



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Minor Source Operating Permit (MSOP)

for Indiana Desk Company in Dubois County

MSOP No.: M 037-43066-00028

The Indiana Department of Environmental Management (IDEM) has received an application from Indiana Desk Company located at 4897 East 450 North Dubois, IN 47527 for a transition from its Part 70 Operating Permit issued on May 17, 2016, to a MSOP. If approved by IDEM's Office of Air Quality (OAQ), this proposed renewal would allow Indiana Desk Company to continue to operate its existing source.

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

A copy of the permit application and IDEM's preliminary findings have been sent to:

Jasper Public Library
1116 Main Street
Jasper, IN 47546

and

IDEM Southwest Regional Office
114 South 7th Street
P.O. Box 128
Petersburg, IN 47567-0128

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

A copy of the application and preliminary findings is also available via IDEM's Virtual File Cabinet (VFC). To access 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.

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>) 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 T037-43066-00028 in all correspondence.

Comments should be sent to:

Daria Antipova
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Daria Antipova or (317) 234-3429
Or dial directly: (317) 234-3429
Fax: (317) 232-6749 attn: Daria Antipova
E-mail: dantipov@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 and will also be sent to the local library indicated above, 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 Daria Antipova or my staff at the above address.



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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb
Governor

DRAFT

Bruno L. Pigott
Commissioner

Minor Source Operating Permit OFFICE OF AIR QUALITY

**Indiana Desk Company
4897 East 450 North
Dubois, Indiana 47527**

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

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

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

Operation Permit No.: M 037-43066-00028	
Master Agency Interest ID: 636	
Issued by:	Issuance Date:
Josiah K. Balogun, Section Chief Permits Branch Office of Air Quality	Expiration Date:

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SECTION A SOURCE SUMMARY

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

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

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

Source Address:	4897 East 450 North, Dubois, Indiana 47527
General Source Phone Number:	(812) 482-5727
SIC Code:	2511 (Wood Household Furniture, Except Upholstered)
County Location:	Dubois
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) Ten (10) surface coating booths, consisting of the following:
- (1) One (1) off-line booth, identified as 477, with a maximum rating of 2 desks per hour, constructed after July 1, 1990, equipped with dry filters for particulate control, and exhausting through stack 3.
 - (2) One (1) SAP booth, identified as 478, with a maximum rating of 29 desks per hour, constructed after July 1, 1990, equipped with dry filters for particulate control, and exhausting through stack 2.
 - (3) One (1) off-line finishing booth, identified as 479, with a maximum rating of 6 desks per hour, constructed in 2009, equipped with dry filters for particulate control, and exhausting through stack 32.
 - (4) One (1) off-line finishing booth, identified as 480, with a maximum rating of 6 desks per hour, constructed in 2009, equipped with dry filters for particulate control, and exhausting through stack 33.
 - (5) One (1) NGR booth, identified as 481, with a maximum rating of 29 desks per hour, constructed after July 1, 1990, equipped with dry filters for particulate control, and exhausting through stacks 5A and 5B.
 - (6) One (1) washcoat spray booth, identified as 482, with a maximum rating of 29 desks per hour, constructed after July 1, 1990, equipped with dry filters for particulate control, and exhausting through stack 6.
 - (7) One (1) first sealer spray booth, identified as 483, with a maximum rating of 29 desks per hour, constructed after July 1, 1990, equipped with dry filters for particulate control, and exhausting through stack 7.

- (8) One (1) second sealer spray booth, identified as 484, with a maximum rating of 29 desks per hour, constructed after July 1, 1990, equipped with dry filters for particulate control, and exhausting through stack 8.
 - (9) One (1) stain spray booth, identified as 485, with a maximum rating of 29 desks per hour, constructed after July 1, 1990, equipped with dry filters for particulate control, and exhausting through stacks 9A and 9B.
 - (10) One (1) topcoat booth, identified as 488, with a maximum rating of 29 desks per hour, constructed after July 1, 1990, equipped with dry filters for particulate control, and exhausting through stack 10.
- (b) One (1) sealer sand closed loop dust collector, associated with topcoat booth 488, identified as 540, with a maximum exhaust flow rate of 10,000 cubic feet per minute.
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing, cutting torches, soldering, and welding equipment, all exhausted through stack 1.
- (d) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour consisting of the following:
- (1) Two (2) oven, identified as 486 and 487, each with a maximum heat input capacity of 1.5 million British thermal units per hour (MMBtu/hr).
 - (2) Three (3) air make up units, identified as 517, 518, and 539, each with a maximum heat input capacity of 1.5 million British thermal units per hour (MMBtu/hr).
 - (3) One (1) heater, identified as 527, with a maximum heat input capacity of 1.20 million British thermal units per hour (MMBtu/hr).
 - (4) Two (2) heaters, identified as 519 and 526, each with a maximum heat input capacity of 0.90 million British thermal units per hour (MMBtu/hr).
 - (5) Five (5) heaters, identified as 520, 521, 523, 524 and 525, each with a maximum heat input capacity of 0.60 million British thermal units per hour (MMBtu/hr).
 - (6) One (1) heater, identified as 522, with a maximum heat input capacity of 0.39 million British thermal units per hour (MMBtu/hr).
 - (7) One (1) heater, identified as 533, with a maximum heat input capacity of 0.23 million British thermal units per hour (MMBtu/hr).
 - (8) Four (4) heaters, identified as 532, 534, 535, and 536, each with a maximum heat input capacity of 0.16 million British thermal units per hour (MMBtu/hr).
- (e) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, M 037-43066-00028, 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, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

- (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 Annual Notification [326 IAC 2-6.1-5(a)(5)]

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

- (a) 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 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.
- (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.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M 037-43066-00028 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

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

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

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

B.14 Source Modification Requirement

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

B.15 Inspection and Entry

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

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

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

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

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

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-8590 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Permit Revocation [326 IAC 2-1.1-9]

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

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

C.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 thirty percent (30%) 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).

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

All required notifications shall be submitted to:

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

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

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

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

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

C.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.

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

Compliance Requirements [326 IAC 2-1.1-11]

C.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 2-6.1-5(a)(2)]

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

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

C.10 Instrument Specifications [326 IAC 2-1.1-11]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.11 Response to Excursions or Exceedances

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

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

C.12 Actions Related to Noncompliance Demonstrated by a Stack Test

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

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

C.13 Malfunctions Report [326 IAC 1-6-2]

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

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

C.14 General Record Keeping Requirements [326 IAC 2-6.1-5]

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

C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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

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

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

- (c) 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.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Ten (10) surface coating booths, consisting of the following:
- (1) One (1) off-line booth, identified as 477, with a maximum rating of 2 desks per hour, constructed after July 1, 1990, equipped with dry filters for particulate control, and exhausting through stack 3.
 - (2) One (1) SAP booth, identified as 478, with a maximum rating of 29 desks per hour, constructed after July 1, 1990, equipped with dry filters for particulate control, and exhausting through stack 2.
 - (3) One (1) off-line finishing booth, identified as 479, with a maximum rating of 6 desks per hour, constructed in 2009, equipped with dry filters for particulate control, and exhausting through stack 32.
 - (4) One (1) off-line finishing booth, identified as 480, with a maximum rating of 6 desks per hour, constructed in 2009, equipped with dry filters for particulate control, and exhausting through stack 33.
 - (5) One (1) NGR booth, identified as 481, with a maximum rating of 29 desks per hour, constructed after July 1, 1990, equipped with dry filters for particulate control, and exhausting through stacks 5A and 5B.
 - (6) One (1) washcoat spray booth, identified as 482, with a maximum rating of 29 desks per hour, constructed after July 1, 1990, equipped with dry filters for particulate control, and exhausting through stack 6.
 - (7) One (1) first sealer spray booth, identified as 483, with a maximum rating of 29 desks per hour, constructed after July 1, 1990, equipped with dry filters for particulate control, and exhausting through stack 7.
 - (8) One (1) second sealer spray booth, identified as 484, with a maximum rating of 29 desks per hour, constructed after July 1, 1990, equipped with dry filters for particulate control, and exhausting through stack 8.
 - (9) One (1) stain spray booth, identified as 485, with a maximum rating of 29 desks per hour, constructed after July 1, 1990, equipped with dry filters for particulate control, and exhausting through stacks 9A and 9B.
 - (10) One (1) topcoat booth, identified as 488, with a maximum rating of 29 desks per hour, constructed after July 1, 1990, equipped with dry filters for particulate control, and exhausting through stack 10.

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

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

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

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), when applying surface coating to wood furniture and cabinets in the booths, identified as 479, 480, 481, 482, 484, 485, and 488, the Permittee shall apply all coating material, with the exception of no more than ten

(10) gallons of coating per day used for touch-up and repair operations, using one (1) of the following application methods:

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

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

D.1.2 Particulate Matter Emission Limitations [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(h), the ten (10) surface coating booths, identified as 477, 478, 479, 480, 481, 482, 483, 484, 485, and 488, shall be controlled by a dry particulate filters, subject to the following:

- (a) The source shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

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

A Preventive Maintenance Plan is required for these facilities and any 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 2-6.1-5(a)(2)]

D.1.4 Particulate Control

In order to assure compliance with Condition D.1.2, the dry filters for particulate control shall be in operation and control emissions from the surface coating booths, identified as 477, 478, 479, 480, 481, 482, 483, 484, 485, and 488, at all times these facilities are in operation.

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

D.1.5 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, identified as 2, 3, 32, 33,

5A, 5B, 6, 7, 8, 9A, 9B, 10, while one or more of the booths are in operation. When an abnormal condition exists, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

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

D.1.6 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.2, the Permittee shall maintain a log of the action taken as a result of the monthly inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.
- (b) To document the compliance status with Condition D.1.5, the Permittee shall maintain a log of weekly overspray observations and daily and monthly inspections.
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing, cutting torches, soldering, and welding equipment, all exhausted through stack 1.
- (d) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour consisting of the following:
 - (1) Two (2) oven, identified as 486 and 487, each with a maximum heat input capacity of 1.5 million British thermal units per hour (MMBtu/hr).
 - (2) Three (3) air make up units, identified as 517, 518, and 539, each with a maximum heat input capacity of 1.5 million British thermal units per hour (MMBtu/hr).
 - (3) One (1) heater, identified as 527, with a maximum heat input capacity of 1.20 million British thermal units per hour (MMBtu/hr).
 - (4) Two (2) heaters, identified as 519 and 526, each with a maximum heat input capacity of 0.90 million British thermal units per hour (MMBtu/hr).
 - (5) Five (5) heaters, identified as 520, 521, 523, 524 and 525, each with a maximum heat input capacity of 0.60 million British thermal units per hour (MMBtu/hr).
 - (6) One (1) heater, identified as 522, with a maximum heat input capacity of 0.39 million British thermal units per hour (MMBtu/hr).
 - (7) One (1) heater, identified as 533, with a maximum heat input capacity of 0.23 million British thermal units per hour (MMBtu/hr).
 - (8) Four (4) heaters, identified as 532, 534, 535, and 536, each with a maximum heat input capacity of 0.16 million British thermal units per hour (MMBtu/hr).

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

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

D.2.1 Particulate Matter Emission Limitations [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(a), the particulate matter emissions from each brazing, soldering, welding facilities, cutting torches, and natural gas-fired combustion units, shall not exceed three-hundredths (0.03) grain per dry standard cubic foot of outlet air.

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

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

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	Indiana Desk Company
Source Address:	4897 East 450 North
City:	Dubois, Indiana 47527
Phone #:	(812) 482-5727
MSOP #:	M 037-43066-00028

I hereby certify that Indiana Desk Company is:

still in operation.

no longer in operation.

I hereby certify that Indiana Desk Company is:

in compliance with the requirements of MSOP 037-43066-00028.

not in compliance with the requirements of MSOP 037-43066-00028.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

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

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

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ? _____, 25 TONS/YEAR SULFUR DIOXIDE ? _____, 25 TONS/YEAR NITROGEN OXIDES? _____, 25 TONS/YEAR VOC ? _____, 25 TONS/YEAR HYDROGEN SULFIDE ? _____, 25 TONS/YEAR TOTAL REDUCED SULFUR ? _____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ? _____, 25 TONS/YEAR FLUORIDES ? _____, 100 TONS/YEAR CARBON MONOXIDE ? _____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ? _____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ? _____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ? _____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ? _____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF "MALFUNCTION" AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

**Indiana Department of Environmental Management
Office of Air Quality**

**Technical Support Document (TSD) for a Part 70 Operating Permit
Transitioning to a Minor Source Operating Permit (MSOP)**

Source Description and Location

Source Name: Indiana Desk Company
Source Location: 4897 East 450 North, Dubois, IN 47527
County: Dubois
SIC Code: 2511 (Wood Household Furniture, Except Upholstered)
Operation Permit No.: M 037-43066-00028
Permit Reviewer: Daria Antipova

On July 16, 2020, the Office of Air Quality (OAQ) received an application from Indiana Desk Company related to the transition of a Part 70 Operating Permit to a MSOP.

Existing Approvals

The source has been operating under Part 70 Operating Permit No. T037-36387-00028, issued on May 17, 2016. There have been no subsequent approvals issued.

Due to this application, the source is transitioning from a Part 70 Operating Permit to a MSOP.

County Attainment Status

The source is located in Dubois County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective January 16, 2018, for the 2015 8-hour ozone standard.
PM _{2.5}	Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Unclassifiable or attainment effective January 29, 2012, for the 2010 NO ₂ standard.
Pb	Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.

- (a) **Ozone Standards**
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) 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 NO_x emissions are considered when evaluating the rule applicability relating to ozone. Dubois County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
Dubois County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

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

Fugitive Emissions

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

The fugitive emissions of hazardous air pollutants (HAP) are counted toward the determination of Part 70 Permit (326 IAC 2-7) and MSOP (326 IAC 2-6.1) applicability and source status under Section 112 of the Clean Air Act (CAA).

The fugitive emissions of regulated air pollutants are counted toward the determination of MSOP (326 IAC 2-6.1) 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.

Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Indiana Desk Company on July 16, 2020, relating to the renewal of its Part 70 Operating Permit to continue operating its stationary wood furniture manufacturing plant. This permit renewal includes a change to the coating materials being utilized in the spray booths. The change resulted in the reduction of the VOCs and HAPs emissions source-wide below the Part 70 major levels. Therefore, the source will transition from a Part 70 Operating Permit to a MSOP.

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

- (a) Ten (10) surface coating booths, consisting of the following:
- (1) One (1) off-line booth, identified as 477, with a maximum rating of 2 desks per hour, constructed after July 1, 1990, equipped with dry filters for particulate control, and exhausting through stack 3.
 - (2) One (1) SAP booth, identified as 478, with a maximum rating of 29 desks per hour, constructed after July 1, 1990, equipped with dry filters for particulate control, and exhausting through stack 2.

- (3) One (1) off-line finishing booth, identified as 479, with a maximum rating of 6 desks per hour, constructed in 2009, equipped with dry filters for particulate control, and exhausting through stack 32.
 - (4) One (1) off-line finishing booth, identified as 480, with a maximum rating of 6 desks per hour, constructed in 2009, equipped with dry filters for particulate control, and exhausting through stack 33.
 - (5) One (1) NGR booth, identified as 481, with a maximum rating of 29 desks per hour, constructed after July 1, 1990, equipped with dry filters for particulate control, and exhausting through stacks 5A and 5B.
 - (6) One (1) washcoat spray booth, identified as 482, with a maximum rating of 29 desks per hour, constructed after July 1, 1990, equipped with dry filters for particulate control, and exhausting through stack 6.
 - (7) One (1) first sealer spray booth, identified as 483, with a maximum rating of 29 desks per hour, constructed after July 1, 1990, equipped with dry filters for particulate control, and exhausting through stack 7.
 - (8) One (1) second sealer spray booth, identified as 484, with a maximum rating of 29 desks per hour, constructed after July 1, 1990, equipped with dry filters for particulate control, and exhausting through stack 8.
 - (9) One (1) stain spray booth, identified as 485, with a maximum rating of 29 desks per hour, constructed after July 1, 1990, equipped with dry filters for particulate control, and exhausting through stacks 9A and 9B.
 - (10) One (1) topcoat booth, identified as 488, with a maximum rating of 29 desks per hour, constructed after July 1, 1990, equipped with dry filters for particulate control, and exhausting through stack 10.
- (b) One (1) sealer sand closed loop dust collector, associated with topcoat booth 488, identified as 540, with a maximum exhaust flow rate of 10,000 cubic feet per minute.
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing, cutting torches, soldering, and welding equipment, all exhausted through stack 1.
- (d) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour consisting of the following:
- (1) Two (2) oven, identified as 486 and 487, each with a maximum heat input capacity of 1.5 million British thermal units per hour (MMBtu/hr).
 - (2) Three (3) air make up units, identified as 517, 518, and 539, each with a maximum heat input capacity of 1.5 million British thermal units per hour (MMBtu/hr).
 - (3) One (1) heater, identified as 527, with a maximum heat input capacity of 1.20 million British thermal units per hour (MMBtu/hr).
 - (4) Two (2) heaters, identified as 519 and 526, each with a maximum heat input capacity of 0.90 million British thermal units per hour (MMBtu/hr).
 - (5) Five (5) heaters, identified as 520, 521, 523, 524 and 525, each with a maximum heat input capacity of 0.60 million British thermal units per hour (MMBtu/hr).

- (6) One (1) heater, identified as 522, with a maximum heat input capacity of 0.39 million British thermal units per hour (MMBtu/hr).
 - (7) One (1) heater, identified as 533, with a maximum heat input capacity of 0.23 million British thermal units per hour (MMBtu/hr).
 - (8) Four (4) heaters, identified as 532, 534, 535, and 536, each with a maximum heat input capacity of 0.16 million British thermal units per hour (MMBtu/hr).
- (e) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].

Emission Units and Pollution Control Equipment Removed From the Source

The source has removed the following emission units:

- (a) Four (4) natural gas heaters each with a rated capacity of 0.08 MMBtu per hour.
- (b) One (1) natural gas heater with a rated capacity of 0.13 MMBtu per hour.
- (c) Two (2) ovens each with a rated capacity of 1.5 MMBtu per hour.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

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

Permit Level Determination – MSOP

This table reflects the unrestricted potential emissions of the source. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

	Unrestricted Source-Wide Emissions (ton/year)							
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1,2}	SO ₂	NO _x	VOC	CO	Total HAPs
477	0.002	0.002	0.002	-	-	0.07	-	0.0002
478	0.01	0.01	0.01	-	-	1.03	-	-
479	0.09	0.09	0.09	-	-	2.39	-	0.11
480	1.35	1.35	1.35	-	-	11.45	-	0.01
481	0.05	0.05	0.05	-	-	7.57	-	0.01
482	0.17	0.17	0.17	-	-	5.87	-	0.44
483	0.13	0.13	0.13	-	-	1.59	-	-
484	0.32	0.32	0.32	-	-	5.42	-	-
485	0.31	0.31	0.31	-	-	7.95	-	-
488	4.49	4.49	4.49	-	-	38.52	-	0.06
Natural Gas Combust.	0.12	0.48	0.48	0.04	6.34	0.35	5.32	0.12
Welding/Cutting	0.01	0.01	0.01	-	-	-	-	0.0001
Total PTE of Entire Source Excluding Fugitives*	7.08	7.44	7.44	0.04	6.34	82.22	5.32	0.77
Title V Major Source Thresholds	--	100	100	100	100	100	100	25
Title V Major Source Thresholds	--	100	100	100	50	50	100	25
Unpaved Roads	4.50	1.20	0.12	-	-	-	-	-
Paved Roads	0.03	0.01	0.002	-	-	-	-	-
Total PTE of Entire Source Including Source-Wide Fugitives*	11.31	8.64	7.56	0.04	6.34	82.22	5.32	0.77
MSOP Thresholds	25	25	25	25	25	25	100	25

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM_{2.5}, not particulate matter (PM), are each considered as a "regulated air pollutant."

²PM_{2.5} listed is direct PM_{2.5}.

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

The fugitive emissions of regulated air pollutants are counted toward the determination of MSOP (326 IAC 2-6.1) applicability

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

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1) of VOC is less than one hundred (100) tons per year, but equal to or greater than twenty-five (25) tons per year. The potential to emit of all other regulated air pollutants is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. The source will be issued an Minor Source Operating Permit (MSOP).

- (b) The potential to emit (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7. The source will be issued an Minor Source Operating Permit (MSOP).

Federal Rule Applicability Determination

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

New Source Performance Standards (NSPS):

- (a) The requirements of the New Source Performance Standard for Surface Coating of Metal Furniture, 40 CFR 60, Subpart EE and 326 IAC 12, are not included in the permit for this source, because the source does not perform metal furniture surface coating operation.
- (b) The requirements of the New Source Performance Standard for Industrial Surface Coating: Large Appliances, 40 CFR 60, Subpart SS and 326 IAC 12, are not included in the permit for this source, because the source does not perform surface coating operation of a large appliances.
- (c) The requirements of the New Source Performance Standard for Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines, 40 CFR 60, Subpart TTT and 326 IAC 12, are not included in the permit for this source, because it does not apply surface coating to plastic parts for use in the manufacture of business machines receive prime coats, color coats, texture coats, or touch-up coats.
- (d) There are no other New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Wood Furniture Manufacturing Operations, 40 CFR 63, Subpart JJ and 326 IAC 20-14 are not included in the permit for this source, since the source is an area source of HAPs emissions.
- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Plywood and Composite Wood Products, 40 CFR 63, Subpart DDDD are not included in the permit because the source is not a plywood and composite wood products (PCWP) manufacturing facility and is not located at a major source of HAPs emissions.
- (c) The requirements of National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Plastic Parts and Products, 40 CFR 63, Subpart PPPP and 326 IAC 20-81, are not included in the permit for this source, since the source does not perform surface coating on plastic parts or products and this source is not a major source of HAPs emissions.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Surface Coating of Wood Building Products, 40 CFR 63 Subpart QQQQ and 326 IAC 20-79, are not included in the permit for this source, since the facility does not perform surface coating of wood building products.
- (e) The requirements of National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Metal Furniture, 40 CFR 63, Subpart RRRR and 326 IAC 20-78, are not included in the permit, since this source does not apply surface coatings to metal furniture and this source is not a major source of HAPs emissions.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart

DDDDD and 326 IAC 20-95 are not included in the permit for this source, since the source is an area source of HAPs emissions and natural gas-fired combustion units are not industrial, commercial, or institutional boiler or process heater as defined in 40 CFR 63.7575.

- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH, are not included in the permit for this source, since the source does not have paint stripping operations that use the chemical methylene chloride and does not perform autobody refinishing operations, and does not perform spray application of coatings to any part or product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment containing the target HAP compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).
- (h) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Wood Preserving Area Sources, 40 CFR 63, Subpart QQQQQQ, are not included in the permit for this source, since the source not is a wood preserving operation as defined in 40 CFR 63.11433.
- (i) There are no other National Emission Standards for Hazardous Air Pollutants under 40 CFR 63, 326 IAC 14 and 326 IAC 20 included in the permit.

Compliance Assurance Monitoring (CAM):

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

State Rule Applicability - Entire Source

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

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

MSOP applicability is discussed under the PTE of the Entire Source After Issuance of the MSOP section of this document.

326 IAC 2-2 (PSD)

PSD applicability is discussed under the PTE of the Entire Source After Issuance of the MSOP section of this document.

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

The operation of this source will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

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

326 IAC 5-1 (Opacity Limitations)

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

- (1) 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.
- (2) 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.

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

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

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

This source (located in Dubois County) is located in one of the counties listed in 326 IAC 6.5 and it is one of the sources specifically listed in 326 IAC 6.5-4. Therefore, the facilities specifically identified in 326 IAC 6.5-4-9 are subject to the limitation requirements of 326 IAC 6.5-4-9. However, the one unit specificity listed in 326 IAC 6.5-4-9 is no longer at the plant.

All other facilities not specifically identified in 326 IAC 6.5-4-9 are subject to the requirements of 326 IAC 6.5-1-2.

State Rule Applicability – Individual Facilities

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

Surface Coating Booths (477, 478, 479, 480, 481, 482, 483, 484, 485, 488)

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

Pursuant to 326 IAC 6-3-1(c)(3), the requirements of 326 IAC 6-3-2 are not applicable to the surface coating booths, identified as 477, 478, 479, 480, 481, 482, 483, 484, 485, 488, since these manufacturing processes are subject to a more stringent particulate matter (PM) limitation that specified in 326 IAC 6.5.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

Pursuant to 326 IAC 6.5-1-2(h), the surface coating booths, identified as 477, 478, 479, 480, 481, 482, 483, 484, 485, and 488, shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, subject to the following:

- (a) The source shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

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

Note: Pursuant to 326 IAC 6.5-1-2(h)(3), the source is not exempt from Section (b) , since it is no longer operating under a permit under 326 IAC 2-7.

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

- (a) Even though, the surface coating booths, identified as 477, 478, 479, 480, 481, 482, 483, 484, and 485, were constructed after January 1, 1980, these are not subject to the requirements of

326 IAC 8-1-6 because each facility has unlimited VOC potential emissions that are less than twenty-five (25) tons per year.

- (b) Although, pursuant to 326 IAC 8-1-6(1), the surface coating booth, identified as 488, has the unlimited VOC potential emissions that are greater than twenty-five (25) tons per year, the facility is not subject to requirement of 326 IAC 8-1-6 because it is regulated by other rules in 326 IAC 8. The surface coating booth, identified as 488, is subject to the requirements of 326 IAC 8-2-12.

326 IAC 8-2-12 (Wood furniture and cabinet coating)

- (a) Pursuant to 326 IAC 8-2-12, this rule applies to surface coating facilities that apply coatings to wood furniture, because these facilities commenced construction after July 1, 1990 and have potential emissions of greater than fifteen (15) pounds per day of VOC, the surface coating booths, identified as 479, 480, 481, 482, 484, 485, and 488, are subject to the requirements of this rule.
- (b) Pursuant to 326 IAC 8-2-12, the surface coating booths, identified as 477, 478, and 483, commenced construction after July 1, 1990. However, since these facilities does not have potential emissions of greater than fifteen (15) pounds per day of VOC, the requirements of 326 IAC 8-2-12 do not apply.

326 IAC 8-11 (Wood Furniture Coatings)

This rule applies to wood furniture manufacturing operations in Lake, Porter, Clark, or Floyd. County. Pursuant to 326 IAC 8-11-1, this source is not subject to the requirements of 326 IAC 8-11 because the source is located in Dubois County.

Natural Gas Combustion Units

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

Fourteen (14) natural gas-fired heaters, two (2) natural gas-fired ovens, and three (3) natural gas-fired air make up units are not subject to the requirements of 326 IAC 6-2 because these units apply direct heat to the process. Therefore, the provisions of 326 IAC 6-2 do not apply.

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

Each of the natural gas-fired combustion units at this source is exempt from the requirements of 326 IAC 6-3-2, since liquid and gaseous fuels and combustion air are not considered as part of the process weight rate.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

Pursuant to 326 IAC 6.5-1-2(a), the particulate matter emissions from the natural gas-fired combustion units shall not exceed 0.03 grains per dry standard cubic foot (dscf).

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

Each of the natural gas-fired combustion units at this source is not subject to the requirements of 326 IAC 7-1.1, because each has unlimited SO₂ potential emissions of less than twenty-five (25) tons/year, and ten (10) pounds/hour.

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

Each of the natural gas-fired combustion units at this source is not subject to the requirements of 326 IAC 8-1-6, since it has unlimited VOC potential emissions of less than twenty-five (25) tons per year.

326 IAC 9-1 (Carbon Monoxide Emission Limits)

Each of the natural gas-fired combustion units at this source is not subject to 326 IAC 9-1-1 because there is no applicable emission limits for the source under 326 IAC 9-1-2.

Welding/Cutting/Brazing Operations

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

Pursuant to 326 IAC 6-3-1(b)(9) (Particulate Emissions for Manufacturing Processes), the welding operation is exempt from the requirements of 326 IAC 6-3-2 because each welding station uses less than six hundred twenty-five (625) pounds of rod or wire per day.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

Pursuant to 326 IAC 6.5-1-2(a), the particulate matter emissions from the welding/cutting/brazing operations each shall not exceed 0.03 grains per dry standard cubic foot (dscf).

Compliance Determination and Monitoring Requirements

- (a) There are no testing requirements applicable to this source.
- (b) The Compliance Monitoring Requirements applicable to this source are as follows:

Control Device / Emission Units	Parameter	Frequency	Range or Specification
Dry Filters / Surface Coating Booths (477, 478, 479, 480, 481, 482, 483, 484, 485, 488)	filter inspection	Daily	Verify that it is operated and maintained per manufacturer's specifications
	overspray observation	Weekly	Verify whether emissions are normal or abnormal
	overspray on the rooftops and the nearby ground	Monthly	Verify whether emissions are normal or abnormal

These monitoring conditions are necessary because the dry filters for the surface coating booths, identified as 477, 478, 479, 480, 481, 482, 483, 484, 485, 488, must operate properly to assure compliance with 326 IAC 6.5.

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 July 16, 2020. Additional information was received on August 10, 2020.

The operation of this source shall be subject to the conditions of the attached proposed MSOP No. 037-43066-00028. The staff recommends to the Commissioner that the MSOP be approved.

IDEM Contact

- (a) If you have any questions regarding this permit, please contact Daria Antipova, 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) 234-3429 or (800) 451-6027, and ask for Daria Antipova or (317) 234-3429.
- (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: Emission Calculations
PTE Summary**

**Company Name: Indiana Desk Company
Source Address: 4897 E. 450 N., Dubois, Indiana 47527
Permit No.: 037-43066-00028
Permit Reviewer: Daria Antipova**

Uncontrolled Potential to Emit (tons/yr)								
Emission Unit	PM	PM10	PM2.5 *	SO ₂	NO _x	VOC	CO	Total HAPs
477	0.002	0.002	0.002	--	--	0.07	--	0.0002
478	0.01	0.01	0.01	--	--	1.03	--	--
479	0.09	0.09	0.09	--	--	2.39	--	0.11
480	1.35	1.35	1.35	--	--	11.45	--	0.01
481	0.05	0.05	0.05	--	--	7.57	--	0.01
482	0.17	0.17	0.17	--	--	5.87	--	0.44
483	0.13	0.13	0.13	--	--	1.59	--	--
484	0.32	0.32	0.32	--	--	5.42	--	--
485	0.31	0.31	0.31	--	--	7.95	--	--
488	4.49	4.49	4.49	--	--	38.52	--	0.06
Natural Gas Combustion	0.12	0.48	0.48	0.04	6.34	0.35	5.32	0.12
Welding/Cutting	0.01	0.01	0.01	--	--	--	--	0.0001
Total Excluding Fugitive Emissions	7.08	7.44	7.44	0.04	6.34	82.22	5.32	0.77
Unpaved Roads	4.50	1.20	0.12	--	--	--	--	--
Paved Roads	0.03	0.01	0.002	--	--	--	--	--
Total Including Fugitive Emissions	11.61	8.64	7.56	0.04	6.34	82.22	5.32	0.77

* PM2.5 listed is direct PM2.5

Appendix A: Emissions Calculations
Appendix A: VOC and Particulate
From Surface Coating Operations
Emission Units: 477, 478, 479

Company Name: Indiana Desk Company
Source Address: 4897 E. 450 N., Dubois, Indiana 47527
Permit No.: 037-43066-00028
Permit Reviewer: Daria Antipova

Material	ID Number	Coating Number	Density (Lb/Gal)	% Solids	Weight % Volatile (H2O & Organics)	VOC lbs/gal	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (tons/yr)	Transfer Efficiency
Black Stain Concentrate	477	97-B5V-51	6.68	2.94%	97.06%	5.29	17.9%	79.2%	0.0%	0.00%	0.001594	2	5.29	5.29	0.02	0.40	0.07	0.00	70%
Paint Stripper	477	360-371-H5PBS	6.90	4.33%	95.67%	0.00	95.7%	0.0%	0.0%	0.00%	0.002215	2	0.00	0.00	0.0000	0.0000	0.0000	0.0017	70%
Walnut Sap Stain	478	4002S0035	6.74	1.57%	98.43%	6.63	0.06%	98.4%	0.0%	0.00%	0.000491	20	6.63	6.63	0.0651	1.5626	0.2852	0.0014	70%
Espresso Walnut Stain	478	4002S2029	6.77	3.36%	96.64%	6.57	-0.4%	97.0%	0.0%	0.00%	0.001790	20	6.57	6.57	0.2352	5.6449	1.0302	0.0107	70%
Acetone	478	50-X5W-7991	6.59	0.00%	100.00%	0.00	100.0%	0.0%	0.0%	0.00%	0.043890	20	0.00	0.00	0.0000	0.0000	0.0000	0.0000	70%
Walnut Sap Stain	479	4002S0035	6.74	1.57%	98.43%	6.63	0.1%	98.4%	0.0%	0.00%	0.004910	6	6.63	6.63	0.20	4.69	0.86	0.00	70%
Spray Stain Base	479	4002S1385	6.67	3.20%	96.80%	6.52	-1.0%	97.8%	0.0%	0.00%	0.000120	6	6.52	6.52	0.00	0.11	0.02	0.00	70%
Spray Stain Base	479	4002S2012	6.65	0.39%	99.61%	6.62	0.1%	99.5%	0.0%	0.00%	0.0009570	6	6.62	6.62	0.38	9.12	1.66	0.00	70%
Spray Stain, AC	479	4002S2020	6.74	2.51%	97.49%	6.57	0.0%	97.5%	0.0%	0.00%	0.001680	6	6.57	6.57	0.07	1.59	0.29	0.00	70%
Spray Stain, PW	479	4002S2021	6.74	3.30%	96.70%	6.57	-0.8%	97.5%	0.0%	0.00%	0.000480	6	6.57	6.57	0.02	0.45	0.08	0.00	70%
Spray Stain, HC	479	4002S2022	6.74	3.54%	96.46%	6.57	-1.0%	97.5%	0.0%	0.00%	0.002390	6	6.57	6.57	0.09	2.26	0.41	0.00	70%
Spray Stain, LW	479	4002S2025	6.74	2.50%	97.50%	6.57	0.0%	97.5%	0.0%	0.00%	0.004790	6	6.57	6.57	0.19	4.53	0.83	0.01	70%
Spray Stain, RM-MW	479	4002S2026	6.74	2.28%	97.72%	6.57	0.2%	97.5%	0.0%	0.00%	0.013160	6	6.57	6.57	0.52	12.45	2.27	0.02	70%
Spray Stain, EN	479	4002S2027	6.74	2.45%	97.55%	6.57	0.1%	97.5%	0.0%	0.00%	0.003590	6	6.57	6.57	0.14	3.40	0.62	0.00	70%
Spray Stain, CO	479	4002S2028	6.74	1.27%	98.73%	6.57	1.3%	97.5%	0.0%	0.00%	0.005980	6	6.57	6.57	0.24	5.66	1.03	0.00	70%
Spray Stain, EW	479	4002S2029	6.74	3.36%	96.64%	6.57	-0.8%	97.5%	0.0%	0.00%	0.001790	6	6.57	6.57	0.07	1.69	0.31	0.00	70%
Spray Stain, DFW	479	4002S2035	6.74	2.27%	97.73%	6.57	0.3%	97.5%	0.0%	0.00%	0.000960	6	6.57	6.57	0.04	0.91	0.17	0.00	70%
Cat. Vinyl Tie Coat	479	5202S0454	7.26	8.50%	91.50%	6.44	2.8%	88.7%	0.0%	0.00%	0.010290	6	6.44	6.44	0.40	9.54	1.74	0.05	70%
Cat. Vinyl Varnish Washcoat	479	02S0610(L1901681-06)	7.20	11.07%	88.93%	6.40	0.0%	88.9%	0.0%	0.00%	0.008970	6	6.40	6.40	0.34	8.27	1.51	0.06	70%
Tint P Red	479	8002T0212A	6.90	10.00%	90.00%	6.21	0.0%	90.0%	0.0%	0.00%	0.000240	6	6.21	6.21	0.01	0.21	0.04	0.00	70%
Tint P Yellow	479	8002T0214	6.90	10.00%	90.00%	6.21	0.0%	90.0%	0.0%	0.00%	0.000240	6	6.21	6.21	0.01	0.21	0.04	0.00	70%
Tint P Black	479	8002T0216	6.94	10.00%	90.00%	6.25	0.0%	90.0%	0.0%	0.00%	0.000360	6	6.25	6.25	0.01	0.32	0.06	0.00	70%
Tint P White	479	8002T0218	7.71	20.00%	80.00%	6.17	0.0%	80.0%	0.0%	0.00%	0.000480	6	6.17	6.17	0.02	0.43	0.08	0.01	70%
Wipe Stain, OC	479	4102S0002	6.60	12.91%	87.09%	5.85	-1.5%	88.6%	0.0%	0.00%	0.003590	6	5.85	5.85	0.13	3.02	0.55	0.02	70%
Wipe Stain, GW	479	4102S0003	6.60	10.67%	89.33%	5.85	0.7%	88.6%	0.0%	0.00%	0.011970	6	5.85	5.85	0.42	10.08	1.84	0.07	70%
Wipe Stain, DFW	479	4102S0005-MP	6.60	12.04%	87.96%	5.85	-0.7%	88.6%	0.0%	0.00%	0.001200	6	5.85	5.85	0.04	1.01	0.18	0.01	70%
Wipe Stain Base, Neutral	479	L1600958-4102S0100	6.60	9.70%	90.30%	5.85	1.7%	88.6%	0.0%	0.00%	0.000248	6	5.85	5.85	0.01	0.21	0.04	0.00	70%
Wipe Stain, RC	479	L1600978 - 4102S000	6.60	11.64%	88.36%	5.85	-0.3%	88.6%	0.0%	0.00%	0.015560	6	5.85	5.85	0.55	13.11	2.39	0.09	70%
Acetone	479	50-X5W-7991	6.59	0.00%	100.00%	0.00	100.0%	0.0%	0.0%	0.00%	0.049615	6	0.00	0.00	0.00	0.00	0.00	0.00	70%

Note:
 Acetone was exempted under the definition of volatile organic compounds (VOCs) by the U.S. EPA. Therefore, acetone is no longer counted toward the source VOC

METHODOLOGY

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

**Appendix A: Emissions Calculations
Appendix A: VOC and Particulate
From Surface Coating Operations
Emission Units: 480, 481, 482, and 483**

Company Name: Indiana Desk Company
Source Address: 4897 E. 450 N., Dubois, Indiana 47527
Permit No.: 037-43066-00028
Permit Reviewer: Daria Antipova

Material	ID Number	Coating Number	Density (Lb/Gal)	% Solids	Weight % Volatile (H2O & Organics)	VOC lbs/gal	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
Cat. Varnish Sealer	480	5202S0613	7.28	16.50%	83.50%	6.00	1.1%	82.4%	0.0%	0.00%	0.013160	6	6.00	6.00	0.47	11.37	2.08	0.12	70%
Cat. Varnish S/G	480	6202S0023	7.74	28.00%	72.00%	5.50	0.9%	71.1%	0.0%	0.00%	0.079220	6	5.50	5.50	2.61	62.74	11.45	1.35	70%
Varnish NF61 Low Glos Ad	480	6202S0611	7.76	24.87%	75.13%	5.74	1.2%	74.0%	0.0%	0.00%	0.000240	6	5.74	5.74	0.01	0.20	0.04	0.00	70%
Cat. Varnish Satin 35	480	6202S0612	7.76	23.94%	76.06%	5.74	2.1%	74.0%	0.0%	0.00%	0.009570	6	5.74	5.74	0.33	7.91	1.44	0.14	70%
Acetone	480	50-X5W-7991	6.59	0.00%	100.00%	0.00	100.0%	0.0%	0.0%	0.00%	0.030000	6	0.00	0.00	0.00	0.00	0.00	0.00	70%
Cat. Varnish High Gloss	480	6202S0614	7.76	23.92%	76.08%	5.74	2.1%	74.0%	0.0%	0.00%	0.002150	6	5.74	5.74	0.07	1.78	0.32	0.03	70%
Cat. Varnish ULF-White Bas	480	6212S0010	9.63	51.20%	48.80%	4.64	0.6%	48.2%	0.0%	0.00%	0.000120	6	4.64	4.64	0.00	0.08	0.01	0.00	70%
Cat. Varnish White Tinted	480	6212S0021	9.63	50.91%	49.09%	4.64	0.9%	48.2%	0.0%	0.00%	0.001030	6	4.64	4.64	0.03	0.69	0.13	0.04	70%
Reducer	480	7002-1907	8.10	0.00%	100.00%	8.10	0.0%	100.0%	0.0%	0.00%	0.000360	6	8.10	8.10	0.02	0.42	0.08	0.00	70%
Fast Reducer	480	7002-1961	6.99	0.00%	100.00%	6.99	0.0%	100.0%	0.0%	0.00%	0.000960	6	6.99	6.99	0.04	0.97	0.18	0.00	70%
																	11.45	1.35	
Columbian Walnut	481	4002S2028	6.74	1.27%	98.73%	6.57	1.3%	97.5%	0.0%	0.00%	0.005980	20	6.57	6.57	0.79	18.86	3.44	0.01	70%
Heritage Cherry	481	4002S2022	6.74	3.54%	96.46%	6.57	-1.0%	97.5%	0.0%	0.00%	0.002939	20	6.57	6.57	0.39	9.27	1.69	0.02	70%
Legacy Walnut	481	4002S2025	6.74	2.50%	97.50%	6.57	0.0%	97.5%	0.0%	0.00%	0.004790	20	6.57	6.57	0.63	15.11	2.76	0.02	70%
Dark Forest	481	4002S2035	6.74	2.27%	97.73%	6.57	0.3%	97.5%	0.0%	0.00%	0.000960	20	6.57	6.57	0.13	3.03	0.55	0.00	70%
Presidential Walnut	481	4002S2021	6.74	3.30%	96.70%	6.57	-0.8%	97.5%	0.0%	0.00%	0.000480	20	6.57	6.57	0.06	1.51	0.28	0.00	70%
Mahogany on Walnut	481	4002S2026	6.74	2.28%	97.72%	6.57	0.2%	97.5%	0.0%	0.00%	0.013160	20	6.57	6.57	1.73	41.50	7.57	0.05	70%
Stain Base	481	4002S1385	6.74	3.20%	96.80%	6.52	0.1%	96.7%	0.0%	0.00%	0.000120	20	6.52	6.52	0.02	0.38	0.07	0.00	70%
Stain Base	481	4002S2000	6.75	4.00%	96.00%	6.48	0.0%	96.0%	0.0%	0.00%	0.000240	20	6.48	6.48	0.03	0.75	0.14	0.00	70%
Stain Base	481	4002S2012	6.65	0.39%	99.61%	6.62	0.1%	99.5%	0.0%	0.00%	0.009570	20	6.62	6.62	1.27	30.41	5.55	0.01	70%
EW Espresso Walnut	481	4002S2029	6.74	3.36%	96.64%	6.57	-0.8%	97.5%	0.0%	0.00%	0.001790	20	6.57	6.57	0.24	5.64	1.03	0.01	70%
Acetone	481	50-X5W-7991	6.59	0.00%	100.00%	0.00	100.0%	0.0%	0.0%	0.00%	0.049615	20	0.00	0.00	0.00	0.00	0.00	0.00	70%
English Walnut	481	4002S2027	6.74	2.45%	97.55%	6.57	0.1%	97.5%	0.0%	0.00%	0.003590	20	6.57	6.57	0.47	11.32	2.07	0.02	70%
Autumn Cherry Stain	481	4002S2020	6.74	2.51%	97.49%	6.57	0.0%	97.5%	0.0%	0.00%	0.001680	20	6.57	6.57	0.22	5.30	0.97	0.01	70%
Bourbon Cherry Stain	481	4002S2024	6.74	2.51%	97.49%	6.57	0.0%	97.5%	0.0%	0.00%	0.000480	20	6.57	6.57	0.06	1.51	0.28	0.00	70%
Black Tint	481	8002T0216	6.94	10.00%	90.00%	6.24	0.1%	89.9%	0.0%	0.00%	0.000240	20	6.24	6.24	0.03	0.72	0.13	0.00	70%
White Tint	481	8002T0218	7.71	20.00%	80.00%	6.17	0.0%	80.0%	0.0%	0.00%	0.000480	20	6.17	6.17	0.06	1.42	0.26	0.02	70%
																	7.57	0.05	
Cat. Vinyl TieCoat	482	5202S0454	7.26	8.50%	91.50%	6.45	2.7%	88.8%	0.0%	0.00%	0.010390	20	6.45	6.45	1.34	32.17	5.87	0.17	70%
Cat. Varnish WashCoat	482	5202S0610	7.20	11.07%	88.93%	6.40	0.0%	88.9%	0.0%	0.00%	0.005980	20	6.40	6.40	0.77	18.37	3.35	0.13	70%
Catalyst	482	9002C0610	7.26	5.99%	94.01%	6.83	-0.1%	94.1%	0.0%	0.00%	0.000360	20	6.83	6.83	0.05	1.18	0.22	0.00	70%
Acetone	482	50-X5W-7991	6.59	0.00%	100.00%	0.00	100.0%	0.0%	0.0%	0.00%	0.049615	20	0.00	0.00	0.00	0.00	0.00	0.00	70%
																	5.87	0.17	
Cat. Varnish Sealer	483	5202S0613	7.28	16.50%	83.50%	6.00	0.0%	83.5%	0.0%	0.00%	0.002990	20	6.08	6.08	0.36	8.72	1.59	0.09	70%
Cat Varnish Base	483	6212S0010	9.63	51.20%	48.80%	4.64	0.0%	48.8%	0.0%	0.00%	0.000120	20	4.70	4.70	0.01	0.27	0.05	0.02	70%
Cat. Varnish Tinted	483	6212S0021	9.63	50.91%	49.09%	4.64	0.0%	49.1%	0.0%	0.00%	0.001030	20	4.73	4.73	0.10	2.34	0.43	0.13	70%
Catalyst 610	483	9002C0610	7.26	5.99%	94.01%	6.83	0.0%	94.0%	0.0%	0.00%	0.001050	20	6.83	6.83	0.14	3.44	0.63	0.01	70%
Acetone	483	50-X5W-7991	6.59	0.00%	100.00%	0.00	0.0%	0.0%	0.0%	0.00%	0.030000	20	0.00	0.00	0.00	0.00	0.00	0.00	70%
																	1.59	0.13	

Note:
Acetone was exempted under the definition of volatile organic compounds (VOCs) by the U.S. EPA. Therefore, acetone is no longer counted toward the source VOC

METHODOLOGY

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

**Appendix A: Emissions Calculations
HAPs
From Surface Coating Operations
Emission Units: 477 and 479**

Company Name: Indiana Desk Company
Source Address: 4897 E. 450 N., Dubois, Indiana 47527
Permit No.: 037-43066-00028
Permit Reviewer: Daria Antipova

Name of Coatings, Solvents, Etc	I.D. Number	HAP Name	HAP CAS No.	Weight % HAP	Material density (lbs/gal)	Material gal/unit	Maximum Number of Units/hr	HAP Emissions lbs/hr	PTE HAPs tons/year	Coating Number
Black Stain Concentra	477	Chromium 3 Complex	0	0.265	6.68	0.001594	2	0.00006	0.00025	97-B5V-51
									0.00025	
Cat. Vinyl Tie Coat	479	Formaldehyde	50000	0.019	7.26	0.010290	6	0.000085	0.000373	5202S0454
		Ethylbenzene	100414	1.013	7.26	0.010290	6	0.004541	0.019888	5202S0454
		Xylenes	1330207	5.760	7.26	0.010290	6	0.025818	0.113084	5202S0454
Stain Base	479	Methyl Isobutyl Ketone	108101	20.000	6.74	0.000120	6	0.000971	0.004251	4002S1385
									0.11308	

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

Appendix A: Emissions Calculations
HAPs
From Surface Coating Operations
Emission Units: 480 and 481

Company Name: Indiana Desk Company
Source Address: 4897 E. 450 N., Dubois, Indiana 47527
Permit No.: 037-43066-00028
Permit Reviewer: Daria Antipova

Name of Coatings, Solvents, Etc	I.D.	HAP Name	HAP CAS No.	Weight % HAP	Material density (lbs/gal)	Gallons of Material per unit	Maximum Number of Units per Hour	HAP Emissions lbs per Hour	PTE HAPs Tons per Year	Coating Number
	Number									
Stain Base	481	Methyl Isobutyl Ketone	108101	20.000	6.74	0.000120	20	0.00324	0.01417	4002S1385
									0.01417	
Cat. Varnish S/G	480	Formaldehyde	50000	0.060	7.74	0.079220	6	0.00221	0.00967	6202S0023
									0.00967	

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

Appendix A: Emissions Calculations
HAPs
From Surface Coating Operations
Emission Units: 482, 483, 484 and 485

Company Name: Indiana Desk Company
 Source Address: 4897 E. 450 N., Dubois, Indiana 47527
 Permit No.: 037-43066-00028
 Permit Reviewer: Daria Antipova

Name of Coatings, Solvents, Etc	I.D. Number	HAP Name	HAP CAS No.	Weight % HAP	Material density (lbs/gal)	Gallons of Material per unit	Maximum Number of Units per Hour	HAP Emissions lbs per Hour	PTE HAPs Tons per Year	Coating Number
	484	Coating contain NO HAPs							0.00000	
	483	Coating contain NO HAPs							0.00000	
	485	Coating contain NO HAPs							0.00000	
Cat. Vinyl TieCoat	482	Formaldehyde	50000	0.019	7.26	0.010290	20	0.00028	0.00124	5202S0454
		Ethyl Benzene	100414	1.013	7.26	0.010290	20	0.01514	0.06629	
		Xylene	1330207	5.760	7.26	0.010290	20	0.08606	0.37695	
									0.44448	

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

Appendix A: Emissions Calculations

HAPs

From Surface Coating Operations

Emission Unit: 488

Company Name: Indiana Desk Company
Source Address: 4897 E. 450 N., Dubois, Indiana 47527
Permit No.: 037-43066-00028
Permit Reviewer: Daria Antipova

Name of Coatings, Solvents, Etc	I.D. Number	HAP Name	HAP CAS No.	Weight % HAP	Material density (lbs/gal)	Gallons of Material per unit	Maximum Number of Units per Hour	HAP Emissions lbs per Hour	PTE HAPs Tons per Year	Coating Number
Cat Varnish DB S/G	488	Formaldehyde	50000	0.121	7.71	0.078927	20	0.01476	0.06466	6202S0023
									0.06466	

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

**Appendix A: Emissions Calculations
Natural Gas Combustion
MM BTU/HR <100**

Company Name: Indiana Desk Compnay
Source Address: 4897 E. 450 N., Dubois, Indiana 47527
Permit No.: 037-43066-00028
Permit Reviewer: Daria Antipova

Unit ID	Max Heat Input Capacity (MMBtu/Hr)
486	1.50
487	1.50
517	1.50
518	1.50
539	1.50
527	1.20
519	0.90
526	0.90
520	0.60
521	0.60
523	0.60
524	0.60
525	0.60
522	0.39
533	0.23
532	0.16
534	0.16
535	0.16
536	0.16

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
14.8	1020	126.8

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.12	0.48	0.48	0.04	6.34	0.35	5.32

*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					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total - Organics
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	1.3E-04	7.6E-05	4.8E-03	0.11	2.2E-04	0.12

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	3.2E-05	7.0E-05	8.9E-05	2.4E-05	1.3E-04	3.5E-04
					Total HAPs	0.12
					Worst HAP	0.11

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
Welding and Thermal Cutting**

Company Name: Indiana Desk Company
Source Address: 4897 E. 450 N., Dubois, Indiana 47527
Permit Number: 037-43066-00028
Permit Reviewer: Daria Antipova

Process	Number of Stations	Maximum electrode consumption per station (lbs/hr)	Maximum electrode consumption per station (lbs/day)	Emission Factors* (lb pollutant/lb electrode)				Potential to Emit (lbs/hr)				HAPs (lbs/hr)	
				PM10/PM2.5	Mn	Ni	Cr	PM10/PM2.5	Mn	Ni	Cr		
Welding													
Metal Inert Gas (MIG)(carbon steel)	1	0.00067	0.01608		0.0055	0.0005			0.000	3.4E-07	0	0	3.4E-07
Flame Cutting	Number of Stations	Maximum Metal Thickness Cut (inches)	Maximum Metal Cutting Rate (inches/minute)	Maximum Metal Cutting Rate (inches/hour)	Emission Factors (lb pollutant/1,000 inches cut, 1 inch thick)**				Potential to Emit (lbs/hr)				HAPs (lbs/hr)
					PM10/PM2.5	Mn	Ni	Cr	PM10/PM2.5	Mn	Ni	Cr	
Oxyacetylene	1	0.25	1	60	0.1622	0.0005	0.0001	0.0003	0.002	7.5E-06	1.5E-06	4.5E-06	0.000014
Totals													
Potential to Emit (lbs/hr)									0.00	7.8E-06	1.5E-06	4.5E-06	1.4E-05
Potential to Emit (lbs/day)									0.06	0.000	3.6E-05	0.000	0.000
Potential to Emit (tons/year)									0.01	3.4E-05	6.6E-06	2.0E-05	6.1E-05

Methodology:

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted).

Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Plasma cutting: Potential to Emit (lbs/hr) = (Number of stations) x (Maximum Metal Cutting Rate, inches/minute) x (60 minutes/hr) x (Emission Factor, lb pollutant/1,000 inches cut, 8 mm thick)

Cutting: Potential to Emit (lbs/hr) = (Number of stations) x (Maximum Metal Thickness, inches) x (Maximum Metal Cutting Rate, inches/minute) x (60 minutes/hour) x (Emission Factor, lb pollutant/1,000 inches cut, 1" thick)

Welding: Potential to Emit (lbs/hr) = (Number of stations) x (Maximum electrode consumption per station, lbs/hr) x (Emission Factor, lb pollutant/lb of electrode used)

Potential to Emit (lbs/day) = Potential to Emit (lbs/hr) x (24 hours/day)

Potential to Emit (tons/year) = Potential to Emit (lbs/hr) x (8,760 hours/year) x (1 ton/2,000 lbs)

**Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads**

Company Name: Indiana Desk Company
Source Address: 4897 E. 450 N., Dubois, Indiana 47527
Permit Number: 037-43066-00028
Permit Reviewer: Daria Antipova

Paved Roads at Industrial Site

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight of Loaded Vehicle (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Sport Utility Vehicle (4-door) Entering	5.0	1.0	5.0	4.0	20.0	303	0.057	0.3	104.7
Sport Utility Vehicle (4-door) Leaving	5.0	1.0	5.0	4.0	20.0	303	0.057	0.3	104.7
Totals			10.0		40.0			0.6	209.5

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

Mitigated Emission Factor, $E_f = [k * (sL)^{0.91} * (W)^{1.02}]$ (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	4.0	4.0	4.0	tons = average vehicle weight
sL =	9.7	9.7	9.7	g/m ² = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E * [1 - (p/4N)]$ (Equation 2 from AP-42 13.2.1)

Adjusted Emission Factor, $E_{ext} = E_f * [1 - (p/4N)]$
 where p = days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
 N = days per year

	PM	PM10	PM2.5	
Mitigated Emission Factor, $E_f =$	0.358	0.072	0.0176	lb/mile
Adjusted Emission Factor, $E_{ext} =$	0.327	0.065	0.0161	lb/mile
Dust Control Efficiency =	0%	0%	0%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Sport Utility Vehicle (4-door) Entering	0.02	0.00342	0.00084
Sport Utility Vehicle (4-door) Leaving	0.02	0.00342	0.00084
Totals	0.03	0.00685	0.00168

Methodology

Total Weight driven per day (tc = [Maximum Weight of Loaded Vehicle (tons/trip)] * [Maximum trips per day (trip/day)])
 Maximum one-way distance (n = [Maximum one-way distance (feet/trip)] / [5280 ft/mile])
 Maximum one-way miles (mile) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
 Average Vehicle Weight Per Trip = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
 Average Miles Per Trip (miles = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)])
 Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
 Mitigated PTE (Before Control) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
 Mitigated PTE (After Control) (t) = [Mitigated PTE (Before Control) (tons/yr)] * [1 - Dust Control Efficiency]

Abbreviations

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

**Appendix A: Emission Calculations
Fugitive Dust Emissions - Unpaved Roads**

Company Name: Indiana Desk Company
Source Address: 4897 E. 450 N., Dubois, Indiana 47527
Permit Number: 037-43066-00028
Permit Reviewer: Daria Antipova

Unpaved Roads at Industrial Site

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

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight of Loaded Vehicle (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Sport Utility Vehicle (4-door) Entering	55.0	1.0	55.0	4.0	220.0	376	0.071	3.9	1429.6
Sport Utility Vehicle (4-door) Leaving	55.0	1.0	55.0	4.0	220.0	376	0.071	3.9	1429.6
Freight Truck (5 axles) Entering	5.0	1.0	5.0	40.0	200.0	324	0.061	0.3	112.0
Freight Truck (5 axles) Leaving	5.0	1.0	5.0	40.0	200.0	324	0.061	0.3	112.0
Moving Truck (2 axles) Entering	2.0	1.0	2.0	10.0	20.0	324	0.061	0.1	44.8
Moving Truck (2 axles) Leaving	2.0	1.0	2.0	10.0	20.0	324	0.061	0.1	44.8
Totals			124.0		880.0			8.7	3172.7

Average Vehicle Weight Per Trip =

7.1

 tons/trip
Average Miles Per Trip =

0.07

 miles/trip

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

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	6.0	6.0	6.0	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Iron and Steel Production)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)
W =	7.1	7.1	7.1	tons = average vehicle weight
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)

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

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

125

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

	PM	PM10	PM2.5	
Mitigated Emission Factor, Ef =	4.44	1.18	0.12	lb/mile
Mitigated Emission Factor, Eext =	2.92	0.78	0.08	lb/mile
Dust Control Efficiency =	0%	0%	0%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5(tons/yr)
Sport Utility Vehicle (4-door) Entering	2.09	0.56	0.06
Sport Utility Vehicle (4-door) Leaving	2.09	0.56	0.06
Freight Truck (5 axles) Entering	0.16	0.04	0.00
Freight Truck (5 axles) Leaving	0.16	0.04	0.00
Totals	4.50	1.20	0.12

Methodology

Total Weight driven per day (ton/c) = [Maximum Weight of Loaded Vehicle (tons/trip)] * [Maximum trips per day (trip/day)]
Maximum one-way distance (mi/tr) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
Maximum one-way miles (miles/d) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
Average Vehicle Weight Per Trip = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
Average Miles Per Trip (miles/tr) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
Mitigated PTE (Before Control) (t) = (Maximum one-way miles (miles/yr)) * (Mitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
Mitigated PTE (After Control) (ton) = (Mitigated PTE (Before Control) (tons/yr)) * (1 - Dust Control Efficiency)

Abbreviations

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

Greg Hildenbrand
Indiana Desk Company
1224 Mill St
Jasper IN 475470270

September 3, 2020

Re: Public Notice
Indiana Desk Company
Permit Level: MSOP
Permit Number: 037-43066-00028

Dear Greg Hildenbrand:

Enclosed is a copy of the preliminary findings for your draft air permit, including the draft permit, Technical Support Document, emission calculations, and the Notice of 30-Day Period for Public Comment.

Our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person. The Notice of 30-Day Period for Public Comment (without supporting documents) has also been sent to the OAQ Permits Branch Interested Parties List and, if applicable, your Consultant/Agent and/or Responsible Official/Authorized Individual.

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/ide/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 Jasper-Dubois County Public Library, 1116 Main St, Jasper IN 47546. 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 Daria Antipova, 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 4-3429 or dial (317) 234-3429.

Sincerely,

L. Pogost

L. Pogost
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter 8/10/2020



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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

September 3, 2020

To: Jasper-Dubois County Public Library 1116 Main St Jasper IN 47546

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: Indiana Desk Company
Permit Number: 037-43066-00028

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 Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library updated 4/2019



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Governor

Bruno L. Pigott
Commissioner

Notice of Public Comment

September 3, 2020

Indiana Desk Company

037-43066-00028

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 Joanne Smiddie-Brush with the Air Permits Administration Section at 1-800-451-6027, ext. 3-0185 or via e-mail at JBRUSH@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
PN AAA Cover Letter 2/28/2020

Mail Code 61-53

IDEM Staff	LPOGOST September 3, 2020 INDIANA DESK COMPANY 037-43066-00028 (draft)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Greg Hildenbrand Indiana Desk Company 1224 Mill St Jasper IN 475470270 (Source CAATS)										
2		Dubois County Commissioners One Courthouse Square Jasper IN 47546 (Local Official)										
3		Jasper-Dubois County Public Library 1116 Main St Jasper IN 47546 (Library)										
4		Dubois County Health Department 1187 S St. Charles Street Jasper IN 47546 (Health Department)										
5		John Blair 800 Adams Ave Evansville IN 47713 (Affected Party)										
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10												
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