NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

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

for Hardwood Interior Design, LLC in Marshall County

Significant Source Modification No.: 099-41230-00115
Significant Permit Modification No.: 099-41260-00115

The Indiana Department of Environmental Management (IDEM) has received an application from Hardwood Interior Design, LLC, located at Building 1: 1342 W. Plymouth Street, Bremen, Indiana 46506 and Building 2: 1730 Bike Street, Bremen, Indiana 46506, for a significant modification of its Part 70 Operating Permit issued on February 22, 2018. If approved by IDEM’s Office of Air Quality (OAQ), this proposed modification would allow Hardwood Interior Design, LLC to make certain changes at its existing source. Hardwood Interior Design, LLC has applied for the addition of a building located at 1730 Bike Street (building 2) to their permit, move currently permitted surface coating booths, identified as SB4 and SB5 from the existing building (building 1) to building 2, install the following new units: surface coating booth, identified as SB 14, UV Line, identified as UV Finish, Lacquer Thinner Cleaner, UV Roll Coater, UV Oven, identified as OV2, an Air Make-Up Unit, identified as AM5.

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

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

Bremen Public Library
304 N. Jackson Street
Bremen, IN 46506

and

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

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

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

How can you participate in this process?

The date that this notice is posted on IDEM’s website ([https://www.in.gov/idem/5474.htm](https://www.in.gov/idem/5474.htm)) marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

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

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM’s mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SSM 099-41230-00115 and SPM 099-41260-00115 in all correspondence.

Comments should be sent to:

Aida DeGuzman
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Aida DeGuzman or (317) 233-4972
Or dial directly: (317) 233-4972
Fax: (317) 232-6749 attn: Aida DeGuzman
E-mail: gshalabi@idem.IN.gov

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

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm, and the Citizens’ Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

What will happen after IDEM makes a decision?

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

If you have any questions, please contact Aida DeGuzman of my staff at the above address.
Mr. John Yutzy  
Hardwood Interior Design, LLC  
1342 W Plymouth Street  
Bremen, IN 46506

Re: 099-41260-00115  
Significant Permit Modification

Dear Mr. Yutzy:

Hardwood Interior Design, LLC was issued Part 70 Operating Permit No. T099-39339-00115 on February 22, 2018 for a stationary for a stationary wood household furniture, manufacturing operation located at 1342 W. Plymouth Street, Bremen, Indiana 46506. An application requesting changes to this permit was received on March 21, 2019. Pursuant to the provisions of 326 IAC 2-7-12, a Significant Permit Modification to this permit is hereby approved as described in the attached Technical Support Document.

Please find attached the entire Part 70 Operating Permit as modified.

A copy of the permit is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/. A copy of the permit is also available via IDEM’s Virtual File Cabinet (VFC.) Please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens’ Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

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

If you have any questions regarding this matter, please contact Aida DeGuzman, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 233-4972 or (800) 451-6027, and ask for Aida DeGuzman or (317) 233-4972.

Sincerely,

Josiah K. Balogun, Section Chief  
Permits Branch  
Office of Air Quality

Attachments: Modified Permit and Technical Support Document
cc: File - Marshall County  
Marshall County Health Department  
U.S. EPA, Region 5  
Compliance and Enforcement Branch  
IDEM Northern Regional Office
Part 70 Operating Permit
OFFICE OF AIR QUALITY

Hardwood Interior Design, LLC
Building 1: 1342 W Plymouth St. Bremen, Indiana 46506
Building 2: 1730 Bike Street, Bremen, Indiana 46506

(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.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. 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. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

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

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<td>Josiah K. Balogun, Section Chief</td>
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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 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary wood household furniture, manufacturing operation.

- **Source Address:** Building 1: 1342 W. Plymouth Street, Bremen, Indiana 46506  
  Building 2: 1730 Bike Street, Bremen, Indiana 46506

- **General Source Phone Number:** 574-529-0121

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

- **County Location:** Marshall

- **Source Location Status:** Attainment for all criteria pollutants

- **Source Status:** Part 70 Operating Permit Program  
  Minor Source, under PSD  
  Minor Source, Section 112 of the Clean Air Act  
  Not 1 of 28 Source Categories

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

Hardwood Interior Design, LLC has two plants in Bremen, Indiana:

(a) Building 1: Hardwood Interior Design, LLC, located at 1324 W Plymouth Street, Bremen, Indiana 46506, Source ID: 099-00115. The plant includes woodworking and surface coating operations.

(b) Building 2: Hardwood Interior Design, LLC, 1730 Bike Street, Bremen, Indiana 46506 (no source ID assigned). The plant includes wood surface coating operations.

IDEM, OAQ finds that Building 1 and Building 2 meet all three parts of the major source definition and, therefore, the two plants are part of the same major source.

This determination was made in this permitting action, Significant Source Modification No. 099-41230-00115 and Significant Permit Modification No. 099-41260-00115.

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

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

**Building 1**

(a) One (1) surface coating booth, identified as SB1, constructed in 2016, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV1.

(b) One (1) surface coating booth, identified as SB2, constructed in 2016, and approved in 2019 for modification with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV2.

(c) One (1) surface coating booth, identified as SB3, constructed in 2014, with a maximum
capacity of 3.0 units per hour, and exhausting to stack SBSV3 and SBSV3B.

(d) One (1) surface coating booth, identified as SB6, constructed in 2015, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV6.

(e) One (1) surface coating booth, identified as SB7, constructed in 2015, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV7.

(f) One (1) surface coating booth, identified as SB8, constructed in 2016, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV8.

(g) One (1) surface coating booth, identified as SB9, constructed in 2019, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV9.

(h) One (1) surface coating booth, identified as SB10, constructed in 2014, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV10.

(i) One (1) surface coating booth, identified as SB11, constructed in 2014, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV11.

(j) One (1) surface coating booth, identified as SB12, constructed in 2016, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV12.

(k) One (1) surface coating booth, identified as SB13, constructed in 2016, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV13.

Building 2

(l) One (1) Surface Coating Booth, identified as SB4, constructed in 2014, approved in 2019 for modification (relocate to building 2), with a maximum capacity of 4.0 units per hour, using dry filters as control, and exhausting through SBSV4;

(m) One (1) Surface Coating Booth, identified as SB5, constructed in 2014, approved in 2019 for modification (relocate to building 2), with a maximum capacity of 4.0 units per hour, using dry filters as control, and exhausting through SBSV5.

(n) One (1) Surface Coating Booth, identified as SB14, approved in 2019 for construction, with a maximum capacity of 4.0 units per hour, using dry filters as control, and exhausting through SBSV14.

(o) One (1) UV Spray Line, identified as UV Line 1, approved in 2019 for construction, with a maximum capacity of 6.0 units per hour, using dry filters as control, and exhausting through UVLSV1.

(p) One (1) Lacquer thinner Cleaner, approved in 2019 for construction, with a maximum capacity of 4.0 units per hour.

(q) One (1) UV Roll Coater, identified as UVRC1, approved in 2019 for construction, with a
maximum capacity of 15.0 units per hour, uncontrolled, and exhausting through stacks RCS1-RCS5.

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

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

(a) One (1) woodworking operation, constructed in 2014, with a maximum capacity of 1100 pounds per hour, using a baghouse, identified as BH1, with an airflow of 40,000 cfm, as PM control, exhausting to stack BH1.

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

This stationary source also includes the following insignificant activities which are not specifically regulated, as defined in 326 IAC 2-7-1(21):

Direct fired natural gas combustion units as follows:

Building 1

(1) Process oven, identified as OV1, constructed in 2016, with a maximum heat input capacity of 0.5 MMBtu/hr, and exhausting to stacks OSV1-OSV3.

(2) Comfort heating units as follows:

(A) One (1) air make-up unit, identified as AM1, with a maximum heat input capacity of 0.3 MMBtu per hour.

(B) One (1) air make-up unit, identified as AM2, constructed in 2015, with a maximum heat input capacity of 4.0 MMBtu per hour.

(C) One (1) air make-up unit, identified as AM3, constructed in 2015, with a maximum heat input capacity of 3.0 MMBtu per hour.

(D) One (1) natural gas-fired air make-up unit, identified as AM4, constructed in 2016, with a maximum heat input capacity of 4.5 MMBtu/hr, and exhausting to stack AMSV4.

Building 2

(3) One ultraviolet oven, identified as UVOven/OV2, with a maximum heat input capacity of 0.44 MMBtu/hour.

(4) One Air-Make-up unit, identified as AM5, with a maximum heat input capacity of 0.75 MMBtu/hour.

A.6 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).
SECTION B  GENERAL CONDITIONS

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

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

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

(a) This permit, T099-39339-00115, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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

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

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

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

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

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

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

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

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

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

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

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:
(1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and

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

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

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

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

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

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

and

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

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

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

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

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

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

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

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

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

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

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

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

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

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

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

The Permittee shall implement the PMPs.

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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

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

   (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
(2) The permitted facility was at the time being properly operated;

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

4. The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

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

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

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

(a) All terms and conditions of permits established prior to T099-39339-00115 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,
(2) revised under 326 IAC 2-7-10.5, or
(3) deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

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

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

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.
(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

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

Request for renewal shall be submitted to:

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

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

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

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

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

B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

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

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

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

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

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

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

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

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

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

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

(4) The Permittee notifies the:

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

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, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b)(1) and (c)(1). The Permittee shall make such records available, upon reasonable request, for public review.
Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1) and (c)(1).

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

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

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

(3) Any change in emissions; and

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

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

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

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

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

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

B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]
Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

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

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

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

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

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

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

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

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

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

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

B.23 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

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

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

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

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]

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

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

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

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

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

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

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

C.7 Performance Testing [326 IAC 3-6]

(a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

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

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

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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.
The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.10 Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

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

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

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

C.11 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 and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than ninety (90) days after the date of issuance of this permit.

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

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

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

C.12 Risk Management Plan [326 IAC 2-7-5(11)][40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.
C.13 Response to Excursions or Exceedances [326 IAC 2-7-5][326 IAC 2-7-6]

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

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

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

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

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

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-19]

C.16  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]

In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

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

The statement must be submitted to:

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

C.17  General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

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

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

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

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

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

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

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

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

(b) The address for report submittal is:

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

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

(d) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

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

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

Emissions Unit Description:

Building 1

(a) One (1) surface coating booth, identified as SB1, constructed in 2016, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV1.

(b) One (1) surface coating booth, identified as SB2, constructed in 2016, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV2.

(c) One (1) surface coating booth, identified as SB3, constructed in 2014, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV3 and SBSV3B.

(d) One (1) surface coating booth, identified as SB6, constructed in 2015, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV6.

(e) One (1) surface coating booth, identified as SB7, constructed in 2015, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV7.

(f) One (1) surface coating booth, identified as SB8, constructed in 2016, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV8.

(g) One (1) surface coating booth, identified as SB9, constructed in 2019, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV9.

(h) One (1) surface coating booth, identified as SB10, constructed in 2014, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV10.

(i) One (1) surface coating booth, identified as SB11, constructed in 2014, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV11.

(j) One (1) surface coating booth, identified as SB12, constructed in 2016, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV12.

(k) One (1) surface coating booth, identified as SB13, constructed in 2016, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV13.

Building 2

(l) One (1) Surface Coating Booth, identified as SB4, constructed in 2014, approved in 2019 for modification (relocate to building 2), with a maximum capacity of 4.0 units per hour, using dry filters as control, and exhausting through SBSV4;
(m) One (1) Surface Coating Booth, identified as SB5, constructed in 2014, approved in 2019 for modification (relocate to building 2), with a maximum capacity of 4.0 units per hour, using dry filters as control, and exhausting through SBSV5.

(n) One (1) Surface Coating Booth, identified as SB14, approved in 2019 for construction, with a maximum capacity of 4.0 units per hour, using dry filters as control, and exhausting through SBSV14.

(o) One (1) UV Spray Line, identified as UV Line 1, approved in 2019 for construction, with a maximum capacity of 6.0 units per hour, using dry filters as control, and exhausting through UVLSV1.

(p) One (1) Lacquer thinner Cleaner, approved in 2019 for construction, with a maximum capacity of 4.0 units per hour.

(q) One (1) UV Roll Coater, identified as UVRC1, approved in 2019 for construction, with a maximum capacity of 15.0 units per hour, uncontrolled, and exhausting through stacks RCS1-RCS5.

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

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

#### D.1.1 Hazardous Air Pollutant (HAP) Limitation [326 IAC 2-4.1] [326 IAC 20-14.1]

In order to render the requirements of 326 IAC 2-4.1 and 326 IAC 20-14-1 (Wood Furniture Manufacturing Operations) not applicable, the Permittee shall comply with the following:

(a) The total input of any single HAP to Building 1 surface coating booths, identified as SB1 through SB3, SB6 through SB13, and Building 2 Surface coating booths, identified as SB4, SB5, SB14, UVLine1-UVC Finish, UV Roll Coater and the Lacquer Thinner Cleaner shall not exceed 9.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The total input of all HAPs to Building 1 surface coating booths, identified as SB1 through SB3, SB6 through SB13, and Building 2 Surface coating booths, identified as SB4, SB5, SB14, UVLine1-UVC Finish, UV Roll Coater and the Lacquer Thinner Cleaner shall not exceed 24.50 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with this limit, combined with the potential to emit single HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of each single HAP to less than ten (10) tons per year and shall render 326 IAC 2-4.1 and 326 IAC 20-14-1 not applicable to the source and make the source an area source of HAPs.

#### D.1.2 Prevention of Significant Deterioration (PSD) Minor Limits 326 IAC 2-2 (PSD)

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

The total VOC input to Building 1 surface coating booths, identified as SB1 through SB3, SB6 through SB13 and Building 2 Surface coating booths, identified as SB4, SB5, SB14, UVLine1-UVC Finish, UV Roll Coater and the Lacquer Thinner Cleaner, shall not exceed 249 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
Compliance with this limit, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 250 tons per year, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to the 2019 modification.

D.1.3 Wood Furniture and Cabinet Coating [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12, the surface coating materials applied to the wood furniture, cabinets and wood furniture components in Building 1 surface coating booths, identified as SB1 through SB3, SB6 through SB13 and Building 2 surface coating booths, identified as SB4, SB5, SB14, UVLine1-UV Finish and Roll Coater shall all be applied, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) or more of the following application methods:

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

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

D.1.4 Particulate Emission Limitation, Work Practices, and Control Technologies [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate emissions from Building 1 surface coating booths, identified as SB1 through SB14 and UV Line 1-UV Finish shall be controlled by dry particulate filters and the Permittee shall operate the control device in accordance with manufacturer’s specifications.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

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

D.1.6 Particulate Control

In order to comply with Condition D.1.3, the dry filters for particulate control from the spray booths, identified as SB1 through SB14 and UV Line 1-UV Finish shall be in operation at all times when the associated spray booths are in operation.

D.1.7 Hazardous Air Pollutants (HAPs)

Compliance with the HAP input usage limitations contained in Condition D.1.1 shall be determined by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" HAP data sheets. IDEM, OAQ, reserves the authority to determine compliance using EPA Method 311 - Analysis of Hazardous Air Pollutant Compounds in Paints and Coatings.
Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]

D.1.8 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks SBSV1, SBSV2, SBSV3, SBSV3B, SBSV4, SBSV5, SBSV6, SBSV6B, SBSV7, SBSV8, SBSV9, SBSV10, SBSV11, SBSV12, SBSV13, SBSV14, and UVLSV1 while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

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

D.1.9 Record Keeping Requirements

(a) To document the compliance status with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) through (2) below for Building 1 surface coating booths, identified as SB1 through SB3, SB6 through SB13 and Building 2 Surface coating booths, identified as SB4, SB5, SB14, UVLine1-UV Finish, UV Roll Coater and the Lacquer Thinner Cleaner. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the single HAP emission limit established in Conditions D.1.1.

(1) The usage by weight of each coating used, including cleaning solvent and the percent by weight of each single HAP used in Building 1 surface coating booths, identified as SB1 through SB3, SB6 through SB13 and Building 2 Surface coating booths, identified as SB4, SB5, SB14, UVLine1-UV Finish, UV Roll Coater and the Lacquer Thinner Cleaner. Records shall include purchase orders, invoices, and material safety data sheets (MSDS), manufacturer's certified product data sheets, and calculations necessary to verify the type, amount used, and the single HAP content of each coating.

(2) The total monthly single HAP usage at Building 1 surface coating booths, identified as SB1 through SB3, SB6 through SB13 and Building 2 Surface coating booths, identified as SB4, SB5, SB14, UVLine1-UV Finish UV Roll Coater and the Lacquer Thinner Cleaner.

(b) To document the compliance status with Condition D.1.8 - Monitoring, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspection.

(c) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.
D.1.10 Reporting Requirements

A quarterly report of the information to document the compliance status with Condition D.1.1 and Condition D.1.2 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days following the end of each calendar quarter. Section C - General Reporting Requirements contains the Permittee's obligations with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(35).
## SECTION D.2  EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

**Insignificant Activities:**

<table>
<thead>
<tr>
<th>Activity</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>(a)</td>
<td>One (1) woodworking operation, constructed in 2014, with a maximum capacity of 1100 pounds per hour, using a baghouse, identified as BH1, with an airflow of 40,000 cfm, as PM control, exhausting to stack BH1.</td>
</tr>
</tbody>
</table>

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

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

#### D.2.1 Particulate Control [326 IAC 2-2]

In order to assure that the requirements of 326 IAC 2-2 (PSD) do not apply, the integral baghouse, identified as BH1 shall be in operation and at all times control emissions from the woodworking operation.

Compliance with this condition, combined with the potential PM, PM10 and PM2.5 emissions from all the other emission units at the source, shall assure PM, PM10 and PM2.5 emissions from the entire source are less than 250 tons per year and shall render the requirements of 326 IAC 2-2 (PSD) not applicable.

#### D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

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

#### D.2.3 Particulate Control

In order to comply with Condition D.2.1 the baghouse shall be in operation and control emissions from the woodworking operations at all times that the woodworking operations are in operation.

#### D.2.4 Broken or Failed Bag Detection

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

Bag failure can be indicated by a significant drop in the baghouse’s pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.
**Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]**

<table>
<thead>
<tr>
<th>D.2.5 Visible Emissions Notations</th>
</tr>
</thead>
<tbody>
<tr>
<td>(a) Visible emission notations of the baghouse stack exhaust identified as BH1 shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.</td>
</tr>
<tr>
<td>(b) For processes operated continuously, &quot;normal&quot; 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.</td>
</tr>
<tr>
<td>(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.</td>
</tr>
<tr>
<td>(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.</td>
</tr>
<tr>
<td>(e) If abnormal emissions are observed, the Permittee shall take a reasonable response. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.</td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>D.2.6 Record Keeping Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>(a) To document the compliance status with Condition D.2.5 - Visible Emissions Notations, the Permittee shall maintain records of daily visible emission notations of the baghouse stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).</td>
</tr>
<tr>
<td>(b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.</td>
</tr>
</tbody>
</table>
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Hardwood Interior Design, LLC
Source Address: 1342 W. Plymouth Street, Bremen, Indiana 46506
Part 70 Permit No.: T099-39339-00115

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

Please check what document is being certified:

- ☐ Annual Compliance Certification Letter
- ☐ Test Result (specify)
- ☐ Report (specify)
- ☐ Notification (specify)
- ☐ Affidavit (specify)
- ☐ Other (specify)

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

Signature:
Printed Name:
Title/Position:
Phone:
Date:
Source Name: Hardwood Interior Design, LLC  
Source Address: 1342 W. Plymouth Street, Bremen, Indiana 46506  
Part 70 Permit No.: T099-39339-00115  

This form consists of 2 pages  

<table>
<thead>
<tr>
<th>Facility/Equipment/Operation:</th>
<th></th>
</tr>
</thead>
</table>

Control Equipment:  

Permit Condition or Operation Limitation in Permit:  

Description of the Emergency:  

Describe the cause of the Emergency:  

☐ This is an emergency as defined in 326 IAC 2-7-1(12)  
  - The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and  
  - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.
If any of the following are not applicable, mark N/A

| Date/Time Emergency started: |
| Date/Time Emergency was corrected: |
| Was the facility being properly operated at the time of the emergency? Y N |

Type of Pollutants Emitted: TSP, PM-10, SO₂, VOC, NOₓ, CO, Pb, other:

Estimated amount of pollutant(s) emitted during emergency:

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: ________________________________
INFORMATION DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

Part 70 Quarterly Report

Source Name: Hardwood Interior Design, LLC
Source Address: 1342 W. Plymouth Street, Bremen, Indiana 46506
Part 70 Permit No.: T099-39339-00115
Facility: Building 1 surface coating booths, identified as SB1 through SB3, SB6 through SB13, and Building 2 Surface coating booths, identified as SB4, SB5, SB14, UVLine1-UV Finish, UV Roll Coater and the Lacquer Thinner Cleaner
Parameter: The total input of any single HAP
Limit: shall not exceed nine and nine-tenths (9.9) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

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

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

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

Submitted by: ____________________________
Title / Position: __________________________
Signature: ________________________________
Date: ________________________________
Phone: ________________________________

DRAFT
### Part 70 Quarterly Report

**Source Name:** Hardwood Interior Design, LLC  
**Source Address:** 1342 W. Plymouth Street, Bremen, Indiana 46506  
**Part 70 Permit No.:** T099-39339-00115  
**Facility:** Building 1 surface coating booths, identified as SB1 through SB3, SB6 through SB13, and Building 2 Surface coating booths, identified as SB4, SB5, SB14, UVLine1-UV Finish, UV Roll Coater and the Lacquer Thinner Cleaner  
**Parameter:** The total input of all HAPs  
**Limit:** shall not exceed 24.50 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

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

<table>
<thead>
<tr>
<th>Month</th>
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<td></td>
</tr>
</tbody>
</table>

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

```
Submitted by: ____________________________  
Title / Position: ____________________________  
Signature: ____________________________  
Date: ____________________________  
Phone: ____________________________
```
**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**

**OFFICE OF AIR QUALITY**

**COMPLIANCE AND ENFORCEMENT BRANCH**

---

**Part 70 Quarterly Report**

**Source Name:** Hardwood Interior Design, LLC  
**Source Address:** 1342 W. Plymouth Street, Bremen, Indiana 46506  
**Part 70 Permit No.:** T099-39339-00115  
**Facility:** Building 1 surface coating booths, identified as SB1 through SB3, SB6 through SB13, and Building 2 Surface coating booths, identified as SB4, SB5, SB14, UVLine1-UV Finish, UV Roll Coater and the Lacquer Thinner Cleaner

**Parameter:** The total VOC input  
**Limit:** shall not exceed 249 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

<table>
<thead>
<tr>
<th>QUARTER :</th>
<th>YEAR:</th>
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<table>
<thead>
<tr>
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<td>Previous 11 Months</td>
<td>12 Month Total</td>
<td></td>
</tr>
</tbody>
</table>

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

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

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

<table>
<thead>
<tr>
<th>Permit Requirement (specify permit condition #)</th>
<th>Date of Deviation:</th>
<th>Duration of Deviation:</th>
</tr>
</thead>
</table>

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

<table>
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<tr>
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Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:
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<td>Number of Deviations:</td>
<td></td>
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<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
</tr>
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<td>Response Steps Taken:</td>
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<td>Probable Cause of Deviation:</td>
<td></td>
</tr>
<tr>
<td>Response Steps Taken:</td>
<td></td>
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</tbody>
</table>

Form Completed by: _____________________________
Title / Position: _______________________________
Date: _________________________________
Phone: _________________________________
Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Significant Source Modification and Significant Permit Modification

Source Description and Location

<table>
<thead>
<tr>
<th>Source Name:</th>
<th>Hardwood Interior Design, LLC</th>
</tr>
</thead>
<tbody>
<tr>
<td>Source Location:</td>
<td>Building 1: 1342 W Plymouth St. Bremen, Indiana 46506</td>
</tr>
<tr>
<td></td>
<td>Building 2: 1730 Bike Street, Bremen, Indiana 46506</td>
</tr>
<tr>
<td>County:</td>
<td>Marshall</td>
</tr>
<tr>
<td>SIC Code:</td>
<td>2511 (Wood Household Furniture, except Upholstered)</td>
</tr>
<tr>
<td>Operation Permit No.:</td>
<td>T 099-39339-00115</td>
</tr>
<tr>
<td>Operation Permit Issuance Date:</td>
<td>February 22, 2018</td>
</tr>
<tr>
<td>Significant Source Modification No.:</td>
<td>099-41230-00115</td>
</tr>
<tr>
<td>Significant Permit Modification No.:</td>
<td>099-41260-00115</td>
</tr>
<tr>
<td>Permit Reviewer:</td>
<td>Ghassan Shalabi/Aida DeGuzman</td>
</tr>
</tbody>
</table>

Source Definition

The following plants are considered in the source determination:

(a) Building 1: Hardwood Interior Design, LLC, located at 1324 W Plymouth Street, Bremen, Indiana 46506, Source ID: 099-00115. The plant includes woodworking and surface coating operations.

(b) Building 2: Hardwood Interior Design, LLC, 1730 Bike Street, Bremen, Indiana 46506 (no source ID assigned). The plant includes wood surface coating operations.

Hardwood Interior Design, LLC, is leasing a new plant (Building 2) and will install new units in it, in addition to moving two permitted surface coating booths (SB4 and SB5) from Building 1 to Building 2.

IDEM, OAQ has examined whether these plants are part of the same major source. The term “major source” is defined at 326 Indiana Administrative Code 2-7-1(22). The Indiana Administrative Code is available at http://www.in.gov/legislative/iac/iac_title?iact=326 on the Internet. In order for these plants to be considered as a major source, all three of the following criteria must be met:

(a) The plants must have common ownership and/or control;

(b) The plants must have the same two-digit Standard Industrial Classification (SIC) Code or one must serve as a support facility to the other; and

(c) The plants must be located on the same, contiguous or adjacent properties.

First Criteria - Common Ownership or Control:
The first criteria to be considered is whether these plants are under common ownership or control. IDEM’s Nonrule Policy Document Air-005 applies to the definition of “major source” in 326 IAC 2-7-1(22). All of IDEM’s nonrule policy documents are available at https://www.in.gov/idem/7110.htm on IDEM’s website. NPD Air-005 states:

Common ownership may exist in several forms.
- If a third party has ownership of fifty-one percent (51%) or more in each of two (2) or more entities, common ownership exists.
- If two (2) or more entities share common corporate officers, in whole or in substantial part, who are responsible for the day-to-day operations of the entities, common ownership exists.
- If one entity has fifty-one percent (51%) or greater ownership of another entity, common ownership exists.

Hardwood Interior Design, LLC owns both plants. The plants are under common ownership and, therefore, common control. The first part of the major source definition is met.

**Second Criteria - Common SIC Code or Support Facility:**
The second criteria is whether either of the plants have a common two-digit Standard Industrial Classification (SIC) Code or if one plant serves as a support facility for the other plant. The Standard Industrial Classification Manual of 1987 sets out how to determine the proper SIC Code for each type of business. More information about SIC Codes is available at [http://www.osha.gov/pls/imis/sic_manual.html](http://www.osha.gov/pls/imis/sic_manual.html) on the Internet. The SIC Code is determined by looking at the principal product or activity of each plant.

Both plants make furniture. They have the same two-digit SIC Code, 25, for the Major Group of Furniture and Fixtures. Since the plants meet the second part of the major source definition, it is not necessary to determine if the plants have a support facility relationship.

**Third Criteria - Same, Contiguous, or Adjacent Properties:**
The third and last criteria of the major source definition is whether the plants are on the same, contiguous or adjacent properties. Plants located on properties that share a common property border are contiguous.

The plants are not located on the same or contiguous properties. Therefore, IDEM, OAQ must determine if they are located on adjacent properties.

Adjacent Determination:
The term "adjacent" is not defined in Indiana’s rules. IDEM’s Nonrule Policy Document, NPD Air-005 adds the following guidance:

- Properties that actually abut at any point would satisfy the requirement of contiguous or adjacent property.
- Properties that are separated by a public road or public property would satisfy this requirement, absent special circumstances.
- Other scenarios would be examined on an individual basis with the focus on the distance between the activities and the relationship between the activities.

All IDEM evaluations of adjacency are done on a case-by-case basis looking at the specific factors for the plants involved. In addition to determining the distance between the plant properties, IDEM asks:

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

These questions focus on whether the separate sources are so interrelated that they are functioning as one plant and whether the distance between them is small enough that it enables them to operate as one plant. U.S. EPA Assistant Administrator Gina McCarry issued a memorandum on September 22, 2009 that confirmed U.S. EPA’s view that each source determination must be done on a case-by-case basis and stated that after that analysis is completed it may be that physical proximity serves as an overwhelming factor in determining if the plant properties are adjacent.

The plants are located on properties that are about a quarter of a mile apart, as the crow flies. Materials are routinely transferred between the plants. The plants have managerial staff that frequently shuttle back and forth to be actively involved in both plants. Some furniture production
processes are split between the plants. Considering all of these factors, IDEM, OAQ has determined that the plants are located on adjacent properties. The third part of the major source definition is met.

**Source Determination - Final Conclusion:**

IDEM, OAQ finds that Building 1 and Building 2 meet all three parts of the major source definition and, therefore, the two plants are part of the same major source.

### Existing Approvals

The source was issued Part 70 Operating Permit No. 099-39339-00115 on February 22, 2018. The source has since received the following approvals:

(a) Administrative Amendment No. 099-40048-00115, issued on June 8, 2018.

### County Attainment Status

The source is located in Marshall County.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO₂</td>
<td>Better than national standards.</td>
</tr>
<tr>
<td>CO</td>
<td>Unclassifiable or attainment effective November 15, 1990.</td>
</tr>
<tr>
<td>O₃</td>
<td>Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard.¹</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective April 5, 2005, for the annual PM₂.₅ standard.</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM₂.₅ standard.</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>Unclassifiable effective November 15, 1990.</td>
</tr>
<tr>
<td>NO₂</td>
<td>Cannot be classified or better than national standards.</td>
</tr>
<tr>
<td>Pb</td>
<td>Unclassifiable or attainment effective December 31, 2011.</td>
</tr>
</tbody>
</table>

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

(a) **Ozone Standards**

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

(b) **PM₂.₅**

Marshall County has been classified as attainment for PM₂.₅. Therefore, direct PM₂.₅, SO₂, and NOₓ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) **Other Criteria Pollutants**

Marshall County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants (PM, PM₁₀ and CO). Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

### Fugitive Emissions

Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants that was in effect on
August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

### Greenhouse Gas (GHG) Emissions

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

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

### Source Status - Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>PM</th>
<th>PM₁₀</th>
<th>PM₂.₅¹</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Worst Single HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Surface Coating Booths</td>
<td>29.28</td>
<td>29.28</td>
<td>29.28</td>
<td>-</td>
<td>-</td>
<td>236.18</td>
<td>-</td>
<td>20.98</td>
<td>9.9</td>
</tr>
<tr>
<td>Woodworking</td>
<td>1.95</td>
<td>1.95</td>
<td>1.95</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.10</td>
<td>-</td>
</tr>
<tr>
<td>Natural Gas Combustion</td>
<td>0.10</td>
<td>0.38</td>
<td>0.38</td>
<td>0.03</td>
<td>5.06</td>
<td>0.28</td>
<td>4.25</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Total for Source</td>
<td>31.33</td>
<td>31.62</td>
<td>31.62</td>
<td>0.03</td>
<td>5.06</td>
<td>236.46</td>
<td>4.25</td>
<td>21.07</td>
<td>9.9</td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>25</td>
<td>10</td>
</tr>
</tbody>
</table>

¹PM₂.₅ listed is direct PM₂.₅.

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

(b) This existing source is not a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed an application, submitted by Hardwood Interior Design, LLC on March 21, 2019, relating to the addition of a building located at 1730 Bike Street (building 2) to their permit, move currently permitted surface coating booths, identified as SB4 and SB5 from the existing building (building 1) to building 2, install the following new units: surface coating booth, identified as SB14, UV Line, identified as UV Finish, Lacquer Thinner Cleaner, UV Roll Coater, UV Oven, identified as OV2, an Air Make-Up Unit, identified as AM5. In addition, the source requested to increase the capacity, redistribute and change the coatings in surface coating booths SB1-SB13, in building 1.

The following is a list of the new and modified emission units and pollution control devices:

Building 1

1. One (1) surface coating booth, identified as SB1, constructed in 2016, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV1.

2. One (1) surface coating booth, identified as SB2, constructed in 2016, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV2.

3. One (1) surface coating booth, identified as SB3, constructed in 2014, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV3 and SBSV3B.

4. One (1) surface coating booth, identified as SB6, constructed in 2015, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV6.

5. One (1) surface coating booth, identified as SB7, constructed in 2015, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV7.

6. One (1) surface coating booth, identified as SB8, constructed in 2016, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV8.

7. One (1) surface coating booth, identified as SB9, constructed in 2019, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV9.

8. One (1) surface coating booth, identified as SB10, constructed in 2014, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV10.

9. One (1) surface coating booth, identified as SB11, constructed in 2014, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV11.

10. One (1) surface coating booth, identified as SB12, constructed in 2016, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV12.

11. One (1) surface coating booth, identified as SB13, constructed in 2016, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV13.
Building 2

(12) One (1) Surface Coating Booth, identified as SB4, constructed in 2014, approved in 2019 for modification (relocate to building 2), with a maximum capacity of 4.0 units per hour, using dry filters as control, and exhausting through SBSV4;

(13) One (1) Surface Coating Booth, identified as SB5, constructed in 2014, approved in 2019 for modification (relocate to building 2), with a maximum capacity of 4.0 units per hour, using dry filters as control, and exhausting through SBSV5.

(14) One (1) Surface Coating Booth, identified as SB14, approved in 2019 for construction, with a maximum capacity of 4.0 units per hour, using dry filters as control, and exhausting through SBSV14.

(15) One (1) UV Spray Line, identified as UV Line 1, approved in 2019 for construction, with a maximum capacity of 6.0 units per hour, using dry filters as control, and exhausting through UVLSV1.

(16) One (1) Lacquer thinner Cleaner, approved in 2019 for construction, with a maximum capacity of 4.0 units per hour.

(17) One (1) UV Roll Coater, identified as UVRC1, approved in 2019 for construction, with a maximum capacity of 15.0 units per hour, uncontrolled, and exhausting through stacks RCS1-RCS5.

(18) One ultraviolet oven, identified as UVOven/OV2, with a maximum heat input capacity of 0.44 MMBtu/hour.

(19) One Air-Make-up unit, identified as AM5, with a maximum heat input capacity of 0.75 MMBtu/hour.

“Integral Part of the Process” Determination

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

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

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

Permit Level Determination – Part 70 Modification to an Existing Source

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

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5¹</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP² (Xylene)</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Building 2</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SB4 - Stain</td>
<td>2.63</td>
<td>2.63</td>
<td>2.63</td>
<td>0.00</td>
<td>0.00</td>
<td>35.22</td>
<td>0.00</td>
<td>0.36</td>
<td>0.69</td>
</tr>
<tr>
<td>SB5 - Stain</td>
<td>2.63</td>
<td>2.63</td>
<td>2.63</td>
<td>0.00</td>
<td>0.00</td>
<td>35.22</td>
<td>0.00</td>
<td>0.36</td>
<td>0.69</td>
</tr>
<tr>
<td>SB14 - Stain</td>
<td>2.63</td>
<td>2.63</td>
<td>2.63</td>
<td>0.00</td>
<td>0.00</td>
<td>35.22</td>
<td>0.00</td>
<td>0.36</td>
<td>0.69</td>
</tr>
<tr>
<td>UV Line - UV Finish</td>
<td>19.66</td>
<td>19.66</td>
<td>19.66</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>UV Roll Coater</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>8.67</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Lacquer Thinner Cleaner</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>3.07</td>
<td>0.00</td>
<td>0.00</td>
<td>3.07</td>
</tr>
<tr>
<td>UVOven/OV2 and AM5, NG Combustion</td>
<td>0.01</td>
<td>0.04</td>
<td>0.04</td>
<td>0.003</td>
<td>0.51</td>
<td>0.03</td>
<td>0.43</td>
<td>0.01</td>
<td>0.01</td>
</tr>
<tr>
<td><strong>Total PTE Before Controls of the New Emission Units:</strong></td>
<td><strong>27.56</strong></td>
<td><strong>27.59</strong></td>
<td><strong>27.59</strong></td>
<td><strong>0.003</strong></td>
<td><strong>0.51</strong></td>
<td><strong>117.38</strong></td>
<td><strong>0.43</strong></td>
<td><strong>1.08</strong></td>
<td><strong>5.15</strong></td>
</tr>
</tbody>
</table>

¹PM2.5 listed is direct PM2.5.
²Single highest HAP.

Appendix A of this TSD reflects the detailed potential emissions of the modification.
Bremen, Indiana  
PTE Increases Due to the Modification (ton/year)

<table>
<thead>
<tr>
<th></th>
<th>PM</th>
<th>PM_{10}</th>
<th>PM_{2.5}</th>
<th>SO_{2}</th>
<th>NO_{x}</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP^{2} (Xylene)</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Uncontrolled</td>
<td>27.56</td>
<td>27.59</td>
<td>27.59</td>
<td>0.003</td>
<td>0.51</td>
<td>117.38</td>
<td>0.43</td>
<td>1.08</td>
<td>5.15</td>
</tr>
<tr>
<td>PTE of the New</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Emission Units</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total Uncontrolled</td>
<td>15.70</td>
<td>15.70</td>
<td>15.70</td>
<td>--</td>
<td>--</td>
<td>158.17</td>
<td>--</td>
<td>0.48</td>
<td>4.44</td>
</tr>
<tr>
<td>PTE Increase of the</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Modified Emission</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Units/Process</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total PTE of the</td>
<td>43.26</td>
<td>43.29</td>
<td>43.29</td>
<td>0.003</td>
<td>0.51</td>
<td>275.55</td>
<td>0.43</td>
<td>1.56</td>
<td>9.59</td>
</tr>
<tr>
<td>Modification</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

^{1}PM_{2.5} listed is direct PM_{2.5}.

Appendix A of this TSD reflects the detailed potential emissions of the modification.

(a) Approval to Construct

Pursuant to 326 IAC 2-7-10.5(g)(4), a Significant Source Modification is required because this modification has the potential to emit PM, PM_{10}, direct PM_{2.5}, and VOC at greater than or equal to twenty-five (25) tons per year, each.

(b) Approval to Operate

Pursuant to 326 IAC 2-7-12(d)(1), this change to the permit is being made through a Significant Permit Modification because this modification does not qualify as a Minor Permit Modification or as an Administrative Amendment.

Permit Level Determination – PSD

The table below summarizes the potential to emit of the modification, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of the Part 70 source and permit modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>PM</th>
<th>PM_{10}</th>
<th>PM_{2.5}</th>
<th>SO_{2}</th>
<th>NO_{x}</th>
<th>VOC</th>
<th>CO</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Building 1 (Modified</td>
<td>10.95</td>
<td>10.95</td>
<td>10.95</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>Project Emissions (ton/year)</td>
</tr>
<tr>
<td>Units)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SB1 – SB3</td>
<td>5.56</td>
<td>5.56</td>
<td>5.56</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>249.00</td>
</tr>
<tr>
<td>SB6</td>
<td>2.82</td>
<td>2.82</td>
<td>2.82</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td></td>
</tr>
<tr>
<td>SB7</td>
<td>3.58</td>
<td>3.58</td>
<td>3.58</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td></td>
</tr>
<tr>
<td>SB8</td>
<td>5.56</td>
<td>5.56</td>
<td>5.56</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td></td>
</tr>
<tr>
<td>SB9</td>
<td>2.82</td>
<td>2.82</td>
<td>2.82</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td></td>
</tr>
<tr>
<td>SB10</td>
<td>3.58</td>
<td>3.58</td>
<td>3.58</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td></td>
</tr>
<tr>
<td>SB11</td>
<td>5.56</td>
<td>5.56</td>
<td>5.56</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td></td>
</tr>
<tr>
<td>SB12</td>
<td>4.55</td>
<td>4.55</td>
<td>4.55</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td></td>
</tr>
<tr>
<td>SB13</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td></td>
</tr>
<tr>
<td>Building 2</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td></td>
</tr>
</tbody>
</table>
This modification to an existing minor PSD stationary source is not major because the emissions increase of each PSD regulated pollutant is limited to less than the PSD major source threshold. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

PTE of the Entire Source After Issuance of the Part 70 Modification

The table below summarizes the after issuance source-wide potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of the Part 70 source and/or permit modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.
### Source-Wide Emissions After Issuance (ton/year)

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>PM¹</th>
<th>PM₁₀¹</th>
<th>PM₂.₅¹, ₂</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Worst Single HAP³ (Xylene)</th>
</tr>
</thead>
<tbody>
<tr>
<td>UV Roll Coater</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SB4</td>
<td>2.63</td>
<td>2.63</td>
<td>2.63</td>
<td>0.00</td>
<td>0.00</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SB5</td>
<td>2.63</td>
<td>2.63</td>
<td>2.63</td>
<td>0.00</td>
<td>0.00</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>UV Oven/OV2 and AM5, NG Combustion</td>
<td>0.01</td>
<td>0.04</td>
<td>0.04</td>
<td>0.003</td>
<td>0.51</td>
<td>0.03</td>
<td>0.43</td>
<td>0.01</td>
<td>0.01</td>
</tr>
</tbody>
</table>

#### Building 1

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>PM¹</th>
<th>PM₁₀¹</th>
<th>PM₂.₅¹, ₂</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Worst Single HAP³ (Xylene)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Woodworking</td>
<td>1.95</td>
<td>1.95</td>
<td>1.95</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Natural Gas Combustion</td>
<td>0.10</td>
<td>0.38</td>
<td>0.38</td>
<td>0.03</td>
<td>5.06</td>
<td>0.28</td>
<td>4.25</td>
<td>-</td>
<td></td>
</tr>
</tbody>
</table>

#### Total for Source

<table>
<thead>
<tr>
<th>PM¹</th>
<th>PM₁₀¹</th>
<th>PM₂.₅¹, ₂</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Worst Single HAP³ (Xylene)</th>
</tr>
</thead>
<tbody>
<tr>
<td>74.59</td>
<td>74.9</td>
<td>74.9</td>
<td>0.003</td>
<td>5.57</td>
<td>5.57</td>
<td>4.25</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| Title V Major Source Thresholds | NA | 100 | 100 | 100 | 100 | 100 | 25 | 10 |

| PSD Major Source Thresholds | 250 | 250 | 250 | 250 | 250 | 250 | -  | -  |

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM₂.₅, not particulate matter (PM), are each considered as a "regulated air pollutant."

²PM₂.₅ listed is direct PM₂.₅.

³Single highest source-wide HAP

*Fugitive HAP emissions are always included in the source-wide emissions.

The table below summarizes the potential to emit of the entire source after issuance of this modification, reflecting all limits, of the emission units. (Note: the table below was generated from the above table, with bold text un-bolded and strikethrough text deleted).
<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>PM$^1$</th>
<th>PM$_{10}^1$</th>
<th>PM$_{2.5}^1,2$</th>
<th>SO$_2$</th>
<th>NO$_X$</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Worst Single HAP$^3$ (Xylene)</th>
</tr>
</thead>
<tbody>
<tr>
<td>SB14</td>
<td>2.63</td>
<td>2.63</td>
<td>2.63</td>
<td>0.00</td>
<td>0.00</td>
<td></td>
<td></td>
<td>0.00</td>
<td></td>
</tr>
<tr>
<td>UV Line1 - UV Finish</td>
<td>19.66</td>
<td>19.66</td>
<td>19.66</td>
<td>0.00</td>
<td>0.00</td>
<td></td>
<td></td>
<td>0.00</td>
<td></td>
</tr>
<tr>
<td>Lacquer Thinner</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td></td>
<td></td>
<td>0.00</td>
<td></td>
</tr>
<tr>
<td>UV Roll Coater</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td></td>
<td></td>
<td>0.00</td>
<td></td>
</tr>
<tr>
<td>SB4</td>
<td>2.63</td>
<td>2.63</td>
<td>2.63</td>
<td>0.00</td>
<td>0.00</td>
<td></td>
<td></td>
<td>0.00</td>
<td></td>
</tr>
<tr>
<td>SB5</td>
<td>2.63</td>
<td>2.63</td>
<td>2.63</td>
<td>0.00</td>
<td>0.00</td>
<td></td>
<td></td>
<td>0.00</td>
<td></td>
</tr>
<tr>
<td>UV Oven/OV2 and AM5, NG</td>
<td>0.01</td>
<td>0.04</td>
<td>0.04</td>
<td>0.003</td>
<td>0.51</td>
<td>0.03</td>
<td>0.43</td>
<td>0.01</td>
<td>0.01</td>
</tr>
</tbody>
</table>

**Building 1**

<table>
<thead>
<tr>
<th></th>
<th>PM$^1$</th>
<th>PM$_{10}^1$</th>
<th>PM$_{2.5}^1,2$</th>
<th>SO$_2$</th>
<th>NO$_X$</th>
<th>VOC</th>
<th>CO</th>
<th>Total PTE of Entire Source</th>
<th>Title V Major Source Thresholds</th>
<th>PSD Major Source Thresholds</th>
</tr>
</thead>
<tbody>
<tr>
<td>Woodworking</td>
<td>1.95</td>
<td>1.95</td>
<td>1.95</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>74.59</td>
<td>NA</td>
<td>250</td>
</tr>
<tr>
<td>Natural Gas Combustion</td>
<td>0.10</td>
<td>0.38</td>
<td>0.38</td>
<td>0.03</td>
<td>5.06</td>
<td>0.28</td>
<td>4.25</td>
<td>74.9</td>
<td>100</td>
<td>250</td>
</tr>
</tbody>
</table>

|                     | 0.08   | 0.35        | 0.35          | 0.03   | 5.07  | 0.28| 4.26| 74.9                      | 100                          | 250                         |

**Federal Rule Applicability Determination**

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

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

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

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

(b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for National Emission Standards for Wood Furniture Manufacturing Operations, 40 CFR 63, Subpart JJ are not included in the permit for Building 1 surface coating booths, identified as SB1 through SB3, SB6 through SB13, and Building 2 Surface coating booths, identified as SB4, SB5, SB14,
UVLine1-UV Finish, UV Roll Coater and the Lacquer Thinner Cleaner. The source is an area source and 40 CFR 63, Subpart JJ only applies to major sources.

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, Subpart HHHHHH are not included in the permit for Building 1 surface coating booths, identified as SB1 through SB3, SB6 through SB13, and Building 2 Surface coating booths, identified as SB4, SB5, SB14, UVLine1-UV Finish, UV Roll Coater and the Lacquer Thinner Cleaner. The source does not use methylene chloride for paint stripping nor does the source coat metal or plastic.

(d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this modification.

Compliance Assurance Monitoring (CAM):

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

1. has a potential to emit before controls equal to or greater than the major source threshold for the regulated pollutant involved;

2. is subject to an emission limitation or standard for that pollutant (or a surrogate thereof); and

3. uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

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

Based on this evaluation, the requirements of 40 CFR Part 64, CAM, are not applicable to any of the new units as part of this modification. Emissions calculated for individual units are less than major source thresholds.

State Rule Applicability - Entire Source

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

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

PSD Minor Source Limits
The VOC emissions from the new Building 2 surface coating booths (SB4, SB5, SB14, UV Line1 - UV Finish, UV Roll Coater and Lacquer Thinner) will be lumped into the current source-wide VOC limit of 249 tons per twelve consecutive month period. The following is the VOC limitation:

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

The total VOC input to Building 1 surface coating booths, identified as SB1 through SB3, SB6 through SB13 and Building 2 Surface coating booths, identified as SB4, SB5, SB14, UVLine1-UV Finish, UV Roll Coater and the Lacquer Thinner Cleaner, shall not exceed 249 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
Compliance with this limit, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 250 tons per year, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

Hazardous Air Pollutants (HAPs) Minor Limits

The source has the uncontrolled potential to emit greater than ten (10) tons per year for a single HAP. The Permittee shall comply with the following:

(a) The total input of any single HAP to Building 1 surface coating booths, identified as SB1 through SB3, SB6 through SB13, and Building 2 Surface coating booths, identified as SB4, SB5, SB14, UVLIne1-UV Finish, UV Roll Coater and the Lacquer Thinner Cleaner shall not exceed 9.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The total input of all HAPs to Building 1 surface coating booths, identified as SB1 through SB3, SB6 through SB13, and Building 2 Surface coating booths, identified as SB4, SB5, SB14, UVLIne1-UV Finish, UV Roll Coater and the Lacquer Thinner Cleaner shall not exceed 24.50 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit HAPs emissions from all other emission units at this source, shall limit the source-wide total potential to emit of any single HAP to less than 10 tons per year and make the source an area source of HAPs.

326 IAC 2-7-6(5) (Annual Compliance Certification)

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

State Rule Applicability – Individual Facilities

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

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The provisions of 326 IAC 2-4.1 apply to any owner or operator who constructs or reconstructs a major source of hazardous air pollutants (HAP), as defined in 40 CFR 63.41, after July 27, 1997, unless the major source has been specifically regulated under or exempted from regulation under a NESHAP that was issued pursuant to Section 112(d), 112(h), or 112(j) of the Clean Air Act (CAA) and incorporated under 40 CFR 63. On and after June 29, 1998, 326 IAC 2-4.1 is intended to implement the requirements of Section 112(g)(2)(B) of the Clean Air Act (CAA).

Since the Hazardous Air Pollutants (HAPs) emissions from the surface coating booths in the proposed Building 2, identified as SB4, SB5, SB14, UVLIne1-UV Finish, UV Roll Coater and the Lacquer Thinner Cleaner, will be lumped into the source-wide current HAPs limits of less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year for combined HAPs, these coating booths are therefore, not subject to 326 IAC 2-4.1.

326 IAC 6-3-2(d) (Particulate Emission Limitations, Work Practices, and Control Technologies)

Pursuant to 326 IAC 6-3-2(d), the particulate matter (PM) from the proposed Building 2, identified as SB4, SB5, SB14, and UVLIne1-UV Finish shall be controlled by dry filter and the Permittee shall operate the filters in accordance with manufacturer’s specifications.
Pursuant to 326 IAC 6-3-1(a)(6), the proposed UV Roll Coater in Building 2 is not subject to the requirements of 326 IAC 6-3 because surface coating using roll coating is specifically exempt from this rule.

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)
Pursuant to 326 IAC 8-2-1(4), facilities construction of which commences after July 1, 1990, that have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls are subject to 326 IAC 8-2-12, Wood Furniture and Cabinet Coating.

(a) The proposed modification made to surface coating booths in Building 1, identified as SB1 through SB3 and S6 through SB13 will not affect the applicability of 326 IAC 8-2-12 already made for these units.

(b) The proposed Building 2 surface coating booth, identified as UVLine 1 - UV Finish is not subject to 328 IAC 8-2-12 because it does not emit any VOC.

(c) The proposed Building 2 surface coating booths, identified as SB4, SB5, SB14, UVLine1-UV Finish and Roll Coater are subject to 326 IAC 8-2-12, since each of these facilities has actual emissions greater than fifteen (15) pounds of VOC per day before add-on controls, and commencement of construction after July 1, 2019.

326 IAC 7-1.1 Sulfur Dioxide Emission Limitations
The new NG combustion units installed at building 2 are not subject to 326 IAC 326 IAC 7-1.1 because they have potential to emit sulfur dioxide (SO2) of less than 25 tons per year or 10 pounds per hour.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
(a) The modified Building 1 surface coating booths, identified as SB1 – SB3, SB6 - SB13 will continue to be not subject to the requirements of 326 IAC 8-1-6 because they are subject to the requirements of 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating).

(b) The proposed Building 2 surface coating booths, identified as SB4, SB5, SB14, UVLine1-UV Finish Finish and Roll Coater are not subject to the requirements of 326 IAC 8-1-6 because they are subject to the requirements of 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating).

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

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

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Frequency</th>
<th>Parameters</th>
</tr>
</thead>
<tbody>
<tr>
<td>Surface Coating Booths Building 1, identified as SB1 through SB3 and S6 through SB13; Building 2 surface coating booths, identified as SB4, SB5, SB14, UVLine1-UV Finish and UV Roll Coater</td>
<td>Daily</td>
<td>Inspections shall be performed to verify the placement, integrity and particle loading of the filters.</td>
</tr>
<tr>
<td></td>
<td>Weekly</td>
<td>Observations shall be made of the overspray from the surface coating process stacks while one or more of the surface coating processes are in operation.</td>
</tr>
<tr>
<td></td>
<td>Monthly</td>
<td>Inspections shall be performed of the coating emissions from each and the presence of overspray on the rooftops and the nearby ground.</td>
</tr>
</tbody>
</table>

These monitoring conditions are necessary because the dry filters for these Surface Coating Booths must operate properly to assure compliance with 326 IAC 6-3-2(d) (Particulate Emission Limitations for Work Practices and Control Technologies).

(b) Testing is not required for the surface coating booths because they don't have any emission limits that would require testing.

## Proposed Changes

As part of this permit approval, the permit may contain new or different permit conditions and some conditions from previously issued permits/approvals may have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes.

The following changes listed below are due to the proposed modification. Deleted language appears as *strikethrough* text and new language appears as **bold** text (these changes may include Title I changes):

1. The existing woodworking operation was inadvertently subject to 326 IAC 6-3-2 in past permit. Although it is not being modified, Condition D.2.1 pertaining to the requirements of 326 IAC 6-3-2 has been deleted in this permitting action SSM 099-41230-00115 since its PM emissions of 0.45 pound per hour after the integral control is less than 0.551 pound per hour.

2. To incorporate the modification, the permit is changed as follows:

**Part 70 Operating Permit**

**OFFICE OF AIR QUALITY**

Hardwood Interior Design, LLC

**Building 1:** 1342 W Plymouth St. Bremen, Indiana 46506

**Building 2:** 1730 Bike Street, Bremen, Indiana 46506
A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary miscellaneous woodworking operation: cabinets and household furniture manufacturing operation.

Source Address: Building 1: 1342 W. Plymouth Street, Bremen, Indiana 46506
Building 2: 1730 Bike Street, Bremen, Indiana 46506

General Source Phone Number: 574-529-0121
SIC Code: 2511 (Wood Household Furniture, Except Upholstered)
County Location: Marshall
Source Location Status: Attainment for all criteria pollutants
Source Status: Part 70 Operating Permit Program
Minor Source, under PSD
Minor Source, Section 112 of the Clean Air Act
Not 1 of 28 Source Categories

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

Hardwood Interior Design, LLC has two plants in Bremen, Indiana:

(a) Building 1: Hardwood Interior Design, LLC, located at 1324 W Plymouth Street, Bremen, Indiana 46506, Source ID: 099-00115. The plant includes woodworking and surface coating operations.

(b) Building 2: Hardwood Interior Design, LLC, 1730 Bike Street, Bremen, Indiana 46506 (no source ID assigned). The plant includes wood surface coating operations.

IDEM, OAQ finds that Building 1 and Building 2 meet all three parts of the major source definition and, therefore, the two plants are part of the same major source.

This determination was made in this permitting action, Significant Source Modification No. 099-41230-00115 and Significant Permit Modification No. 099-41260-00115.

A.23 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

Building 1

(a) Thirteen (13) surface coating booths, using HVLP applicators, controlled by dry filters as follows:

(1) Five (5) surface coating booths, identified as SB1 through SB5, constructed in 2014, with a maximum capacity of 3.0 units per hour, and exhausting as follows:
   (A) SB1 exhausting to stack SBSV1;
   (B) SB2 exhausting to stack SBSV2;
   (C) SB3 exhausting to stacks SBSV3 and SBSV3B;
   (D) SB4 exhausting to stack SBSV4; and
   (E) SB5 exhausting to stack SBSV5.

(2) One (1) surface coating booth, identified as SB6, constructed in 2015, with a maximum capacity of 0.25 units per hour, and exhausting to stacks SBSV6 and SBSV6B.

(3) One (1) surface coating booth, identified as SB7, constructed in 2015, with a maximum capacity of 0.25 units per hour, and exhausting to stack SBSV7.

(4) One (1) surface coating booth, identified as SB8, constructed in 2015, with a maximum capacity of 0.25 units per hour, and exhausting to stacks SBSV8.
(5) One (1) surface coating booth, identified as SB9, constructed in 2015, with a maximum capacity of 0.25 units per hour, and exhausting to stack SBSV9.

(6) One (1) surface coating booth, identified as SB10, constructed in 2016 for construction, with a maximum capacity of 0.5 units per hour, and exhausting to stack SBSV10.

(7) One (1) surface coating booth, identified as SB11, constructed in 2016, with a maximum capacity of 0.5 units per hour, and exhausting to stack SBSV11.

(8) One (1) surface coating booth, identified as SB12, constructed in 2016, with a maximum capacity of 0.5 units per hour, and exhausting to stack SBSV12.

(9) One (1) surface coating booth, identified as SB13, constructed in 2016 for construction, with a maximum capacity of 0.5 units per hour, and exhausting to stack SBSV13.

(a) One (1) surface coating booth, identified as SB1, constructed in 2016, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV1.

(b) One (1) surface coating booth, identified as SB2, constructed in 2016, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV2.

(c) One (1) surface coating booth, identified as SB3, constructed in 2014, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV3 and SBSV3B.

(d) One (1) surface coating booth, identified as SB6, constructed in 2015, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV6.

(e) One (1) surface coating booth, identified as SB7, constructed in 2015, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV7.

(f) One (1) surface coating booth, identified as SB8, constructed in 2016, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV8.

(g) One (1) surface coating booth, identified as SB9, constructed in 2019, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV9.

(h) One (1) surface coating booth, identified as SB10, constructed in 2014, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV10.

(i) One (1) surface coating booth, identified as SB11, constructed in 2014, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV11.

(j) One (1) surface coating booth, identified as SB12, constructed in 2016, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV12.

(k) One (1) surface coating booth, identified as SB13, constructed in 2016, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV13.
Building 2

(l) One (1) Surface Coating Booth, identified as SB4, constructed in 2014, approved in 2019 for modification (relocate to building 2), with a maximum capacity of 4.0 units per hour, using dry filters as control, and exhausting through SBSV4;

(m) One (1) Surface Coating Booth, identified as SB5, constructed in 2014, approved in 2019 for modification (relocate to building 2), with a maximum capacity of 4.0 units per hour, using dry filters as control, and exhausting through SBSV5.

(n) One (1) Surface Coating Booth, identified as SB14, approved in 2019 for construction, with a maximum capacity of 4.0 units per hour, using dry filters as control, and exhausting through SBSV14.

(o) One (1) UV Spray Line, identified as UV Line 1, approved in 2019 for construction, with a maximum capacity of 6.0 units per hour, using dry filters as control, and exhausting through UVLSV1.

(p) One (1) Lacquer thinner Cleaner, approved in 2019 for construction, with a maximum capacity of 4.0 units per hour.

(q) One (1) UV Roll Coater, identified as UVRC1, approved in 2019 for construction, with a maximum capacity of 15.0 units per hour, uncontrolled, and exhausting through stacks RCS1-RCS5.

(r) One ultraviolet oven, identified as UVOven/OV2, with a maximum heat input capacity of 0.44 MMBtu/hour.

(s) One Air-Make-up unit, identified as AM5, with a maximum heat input capacity of 0.75 MMBtu/hour.

A.34 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

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

(a) One (1) woodworking operation, constructed in 2014, with a maximum capacity of 1100 pounds per hour, using a baghouse, identified as BH1, with an airflow of 40,000 cfm, as PM control, exhausting to stack BH1.

A.45 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

This stationary source also includes the following insignificant activities which are not specifically regulated, as defined in 326 IAC 2-7-1(21):

Building 1:

(a) Direct fired natural gas combustion units as follows:

(1) Process oven, identified as OV1, constructed in 2016, with a maximum heat input capacity of 0.5 MMBtu/hr, and exhausting to stacks OSV1-OSV3.

(2) Comfort heating units as follows:

(A) One (1) air make-up unit, identified as AM1, with a maximum heat input capacity of 0.3 MMBtu per hour.
(B) One (1) air make-up unit, identified as AM2, constructed in 2015, with a maximum heat input capacity of 4.0 MMBtu per hour.

(C) One (1) air make-up unit, identified as AM3, constructed in 2015, with a maximum heat input capacity of 3.0 MMBtu per hour.

(D) One (1) natural gas-fired air make-up unit, identified as AM4, constructed in 2016, with a maximum heat input capacity of 4.5 MMBtu/hr, and exhausting to stack AMSV4.

Building 2:

(3) One ultraviolet oven, identified as UVOven/OV2, with a maximum heat input capacity of 0.44 MMBtu/hour.

(4) One Air-Make-up unit, identified as AM5, with a maximum heat input capacity of 0.75 MMBtu/hour.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

<table>
<thead>
<tr>
<th>Building 1</th>
</tr>
</thead>
<tbody>
<tr>
<td>(a) Thirteen (13) surface coating booths, using HVLP applicators, controlled by dry filters as follows:</td>
</tr>
<tr>
<td>(1) Five (5) surface coating booths, identified as SB1 through SB5, constructed in 2014, with a maximum capacity of 3.0 units per hour, and exhausting as follows:</td>
</tr>
<tr>
<td>(A) SB1 exhausting to stack SBSV1;</td>
</tr>
<tr>
<td>(B) SB2 exhausting to stack SBSV2;</td>
</tr>
<tr>
<td>(C) SB3 exhausting to stacks SBSV3 and SBSV3B;</td>
</tr>
<tr>
<td>(D) SB4 exhausting to stack SBSV4; and</td>
</tr>
<tr>
<td>(E) SB5 exhausting to stack SBSV5.</td>
</tr>
<tr>
<td>(2) One (1) surface coating booth, identified as SB6, constructed in 2015, with a maximum capacity of 0.25 units per hour, and exhausting to stacks SBSV6 and SBSV6B.</td>
</tr>
<tr>
<td>(3) One (1) surface coating booth, identified as SB7, constructed in 2015, with a maximum capacity of 0.25 units per hour, and exhausting to stack SBSV7.</td>
</tr>
<tr>
<td>(4) One (1) surface coating booth, identified as SB8, constructed in 2015, with a maximum capacity of 0.25 units per hour, and exhausting to stack SBSV8.</td>
</tr>
<tr>
<td>(5) One (1) surface coating booth, identified as SB9, constructed in 2015, with a maximum capacity of 0.25 units per hour, and exhausting to stack SBSV9.</td>
</tr>
<tr>
<td>(6) One (1) surface coating booth, identified as SB10, constructed in 2016 for construction, with a maximum capacity of 0.5 units per hour, and exhausting to stack SBSV10.</td>
</tr>
<tr>
<td>(7) One (1) surface coating booth, identified as SB11, constructed in 2016, with a maximum capacity of 0.5 units per hour, and exhausting to stack SBSV11.</td>
</tr>
<tr>
<td>(8) One (1) surface coating booth, identified as SB12, constructed in 2016, with a maximum capacity of 0.5 units per hour, and exhausting to stack SBSV12.</td>
</tr>
<tr>
<td>(9) One (1) surface coating booth, identified as SB13, constructed in 2016 for construction, with a maximum capacity of 0.5 units per hour, and exhausting to stack SBSV13.</td>
</tr>
<tr>
<td>(a) One (1) surface coating booth, identified as SB1, constructed in 2016, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV1.</td>
</tr>
</tbody>
</table>
(b) One (1) surface coating booth, identified as SB2, constructed in 2016, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV2.

(c) One (1) surface coating booth, identified as SB3, constructed in 2014, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV3 and SBSV3B.

(d) One (1) surface coating booth, identified as SB6, constructed in 2015, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV6.

(e) One (1) surface coating booth, identified as SB7, constructed in 2015, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV7.

(f) One (1) surface coating booth, identified as SB8, constructed in 2016, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV8.

(g) One (1) surface coating booth, identified as SB9, constructed in 2019, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV9.

(h) One (1) surface coating booth, identified as SB10, constructed in 2014, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV10.

(i) One (1) surface coating booth, identified as SB11, constructed in 2014, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV11.

(j) One (1) surface coating booth, identified as SB12, constructed in 2016, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV12.

(k) One (1) surface coating booth, identified as SB13, constructed in 2016, approved in 2019 for modification, with a maximum capacity of 3.0 units per hour, and exhausting to stack SBSV13.

Building 2

(l) One (1) Surface Coating Booth, identified as SB4, constructed in 2014, approved in 2019 for modification (relocate to building 2), with a maximum capacity of 4.0 units per hour, using dry filters as control, and exhausting through SBSV4;

(m) One (1) Surface Coating Booth, identified as SB5, constructed in 2014, approved in 2019 for modification (relocate to building 2), with a maximum capacity of 4.0 units per hour, using dry filters as control, and exhausting through SBSV5.

(n) One (1) Surface Coating Booth, identified as SB14, approved in 2019 for construction, with a maximum capacity of 4.0 units per hour, using dry filters as control, and exhausting through SBSV14.
**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

**D.1.1 Hazardous Air Pollutant (HAP) Limitation [326 IAC 2-4.1] [326 IAC 20-14.1]**

In order to render the requirements of **326 IAC 2-4.1** and **326 IAC 20-14-1** (Wood Furniture Manufacturing Operations) not applicable, the Permittee shall comply with the following:

The total input of any single HAP to the thirteen (13) surface coating booths, SB1 through SB13, shall not exceed nine and nine-tenths (9.9) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(a) The total input of any single HAP to Building 1 surface coating booths, identified as SB1 through SB3, SB6 through SB13, and Building 2 Surface coating booths, identified as SB4, SB5, SB14, UVLine1-UV Finish, UV Roll Coater and the Lacquer Thinner Cleaner shall not exceed 9.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The total input of all HAPs to Building 1 surface coating booths, identified as SB1 through SB3, SB6 through SB13, and Building 2 Surface coating booths, identified as SB4, SB5, SB14, UVLine1-UV Finish, UV Roll Coater and the Lacquer Thinner Cleaner shall not exceed 24.50 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with this limit, combined with the potential to emit single HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of each single HAP to less than ten (10) tons per year and shall render **326 IAC 2-4.1** and **326 IAC 20-14-1** not applicable to the source and make the source an area source of HAPs.

**D.1.2 Prevention of Significant Deterioration (PSD) Minor Limits 326 IAC 2-2 (PSD)**

In order to render the requirements of **326 IAC 2-2** (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

The total VOC input to Building 1 surface coating booths, identified as SB1 through SB3, SB6 through SB13 and Building 2 Surface coating booths, identified as SB4, SB5, SB14, UVLine1-UV Finish, UV Roll Coater and the Lacquer Thinner Cleaner, shall not exceed 249 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
Compliance with this limit, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 250 tons per year, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to the 2019 modification.

D.1.23 Volatile Organic Compounds (VOC) Wood Furniture and Cabinet Coating [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12, the surface coating materials applied to the wood furniture, cabinets and wood furniture components in Building 1 surface coating booths, identified as SB1 through SB3, SB6 through SB13 and Building 2 surface coating booths, identified as SB4, SB5, SB14, UVLine1-UV Finish and Roll Coater shall all be applied, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) or more of the following application methods:

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

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.1.34 Particulate Emission Limitation, Work Practices, and Control Technologies [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate emissions from the surface coating booths, SB1 through SB13 Building 1 surface coating booths, identified as SB1 through SB3, SB6 through SB13 and Building 2 Surface coating booths, identified as SB4, SB5, SB14, and UVLine1-UV Finish shall be controlled by dry particulate filters and the Permittee shall operate the control device in accordance with manufacturer's specifications.

**********************

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

D.1.56 Particulate Control

In order to comply with Condition D.1.3, the dry filters for particulate control from the spray booths, identified as SB1 through SB13 Building 1 surface coating booths, identified as SB1 through SB3, SB6 through SB13 and Building 2 Surface coating booths, identified as SB4, SB5, SB14, and UVLine1-UV Finish shall be in operation at all times when the associated spray booths are in operation.

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

D.1.78 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks SBSV1, SBSV2, SBSV3, SBSV3B, SBSV4, SBSV5, SBSV6, SBSV6B, SBSV7, SBSV8, SBSV9, SBSV10, SBSV11, SBSV12, and SBSV13, SBSV14, and UVLSV1 while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

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

D.1.89 Record Keeping Requirements

(a) To document the compliance status with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) through (2) below for spray booths SB1 through SB13:

Building 1 surface coating booths, identified as SB1 through SB3, SB6 through SB13 and Building 2 Surface coating booths, identified as SB4, SB5, SB14, UVLine1-UV Finish, UV Roll Coater and the Lacquer Thinner Cleaner. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the single HAP emission limit established in Conditions D.1.1.

(1) The usage by weight of each coating used, including cleaning solvent and the percent by weight of each single HAP used in SB1 through SB13:

Building 1 surface coating booths, identified as SB1 through SB3, SB6 through SB13 and Building 2 Surface coating booths, identified as SB4, SB5, SB14, UVLine1-UV Finish, UV Roll Coater and the Lacquer Thinner Cleaner. Records shall include purchase orders, invoices, and material safety data sheets (MSDS), manufacturer's certified product data sheets, and calculations necessary to verify the type, amount used, and the single HAP content of each coating.

(2) The total monthly single HAP usage at the spray booths SB1 through SB13:

Building 1 surface coating booths, identified as SB1 through SB3, SB6 through SB13 and Building 2 Surface coating booths, identified as SB4, SB5, SB14, UVLine1-UV Finish UV Roll Coater and the Lacquer Thinner Cleaner.

(b) To document the compliance status with Condition D.1.7 - Monitoring, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspection.

***************************
D.1.9 Reporting Requirements

A quarterly report of the information to document the compliance status with Condition D.1.1 and Condition D.1.2 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days following the end of each calendar quarter. Section C - General Reporting Requirements contains the Permittee's obligations with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(35).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities:

(a) One (1) woodworking operation, constructed in 2014, with a maximum capacity of 1100 pounds per hour, using a baghouse, identified as BH1, with an airflow of 40,000 cfm, as PM control, exhausting to stack BH1.

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

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

D.2.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate matter (PM) from the woodworking operation shall not exceed 2.75 pounds per hour when operating at a process weight rate of 0.55 tons per hour. The pound per hour limitation was calculated with the following equation:

Interpolation 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:

\[ E = \text{rate of emission in pounds per hour} \]

\[ P = \text{process weight rate in tons per hour} \]

D.2.1 Particulate Control [326 IAC 2-2]

In order to assure that the requirements of 326 IAC 2-2 (PSD) do not apply, the integral baghouse, identified as BH1 shall be in operation and at all times control emissions from the woodworking operation.

Compliance with this condition, combined with the potential PM, PM10 and PM2.5 emissions from all the other emission units at the source, shall assure PM, PM10 and PM2.5 emissions from the entire source are less than 250 tons per year and shall render the requirements of 326 IAC 2-2 (PSD) not applicable.

*********************************

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

D.2.3 Particulate Control

In order to comply with Condition D.2.1 and Condition D.2.2, the baghouse shall be in operation and control emissions from the woodworking operations at all times that the woodworking operations are in operation.
D.2.7 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.5 - Visible Emissions Notations, the Permittee shall maintain records of daily visible emission notations of the baghouse stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
NDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

Part 70 Quarterly Report

Source Name: Hardwood Interior Design, LLC
Source Address: 1342 W. Plymouth Street, Bremen, Indiana 46506
Part 70 Permit No.: T099-39339-00115
Facility: Surface Coating Booths SB1 – SB13

Building 1 surface coating booths, identified as SB1 through SB3, SB6 through SB13, and Building 2 Surface coating booths, identified as SB4, SB5, SB14, UVLine1-UV Finish, UV Roll Coater and the Lacquer Thinner Cleaner

Parameter: The total input of any single HAP

Limit: The total input of any single HAP to the thirteen (13) surface coating booths, identified as SB1 through SB13, shall not exceed nine and nine-tenths (9.9) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: ________________ YEAR: ________________

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<th>Column 2</th>
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<td>Previous 11 Months</td>
<td>12 Month Total</td>
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☐ No deviation occurred in this quarter.

☐ 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 QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  

Part 70 Quarterly Report

Source Name: Hardwood Interior Design, LLC  
Source Address: 1342 W. Plymouth Street, Bremen, Indiana 46506  
Part 70 Permit No.: T099-39339-00115  
Facility: Building 1 surface coating booths, identified as SB1 through SB3, SB6 through SB13, and Building 2 Surface coating booths, identified as SB4, SB5, SB14, UVLine1-UV Finish, UV Roll Coater and the Lacquer Thinner Cleaner  
Parameter: The total input of all HAPs  
Limit: shall not exceed 24.50 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

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- □ No deviation occurred in this quarter.
- □ 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 QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

Part 70 Quarterly Report

Source Name: Hardwood Interior Design, LLC
Source Address: 1342 W. Plymouth Street, Bremen, Indiana 46506
Part 70 Permit No.: T099-39339-00115
Facility: Building 1 surface coating booths, identified as SB1 through SB3, SB6 through SB13, and Building 2 Surface coating booths, identified as SB4, SB5, SB14, UVLine1-UV Finish, UV Roll Coater and the Lacquer Thinner Cleaner
Parameter: The total VOC input
Limit: shall not exceed 249 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

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</table>

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.

Deviation has been reported on:

Submitted by: ________________________________
Title / Position: ________________________________
Signature: ________________________________
Date: ________________________________
Phone: ________________________________
Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on March 21, 2019.

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 099-41230-00115. The operation of this proposed modification shall be subject to the conditions of the attached proposed Significant Permit Modification No.099-41260-00115.

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

IDEM Contact

(a) If you have any questions regarding this permit, please contact Aida DeGuzman, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 233-4972 or (800) 451-6027, and ask for Aida DeGuzman or (317) 233-4972.

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

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens’ Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.
### Appendix A: Emissions Calculations
#### Potential to Emit Summary

**Company Name:** Hardwood Interior Design, LLC  
**Address:** 1342 W. Plymouth Street AND 1730 W. Bike Street, Bremen, IN 46506  
**SSM No.:** 009-41230-00115  
**SPM No.:** 009-41260-00115  
**Reviewer:** Aida DeGuzman

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<th>PM$_{2.5}$</th>
<th>SO$_2$</th>
<th>NO$_x$</th>
<th>VOC</th>
<th>CO</th>
<th>Combined HAPs</th>
<th>Worst Single HAP (Xylene)</th>
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<td>0.03</td>
<td>5.06</td>
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<td>0.04</td>
<td>0.00</td>
<td>0.51</td>
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<td>0.43</td>
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<th>PM$_{2.5}$</th>
<th>SO$_2$</th>
<th>NO$_x$</th>
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<th>CO</th>
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<th>Worst Single HAP (Xylene)</th>
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<td>44.98</td>
<td>44.98</td>
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<td>9.9</td>
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<td>Surface Coating Booths (SB4, 5 &amp; 14, UVLINE1, UV Roll Coater)</td>
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<td>27.55</td>
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### 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)  

**PTE VOC (pounds/day) = Pounds of VOC/Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) / (24 hr/day)**  
**PTE VOC (tons/year) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)**  
**PTE PM/PM10 (tons/year) = Max. (units/hr) * Gal of Mat (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer efficiency) *8760 hours/year *1ton/2000 lbs**  
**PTE PM/PM10 (lbs/hour) = Max (units/hr) * Gal of Mat (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer efficiency)**

Coatings are mutually exclusive
### 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)
PTE VOC (pounds/day) = Pounds of VOC/Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

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

PTE VOC (tons/year) = Pounds of VOC per Gallon coating (tons/yr) * (1 ton/2000 lbs)

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

Coatings are mutually exclusive

---

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (lb/gal)</th>
<th>Weight % Volatile (H2O &amp; Organics)</th>
<th>Weight % Water</th>
<th>Weight % Organics</th>
<th>Volume % Non-Volatiles</th>
<th>Weight % Mat</th>
<th>Max. (unit/hr)</th>
<th>Pounds VOC per gallon of coating less water (lbs/hr)</th>
<th>Pounds VOC per gallon of coating less water (lbs/day)</th>
<th>Pounds VOC per gallon of coating less water (tons/yr)</th>
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**SB1 - SB3 Potential to Emit (Add Worst Case Coating to All Solvents Used)**

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<th>Material</th>
<th>Density (lb/gal)</th>
<th>Weight % Volatile (H2O &amp; Organics)</th>
<th>Weight % Water</th>
<th>Weight % Organics</th>
<th>Volume % Non-Volatiles</th>
<th>Weight % Mat</th>
<th>Max. (unit/hr)</th>
<th>Pounds VOC per gallon of coating less water (lbs/hr)</th>
<th>Pounds VOC per gallon of coating less water (lbs/day)</th>
<th>Pounds VOC per gallon of coating less water (tons/yr)</th>
<th>Transfer Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>SB6 Stain 19-007</td>
<td>7.48</td>
<td>77.00%</td>
<td>0.00%</td>
<td>77.00%</td>
<td>0.00%</td>
<td>23.00%</td>
<td>3.000</td>
<td>5.74</td>
<td>5.74</td>
<td>8.62</td>
<td>206.79</td>
</tr>
<tr>
<td>SB6 Seal 9926</td>
<td>8.07</td>
<td>73.00%</td>
<td>17.00%</td>
<td>56.00%</td>
<td>20.60%</td>
<td>27.00%</td>
<td>3.000</td>
<td>5.69</td>
<td>4.52</td>
<td>6.78</td>
<td>162.69</td>
</tr>
<tr>
<td>SB6 Glaze</td>
<td>7.91</td>
<td>57.20%</td>
<td>0.00%</td>
<td>57.20%</td>
<td>0.00%</td>
<td>31.60%</td>
<td>3.000</td>
<td>4.32</td>
<td>4.32</td>
<td>6.79</td>
<td>162.86</td>
</tr>
<tr>
<td>SB6 Topcoat 9950</td>
<td>8.56</td>
<td>68.00%</td>
<td>4.00%</td>
<td>64.00%</td>
<td>5.90%</td>
<td>32.00%</td>
<td>3.000</td>
<td>5.89</td>
<td>5.54</td>
<td>8.31</td>
<td>199.53</td>
</tr>
</tbody>
</table>

**SB6 Potential to Emit (Worst Case Coating Used)**

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (lb/gal)</th>
<th>Weight % Volatile (H2O &amp; Organics)</th>
<th>Weight % Water</th>
<th>Weight % Organics</th>
<th>Volume % Non-Volatiles</th>
<th>Weight % Mat</th>
<th>Max. (unit/hr)</th>
<th>Pounds VOC per gallon of coating less water (lbs/hr)</th>
<th>Pounds VOC per gallon of coating less water (lbs/day)</th>
<th>Pounds VOC per gallon of coating less water (tons/yr)</th>
<th>Transfer Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>SB8 Seal 9926</td>
<td>8.07</td>
<td>73.00%</td>
<td>17.00%</td>
<td>56.00%</td>
<td>20.60%</td>
<td>27.00%</td>
<td>3.000</td>
<td>5.69</td>
<td>4.52</td>
<td>6.78</td>
<td>162.69</td>
</tr>
</tbody>
</table>

**SB8 Potential to Emit (Worst Case Coating Used)**

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (lb/gal)</th>
<th>Weight % Volatile (H2O &amp; Organics)</th>
<th>Weight % Water</th>
<th>Weight % Organics</th>
<th>Volume % Non-Volatiles</th>
<th>Weight % Mat</th>
<th>Max. (unit/hr)</th>
<th>Pounds VOC per gallon of coating less water (lbs/hr)</th>
<th>Pounds VOC per gallon of coating less water (lbs/day)</th>
<th>Pounds VOC per gallon of coating less water (tons/yr)</th>
<th>Transfer Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>SB10 Stain 19-007</td>
<td>7.48</td>
<td>77.00%</td>
<td>0.00%</td>
<td>77.00%</td>
<td>0.00%</td>
<td>23.00%</td>
<td>3.000</td>
<td>5.74</td>
<td>5.74</td>
<td>8.62</td>
<td>206.79</td>
</tr>
<tr>
<td>SB11 Seal 9926</td>
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<td>73.00%</td>
<td>17.00%</td>
<td>56.00%</td>
<td>20.60%</td>
<td>27.00%</td>
<td>3.000</td>
<td>5.69</td>
<td>4.52</td>
<td>6.78</td>
<td>162.69</td>
</tr>
<tr>
<td>SB12 Glaze</td>
<td>7.91</td>
<td>57.20%</td>
<td>0.00%</td>
<td>57.20%</td>
<td>0.00%</td>
<td>31.60%</td>
<td>3.000</td>
<td>4.32</td>
<td>4.32</td>
<td>6.79</td>
<td>162.86</td>
</tr>
<tr>
<td>SB13 Topcoat 9950</td>
<td>8.66</td>
<td>68.00%</td>
<td>4.00%</td>
<td>64.00%</td>
<td>5.90%</td>
<td>32.00%</td>
<td>3.000</td>
<td>5.89</td>
<td>5.54</td>
<td>8.31</td>
<td>199.53</td>
</tr>
</tbody>
</table>

**SB10 - SB13 Potential to Emit (Add Worst Case Coating to All Solvents Used)**

**Total:** 394.35  44.38

90% Control Efficiency (booth filters): 4.90

* Coating applied using HVLP

---

Company Name: Hardwood Interior Design, LLC
Address: 1342 W. Plymouth Street, Bremen, Indiana
SSM No.: 099-41230-00115
SPM No.: 099-41269-00115
Reviewer: Aida DeGuzman
Appendix A: Emissions Calculations

Uncontrolled PTE of Project (SSM 099-41230-00115, SPM 099-41260-00115)

Company Name: Hardwood Interior Design, LLC
Address: 1342 W. Plymouth Street, Bremen, IN 46506
SSM No.: 099-41230-00115
SPM No.: 099-41260-00115
Reviewer: Aida DeGuzman

326 IAC 2-7-10.5 Permitting Level Determination

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>PM</th>
<th>PM&lt;sub&gt;10&lt;/sub&gt;</th>
<th>PM&lt;sub&gt;2.5&lt;/sub&gt;</th>
<th>SO&lt;sub&gt;2&lt;/sub&gt;</th>
<th>NO&lt;sub&gt;x&lt;/sub&gt;</th>
<th>VOC</th>
<th>CO</th>
<th>Combined HAPs</th>
<th>Worst Single HAP (Xylene)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Surface Coating Booths (SB1-SB13)</td>
<td>29.28</td>
<td>29.28</td>
<td>29.28</td>
<td>-</td>
<td>-</td>
<td>236.18</td>
<td>-</td>
<td>20.98</td>
<td>18.45</td>
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<tr>
<td>Surface Coating Booths (SB1-SB13)</td>
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<td>44.98</td>
<td>44.98</td>
<td>-</td>
<td>-</td>
<td>394.35</td>
<td>-</td>
<td>25.42</td>
<td>18.93</td>
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<tr>
<td>Uncontrolled PTE Increase of Modified Units</td>
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<td>15.70</td>
<td>15.70</td>
<td>-</td>
<td>-</td>
<td>158.17</td>
<td>-</td>
<td>4.44</td>
<td>0.48</td>
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Potential to Emit of New Emission Units

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (lb/gal)</th>
<th>Weight % Volatile (H&lt;sub&gt;2&lt;/sub&gt;O &amp; Organics)</th>
<th>Weight % Water</th>
<th>Weight % Organics</th>
<th>Volume % Non-Volatiles (Solids)</th>
<th>Gallons of Mat. /unit</th>
<th>Max. (unit/hr)</th>
<th>Pounds VOC per gallon of coating less water (lbs/hr)</th>
<th>Pounds VOC per gallon of coating (lbs/day)</th>
<th>(tons/yr)</th>
<th>*Transfer Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>SB4 - Stain 19-007</td>
<td>7.46</td>
<td>77.00%</td>
<td>0.00%</td>
<td>77.00%</td>
<td>0.00%</td>
<td>23.00%</td>
<td>0.350</td>
<td>4.000</td>
<td>5.74</td>
<td>5.74</td>
<td>8.04</td>
</tr>
<tr>
<td>SB5 - Stain 19-007</td>
<td>7.46</td>
<td>77.00%</td>
<td>0.00%</td>
<td>77.00%</td>
<td>0.00%</td>
<td>23.00%</td>
<td>0.350</td>
<td>4.000</td>
<td>5.74</td>
<td>5.74</td>
<td>8.04</td>
</tr>
<tr>
<td>SB14 - Stain 19-007</td>
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<td>77.00%</td>
<td>0.00%</td>
<td>77.00%</td>
<td>0.00%</td>
<td>23.00%</td>
<td>0.350</td>
<td>4.000</td>
<td>5.74</td>
<td>5.74</td>
<td>8.04</td>
</tr>
<tr>
<td>UVLine 1 - UV Finish</td>
<td>8.55</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>100.00%</td>
<td>0.350</td>
<td>6.000</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Lacquer Thinner Cleaner</td>
<td>7.01</td>
<td>100.00%</td>
<td>0.00%</td>
<td>100.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.025</td>
<td>4.000</td>
<td>7.01</td>
<td>7.01</td>
<td>0.70</td>
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<td>6.60</td>
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<td>0.00%</td>
<td>100.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.020</td>
<td>15.000</td>
<td>6.60</td>
<td>6.60</td>
<td>1.98</td>
</tr>
</tbody>
</table>

* Coating applied using HVLP

The worst case PTE for new units was considered for SB4 and SB5 since they are being relocated to a new building. The level of permit will not changed even they are evaluated as modified units.

Uncontrolled PTE Before Modification of Existing Modified Units

Uncontrolled PTE After Modification of Existing Modified Units

Uncontrolled PTE Increase of Modified Units

TOTAL Uncontrolled PTE Project (tons/year)
**Potential to Emit**

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (lb/gal)</th>
<th>Weight % Volatile (H2O &amp; Organics)</th>
<th>Weight % Water</th>
<th>Weight % Organics</th>
<th>Volume % Non-Volatiles (solids)</th>
<th>Gal of Mat. (gal/unit)</th>
<th>Max. (unit/hr)</th>
<th>Pounds VOC per gallon of coating less water</th>
<th>Pounds VOC per gallon of coating</th>
<th>(lbs/hr)</th>
<th>(lbs/day)</th>
<th>(tons/yr)</th>
<th>(tons/yr) *Transfer Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>SB4 - Stain 19-007</td>
<td>7.46</td>
<td>77.00%</td>
<td>0.00%</td>
<td>77.00%</td>
<td>0.00%</td>
<td>23.00%</td>
<td>0.350</td>
<td>4.000</td>
<td>5.74</td>
<td>5.74</td>
<td>8.04</td>
<td>193.01</td>
<td>35.22</td>
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<tr>
<td>SB5 - Stain 19-007</td>
<td>7.46</td>
<td>77.00%</td>
<td>0.00%</td>
<td>77.00%</td>
<td>0.00%</td>
<td>23.00%</td>
<td>0.350</td>
<td>4.000</td>
<td>5.74</td>
<td>5.74</td>
<td>8.04</td>
<td>193.01</td>
<td>35.22</td>
</tr>
<tr>
<td>SB14 - Stain 19-007</td>
<td>7.46</td>
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<td>0.00%</td>
<td>77.00%</td>
<td>0.00%</td>
<td>23.00%</td>
<td>0.350</td>
<td>4.000</td>
<td>5.74</td>
<td>5.74</td>
<td>8.04</td>
<td>193.01</td>
<td>35.22</td>
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<tr>
<td>UVLine1 - UV Finish</td>
<td>8.55</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>100.00%</td>
<td>0.350</td>
<td>6.000</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Lacquer Thinner Cleaner</td>
<td>7.01</td>
<td>100.00%</td>
<td>0.00%</td>
<td>100.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.025</td>
<td>4.000</td>
<td>7.01</td>
<td>7.01</td>
<td>0.70</td>
<td>16.82</td>
<td>3.07</td>
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<td>0.00%</td>
<td>100.00%</td>
<td>0.500</td>
<td>15.000</td>
<td>0.00</td>
<td>0.00</td>
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<tr>
<td>UV Roll Coater - Seal/topcoat 1200</td>
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<td>0.00%</td>
<td>100.00%</td>
<td>1.500</td>
<td>15.000</td>
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<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
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<tr>
<td>UV Roll Coater - TH3500 Cleaner</td>
<td>6.60</td>
<td>100.00%</td>
<td>0.00%</td>
<td>100.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.020</td>
<td>15.000</td>
<td>6.60</td>
<td>6.60</td>
<td>1.98</td>
<td>47.52</td>
<td>8.67</td>
</tr>
</tbody>
</table>

* Coating applied using HVLP

**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)  

\[
PTE \text{ VOC (pounds/hour)} = \frac{\text{Pounds of VOC/Gallon coating (lb/gal) } \times \text{Gal of Material (gal/unit) } \times \text{Maximum (units/hr)}}{\text{Max. (unit/hr)}}
\]

\[
PTE \text{ VOC (tons/year)} = \frac{\text{Pounds of VOC per Gallon coating (lb/gal) } \times \text{Gal of Material (gal/unit) } \times \text{Maximum (units/hr)} }{(\text{8760 hr/yr} } \times \text{1 ton/2000 lbs})
\]

\[
PTE \text{ PM/PM10 (lbs/hour)} = \frac{\text{Max. (units/hour) } \times \text{Gal of Mat (gal/unit) } \times \text{Density (lbs/gal) } \times (1-\text{Weight % Volatile}) }{(1-\text{Transfer efficiency})}
\]

Coatings are mutually exclusive
### Appendix A: Emissions Calculations

#### HAP Emissions

**Spray Booths (SB1 - SB3 and SB6 - SB13)**

- **Company Name:** Hardwood Interior Design, LLC
- **Address:** 1342 W. Plymouth Street, Bremen, IN
- **SSM No.:** 009-41220-00115
- **SPM No.:** 009-41260-00115
- **Reviewer:** Aida DeOuzman

#### Laboratory Data

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (lb/gal)</th>
<th>Gal of Mat. (gal/unit)</th>
<th>Maximum (unit/hour)</th>
<th>Ethylbenzene Weight %</th>
<th>Xylene Weight %</th>
<th>Cumene Weight %</th>
<th>Toluene Weight %</th>
<th>MK Weight %</th>
<th>Methanol Weight %</th>
<th>Formaldehyde Weight %</th>
<th>Naphthalene Weight %</th>
<th>Total HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>SB1 Stain 19-907</td>
<td>7.40</td>
<td>0.50</td>
<td>3.00</td>
<td>0.000%</td>
<td>0.681%</td>
<td>0.350%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
</tr>
<tr>
<td>SB2 Seal 9550</td>
<td>8.07</td>
<td>0.50</td>
<td>3.00</td>
<td>0.000%</td>
<td>0.621%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
</tr>
<tr>
<td>SB3 Topcoat 9550</td>
<td>8.66</td>
<td>0.50</td>
<td>3.00</td>
<td>0.00%</td>
<td>8.88%</td>
<td>0.00%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
</tr>
</tbody>
</table>

#### SB1-3 Potential Emission Rate (Add Worst Case Coating to All Solvents Used)

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (lb/gal)</th>
<th>Gal of Mat. (gal/unit)</th>
<th>Maximum (unit/hour)</th>
<th>Ethylbenzene</th>
<th>Xylene</th>
<th>Cumene</th>
<th>Toluene</th>
<th>MK</th>
<th>Methanol</th>
<th>Formaldehyde</th>
<th>Naphthalene</th>
<th>Total HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>SB1 Stain 19-907</td>
<td>7.40</td>
<td>0.50</td>
<td>3.00</td>
<td>0.000%</td>
<td>0.681%</td>
<td>0.350%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
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<td>0.000%</td>
<td>0.000%</td>
</tr>
<tr>
<td>SB2 Seal 9550</td>
<td>8.07</td>
<td>0.50</td>
<td>3.00</td>
<td>0.000%</td>
<td>0.621%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
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<td>0.000%</td>
<td>0.000%</td>
</tr>
<tr>
<td>SB3 Topcoat 9550</td>
<td>8.66</td>
<td>0.50</td>
<td>3.00</td>
<td>0.00%</td>
<td>8.88%</td>
<td>0.00%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
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</tbody>
</table>

#### SB8 Potential to Emit (Worst Case Coating Used)

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (lb/gal)</th>
<th>Gal of Mat. (gal/unit)</th>
<th>Maximum (unit/hour)</th>
<th>Ethylbenzene Weight %</th>
<th>Xylene Weight %</th>
<th>Cumene Weight %</th>
<th>Toluene Weight %</th>
<th>MK Weight %</th>
<th>Methanol Weight %</th>
<th>Formaldehyde Weight %</th>
<th>Naphthalene Weight %</th>
<th>Total HAP</th>
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</thead>
<tbody>
<tr>
<td>SB1 Stain 19-907</td>
<td>7.40</td>
<td>0.50</td>
<td>3.00</td>
<td>0.000%</td>
<td>0.681%</td>
<td>0.350%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
</tr>
<tr>
<td>SB2 Seal 9550</td>
<td>8.07</td>
<td>0.50</td>
<td>3.00</td>
<td>0.000%</td>
<td>0.621%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
</tr>
<tr>
<td>SB3 Topcoat 9550</td>
<td>8.66</td>
<td>0.50</td>
<td>3.00</td>
<td>0.00%</td>
<td>8.88%</td>
<td>0.00%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
</tr>
</tbody>
</table>

#### SB8 Potential to Emit (Worst Case Coating Used)

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (lb/gal)</th>
<th>Gal of Mat. (gal/unit)</th>
<th>Maximum (unit/hour)</th>
<th>Ethylbenzene Weight %</th>
<th>Xylene Weight %</th>
<th>Cumene Weight %</th>
<th>Toluene Weight %</th>
<th>MK Weight %</th>
<th>Methanol Weight %</th>
<th>Formaldehyde Weight %</th>
<th>Naphthalene Weight %</th>
<th>Total HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>SB1 Stain 19-907</td>
<td>7.40</td>
<td>0.50</td>
<td>3.00</td>
<td>0.000%</td>
<td>0.681%</td>
<td>0.350%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
</tr>
<tr>
<td>SB2 Seal 9550</td>
<td>8.07</td>
<td>0.50</td>
<td>3.00</td>
<td>0.000%</td>
<td>0.621%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
</tr>
<tr>
<td>SB3 Topcoat 9550</td>
<td>8.66</td>
<td>0.50</td>
<td>3.00</td>
<td>0.00%</td>
<td>8.88%</td>
<td>0.00%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
</tr>
</tbody>
</table>

#### SB10-13 Potential Emission Rate (All Coatings Used)

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (lb/gal)</th>
<th>Gal of Mat. (gal/unit)</th>
<th>Maximum (unit/hour)</th>
<th>Ethylbenzene Weight %</th>
<th>Xylene Weight %</th>
<th>Cumene Weight %</th>
<th>Toluene Weight %</th>
<th>MK Weight %</th>
<th>Methanol Weight %</th>
<th>Formaldehyde Weight %</th>
<th>Naphthalene Weight %</th>
<th>Total HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>SB10-13 Potential to Emit (Worst Case Coating Used)</td>
<td>0.80</td>
<td>0.50</td>
<td>3.00</td>
<td>0.000%</td>
<td>0.681%</td>
<td>0.350%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
<td>0.000%</td>
</tr>
</tbody>
</table>

#### Total HAP

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (lb/gal)</th>
<th>Gal of Mat. (gal/unit)</th>
<th>Maximum (unit/hour)</th>
<th>Ethylbenzene</th>
<th>Xylene</th>
<th>Cumene</th>
<th>Toluene</th>
<th>MK</th>
<th>Methanol</th>
<th>Formaldehyde</th>
<th>Naphthalene</th>
<th>Total HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Individual HAP</td>
<td>0.54</td>
<td>18.53</td>
<td>0.82</td>
<td>2.40</td>
<td>0.52</td>
<td>2.35</td>
<td>0.20</td>
<td>0.52</td>
<td>25.42</td>
<td>Total HAPs</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### METHODOLOGY

- PTE HAPs (t/year) = Density (lb/gal) * Gal of Mat. (gal/unit) * Maximum (unit/hour) * Weight % HAP * 8760 hours/year * 1 ton/2000 lbs
## Appendix A: Emissions Calculations

### HAP Emissions

#### New Spray Booths (SB4, SB5 & SB14)

**UVLine 1**

**Company Name:** Hardwood Interior Design, LLC  
**Address:** 1730 Bike Street, Bremen IN 46506  
**SSM No.:** 099-41230-00115  
**SPM No.:** 099-41260-00115  
**Reviewer:** Aida DeGuzman

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (lb/gal)</th>
<th>Gal of Mat. (gal/unit)</th>
<th>Maximum (unit/hour)</th>
<th>Xylene Weight %</th>
<th>Toluene Weight %</th>
<th>MIK Weight %</th>
<th>Methanol Weight %</th>
<th>Cumene Weight %</th>
<th>Napthalene Weight %</th>
<th>Xylene</th>
<th>Toluene</th>
<th>MIK</th>
<th>Methanol</th>
<th>Cumene</th>
<th>Naphthalene</th>
<th>Total HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>SB4 - Stain 19-007</td>
<td>7.46</td>
<td>0.350</td>
<td>4.00</td>
<td>0.78%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.35%</td>
<td>0.33%</td>
<td>0.36</td>
<td>0.36</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.18</td>
<td>0.15</td>
<td>0.69</td>
</tr>
<tr>
<td>SB5 - Stain 19-007</td>
<td>7.46</td>
<td>0.350</td>
<td>4.00</td>
<td>0.78%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.35%</td>
<td>0.33%</td>
<td>0.36</td>
<td>0.36</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.18</td>
<td>0.15</td>
<td>0.69</td>
</tr>
<tr>
<td>SB14 - Stain 19-007</td>
<td>7.46</td>
<td>0.350</td>
<td>4.00</td>
<td>0.78%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.35%</td>
<td>0.33%</td>
<td>0.36</td>
<td>0.36</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.15</td>
<td>0.15</td>
<td>0.69</td>
</tr>
<tr>
<td>UVLine1 - UV Finish</td>
<td>8.55</td>
<td>0.350</td>
<td>6.00</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Lacquer Thinner Cleaner</td>
<td>7.01</td>
<td>0.025</td>
<td>4.00</td>
<td>0.00%</td>
<td>70.00%</td>
<td>15.00%</td>
<td>15.00%</td>
<td>0.00%</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.46</td>
<td>0.46</td>
<td>0.00</td>
</tr>
</tbody>
</table>

**Total Individual HAPs**  
1.07  2.15  0.46  0.46  0.54  0.45  5.13 :Total HAPs

### METHODOLOGY

\[
PTE \text{ HAPs (tons/year)} = \text{Density (lb/gal)} \times \text{Gal of Mat. (gal/unit)} \times \text{Maximum (unit/hour)} \times \text{Weight % HAP} \times 8760 \text{ hours/year} \times \frac{1}{2000} \text{ tons/2000 lbs}
\]
### Appendix A: Emissions Calculations

**Woodworking - Particulate**

**Company Name:** Hardwood Interior Design, LLC  
**Address:** 1342 W. Plymouth Street, Bremen, IN  
**SSM No.:** 099-41230-00115  
**SPM No.:** 099-41260-00115  
**Reviewer:** Aida DeGuzman

<table>
<thead>
<tr>
<th>Unit ID</th>
<th>Control Device</th>
<th>Control Efficiency</th>
<th>Outlet Grain Loading (grains/dscf)</th>
<th>Air Flow Rate (cfm)</th>
<th>PM/PM10/PM2.5 before Controls (lbs/hr)</th>
<th>PM/PM10/PM2.5 after Integral Controls (lbs/hr)</th>
<th>PM/PM10/PM2.5 after Integral Controls (tons/yr)</th>
<th>326 IAC 6-3-2 Y/N</th>
</tr>
</thead>
<tbody>
<tr>
<td>Woodworking Operation</td>
<td>Baghouse</td>
<td>99.00%</td>
<td>0.0013</td>
<td>40000</td>
<td>44.57</td>
<td>195.22</td>
<td>0.45</td>
<td>1.95</td>
</tr>
</tbody>
</table>

**Methodology**

PM10 and PM2.5 emissions assumed equal to PM emissions.

\[
\text{PM10/PM2.5 after Integral Controls (lbs/hr)} = [\text{Outlet Grain Loading (grains/dscf)}] \times [\text{Air Flow Rate (cfm)}] \times [60 \text{ min/hr}] \times [\frac{\text{lb}}{7000 \text{ grains}}]
\]

\[
\text{PM10/PM2.5 after Integral Controls (tons/yr)} = \left[\frac{\text{PM10/PM2.5 after Integral Controls (lbs/hr)}}{\text{8760 hr/yr}}\right] \times [\frac{\text{ton}}{2000 \text{ lb}}]
\]

\[
\text{PM10/PM2.5 before Integral Controls (lbs/hr)} = \frac{\text{PM10/PM2.5 after Integral Controls (lbs/hr)}}{1 - \text{control efficiency}}
\]

\[
\text{PM10/PM2.5 before Integral Controls (tons/yr)} = \frac{\text{PM10/PM2.5 after Integral Controls (tons/yr)}}{1 - \text{control efficiency}}
\]

**PM After integral control <0.551 lb/hr**
## Appendix A: Emissions Calculations

### Natural Gas Combustion Only

**MM BTU/HR <100**

### Company Name: Hardwood Interior Design, LLC

**Address:** 1342 W. Plymouth Street, Bremen, IN

**SSM No.:** 099-41230-00115

**SPM No.:** 099-41260-00115

**Reviewer:** Aida DeGuzman

### Natural Gas Combustion Only

<table>
<thead>
<tr>
<th>Heat Input Capacity MM BTU/hr</th>
<th>Pollutant</th>
<th>Emission Factor in lb/MMCF</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Emission Unit/Unit ID</strong></td>
<td><strong>Pollutant</strong></td>
<td><strong>Emission Factor in lb/MMCF</strong></td>
<td><strong>Potential Emission in tons/yr</strong></td>
</tr>
<tr>
<td><strong>Oven/OV1</strong></td>
<td>PM*</td>
<td>1.9</td>
<td>0.10</td>
</tr>
<tr>
<td><strong>Air Make-up Unit/AM1</strong></td>
<td>PM10*</td>
<td>7.6</td>
<td>0.38</td>
</tr>
<tr>
<td><strong>Air Make-up Unit/AM2</strong></td>
<td>direct PM2.5*</td>
<td>7.6</td>
<td>0.38</td>
</tr>
<tr>
<td><strong>Air Make-up Unit/AM3</strong></td>
<td>SO2</td>
<td>0.6</td>
<td>0.03</td>
</tr>
<tr>
<td><strong>Air Make-up Unit/AM4</strong></td>
<td>NOx</td>
<td>100</td>
<td>5.06</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td>VOC</td>
<td>5.5</td>
<td>0.28</td>
</tr>
<tr>
<td></td>
<td>CO</td>
<td>84</td>
<td>4.25</td>
</tr>
</tbody>
</table>

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

### Methodology

All emission factors are based on normal firing.

**MMBtu = 1,000,000 Btu**

**MMCF = 1,000,000 Cubic Feet of Gas**

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

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

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

### Hazardous Air Pollutants (HAPs)

#### HAPs - Organics

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</th>
<th>Benzene</th>
<th>Dichlorobenzene</th>
<th>Formaldehyde</th>
<th>Hexane</th>
<th>Toluene</th>
<th>Total - Organics</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in tons/yr</td>
<td>2.1E-03</td>
<td>1.2E-03</td>
<td>7.5E-02</td>
<td>1.8E+00</td>
<td>3.4E-03</td>
<td>0.10</td>
</tr>
</tbody>
</table>

#### HAPs - Metals

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</th>
<th>Lead</th>
<th>Cadmium</th>
<th>Chromium</th>
<th>Manganese</th>
<th>Nickel</th>
<th>Total - Metals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in tons/yr</td>
<td>5.0E-04</td>
<td>1.1E-03</td>
<td>1.4E-03</td>
<td>3.8E-04</td>
<td>2.1E-03</td>
<td>2.8E-04</td>
</tr>
</tbody>
</table>

Methodology is the same as above.

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

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

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**Company Name:** Hardwood Interior Design, LLC  
**Address:** 1730 W. Bike Street, Bremen, IN 46506  
**SSM No.:** 099-41230-00115  
**SPM No.:** 099-41260-00115  
**Reviewer:** Aida DeGuzman

## New Units for Building 2

<table>
<thead>
<tr>
<th>Emission Unit/Unit ID</th>
<th>Emission Capacity</th>
<th>MM BTU/hr</th>
</tr>
</thead>
<tbody>
<tr>
<td>UV Oven/OV2</td>
<td>0.44</td>
<td>11.9</td>
</tr>
<tr>
<td>Air Make-up Unit/AM5</td>
<td>0.75</td>
<td>20.2</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td></td>
<td>1.19</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Emission Unit/Unit ID</th>
<th>Potential Throughput</th>
</tr>
</thead>
<tbody>
<tr>
<td>HHV</td>
<td>mmBTU</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td>AM5</td>
<td>mmscf</td>
</tr>
<tr>
<td></td>
<td>MMCF/yr</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td></td>
</tr>
</tbody>
</table>

**Potential Throughput (MMCF/yr)**: 1020

### Pollutant Emissions

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor in lb/MMCF</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM*</td>
<td>1.9</td>
<td>0.01</td>
</tr>
<tr>
<td>PM10*</td>
<td>7.6</td>
<td>0.04</td>
</tr>
<tr>
<td>SO2</td>
<td>0.6</td>
<td>0.00</td>
</tr>
<tr>
<td>NOx</td>
<td>0.51</td>
<td>0.03</td>
</tr>
<tr>
<td>VOC</td>
<td>84</td>
<td>0.43</td>
</tr>
</tbody>
</table>

**PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.**

**PM2.5 emission factor is filterable and condensable PM2.5 combined.**

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

**Methodology**

All emission factors are based on normal firing.

**Hazardous Air Pollutants (HAPs)**

<table>
<thead>
<tr>
<th>HAPs - Organics</th>
<th>Benzene</th>
<th>Dichlorobenzene</th>
<th>Formaldehyde</th>
<th>Hexane</th>
<th>Toluene</th>
<th>Total - Organics</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMcf</td>
<td>2.1E-03</td>
<td>1.2E-03</td>
<td>7.5E-02</td>
<td>1.8E+00</td>
<td>3.4E-03</td>
<td></td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>1.1E-05</td>
<td>6.1E-06</td>
<td>3.8E-04</td>
<td>0.01</td>
<td>1.7E-05</td>
<td><strong>0.01</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>HAPs - Metals</th>
<th>Lead</th>
<th>Cadmium</th>
<th>Chromium</th>
<th>Manganese</th>
<th>Nickel</th>
<th>Total - Metals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMcf</td>
<td>5.0E-04</td>
<td>1.1E-03</td>
<td>1.4E-03</td>
<td>3.8E-04</td>
<td>2.1E-03</td>
<td></td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>2.6E-06</td>
<td>5.6E-06</td>
<td>7.2E-06</td>
<td>1.9E-06</td>
<td>1.1E-05</td>
<td><strong>2.8E-05</strong></td>
</tr>
</tbody>
</table>

**Methodology is the same as above.**

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

Additional HAPs emission factors are available in AP-42, Chapter 1.4.
October 3, 2019

John Yutzy
Hardwood Interior Design LLC
1342 W Plymouth St
Bremen, IN  46506

Re: Public Notice
Hardwood Interior Design LLC
Permit Level:  Title V Significant Source Mod. (Minor PSD/EO) (120) & Title V Significant Permit Modification
Permit Number: 099-41230-00115 & 099-41260-00115

Dear John Yutzy:

Enclosed is a copy of your draft Title V Significant Source Mod. (Minor PSD/EO) (120) & Title V Significant Permit Modification, Technical Support Document, emission calculations, and the Public Notice.

The Public Notice period will begin the date the Notice is published on the IDEM Official Public Notice website. Publication has been requested and is expected within 2-3 business days. You may check the exact Public Notice begins and ends date here: https://www.in.gov/idem/5474.htm

Please note that as of April 17, 2019, IDEM is no longer required to publish the notice in a newspaper.

OAQ has submitted the draft permit package to the Bremen Public Library, 304 N Jackson St in Bremen IN 46506-1130. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Aida DeGuzman, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-4972 or dial (317) 233-4972.

Sincerely,

L. Pogost

L. Pogost
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter 4/12/19
October 3, 2019

To: Bremen Public Library 304 N Jackson St Bremen IN 46506-1130 (Library)

From: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

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

Applicant Name: Hardwood Interior Design LLC
Permit Number: 099-41230-00115 & 099-41260-00115

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

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

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

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

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

October 3, 2019
Hardwood Interior Design LLC
099-41230-00115 & 099-41260-00115

Dear Concerned Citizen(s):

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

Enclosed is a Notice of Public Comment, which has posted on IDEM’s Public Notice website at https://www.in.gov/idem/5474.htm.

The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

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

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

October 3, 2019

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

Permit Number: 099-41230-00115 & 099-41260-00115
Applicant Name: Hardwood Interior Design LLC
Location: Bremen, Marshall County, Indiana

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

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

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

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

Affected States Notification 1/9/2017
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<th>Handing Charges</th>
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<th>Insured Value</th>
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<td>John Yutzy, Hardwood Interior Design LLC 1342 W Plymouth St Bremen IN 46506 (Source CAATS)</td>
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<td>LaPaz Town Council PO Box 0820 LaPaz IN 46537 (Local Official)</td>
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<td>Ms. Julie Grzesiak, 139 N. Michigan St. Argos IN 46501 (Affected Party)</td>
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<td>Polly Mishler, D &amp; B Environmental Services, Inc., 401 Lincoln Way West Osceola IN 46561 (Consultant)</td>
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<td>Christina Seiler, The Rochester Sentinel PO Box 260 Rochester IN 46975 (Affected Party)</td>
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<td>Mr. Roger Schneider, The Goshen News, 114 S. Main St Goshen IN 46526 (Affected Party)</td>
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