xylene	9.13
Total	11.5

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of all pollutants are less than 100 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination of HAPs is less than twenty-five (25) tons per year, therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (c) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM10 is greater than 25 tons per year, therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.

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Wakarusa, Indiana Permit Reviewer: ERG/YC

### (e) Fugitive Emissions

Since this type of operation is not in one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.

### **County Attainment Status**

The source is located in Elkhart County.

Pollutant	Status
PM-10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
Ozone	Maintenance Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) Elkhart County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (c) Fugitive Emissions

Since this type of operation is not in one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.

### **Source Status**

New Source PSD Definition (based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	54.3
PM-10	54.3
SO <sub>2</sub>	0.01
VOC	18.3
CO	1.99
NO <sub>x</sub>	2.37
Single HAP	9.13
Combination HAPs	11.5

- (a) This new source is not a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (b) These emissions are based on the potential to emit of this source (see Appendix A).

The Oak Hole Page 4 of 7 Wakarusa, Indiana MSOP: 039-18480-00593 Permit Reviewer: ERG/YC

## **Part 70 Permit Determination**

### 326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons per year.

This is the first air approval issued to this source.

### **Federal Rule Applicability**

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) The boilers at this source have maximum heat inputs less than 10 MMBtu/hr. Therefore, the New Source Performance Standards for Small Industrial Commercial Institutional Steam generating Units (40 CFR 60.40c-48c, Subpart Dc) are not applicable to these boilers.
- (c) The source does not perform surface coating operations to metal furniture. Therefore, the requirements of the New Source Performance Standards for Surface Coating of Metal Furniture (40 CFR Part 60.310 60.316, Subpart EE) are not applicable to this source.
- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) applicable to this source.
- (e) This wooden chairs and windows manufacturing plant does not have potential to emit HAPs greater than 10 tons/yr for a single HAP and greater than 25 tons/yr for any combination of HAPs. Therefore, the requirements of the National Emission Standards for Wood Furniture Manufacturing Operations (326 IAC 20-14, 40 CFR 63.800 63.808, Subpart JJ) are not applicable to this source.
- (f) This source is not a major source for HAPs. Therefore, the National Emission Standards for Hazardous Air Pollutants Industrial/Commercial/Institutional Boilers and Process Heaters (40 CFR 63, Subpart DDDDD) are not applicable.

### State Rule Applicability - Entire Source

### 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

The source will be constructed in 2004. This source is not in 1 of 28 source categories defined in 326 IAC 2-2-1(p)(1) and the potential to emit of all criteria pollutants and PM is less than 250 tons/yr. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.

### 326 IAC 2-7 (Part 70 Program)

The potential to emit of each criteria pollutant of the entire source is less than 100 tons/yr. The potential to emit HAPs for the entire source is less than 10 tons/yr for a single HAP and less than 25 tons/yr for any combination of HAPs. Therefore, the requirements of 326 IAC 2-7 are not applicable. Since the potential to emit a single HAP is closed to 10 tons/yr, the Permittee shall comply with the following:

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Permit Reviewer: ERG/YC

(a) Any change or modification which may increase a single HAP usage for the spray booth EP-02 to greater than 10 tons per year must be approved by the Office of Air Quality before any such change may occur.

(b) Any change or modification which may increase the total HAP usage for spray booth EP-02 to greater than 25 tons per year must be approved by the Office of Air Quality before any such change may occur.

### 326 IAC 2-4.1 (New Sources of Hazardous Air Pollutants)

The source will be constructed in 2004. The potential to emit HAPs from the entire source is less than 10 tons/yr for a single HAP and less than 25 tons/yr for any combination HAPs. Therefore, the requirements of 326 IAC 2-4.1 are not applicable.

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

This source is located in Elkhart County and the potential to emit of all criteria pollutants is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

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

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

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

### State Rule Applicability - Woodworking Operation (EP-01)

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

The maximum process weight rate of the woodworking operation at this source is less than 100 pounds per hour. Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emission rate for this woodworking operation is 0.551 pounds per hour.

### State Rule Applicability – Spray Booth (EP-02)

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

The spray booth EP-02, which applies coatings to wooden chairs and windows, will be constructed after July 1, 1990 and the potential to emit VOC from this booth is greater than 15 pounds per day. Pursuant to 326 IAC 8-2-12, 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

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coating to substrate by means of coating application equipment which operates between onetenth (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 8-1-6 (General Reduction Requirements for VOC Emissions)

Although constructed after January 1, 1980, the requirements of 326 IAC 8-1-6 are not applicable because the requirements of 326 IAC 8-2-12 apply to this booth.

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

The maximum coating usage for spray booth EP-02 is greater than 5 gallons/day. Pursuant to 326 IAC 6-3-2(d), particulate emissions from this spray booth shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

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

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

### State Rule Applicability – Boilers B1 and B2

326 IAC 6-2-4 (PM Emissions for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-4(a), indirect heating facilities constructed after September 12, 1983, shall be limited by the following equation:

Pt = 
$$\frac{1.09}{Q^{0.26}}$$

Where Pt = emission rate limit (lbs/MMBtu)

Q = total source heat input capacity (MMBtu/hr)

However, 326 IAC 6-2-4(a) also states that if Q is less than 10 MMBtu/hr, Pt shall not exceed 0.6. Therefore, the PM emission limit for each of the boilers at this source is 0.6 lbs/MMBtu.

### State Rule Applicability - Assembling Area

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

The potential to emit VOC of the proposed assembling area is less than 15 pounds per day. Therefore, pursuant to 326 IAC 8-2-1(b)(3), this assembling area is not subject to the requirements of 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), pursuant to 326 IAC 8-2-1(b)(3).

326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)

Although constructed after January 1, 1980, the potential VOC emissions from the assembling area at this source is less than 25 tons/yr. Therefore, the requirements of 326 IAC 8-1-6 (BACT) are not applicable.

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Permit Reviewer: ERG/YC

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

There are no particulate emissions from the assembling area. Therefore, the requirements of 326 IAC 6-3-2 are not applicable.

### State Rule Applicability - Air Make-up Unit

There are no specifically applicable requirements for this unit.

### Conclusion

The construction and operation of this wooden chairs and windows manufacturing plant shall be subject to the conditions of the New Source Construction and Minor Source Operating Permit 039-18480-00593.

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# Appendix A: Emissions Calculations PM/PM10 Emissions From One (1) Woodworking Opeation (EP-01)

Company Name: The Oak Hole

Address: 901 Nelson Parkway, Wakarusa, IN 46573

MSOP #: 039-18480-00593

Reviewer: ERG/YC
Date: April 9, 2004

### **Woodworking Process Description:**

PM Control Euipment: Dust Collector

Grain Loading: 0.0035 grain/cf
Air Flow Rate: 8,000 cf/m
Control Efficiency: 98%

#### 1. Potential to Emit After Control:

Assume all the PM emissions are equal to PM10 emissions.

**Hourly PM/PM10 Emissions** =  $0.0035 \text{ (gr/cf)} \times 8,000 \text{ (acf/min)} \times 60 \text{ (min/hr)} \times 1/7000 \text{ (lbs/gr)} =$  **0.24 lbs/hr Annual PM/PM10 emissions** =  $0.24 \text{ lbs/hr} \times 8760 \text{ hr/yr} \times 1 \text{ ton/}2000 \text{ lbs} =$  **0.25 tons/yr** 

### 2. Potential to Emit Before Control:

PTE of PM/PM10 Before Control = 1.05 tons/yr / (1-98%) =

52.6 tons/yr

Appendix A: Emission Calculations
VOC and PM/PM10 Emissions
From the Spray Coating Booth (EP-02)

Company Name: The Oak Hole

Address: 901 Nelson Parkway, Wakarusa, IN 46573

MSOP #: 039-18480-00593

Reviewer: ERG/YC
Date: April 9, 2004

Material	Density (lbs/gal)	Weight % Volatile (H <sub>2</sub> O & Organics)	Weight % Water	Weight % Organics	Maximum Throughput (unit/hr)	Maximum Usage (gal/unit)	Pounds VOC per gallon of coating	PTE of VOC (lbs/hr)	PTE of VOC (lbs/day)	PTE of VOC (tons/yr)	*PTE of PM/PM10 before Control (lbs/hr)	*PTE of PM/PM10 before Control (ton/yr)	**Transfer Efficiency
Seal TC-40	7.66	74.6%	8.0%	66.6%	20	0.025	5.10	2.55	61.2	11.2	0.34	1.49	65%
Stain	7.31	97.6%	0.0%	97.6%	20	0.011	7.13	1.57	37.7	6.87	0.01	0.06	65%
All Purpose Wash	7.30	100%	0.0%	100%	20	0.000123	7.30	0.02	0.43	0.08	0.00	0.00	100%
Total								4.14	99.3	18.1	0.35	1.55	

<sup>\*</sup> Assume all the PM emissions are PM10 emissions.

#### **METHODOLOGY**

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

PTE of VOC (lbs/hr) = Pounds of VOC per Gallon coating (lbs/gal) \* Max. Throughput (unit/hr) \* Max. Usage (gal/unit)

PTE of VOC (lbs/day) = Pounds of VOC per Gallon coating (lbs/gal) \* Max. Throughput (unit/hr) \* Max. Usage (gal/unit) \* (24 hr/day)

PTE of VOC (tons/yr) = Pounds of VOC per Gallon coating (lbs/gal) \* Max. Throughput (unit/hr) \* Max. Usage (gal/unit) \* (8760 hr/yr) \* (1 ton/2000 lbs)

PTE of PM/PM10 before Control (lbs/hr) = Max. Throughput (unit/hr) \* Max. Usage (gal/unit) \* Density (lbs/gal) \* (1- Weight % Volatile) \* (1-Transfer efficiency)

PTE of PM/PM10 before Control (tons/yr) = Max. Throughput (unit/hr) \* Max. Usage (gal/unit) \* Density (lbs/gal) \* (1- Weight % Volatile) \* (1-Transfer efficiency) \* (8760 hrs/yr) \* (1 ton/2000 lbs)

<sup>\*\*</sup> HVLP application method is used in this booth. The transfer efficiency is from a HVLP document prepared by BINKS.

# Appendix A: Emission Calculations HAP Emissions From the Spray Coating Booth (EP-02)

Company Name: The Oak Hole

Address: 901 Nelson Parkway, Wakarusa, IN 46573

MSOP #: 039-18480-00593

Reviewer: ERG/YC
Date: April 9, 2004

Material	Density (lbs/gal)	Maximum Throughput (unit/hr)	Maximum Usage (gal/unit)	Weight % Toluene	PTE of Toluene (tons/yr)	Weight % Ethylbenzene	PTE of Ethylbenzene (tons/yr)	Weight % Xylene	PTE of Xylene (tons/yr)
Seal TC-40	7.66	20	0.025	13.0%	2.18	1.00%	0.17	13.0%	2.18
Stain	7.31	20	0.011	0.0%	0.00	0.0%	0.00	97.6%	6.87
*All Purpose Wash	7.30	20	0.000123	0.0%	0.00	0.0%	0.00	100%	0.08
Total					2.18		0.17		9.13

<sup>\*</sup> The specific HAP content is not available for the all purpose wash used at this source. Assume 100 % of this material is Xylene.

Total HAPs = 11.5 tons/yr

### **METHODOLOGY**

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

# Appendix A: Emission Calculations VOC Emissions From the Assembling Area

**Company Name: The Oak Hole** 

Address: 901 Nelson Parkway, Wakarusa, IN 46573

MSOP #: 039-18480-00593

Reviewer: ERG/YC

Date: April 9, 2004

*Material	Density (lbs/gal)	Weight % Volatile (H <sub>2</sub> O & Organics)	Weight % Water	Weight % Organics	Maximum Throughput (unit/hr)	Maximum Usage (gal/unit)	Pounds VOC per gallon of coating	PTE of VOC (lbs/hr)	PTE of VOC (lbs/day)	PTE of VOC (tons/yr)
Wood Filler	12.9	21.0%	8.00%	13.0%	20	0.0002	1.68	0.007	0.16	0.03
Wood Glue	9.08	54.1%	53.8%	0.30%	20	0.001	0.03	0.001	0.01	0.002
Total								0.01	0.17	0.03

<sup>\*</sup>These materials do not contain regulated HAPs.

#### **METHODOLOGY**

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

PTE of VOC (lbs/hr) = Pounds of VOC per Gallon coating (lbs/gal) \* Max. Throughput (unit/hr) \* Max. Usage (gal/unit)

PTE of VOC (lbs/day) = Pounds of VOC per Gallon coating (lbs/gal) \* Max. Throughput (unit/hr) \* Max. Usage (gal/unit) \* (24 hr/day)

PTE of VOC (tons/yr) = Pounds of VOC per Gallon coating (lbs/gal) \* Max. Throughput (unit/hr) \* Max. Usage (gal/unit) \* (8760 hr/yr) \* (1 ton/2000 lbs)

# Appendix A: Emission Calculations Natural Gas Combustion (MMBtu/hr < 100)

### From Two (2) 0.2 MMBtu/hr Boilers (B1 and B2) and One (1) 5 MMBtu/hr Air Make-up Unit

Company Name: The Oak Hole

Address: 901 Nelson Parkway, Wakarusa, IN 46573

MSOP #: 039-18480-00593

Reviewer: ERG/YC
Date: April 9, 2004

Heat Input Capacity Potential Throughput MMBtu/hr MMCF/yr

5.40 (3 units total) 47.3

#### Pollutant

Emission Factor in Ibs/MMCF	PM*	PM10*	SO <sub>2</sub>	**NO <sub>x</sub>	VOC	CO
	7.6	7.6	0.6	100	5.5	84.0
Potential Emission in tons/yr	0.18	0.18	0.01	2.37	0.13	1.99

<sup>\*</sup>PM and PM10 emission factors are condensable and filterable PM10 combined.

Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (AP-42 Supplement D 3/98)

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

### Methodology

Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu Potential to Emit (tons/yr) = Potential Throughput (MMCF/yr) x Emission Factor (lbs/MMCF) x 1 ton/2000 lbs

<sup>\*\*</sup>Emission Factors for NO<sub>x</sub>: Uncontrolled = 100 lbs/MMCF.