



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb
Governor

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Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

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

for SMART, LLC in Elkhart County

Significant Source Modification No.: 039-43127-00750

Significant Permit Modification No.: 039-43197-00750

The Indiana Department of Environmental Management (IDEM) has received an application from SMART, LLC, located at 70680 County Road 23, New Paris, Indiana 46553, for a significant modification of its Part 70 Operating Permit issued on December 6, 2017. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow SMART, LLC to make certain changes at its existing source. SMART, LLC has applied to construct and operate new storage silo, metal welding and cutting equipment and a wastewater treatment system.

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

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

Goshen Public Library
601 S 5th St
Goshen IN 46526

and

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

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

A copy of the 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 SSM 039-43127-00750 and SPM 039-43197-00750 in all correspondence.

Comments should be sent to:

Mehul Sura
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Mehul Sura or (317) 233-6868
Or dial directly: (317) 233-6868
Fax: (317)-232-6749 attn: Mehul Sura
E-mail: msura@IDEM.IN.gov

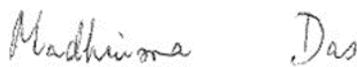
All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have 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 Mehul Sura of my staff at the above address.



Madhurima D. Moulik, Ph.D., Section Chief
Permits Branch
Office of Air Quality



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Eric J. Holcomb
Governor

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Bruno L. Pigott
Commissioner

Terry Sauer
SMART, LLC
70680 County Road 23
New Paris, Indiana 46553

Re: 039-43197-00750
Significant Permit Modification

Dear Terry Sauer:

SMART, LLC was issued Part 70 Operating Permit Renewal No. T039-38960-00750 on December 6, 2017 for a stationary wood cabinet manufacturing operation located at 70680 County Road 23, New Paris, Indiana 46553. An application requesting changes to this permit was received on August 6, 2020. Pursuant to the provisions of 326 IAC 2-7-12, a Significant Permit Modification to this permit is hereby approved as described in the attached Technical Support Document.

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

A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. A copy of the application and permit 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. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: <http://www.in.gov/idem/airquality/2356.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

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

If you have any questions regarding this matter, please contact Mehul Sura, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 233-6868 or (800) 451-6027, and ask for Mehul Sura or (317) 233-6868.

Sincerely,

Madhurima D. Moulik, Ph.D., Section Chief
Permits Branch
Office of Air Quality

Attachments: Modified Permit and Technical Support Document

cc: File - Elkhart County
Elkhart County Health Department
U.S. EPA, Region 5
Compliance and Enforcement Branch
IDEM Northern Regional Office



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Part 70 Operating Permit OFFICE OF AIR QUALITY

**SMART, LLC
70680 County Road 23
New Paris, Indiana 46553**

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

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

Operation Permit No.: T039-38960-00750	
Master Agency Interest ID.: 106876	
Issued by: Original signed by: Nathan C. Bell, Section Chief Permits Branch, Office of Air Quality	Issuance Date: December 6, 2017 Expiration Date: December 6, 2022

Significant Permit Modification No. 039-41748-00750, issued on September 26, 2019

Significant Permit Modification No.: 039-42218-00750, issued on February 12, 2020

Significant Permit Modification No.: 039-43197-00750	
Master Agency Interest ID.: 106876	
Issued by: Madhurima D. Moulik, Ph.D., Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date: December 6, 2022

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary wood cabinet manufacturing operation.

Source Address:	70680 County Road 23, New Paris, Indiana 46553
General Source Phone Number:	574-831-5010
SIC Code:	2434 (Wood Kitchen Cabinets)
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD 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 [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

- (a) One (1) woodworking operation, constructed in 2014, identified as WW1, with a maximum capacity of 500 lbs per hour, and using an integral baghouse (DC1) as control.
- (b) Two (2) woodworking operations, constructed in 2014, identified as WW2 and WW3, each with a maximum capacity of 1250 lbs per hour, and each using an integral baghouse (DC2 and DC3) as control.
- (c) Four (4) spray booths, constructed in 2014, identified as SB1, SB2, SB3, and SB4, each with a maximum capacity of 12.5 parts per hour, each utilizing airless spray application, each using dry filter as control, and exhausting to stacks SB1S, SB2S, SB3S, and SB4S.
- (d) Two (2) flat lines, constructed in 2014, consisting of the following:
 - (1) Flat Line 1 (FL1), approved in 2020 for modification, consisting of the following two (2) mutually exclusive operations:
 - (i) A stain operation with a maximum capacity of 125 parts per hour, composed of (3) spray booths, identified as FLST1, FLSC1, and FLTC1, respectively each utilizing airless spray application, each using dry filters as control, and exhausting to stacks FLST1S, FLSC1S, and FLTC1S, respectively.
 - (ii) A paint operation with a maximum capacity of 83.75 parts per hour, composed of (2) spray booths, identified as FLPC1 and FLPC2, respectively, each utilizing airless spray application, each using dry filters as control, and exhausting to stacks FLPC1S and FLTC1S, respectively. Spray booths FLPC1 and FLPC2 were constructed in 2015.
 - (iii) Four (4) drying ovens and two (2) flash tunnels that are heated by hot water, identified as followed:

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- (A) Drying Oven 1, identified as FL1DO1, exhausting to stack FLST1S;
- (B) Flash Tunnel 1, identified as FL1FT1, exhausting to stack FLSC1S;
- (C) Drying Oven 2, identified as FL1DO2, exhausting to stack FLSC1S;
- (D) Flash Tunnel 2, identified as FL1FT2, exhausting to stack FLTC1S;
- (E) Drying Oven 3, identified as FL1DO3, exhausting to stack FLTC1S; and
- (F) Drying Oven 4, identified as FL1DO4, exhausting to stack FLTC1S.

The stain operation and the paint operation cannot be operated simultaneously.

- (2) Flat Line 2 (FL2), constructed in 2014, with a maximum capacity of 125 parts per hour, composed of three (3) spray booths, each utilizing airless spray application, each using dry filters as control, and exhausting to FLST2S, FLSC2S, and FLTC2S, respectively.
 - (i) Four (4) drying ovens and two (2) flash tunnels that are heated by hot water, identified as followed:
 - (A) Drying Oven 1, identified as FL2DO1, exhausting to stack FLST2S;
 - (B) Flash Tunnel 1, identified as FL2FT1, exhausting to stack FLST2S;
 - (C) Drying Oven 2, identified as FL2DO2, exhausting to stack FLST2S;
 - (D) Flash Tunnel 2, identified as FL2FT2, exhausting to stack FLSC2S;
 - (E) Drying Oven 3, identified as FL2DO3, exhausting to stack FLSC2S; and
 - (F) Drying Oven 4, identified as FL2DO4, exhausting to stack FLSC2S.
 - (e) One (1) panel brush, used to remove wood dust from wood panels, identified as WW4, constructed in 2019, with a maximum capacity of 1500 lbs per hour, using baghouse (DC4) as control and exhausting inside.
 - (f) One (1) storage silo, identified as S1, approved in 2020 for construction, with a maximum storage capacity of 750 cubic yard of wood material, controlled by cyclonic baghouse (SC1), and exhausting to stack SC1S.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

- (a) Four (4) natural gas-fired air rotation furnaces, identified as AR-1 through AR-4, constructed in 2014, with a maximum heat input capacity of 0.464 MMBtu/hr, each.

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- (b) Three (3) natural gas-fired air makeup units, identified as AM-1 through AM-3, constructed in 2014, with a maximum heat input capacity of 5.95 MMBtu/hr, each.
- (c) Five (5) natural gas-fired space heaters, identified as SLH1 through SLH5, constructed in 2014, with a maximum heat input capacity of 0.38 MMBtu/hr, each.
- (d) Two (2) natural gas-fired office furnaces, identified as OH1 and OH2, constructed in 2014, with a maximum heat input capacity of 0.0884 MMBtu/hr, each.
- (e) One (1) natural gas-fired production office heater, identified as OH3, constructed in 2014, with a maximum heat input capacity of 0.0663 MMBtu/hr.
- (f) One (1) natural gas-fired shipping office heater, identified as OH4, constructed in 2014, with a maximum heat input capacity of 0.0442 MMBtu/hr.
- (g) One (1) hot melt adhesive application, using roll coating application method, used to bond foil/paper to wood panels, identified as PL1, constructed in 2019, with a maximum capacity of 150 units per hour, using roll coating application method, without control and not emitting VOC and HAPs.
- (h) Two (2) air rotational furnaces used for space heating, identified as AR5 and AR6, constructed in 2019, with maximum capacities of four-tenths (0.40) and fifty-eight hundredths (0.58), respectively, using no control, and exhausting indoors.
- (i) Two (2) ultraviolet cure light tunnels, identified as FL1UV1 and FL1UV2, venting to stack FL1UV1S and FL1UV2S, respectively.
- (j) Two (2) metal inert gas (MIG) welders, used for maintenance purpose.
- (k) One (1) Oxyacetylene torch, used for maintenance purpose.
- (l) One (1) wastewater treatment system for treatment of aqueous coating wash water using Ph adjustment and rotary vacuum drum filter.
- (m) Paved roads.

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

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

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B

GENERAL CONDITIONS

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

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

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

- (a) This permit, T039-38960-00750, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:
- (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(35).

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

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

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

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

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

(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

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

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

The Permittee shall implement the PMPs.

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

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

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ or Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

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

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

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

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

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

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

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

- (a) All terms and conditions of permits established prior to T039-38960-00750 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

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

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

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

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

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

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

- (a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

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

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b)(1) and (c)(1). The Permittee shall make such records available, upon reasonable request, for public review.

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

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

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

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

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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

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- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall

preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

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- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

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

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

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

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

C.11 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

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

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.13 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

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

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.

- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

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

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

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

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

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(33) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

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

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

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

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

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

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

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

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

C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

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

- (b) The address for report submittal is:

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

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

- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) woodworking operation, constructed in 2014, identified as WW1, with a maximum capacity of 500 lbs per hour, and using an integral baghouse (DC1) as control.
- (b) Two (2) woodworking operations, constructed in 2014, identified as WW2 and WW3, each with a maximum capacity of 1250 lbs per hour, and each using an integral baghouse (DC2 and DC3) as control.
- (e) One (1) panel brush, used to remove wood dust from wood panels, identified as WW4, constructed in 2019, with a maximum capacity of 1500 lbs per hour, using baghouse (DC4) as control and exhausting inside.
- (f) One (1) storage silo, identified as S1, approved in 2020 for construction, with a maximum storage capacity of 750 cubic yard of wood material, controlled by cyclonic baghouse (SC1), and exhausting to stack SC1S.

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

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

D.1.1 PSD Minor Limit [326 IAC 2-2]

- (a) In order to assure that the requirements of 326 IAC 2-2 (PSD) do not apply, the integral control devices for PM, PM10 and PM2.5 control for the woodworking units WW1, WW2 and WW3 shall be in operation and control emissions from woodworking at all times these woodworking units are in operation.
- (b) In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the PM, PM10, and PM2.5 emissions from the following units shall be less than the limits specified in the table below:

Emission Unit	ID	PM Limit (lb/hr)	PM10 Limit (lb/hr)	PM2.5 Limit (lb/hr)
Storage Silo	S1	12.06	12.06	12.06
panel brush	WW4	0.03	0.03	0.03

Compliance with these limits, combined with the potential to emit PM, PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide PM, PM10, and PM2.5 emissions to less than 250 tons per year, each, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.2 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, particulate emissions from each of the operations shall not exceed the pound per hour limits listed in the table below:

Unit ID	Unit Description	Max. Throughput Rate (tons/hr)	Particulate Emission Limit (lbs/hr)
WW1	Woodworking Operation	0.25	1.62
WW2	Woodworking Operation	0.625	2.99
WW3	Woodworking Operation	0.625	2.99
WW4	panel brush	0.75	3.38
S1	Storage Silo	1.25	4.7

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

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

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

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities and any associated control devices. Section B – Preventative Maintenance Plan contains the Permittee’s obligation with regard to Preventative Maintenance Plans.

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

D.1.4 Particulate Control [326 IAC 2-2] [326 IAC 6-3-2]

- (a) In order to assure compliance with Conditions D.1.1 and D.1.2, the baghouses for particulate control shall be in operation and control emissions from WW1 through WW4 and Storage Silo (S1) at all times that these facilities are in operation.
- (b) In the event that bag failure is observed in a multi-compartment dust collector, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.1.5 Visible Emissions Notations

- (a) Visible emission notations of the exhausts from the baghouses DC1 through DC3 and SC1 shall be performed once per day during normal daylight operations when one or both dual manual bag dump systems and associated fabric filter dust collectors are operating. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

- (e) If abnormal emissions are observed, the Permittee shall take 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.

D.1.6 Baghouse Inspections

The Permittee shall perform quarterly inspections of the baghouse (DC4) controlling particulate emissions from WW4 to verify that baghouse (DC4) is being operated and maintained in accordance with the manufacturer's specifications. Inspections required by this condition shall not be performed in consecutive months. All defective bags/filters shall be replaced.

D.1.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

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

Bag failure can be indicated by a significant drop in the baghouse pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces, or triboflows.

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

D.1.8 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.5, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhaust, when exhausting to the atmosphere. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).
- (b) To document the compliance status with Condition D.1.6, the Permittee shall maintain records of the dates and results of the inspections required under Condition D.1.6.
- (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) Four (4) spray booths, constructed in 2014, identified as SB1, SB2, SB3, and SB4, each with a maximum capacity of 12.5 parts per hour, each utilizing airless spray application, each using dry filter as control, and exhausting to stacks SB1S, SB2S, SB3S, and SB4S.
- (d) Two (2) flat lines, constructed in 2014, consisting of the following:
 - (1) Flat Line 1 (FL1), approved in 2020 for modification, consisting of the following two (2) mutually exclusive operations:
 - (i) A stain operation with a maximum capacity of 125 parts per hour, composed of (3) spray booths, identified as FLST1, FLSC1, and FLTC1, respectively each utilizing airless spray application, each using dry filters as control, and exhausting to stacks FLST1S, FLSC1S, and FLTC1S, respectively.
 - (ii) A paint operation with a maximum capacity of 83.75 parts per hour, composed of (2) spray booths, identified as FLPC1 and FLPC2, respectively, each utilizing airless spray application, each using dry filters as control, and exhausting to stacks FLPC1S and FLTC1S, respectively. Spray booths FLPC1 and FLPC2 were constructed in 2015.
 - (iii) Four (4) drying ovens and two (2) flash tunnels that are heated by hot water, identified as followed:
 - (A) Drying Oven 1, identified as FL1DO1, exhausting to stack FLST1S;
 - (B) Flash Tunnel 1, identified as FL1FT1, exhausting to stack FLSC1S;
 - (C) Drying Oven 2, identified as FL1DO2, exhausting to stack FLSC1S;
 - (D) Flash Tunnel 2, identified as FL1FT2, exhausting to stack FLTC1S;
 - (E) Drying Oven 3, identified as FL1DO3, exhausting to stack FLTC1S; and
 - (F) Drying Oven 4, identified as FL1DO4, exhausting to stack FLTC1S.

The stain operation and the paint operation cannot be operated simultaneously.

- (2) Flat Line 2 (FL2), constructed in 2014, with a maximum capacity of 125 parts per hour, composed of three (3) spray booths, each utilizing airless spray application, each using dry filters as control, and exhausting to FLST2S, FLSC2S, and FLTC2S, respectively.
 - (i) Four (4) drying ovens and two (2) flash tunnels that are heated by hot water, identified as followed:

- (A) Drying Oven 1, identified as FL2DO1, exhausting to stack FLST2S;
- (B) Flash Tunnel 1, identified as FL2FT1, exhausting to stack FLST2S;
- (C) Drying Oven 2, identified as FL2DO2, exhausting to stack FLST2S;
- (D) Flash Tunnel 2, identified as FL2FT2, exhausting to stack FLSC2S;
- (E) Drying Oven 3, identified as FL2DO3, exhausting to stack FLSC2S; and
- (F) Drying Oven 4, identified as FL2DO4, exhausting to stack FLSC2S.

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

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

D.2.1 PSD Minor Limit [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the total combined VOC input to the four spray booths (SB1 through SB4) and the two flat lines (FL1 (approved in 2020 for modification) and FL2) shall not exceed 248.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit, combined with the potential to emit VOC from all other emission units at this source, shall limit VOC emissions to less than 250 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.2.2 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), the four (4) spray booths (SB1 through SB4) and two (2) flat lines (FL1 (approved in 2020 for modification) and FL2) shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, operated in accordance with manufacturer's specifications.

D.2.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), when applying surface coatings to wood furniture and cabinets in the four (4) spray booths (SB1 through SB4) and two (2) flat lines (FL1 (approved in 2020 for modification) and FL2), 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) or more of the following application methods:

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

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

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan of this permit is required for these facilities. Section B – Preventative Maintenance Plan contains the Permittee's obligation with regard to Preventative Maintenance Plans.

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

D.2.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC input limitation contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.6 Particulate Control [326 IAC 6-3-2]

In order to comply with Condition D.2.2, the dry filters for particulate control shall be in operation and control emissions from the spray booths (SB1 through SB4) and flat lines (FL1 (approved in 2020 for modification) and FL2) at all times that these units are in operation. The Permittee shall operate the control devices in accordance with manufacturer's specifications.

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

D.2.7 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 four (4) spray booths (SB1 through SB4) and two (2) flat lines (FL1 (approved in 2020 for modification) and FL2), while one or more of the units are in operation. If a condition exists which should result in a response step the permittee shall take reasonable response. Section C- Response to Excursions or Exceedances contains the Permittee's obligation with regard to 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 there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response. Section C- Response to Excursions or Exceedances contains the Permittee's obligation with regard to reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.2.8 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.1 and D.2.5, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC input limit established in Condition D.2.1. Records necessary to demonstrate compliance shall be available no later than 30 days of the end of each compliance period.

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- (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on a monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (3) The cleanup solvent usage for each month.
 - (4) The total VOC input each month and each compliance period.
- (b) To document the compliance status with Condition D.2.7, 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.

D.2.9 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.2.1 shall be submitted using the reporting form located at the end of this permit, or its equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: SMART, LLC
Source Address: 70680 County Road 23, New Paris, Indiana 46553
Part 70 Permit No.: T039-38960-00750

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: (317) 233-0178
Fax: (317) 233-6865

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: SMART, LLC
Source Address: 70680 County Road 23, New Paris, Indiana 46553
Part 70 Permit No.: T039-38960-00750

This form consists of 2 pages

Page 1 of 2

<input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.
--

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

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

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

Part 70 Quarterly Report

Source Name: SMART, LLC
Source Address: 70680 County Road 23, New Paris, Indiana 46553
Part 70 Permit No.: T039-38960-00750
Facility: SB1 through SB4 and FL1 and FL2
Parameter: Volatile Organic Compounds (VOC)
Limit: The total combined VOC input to the four (4) spray booths (SB1 through SB4) and the two (2) flat lines (FL1 (approved in 2020 for modification) and FL2) shall not exceed 248.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: SMART, LLC
Source Address: 70680 County Road 23, New Paris, Indiana 46553
Part 70 Permit No.: T039-38960-00750

Months: _ to _____ Year: _____

<p>This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C- General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

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

Source Description and Location
--

Source Name:	SMART, LLC
Source Location:	70680 County Road 23, New Paris, Indiana 46553
County:	Elkhart County
SIC Code:	2434 (Wood Kitchen Cabinets)
Operation Permit No.:	T039-38960-00750
Operation Permit Issuance Date:	December 6, 2017
Significant Source Modification No.:	039-43127-00750
Significant Permit Modification No.:	039-43197-00750
Permit Reviewer:	Mehul Sura

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. T039-38960-00750 on December 6, 2017. The source has since received the following approvals:

- (a) TV MSM No. 039-41638-00750, issued on August 7, 2019.
- (b) TV SPM No. 039-41748-00750, issued on September 26, 2019.
- (c) TV SSM No. 039-42143-00750, issued on January 23, 2020.
- (d) TV SPM No. 039-42218-00750, issued on February 12, 2020.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective August 3, 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. Elkhart 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}**
 Elkhart 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**
 Elkhart 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 applicability and source status under Section 112 of the Clean Air Act (CAA).

Greenhouse Gas (GHG) Emissions

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

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

Source Status - Existing Source

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

	Source-Wide Emissions Prior to Modification (ton/year)									
	PM¹	PM₁₀¹	PM_{2.5}^{1,2}	SO₂	NO_x	VOC	CO	Total HAPs	Single HAP³	
Total PTE of Entire Source Excluding Fugitive Emissions*	57.14	57.70	57.70	0.06	9.82	249.54	8.25	0.19	0.18	Hexane
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10	
PSD Major Source Thresholds	250	250	250	250	250	250	250	--	--	--

Source-Wide Emissions Prior to Modification (ton/year)										
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1,2}	SO ₂	NO _x	VOC	CO	Total HAPs	Single HAP ³	
¹ Under the Part 70 Permit program (40 CFR 70), PM ₁₀ and PM _{2.5} , not particulate matter (PM), are each considered as a "regulated air pollutant." ² PM _{2.5} listed is direct PM _{2.5} . ³ Single highest source-wide HAP. *Fugitive HAP emissions are always included in the source-wide emissions.										

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is not a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (c) These emissions are based on the TSD of SPM No. 039-42218-00750, issued on February 12, 2020.

Description of Proposed Modification Amendment

The Office of Air Quality (OAQ) has reviewed an application, submitted by SMART, LLC on August 6, 2020, relating to the following:

Add the following new emission units:

- (a) One (1) storage silo, identified as S1, approved in 2020 for construction, with a maximum storage capacity of 750 cubic yard of wood material, controlled by cyclonic baghouse (SC1), and exhausting to stack SC1S.
- (b) Two (2) ultraviolet cure light tunnels, identified as FL1UV1 and FL1UV2, venting to stack FL1UV1S and FL1UV2S, respectively.
- (c) Two (2) metal inert gas (MIG) welders, used for maintenance purpose.
- (d) One (1) Oxyacetylene torch , used for maintenance purpose.
- (e) One (1) wastewater treatment system for treatment of aqueous coating wash water using Ph adjustment and rotary vacuum drum filter.

Change the stack IDs as follows:

- (a) change stack ID to FL1DO2S for Drying Oven 2 (FL1DO2)
- (b) change stack ID to FL1DO34S for Drying Oven 3 (FL1DO3) and Drying Oven 3 (FL1DO4)

Revise the existing VOC limit as follows:

- (a) Lower the VOC emission limit for four spray booths (SB1 through SB4) and the two flat lines (FL1 and FL2) from 249 to 248 tons per year.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

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

Permit Level Determination – Part 70 Modification at an Existing Source

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

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

Process / Emission Unit	PTE Before Controls of the New Emission Units (ton/year)							Total HAPs
	PM	PM ₁₀	PM _{2.5} ¹	SO ₂	NO _x	VOC	CO	
Storage Silo (S1)	337.89	337.89	337.89	-	-	-	-	-
Welding and Cutting Operations (WC1)	0.04	0.04	0.04	-	-	-	-	0.01
Wastewater Treatment Operations (WT1)	-	-	-	-	-	1.12	-	-
Total PTE Before Controls of the New Emission Units:	337.93	337.93	337.93	0.00	0.00	1.12	0.00	0.01

¹PM_{2.5} listed is direct PM_{2.5}.

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

(a) Approval to Construct

Pursuant to 326 IAC 2-7-10.5(g)(4), a Significant Source Modification is required because this modification has the potential to emit PM/PM10/direct PM2.5 at equal to or greater than twenty-five (25) tons per year.

(b) Approval to Operate

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

Permit Level Determination – PSD

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

Process / Emission Unit	Project Emissions (ton/year)							
	PM	PM ₁₀	PM _{2.5} ¹	SO ₂	NO _x	VOC	CO	Other
Storage Silo (S1)	22.53	22.53	22.53	-	-	-	-	
Welding and Cutting Operations (WC1)	0.04	0.04	0.04	-	-	-	-	
Wastewater Treatment Operations (WT1)	-	-	-	-	-	1.12	-	
Total for Modification	22.57	22.57	22.57	0.00	0.00	1.12	0.00	
PSD Major Source Thresholds	250	250	250	250	250	250	250	XX
¹ PM _{2.5} listed is direct PM _{2.5} .								

The source opted to take limit(s) in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to this modification. See Technical Support Document (TSD) State Rule Applicability - Entire Source section, 326 IAC 2-2 (PSD) for more information regarding the limit(s).

- (a) This modification to an existing minor PSD stationary source is not major because the emissions increase of each PSD regulated pollutant is less than the PSD major source threshold. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

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

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

	Source-Wide Emissions After Issuance (ton/year)								
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1,2}	SO ₂	NO _x	VOC	CO	Single HAP ³	Total HAPs
Total PTE of Entire Source Excluding Fugitives*	60.56	61.12	61.12	0.06	9.82	249.66	8.25	0.18	0.20
Title V Major Source Thresholds	NA	100	100	100	100	100	100	10	25
PSD Major Source Thresholds	250	250	250	250	250	250	250	--	--
¹ Under the Part 70 Permit program (40 CFR 70), PM ₁₀ and PM _{2.5} , not particulate matter (PM), are each considered as a "regulated air pollutant." ² PM _{2.5} listed is direct PM _{2.5} . ³ Single highest source-wide HAP *Fugitive HAP emissions are always included in the source-wide emissions.									

The source opted to take limit(s) in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to this source and to render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA). See Technical Support Document (TSD) State Rule Applicability - Entire Source section, 326 IAC 2-2 (PSD) 326 IAC 20 (Hazardous Air Pollutants) for more information regarding the limit(s).

- (a) This existing minor PSD stationary source will continue to be minor under 326 IAC 2-2 because the emissions of each PSD regulated pollutant will continue to be less than the PSD major source

thresholds.

- (a) This existing area source of HAP will continue to be an area source of HAP, as defined in 40 CFR 63.2, because HAP emissions will continue to be less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Federal Rule Applicability Determination

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

New Source Performance Standards (NSPS):

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

National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (f) Subpart XXXXXX – National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories

The SIC codes of 3714 is not one of the SIC codes listed in the EPA November 2011 Questions & Answers document related to applicability determination of the 40 CFR Part 63 Subpart XXXXXX (Nine Metal Fabrication and Finishing Area Source Categories) <http://www.epa.gov/ttn/atw/area/arearules.html#imp>. Therefore, the source is not subject to the requirements of this NESHAP.

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (40 CFR Part 63, 326 IAC 14, and 326 IAC 20) included in the permit for this proposed modification.

Compliance Assurance Monitoring (CAM):

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each pollutant-specific emission unit that meets the following criteria:
- (1) has a potential to emit before controls equal to or greater than the major source threshold for the regulated pollutant involved;
 - (2) is subject to an emission limitation or standard for that pollutant (or a surrogate thereof); and
 - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of CAM to new and modified emission unit and each emission limitation or standard for a specified pollutant based on the criteria specified under 40 CFR 64.2:

Emission Unit/Pollutant	Type of Limit	Control Device	Applicable Emission Limitation	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Storage Silo (S1) / PM, PM10 and PM2.5	326 IAC 2-2 (PSD Minor Limit)	Baghouse	Y	>100	<100	Y	N

Emission Unit/Pollutant	Type of Limit	Control Device	Applicable Emission Limitation	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Under the Part 70 Permit program (40 CFR 70), PM is not a regulated air pollutant. Uncontrolled PTE (tpy) and controlled PTE (tpy) are evaluated against the Major Source Threshold for each pollutant. Major Source Threshold for regulated air pollutants (PM10, PM2.5, SO2, NOx, VOC and CO) is 100 tpy, for a single HAP ten (10) tpy, and for total HAPs twenty-five (25) tpy.							
PM*	For limitations under 326 IAC 6-3-2, 326 IAC 6.5, and 326 IAC 6.8, IDEM OAQ uses PM as a surrogate for the regulated air pollutant PM10. Therefore, uncontrolled PTE and controlled PTE reflect the emissions of the regulated air pollutant PM10.						
Emission units without air pollution controls are not subject to CAM. Therefore, they are not listed.							

Based on this evaluation, the requirements of 40 CFR Part 64, CAM, are applicable to Storage Silo (S1) for PM, PM10 and PM2.5 upon issuance of the Part 70 Permit Renewal. A CAM plan must be submitted as part of the Part 70 Operating Permit Renewal application.

State Rule Applicability - Entire Source

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

326 IAC 2-2 (PSD)

PSD applicability is discussed under the Permit Level Determination – PSD section and the Permit Level Determination - PSD Emissions Increase section of this document.

PM, PM10 and PM2.5 PSD Minor Source Limits

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the PM, PM10, and PM2.5 emissions from the following shall be less than the limits specified in the table below:

Emission Unit	ID	PM Limit (lb/hr)	PM10 Limit (lb/hr)	PM2.5 Limit (lb/hr)
Storage Silo	S1	12.06	12.06	12.06

Compliance with these limits, combined with the potential to emit PM, PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM, PM10 and PM2.5 to less than 250 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

VOC PSD Minor Source Limit

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the total combined VOC input to the four spray booths (SB1 through SB4) and the two flat lines (FL1 and FL2) shall not exceed 248.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit, combined with the potential to emit VOC from all other emission units at this source, shall limit VOC emissions to less than 250 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

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

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

compliance certifications that submission to IDEM has satisfied reporting to EPA per Federal Register 79 FR 54978. This only applies to Title V Permittees and Title V compliance certifications.

326 IAC 12 (New Source Performance Standards)

See Federal Rule Applicability Section of this TSD.

326 IAC 20 (Hazardous Air Pollutants)

See Federal Rule Applicability Section of this TSD.

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

- (a) Pursuant to 326 IAC 6-3-1(b)(14), welding and Oxyacetylene torch cutting operation are not subject to the requirements of 326 IAC 6-3, since the particulate emissions from these emission units are less than 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to the Storage Silo (S1), since it is a manufacturing process not exempted from this rule under 326 IAC 6-3-1(b) and is not subject to a particulate matter limitation that is as stringent as or more stringent than the particulate limitation established in this rule as specified in 326 IAC 6-3-1(c).

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the Storage Silo (S1) shall not exceed 4.7 pounds per hour when operating at a process weight rate of 1.25 tons per hour. The pound per hour limitation was calculated with the following equation:

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

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

The cyclonic baghouse shall be in operation at all times the Storage Silo (S1) is in operation, in order to comply with this limit.

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

Wastewater treatment system is not subject to the requirements of 326 IAC 8 (VOC Rules) because this emission unit has VOC potential emissions less than 15 pounds per day.

Compliance Determination and Monitoring Requirements

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

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

- (a) The Compliance Determination Requirements applicable to this modification are as follows:

In order comply with the PM, PM10 and PM2.5 limits of Storage Silo (S1), the baghouse for particulate control shall be in operation and control emissions from Storage Silo (S1) at all times

when Storage Silo (S1) is in operation.

(b) The Compliance Monitoring Requirements applicable to this proposed modification are as follows:

Emission Unit	Control Device	Type of Monitoring	Frequency
Storage Silo (S1)	Baghouse	Visible emission notations	Daily

This monitoring condition is necessary because the baghouse for the Storage Silo (S1) must operate properly to assure compliance with the with 326 IAC 2-2 (PSD) and 326 IAC 6-3 (Particulate Emissions Limitations for Manufacturing Processes).

Proposed Changes

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

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

- (a) The new emission units have been included in the permit.
- (b) Based on the recent IDEM integral guidance, the PM, PM10 and PM2.5 numerical limits for the woodworking units WW1, WW2 and WW3 have been removed.

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

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

...

(e) ...

(f) **One (1) storage silo, identified as S1, approved in 2020 for construction, with a maximum storage capacity of 750 cubic yard of wood material, controlled by cyclonic baghouse (SC1), and exhausting to stack SC1S.**

A.3 ~~Specifically Regulated~~ Insignificant Activities
 [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

This stationary source ~~does not currently have~~ **following** any insignificant activities, ~~as defined in 326 IAC 2-7-1(21) that have applicable requirements.~~

...

(i) **Two (2) ultraviolet cure light tunnels, identified as FL1UV1 and FL1UV2, venting to stack FL1UV1S and FL1UV2S, respectively.**

(j) **Two (2) metal inert gas (MIG) welders, used for maintenance purpose.**

(k) **One (1) Oxyacetylene torch , used for maintenance purpose.**

(l) **One (1) wastewater treatment system for treatment of aqueous coating wash water using Ph adjustment and rotary vacuum drum filter.**

(m) Paved roads.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

...

(f) **One (1) storage silo, identified as S1, approved in 2020 for construction, with a maximum storage capacity of 750 cubic yard of wood material, controlled by cyclonic baghouse (SC1), and exhausting to stack SC1S.**

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

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

D.1.1 PSD Minor Limit [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the PM, PM10, and PM2.5 emissions from the following units shall be less than the limits specified in the table below:

- (a) **In order to assure that the requirements of 326 IAC 2-2 (PSD) do not apply, the integral control devices for PM, PM10 and PM2.5 control for the woodworking units WW1, WW2 and WW3 shall be in operation and control emissions from woodworking at all times these woodworking units are in operation.**

Emission Unit	ID	PM Limit (lb/hr)	PM10 Limit (lb/hr)	PM2.5 Limit (lb/hr)
Woodworking Operations	WW1	16.0812.06	16.0812.06	16.0812.06
Woodworking Operations	WW2	16.0812.06	16.0812.06	16.0812.06
Woodworking Operations	WW3	16.0812.06	16.0812.06	16.0812.06
panel brush	WW4	0.03	0.03	0.03

- (b) **In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the PM, PM10, and PM2.5 emissions from the following units shall be less than the limits specified in the table below:**

Emission Unit	ID	PM Limit (lb/hr)	PM10 Limit (lb/hr)	PM2.5 Limit (lb/hr)
Storage Silo	S1	12.06	12.06	12.06
panel brush	WW4	0.03	0.03	0.03

...

D.1.2 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, particulate emissions from each of the operations shall not exceed the pound per hour limits listed in the table below:

Unit ID	Unit Description	Max. Throughput Rate (tons/hr)	Particulate Emission Limit (lbs/hr)
WW1	Woodworking Operation	0.25	1.62
WW2	Woodworking Operation	0.625	2.99
WW3	Woodworking Operation	0.625	2.99
WW4	panel brush	0.75	3.38

Unit ID	Unit Description	Max. Throughput Rate (tons/hr)	Particulate Emission Limit (lbs/hr)
S1	Storage Silo	1.25	4.7

...

D.1.4 Particulate Control [326 IAC 2-2] [326 IAC 6-3-2]

- (a) In order to assure compliance with Conditions D.1.1 and D.1.2, the baghouses for particulate control shall be in operation and control emissions from WW1 through WW4 **and Storage Silo (S1)** at all times that these facilities are in operation.

...

D.1.5 Visible Emissions Notations

- (a) Visible emission notations of the exhausts from the baghouses DC1 through DC3 **and SC1** shall be performed once per day during normal daylight operations when one or both dual manual bag dump systems and associated fabric filter dust collectors are operating. A trained employee shall record whether emissions are normal or abnormal.

...

D.2.1 PSD Minor Limit [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the total combined VOC input to the four spray booths (SB1 through SB4) and the two flat lines (FL1 (approved in 2020 for modification) and FL2) shall not exceed ~~249~~**248**.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

...

...

Part 70 Quarterly Report

Facility: SB1 through SB4 and FL1 and FL2
 Parameter: Volatile Organic Compounds (VOC)
 Limit: The total combined VOC input to the four (4) spray booths (SB1 through SB4) and the two (2) flat lines (FL1 (approved in 2020 for modification) and FL2) shall not exceed ~~249~~**248**.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

...

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

August 6, 2020.

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 039-43127-00750. The operation of this proposed modification shall be subject to the conditions of the attached proposed Significant Permit Modification No. 039-43197-00750.

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

IDEM Contact

- (a) If you have any questions regarding this permit, please contact Mehul Sura, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 233-6868 or toll free at 1-800-451-6027, and ask for Mehul Sura or (317) 233-6868.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: <http://www.in.gov/idem/airquality/2356.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emissions Calculations
Emissions Summary**

Company Name: SMART, LLC
Source Address: 70680 County Road 23, New Paris, Indiana 46553

Unlimited Potential to Emit (Before Integral Woodworking Controls)

Emission Units	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Single HAP		
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)		
Woodworking Operations (WW1, WW2, WW3 and S1)	2,252.57	2,252.57	2,252.57	-	-	-	-	-	-	-	-
WW4	11.54	11.54	11.54	-	-	-	-	-	-	-	-
Spray Booths (SB1 through SB4)	15.95	15.95	15.95	-	-	45.20	-	0.00	-	-	-
Flat Lines (FL1 and FL2)	21.73	21.73	21.73	-	-	506.27	-	-	-	-	-
Natural Gas Combustion (Space Heating)	0.19	0.75	0.75	0.06	9.82	0.54	8.25	0.19	0.18	Hexane	-
Hot Melt Panel Line (PL1)	-	-	-	-	-	-	-	-	-	-	-
Welding and Cutting Operations (WC1)	0.04	0.04	0.04	-	-	-	-	0.01	0.01	Manganese	-
Wastewater Treatment Operation (WT1)	-	-	-	-	-	1.12	-	-	-	-	-
Total	2,302.03	2,302.59	2,302.59	0.06	9.82	553.13	8.25	0.20	0.18	Hexane	-

Unlimited Potential to Emit (After Integral Woodworking Controls)***

Emission Units	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Single HAP		
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)		
Woodworking Operations (WW1, WW2, WW3 and S1)	22.53	22.53	22.53	-	-	-	-	-	-	-	-
WW4	0.12	0.12	0.12	-	-	-	-	-	-	-	-
Spray Booths (SB1 through SB4)	15.95	15.95	15.95	-	-	45.20	-	-	-	-	-
Flat Lines (FL1 and FL2)	21.73	21.73	21.73	-	-	506.27	-	-	-	-	-
Natural Gas Combustion (Space Heating)	0.19	0.75	0.75	0.06	9.82	0.54	8.25	0.19	0.18	Hexane	-
Hot Melt Panel Line (PL1)	-	-	-	-	-	-	-	-	-	-	-
Welding and Cutting Operations (WC1)	0.04	0.04	0.04	-	-	-	-	0.01	0.01	Manganese	-
Wastewater Treatment Operation (WT1)	-	-	-	-	-	1.12	-	-	-	-	-
Total	60.56	61.12	61.12	0.06	9.82	553.13	8.25	0.20	0.18	Hexane	-

Limited Potential to Emit

Emission Units	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Single HAP		
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)		
Woodworking Operations (WW1, WW2, WW3, S1)*	22.53	22.53	22.53	-	-	-	-	-	-	-	-
WW4	0.12	0.12	0.12	-	-	-	-	-	-	-	-
Spray Booths (SB1 through SB4)**	15.95	15.95	15.95	-	-	248.00	-	-	-	-	-
Flat Lines (FL1 and FL2)**	21.73	21.73	21.73	-	-	-	-	-	-	-	-
Natural Gas Combustion (Space Heating)	0.19	0.75	0.75	0.06	9.82	0.54	8.25	0.19	0.18	Hexane	-
Hot Melt Panel Line (PL1)	-	-	-	-	-	-	-	-	-	-	-
Welding and Cutting Operations (WC1)	0.04	0.04	0.04	-	-	-	-	0.01	0.01	Manganese	-
Wastewater Treatment Operation (WT1)	-	-	-	-	-	1.12	-	-	-	-	-
Total	60.56	61.12	61.12	0.06	9.82	249.66	8.25	0.20	0.18	Hexane	-

* PM/PM10/PM2.5 emissions from Woodworking Operations (WW1, WW2, and WW3) are limited to render 326 IAC 2-2 (PSD) not applicable.

** VOC emissions from Spray Booths and Flat Lines (SB1 through SB2, FL1, and FL2) are limited to render 326 IAC 2-2 (PSD) not applicable.

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

**Appendix A: Emissions Calculations
 Emissions Summary**

**Company Name: SMART, LLC
 Source Address: 70680 County Road 23, New Paris, Indiana 46553**

Unlimited Potential to Emit (Before Integral Woodworking Controls)

Emission Units	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Single HAP	
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	
Storage Silo (S1)	337.89	337.89	337.89	-	-	-	-	-	-	-
Welding and Cutting Operations (WC1)	0.04	0.04	0.04	-	-	-	-	0.01	0.01	Manganese
Wastewater Treatment Operations (WT1)	-	-	-	-	-	1.12	-	-	-	-
Total	337.93	337.93	337.93	0.00	0.00	1.12	0.00	0.01	0.01	Manganese

Unlimited Potential to Emit (After Integral Woodworking Controls)***

Emission Units	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Single HAP	
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	
Storage Silo (S1)	22.53	22.53	22.53	-	-	-	-	-	-	-
Welding and Cutting Operations (WC1)	0.04	0.04	0.04	-	-	-	-	0.01	0.01	Manganese
Wastewater Treatment Operations (WT1)	-	-	-	-	-	1.12	-	-	-	-
Total	22.57	22.57	22.57	0.00	0.00	1.12	0.00	0.01	0.01	Manganese

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

**Appendix A: Emissions Calculations
 Particulate Emissions
 Woodworking Operations (WW1, WW2, WW3, S1)**

**Company Name: SMART, LLC
 Source Address: 70680 County Road 23, New Paris, Indiana 46553**

Emission Unit ID	Outlet Grain Loading (gr/dscf)	Maximum Air Flow Rate (scfm)	Control Efficiency (%)	PTE of PM/PM10/PM2.5* After Control (lbs/hr)	PTE of PM/PM10/PM2.5* After Control (tons/yr)	PTE of PM/PM10/PM2.5* Before Control (lbs/hr)	PTE of PM/PM10/PM2.5* Before Control (tons/yr)	Limited PTE of PM/PM10/PM2.5 (lbs/hr)	Limited PTE of PM/PM10/PM2.5 (tons/yr)
WW1 (DC1)	0.003	45,000	99.0%	1.16	5.07	115.71	506.83	12.06	52.82
WW2 (DC2)	0.003	80,000	99.0%	2.06	9.01	205.71	901.03	12.06	52.82
WW3 (DC3)	0.003	45,000	99.0%	1.16	5.07	115.71	506.83	12.06	52.82
Storage Silo (S1)	0.003	30,000	99.0%	0.77	3.38	77.14	337.89	12.06	52.82
Total				5.14	22.53	514.29	2,252.57	48.24	211.29

*PM emissions are assumed to be equal to PM10 and PM2.5 emissions.

Methodology

PTE of PM/PM10/PM2.5 After Control (lbs/hr) = Grain Loading (gr/dscf) x Max. Air Flow Rate (scfm) x 60 (min/hr) x 1/7000 (lb/gr)

PTE of PM/PM10/PM2.5 Before Control (lbs/hr) = PTE of PM/PM10/PM2.5 After Control (lb/hr) / (1 - Control Efficiency (%))

PTE of PM/PM10/PM2.5 After Control (tons/yr) = Grain Loading (gr/dscf) x Max. Air Flow Rate (scfm) x 60 (min/hr) x 1/7000 (lb/gr) x 8760 (hr/yr) x 1 ton/2000 lbs

PTE of PM/PM10/PM2.5 Before Control (tons/yr) = PTE of PM/PM10/PM2.5 After Control (tons/yr) / (1 - Control Efficiency (%))

For DC1, DC2 and DC3, control equipment is integral to the process and potential particulate emissions are considered after controls.

Compliance with 326 IAC 6-3-2 - Particulate Matter Emissions Limitations

Allowable Emissions = 4.10(Process Weight Rate)^{0.67}

Emission Unit ID	Maximum Process Weight Rate (lb/hr)	Maximum Process Weight Rate (ton/hr)	Maximum Allowable Emissions (lb/hr)	Emissions Before Controls (lb/hr)	Emissions After Controls (lb/hr)
WW1 (DC1)	500.00	0.25	1.62	115.71	1.16
WW2 (DC2)	1,250.00	0.625	2.99	205.71	2.06
WW3 (DC3)	1,250.00	0.625	2.99	115.71	1.16
Storage Silo (S1)	2,500.00	1.25	4.76	77.14	0.77

The filters must be in operation at all times that the woodworking operations are in operation in order to ensure compliance with 326 IAC 6-3-2.

Appendix A: Emissions Calculations
Welding and Thermal Cutting

Company Name: SMART, LLC
Source Address: 70680 County Road 23, New Paris, Indiana 46553

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	Max. electrode consumption per station (lbs/day)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM/PM10/PM2.5	Mn	Ni	Cr	PM/PM10/PM2.5	Mn	Ni	Cr	
WELDING												
Metal Inert Gas (MIG)(E70S)	2.00	0.50	1.00	0.0052	0.00318	0.00001	0.00001	0.005	0.003	0.00001	0.00001	0.003
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM/PM10/PM2.5	Mn	Ni	Cr	PM/PM10/PM2.5	Mn	Ni	Cr	
Oxyacetylene	1.00	0.50	1.00	0.1622	0.0005	0.0001	0.0003	0.005	1.50E-05	3.00E-06	9.00E-06	2.70E-05
EMISSION TOTALS												
Potential Emissions lbs/hr								0.010	0.003	1.30E-05	1.90E-05	0.003
Potential Emissions lbs/day								0.24	0.077	3.12E-04	4.56E-04	0.077
Potential Emissions tons/year								0.04	0.014	5.69E-05	8.32E-05	0.014

Methodology

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

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

**Appendix A: Emissions Calculations
 Wastewater Treatment Operations (WT)**

**Company Name: SMART, LLC
 Source Address: 70680 County Road 23, New Paris, Indiana 46553**

Potential Emissions

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gallons Processed (gal/hr)	Material Usage (lb/hr)	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year
Coating Waste	10.73	48.36%	47.16%	1.20%	60.67%	37.34%	2.00	21.46	0.26	6.15	1.12
Water (Dilution for Treatment)	8.34	100.00%	100.00%	0.00%	100.00%	0.00%	8.00	66.72	0.00	0.00	0.00

Uncontrolled Potential Emission Rate **88.18 0.26 6.15 1.12**

Notes: The source will operate a small wastewater treatment system for the treatment of aqueous coating wash water using pH adjustment and a rotary vacuum drum filter.

Methodology

- Potential Pounds Material per Hour = Density (lb/gal) * Gallons Processed (gal/hr)
- Potential VOC Pounds per Hour = Density (lb/gal) * Gallons Processed (gal/hr) * Weight Percent Organics (% WT)
- Potential VOC Pounds per Day = Potential VOC Pounds per Hour (lb/hr) * (24 hr/day)
- Potential VOC Tons per Year = Potential VOC Pounds per Hour (lb/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

**Appendix A: Emissions Calculations
 VOC and Particulate
 Hot Melt Panel Line (PL1)
 Paper Covered Interior Wood Panels**

**Company Name: SMART, LLC
 Source Address: 70680 County Road 23, New Paris, Indiana 46553**

Line	Material	Material Description	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)**	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Material Usage (lb/hr)	Material Usage (gal/day)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Exempt Emissions (lb/hr)	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Hot Melt Panel Coating Line (PL1)	Adhesive	SWIFT@THERM BL 9243	8.34	0.00%	0.00%	0.00%	0.00%	100.00%	0.0625	150.00	78.19	225.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
	Cleanup Solvent	Water	8.34	100.00%	100.00%	0.00%	100.00%	0.00%	0.0200	150.00	25.02	72.00	0.00	0.00	25.02	0.00	0.00	0.00	0.00	n/a	100%
Totals															25.02	0.00	0.00	0.00	0.00		

Uncontrolled Potential Emission Rate 25.02 0.00 0.00 0.00 0.00
Control Device Efficiency (%) 0.00% 0.00% 0.00% 0.00% 0.00%
Controlled Potential Emission Rate 25.02 0.00 0.00 0.00 0.00

PM is assumed to be equal to PM10 and PM2.5.
 Application Method = Hot Melt and Roll Coating and Manual Application of Cleanup Solvent

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 Pounds Material per Hour = Pounds per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
 Potential Exempt Pounds per Hour = Pounds per Gallon coating (lb/gal) * Weight % Exempt * Gal of Material (gal/unit) * Maximum (units/hr)
 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)

**The SDS indicates zero VOC emissions and therefore no emissions of HAP are expected from this process.

**Appendix A: Emissions Calculations
 Particulate Emissions
 Woodworking Operation (WW4) - Panel Brush for Hot Melt Laminating Machine**

**Company Name: SMART, LLC
 Source Address: 70680 County Road 23, New Paris, Indiana 46553**

Emission Unit ID	Outlet Grain Loading (gr/dscf)	Maximum Air Flow Rate (scfm)	Control Efficiency (%)	PTE of PM/PM10/PM2.5 After Control (lbs/hr)	PTE of PM/PM10/PM2.5 After Control (tons/yr)	PTE of PM/PM10/PM2.5 Before Control (lbs/hr)	PTE of PM/PM10/PM2.5 Before Control (tons/yr)
WW4	0.001	3,075	99.0%	0.03	0.12	2.64	11.54
Total				0.03	0.12	2.64	11.54

*PM emissions are assumed to be equal to PM10 and PM2.5 emissions.

Methodology

PTE of PM/PM10/PM2.5 After Control (lbs/hr) = Grain Loading (gr/dscf) x Max. Air Flow Rate (scfm) x 60 (min/hr) x 1/7000 (lb/gr)

PTE of PM/PM10/PM2.5 Before Control (lbs/hr) = PTE of PM/PM10/PM2.5 After Control (lb/hr) / (1 - Control Efficiency (%))

PTE of PM/PM10/PM2.5 After Control (tons/yr) = Grain Loading (gr/dscf) x Max. Air Flow Rate (scfm) x 60 (min/hr) x 1/7000 (lb/gr) x 8760 (hr/yr) x 1 ton/2000 lbs

PTE of PM/PM10/PM2.5 Before Control (tons/yr) = PTE of PM/PM10/PM2.5 After Control (tons/yr) / (1 - Control Efficiency (%))

Compliance with 326 IAC 6-3-2 - Particulate Matter Emissions Limitations

Allowable Emissions = 4.10(Process Weight Rate)^{0.67}

Emission Unit ID	Maximum Process Weight Rate (lb/hr)	Maximum Process Weight Rate (ton/hr)	Maximum Allowable Emissions (lb/hr)	Emissions Before Controls (lb/hr)	Emissions After Controls (lb/hr)
WW4	1,500.00	0.75	3.38	2.64	0.03

**Appendix A: Emissions Calculations
 VOC and Particulate
 From Surface Coating Operations SB1, SB2, SB3, and SB4**

Company Name: SMART, LLC
Source Address: 70680 County Road 23, New Paris, Indiana 46553

Potential Emissions Per Unit

Material	Material Description	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Material Usage (lb/hr)	Material Usage (gal/day)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Exempt Emissions (lb/hr)	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Stain	SS0107 Low VOC Chestnut	7.17	96.14%	74.66%	21.48%	80.99%	2.44%	0.1340	12.50	12.01	40.20	8.10	1.54	8.97	2.58	61.91	11.30	0.71	63.09	65%
Sealer	30 Sheen Precat	7.50	76.28%	57.08%	19.20%	64.77%	17.52%	0.1170	12.50	10.97	35.10	4.09	1.44	6.26	2.11	50.54	9.22	3.99	8.22	65%
Topcoat	30 Sheen UV Spray	7.71	64.61%	44.20%	20.41%	51.56%	26.79%	0.0556	12.50	5.36	16.68	3.25	1.57	2.37	1.09	26.25	4.79	2.91	5.87	65%
Cleanup Solvent	Acetone	6.61	100.00%	100.00%	0.00%	100.00%	0.00%	0.0200	12.50	1.65	6.00	0.00	0.00	1.65	0.00	0.00	0.00	0.00	n/a	100%

Uncontrolled Potential Emission Rate - Add Cleaning Solvent to Worst Case Coating (1 spray booth)	10.62	2.58	61.91	11.30	3.99
Control Device Efficiency (%)	0.00%	0.00%	0.00%	0.00%	95.00%
Controlled Potential Emission Rate (1 spray booth)	10.62	2.58	61.91	11.30	0.20
Number of spray booths	4				
Total Uncontrolled PTE (for 4 spray booths) (tons/year)				45.20	15.95
Total Controlled PTE (for 4 spray booths) (tons/year)				45.20	0.80

Surface coating materials listed are worst case materials.

PM is assumed to be equal to PM10 and PM2.5.

Application Method = Airless Spray Application of Coatings and Manual Application of Cleanup Solvent

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 Pounds Material per Hour = Pounds per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential Exempt Pounds per Hour = Pounds per Gallon coating (lb/gal) * Weight % Exempt * Gal of Material (gal/unit) * Maximum (units/hr)

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)

Coatings are mutually exclusive.

**Appendix A: Emissions Calculations
 Hazardous Air Pollutants (HAPs)
 From Surface Coating Operations SB1, SB2, SB3, and SB4**

Company Name: SMART, LLC

Source Address: 70680 County Road 23, New Paris, Indiana 46553

Emissions Per Booth

Material	Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Toluene	Toluene Emissions (ton/yr)	Total HAP Emissions (ton/yr)
Stain	SS0107 Low VOC Chestnut	7.17	0.1340	12.50	0.00%	0.00	0.00
Sealer	30 Sheen Precat	7.50	0.1170	12.50	0.00%	0.00	0.00
Topcoat	30 Sheen UV Spray	7.71	0.0556	12.50	0.00%	0.00	0.00
Cleanup Solvent	Acetone	6.61	0.0200	12.50	0.00%	0.00	0.00

Uncontrolled PTE - Add Cleaning Solvent to Worst Case Coating		0.00	0.00
Number of spray booths	4		
Total Emissions		0.00	0.00

Methodology

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
 Surface coating materials listed are worst case materials.

**Appendix A: Emissions Calculations
VOC and Particulate
from Flat Line FL1 and FL2 Surface Coating Operations**

Company Name: **SMART, LLC**
Source Address: **70680 County Road 23, New Paris, Indiana 46553**

Line	Material	Material Description	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Material Usage (lb/hr)	Material Usage (gal/day)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Exempt Emissions (lb/hr)	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency	
Flat Line FL1 - Stain Operation	Stain - FLST1	SS0107 Low VOC Chestnut	7.17	96.14%	74.66%	21.48%	80.99%	2.44%	0.1340	125.00	120.10	402.00	8.10	1.54	89.66	25.80	619.13	112.99	1.02	63.09	95%	
	Sealer - FLSC1	30 Sheen Precat	7.50	76.28%	57.08%	19.20%	64.77%	17.52%	0.1170	125.00	109.69	351.00	4.09	1.44	62.61	21.06	505.44	92.24	5.70	8.22	95%	
	Topcoat - FLTC1	30 Sheen UV Spray	7.71	64.61%	44.20%	20.41%	51.56%	26.79%	0.0556	125.00	53.58	166.80	3.25	1.57	23.68	10.94	262.48	47.90	4.15	5.87	95%	
	Cleanup Solvent	Acetone	6.61	100.00%	100.00%	0.00%	100.00%	0.00%	0.0200	125.00	16.53	60.00	0.00	0.00	16.53	0.00	0.00	0.00	0.00	n/a	100%	
	Subtotal Stain Operation															192.48	57.79	1387.04	253.14	10.87		
Flat Line FL1 -Paint Operation	Paint - FLPC1	Off White Water Based TC	10.79	50.50%	46.88%	3.61%	60.66%	34.00%	0.0442	83.75	39.94	88.84	0.99	0.39	18.73	1.44	34.65	6.32	4.33	1.15	95%	
	Cleanup Solvent	Acetone	6.61	100.00%	100.00%	0.00%	100.00%	0.00%	0.0100	83.75	5.54	20.10	0.00	0.00	5.54	0.00	0.00	0.00	0.00	n/a	100%	
	Subtotal FLPC1															24.26	1.44	34.65	6.32	4.33		
	Paint - FLPC2	Off White Water Based TC	10.79	50.50%	46.88%	3.61%	60.66%	34.00%	0.0442	83.75	39.94	88.84	0.99	0.39	18.73	1.44	34.65	6.32	4.33	1.15	95%	
	Cleanup Solvent	Acetone	6.61	100.00%	100.00%	0.00%	100.00%	0.00%	0.0100	83.75	5.54	20.10	0.00	0.00	5.54	0.00	0.00	0.00	0.00	n/a	100%	
Subtotal Paint Operation															48.52	2.89	69.30	12.65	8.66			
Worst Case*	Stain Operation														192.48	57.79	1387.04	253.14	10.87			
Flat Line FL2	Stain - FLST2	SS0107 Low VOC Chestnut	7.17	96.14%	74.66%	21.48%	80.99%	2.44%	0.1340	125.00	120.10	402.00	8.10	1.54	89.66	25.80	619.13	112.99	1.02	63.09	95%	
	Sealer - FLSC2	30 Sheen Precat	7.50	76.28%	57.08%	19.20%	64.77%	17.52%	0.1170	125.00	109.69	351.00	4.09	1.44	62.61	21.06	505.44	92.24	5.70	8.22	95%	
	Topcoat - FLTC2	30 Sheen UV Spray	7.71	64.61%	44.20%	20.41%	51.56%	26.79%	0.0556	125.00	53.58	166.80	3.25	1.57	23.68	10.94	262.48	47.90	4.15	5.87	95%	
	Cleanup Solvent	Acetone	6.61	100.00%	100.00%	0.00%	100.00%	0.00%	0.0200	125.00	16.53	60.00	0.00	0.00	16.53	0.00	0.00	0.00	0.00	n/a	100%	
	Subtotal FL2															192.48	57.79	1387.04	253.14	10.87		

Uncontrolled Potential Emission Rate	384.97	115.59	2,774.09	506.27	21.73
Control Device Efficiency (%)	0.00%	0.00%	0.00%	0.00%	95.00%
Controlled Potential Emission Rate	384.97	115.59	2,774.09	506.27	1.09

Surface coating materials listed are worst case materials.

PM is assumed to be equal to PM10 and PM2.5.

Application Method = Airless Spray Application of Coatings Using Fixed Head Spray Machines and Manual Application of Cleanup Solvent

*The Flat Line FL1 "stain operation" and "paint operation" are mutually exclusive (only one of these operations can be performed at any given time, the operations cannot be performed simultaneously).

Process Flow

The "paint operation" panels need to go through all three (3) electric cure ovens in the line, because the water-based paint takes longer to dry than the solvent-based coatings used in the "stain operation." An employee at the source programs the line (FL1) to run a series. If the series is for the "paint operation", then FLST1, FLSC1, and FLTC1 are turned off and only FLPC1 and FLPC2 apply coating to the part moving through the line. If the series is for the "stain operation" (stain, sealer, and top-coated panels), then FLPC1 and FLPC2 are turned off and the other three booths, FLST1, FLSC1, and FLTC1 are turned on.

Process Flow of Flat Line 1 Stain Operation:

Wood panel coated with stain in FLST1, cure oven, conveyor, coated with sealer in FLSC1, cure oven, conveyor, coated with top coat in FLTC1 conveyor

Process Flow of Flat Line 1 Paint Operation:

Wood panel coated with water-based paint in FLPC1, cure oven, conveyor, FLSC1 (where no coating is applied), cure oven, conveyor, FLPC2 (second water-based paint coat applied), FLTC1 (where no coating is applied), cure oven, conveyor

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 Pounds Material per Hour = Pounds per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential Exempt Pounds per Hour = Pounds per Gallon coating (lb/gal) * Weight % Exempt * Gal of Material (gal/unit) * Maximum (units/hr)

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)

0.22

**Appendix A: Emissions Calculations
 HAPs
 Flat Line FL1 and FL2 Surface Coating Operations**

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**Company Name: SMART, LLC
 Source Address: 70680 County Road 23, New Paris, Indiana 46553**

Line	Material	Material Description	Density	Gallons of Material	Maximum	Weight %	Toluene Emissions	Total HAP Emissions
			(Lb/Gal)	(gal/unit)	(unit/hour)	Toluene	(ton/yr)	(ton/yr)
Flat Line FL1- Stain Operation	Stain - FLST1	SS0107 Low VOC Chestnut	7.17	0.1340	125.00	0.00%	0.00	0.00
	Sealer - FLSC1	30 Sheen Precat	7.50	0.1170	125.00	0.00%	0.00	0.00
	Topcoat - FLTC1	30 Sheen UV Spray	7.71	0.0556	125.00	0.00%	0.00	0.00
	Cleanup Solvent	Acetone	6.61	0.0200	125.00	0.00%	0.00	0.00
						0.00	0.00	
Flat Line FL1- Paint Operation	Paint - FLPC1	Off White Water Based TC	10.79	0.0442	83.75	0.00%	0.00	0.00
	Cleanup Solvent	Acetone	6.61	0.0200	83.75	0.00%	0.00	0.00
	Paint - FLPC2	Off White Water Based TC	10.79	0.0442	83.75	0.00%	0.00	0.00
	Cleanup Solvent	Acetone	6.61	0.0200	83.75	0.00%	0.00	0.00
	Subtotal					0.00	0.00	
Worst Case*						0.00	0.00	
Flat Line FL2	Stain - FLST2	SS0107 Low VOC Chestnut	7.17	0.1340	125.00	0.00%	0.00	0.00
	Sealer - FLSC2	30 Sheen Precat	7.50	0.1170	125.00	0.00%	0.00	0.00
	Topcoat - FLTC2	30 Sheen UV Spray	7.71	0.0556	125.00	0.00%	0.00	0.00
	Cleanup Solvent	Acetone	6.61	0.0200	125.00	0.00%	0.00	0.00
						0.00	0.00	

Uncontrolled PTE 0.00 0.00

Surface coating materials listed are worst case materials.

*The Flat Line FL1 "stain operation" and "paint operation" are mutually exclusive (only one of these operations can be performed at any given time, the operations cannot be performed simultaneously).

Process Flow

The "paint operation" panels need to go through all three (3) electric cure ovens in the line, because the water-based paint takes longer to dry than the solvent-based coatings used in the "stain operation." An employee at the source programs the line (FL1) to run a series. If the series is for the "paint operation", then FLST1, FLSC1, and FLTC1 are turned off and only FLPC1 and FLPC2 apply coating to the part moving through the line. If the series is for the "stain operation" (stain, sealer, and top-coated panels), then FLPC1 and FLPC2 are turned off and the other three booths, FLST1, FLSC1, and FLTC1 are turned

Process Flow of Flat Line 1 Stain Operation:

Wood panel coated with stain in FLST1, cure oven, conveyor, coated with sealer in FLSC1, cure oven, conveyor, coated with top coat in FLTC1 conveyor

Process Flow of Flat Line 1 Paint Operation:

Wood panel coated with water-based paint in FLPC1, cure oven, conveyor, FLSC1 (where no coating is applied), cure oven, conveyor, FLPC2 (second water-

Methodology

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

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

Company Name: SMART, LLC
Source Address: 70680 County Road 23, New Paris, Indiana 46553

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr	Unit Type	Number of Units	Heat Input Capacity (MMBtu/hr) per Unit	Total Capacity (MMBtu/hr)
22.87	1020	196.4	Air Rotary Units (AR1 - AR4)	4	0.464	1.856
0.98	1020	8.4	Air Rotary Units (AR5)	1	0.40	0.4
			Air Rotary Units (AR6)	1	0.58	0.58
			Air Make Up Units	3	5.95	17.85
			Space Heaters	5	0.38	1.9
			Office Furnaces	2	0.0884	0.1768
			Production Office Heater	1	0.0663	0.0663
			Shipping Office Heater	1	0.0442	0.0442
			Total			22.8733

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
Potential Emission in tons/yr	0.19	0.75	0.75	0.06	**see below	0.54	8.25
New Air Rotary Units (AR5 & AR6)	0.01	0.03	0.03	2.52E-03	0.42	0.02	0.35

*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)

Emission Factor in lb/MMcf	HAPs - Organics					Total - Organics
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	2.1E-04	1.2E-04	7.4E-03	0.18	3.3E-04	0.18
New Air Rotary Units (AR5 & AR6)	8.7E-07	5.0E-07	3.1E-05	7.44E-04	1.4E-06	7.78E-04

Emission Factor in lb/MMcf	HAPs - Metals					Total - Metals
	Lead	Cadmium	Chromium	Manganese	Nickel	
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	4.9E-05	1.1E-04	1.4E-04	3.7E-05	2.1E-04	5.4E-04
New Air Rotary Units (AR5 & AR6)	2.1E-07	4.5E-07	5.8E-07	1.6E-07	8.7E-07	2.3E-06
					Total HAPs	0.19
					Worst HAP	0.18

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.

AR5 & AR6	Total HAPs	7.80E-04
	Worst HAPs	7.44E-04

Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads

Company Name: SMART, LLC
Source Address: 70680 County Road 23, New Paris, Indiana 46553

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)
Raw Material Delivery (entering Plant) (one-way trip)	15.0	1.0	15.0	40.0	600.0	650	0.123	1.8	674.0
Raw Material Delivery (leaving plant) (one-way trip)	15.0	1.0	15.0	20.0	300.0	650	0.123	1.8	674.0
Finished Goods Shipment (leaving plant) (one-way trip)	15.0	1.0	15.0	40.0	600.0	271	0.051	0.8	280.7
Finished Goods Empty Vehicle (entering plant) (one-way trip)	1.0	1.0	1.0	20.0	20.0	271	0.051	0.1	18.7
Totals			46.0		1520.0			4.5	1647.5

Average Vehicle Weight Per Trip = 33.0 tons/trip
Average Miles Per Trip = 0.10 miles/trip

Unmitigated Emission Factor, Ef = $[k * (sL)^{0.91} * (W)^{1.02}]$ (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 =	33.0	33.0	33.0	tons = average vehicle weight
sL =	9.7	9.7	9.7	g/m ³ = 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, Eext = $E * [1 - (p/4N)]$ (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, Eext = $Ef * [1 - (p/4N)]$
where p = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	3.082	0.616	0.1513	lb/mile
Mitigated Emission Factor, Eext =	2.818	0.564	0.1383	lb/mile
Dust Control Efficiency =	0%	0%	0%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Mitigated PTE of PM (Before Control) (tons/yr)	Mitigated PTE of PM10 (Before Control) (tons/yr)	Mitigated PTE of PM2.5 (Before Control) (tons/yr)	Mitigated PTE of PM (After Control) (tons/yr)	Mitigated PTE of PM10 (After Control) (tons/yr)	Mitigated PTE of PM2.5 (After Control) (tons/yr)
Raw Material Delivery (entering Plant) (one-way trip)	0.95	0.19	0.05	0.95	0.19	0.05
Raw Material Delivery (leaving plant) (one-way trip)	0.95	0.19	0.05	0.95	0.19	0.05
Finished Goods Shipment (leaving plant) (one-way trip)	0.40	0.08	0.02	0.40	0.08	0.02
Finished Goods Empty Vehicle (entering plant) (one-way trip)	0.03	0.01	0.00	0.03	0.01	0.00
Totals	2.32	0.46	0.11	2.32	0.46	0.11

Methodology

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

September 17, 2020
Terry Sauer
SMART, LLC
70680 County Road 23
New Paris, IN 46553

Re: Public Notice
SMART, LLC
Permit Level: Title V-Significant Permit Modification
and Title V – Significant Source Modification
Permit Number: 039-43197-00750 &
039-43127-00750

Dear Mr. Terry Sauer:

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/idem/5474.htm>

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

OAQ has submitted the draft permit package to the Goshen Public Library, 601 South 5th Street in Goshen, IN 46526. 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 Mehul Sura, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-6868 or dial (317) 233-6868.

Sincerely,
Kathy Bourquein

Kathy Bourquein
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter 8/10/2020



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

September 17, 2020

To: Goshen Public Library

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

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

Applicant Name: SMART, LLC
Permit Number: 039-43197-00750 & 039-43127-00750

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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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

Notice of Public Comment

September 17, 2020

SMART, LLC

039-43197-00750 & 039-43127-00750

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD DRAFT INDIANA AIR PERMIT

September 17, 2020

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

Permit Number: 039-43197-00750 & 039-43127-00750

Applicant Name: SMART, LLC

Location: New Paris, Elkhart County, Indiana

The public notice, draft permit and technical support documents can be accessed via the **IDEM Air Permits Online** site at:

<http://www.in.gov/ai/appfiles/idem-caats/>

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

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

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

Affected States Notification 1/9/2017

Mail Code 61-53

IDEM Staff	KBOURQUE SMART LLC 039-43197-00750 & 039-43127-00750 (draft)	September 17, 2020	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	Type of Mail: CERTIFICATE OF MAILING ONLY

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handling 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		Terry Sauer SMART LLC 70680 CR 23 New Paris IN 46553 (Source CAATS)									
2		Kirk Barron President & COO SMART LLC 70680 CR 23 New Paris IN 46553 (RO CAATS)									
3		Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 (Health Department)									
4		Goshen Public Library 601 S 5th St Goshen IN 46526-3994 (Library)									
5		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 (Local Official)									
6		John & Judy Schrock 69221 County Road 21 New Paris IN 46553 (Affected Party)									
7		Dean & Lorita Everest 70850 County Road 23 New Paris IN 46553 (Affected Party)									
8		K Development, Inc. 70891 County Road 23 New Paris IN 46553 (Affected Party)									
9		Mr. Kevin Parks D & B Environmental Services, Inc. 401 Lincoln Way West Osceola IN 46561 (Consultant)									
10		New Paris Chamber of Commerce PO Box 402 New Paris IN 46553 (Local Official)									
11		Jeri Seely The Mail-Journal PO Box 188 Milford IN 46542 (Affected Party)									
12		Mr. Roger Schneider The Goshen News 114 S. Main St Goshen IN 46526 (Affected Party)									
13											
14											
15											

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