



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

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

for Patrick Industries, Inc. d.b.a. Adorn in Elkhart County

Significant Permit Modification No.: 039-43070-00324

The Indiana Department of Environmental Management (IDEM) has received an application from Patrick Industries, Inc. d.b.a. Adorn, located at 1808 West Hively Ave. & 57420 Nagy Dr., Elkhart, IN 46517, for a significant modification of its Part 70 Operating Permit issued on March 12, 2020. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow Patrick Industries, Inc. d.b.a. Adorn to make certain changes at its existing source. Patrick Industries, Inc. d.b.a. Adorn has applied to add emission units, add control devices to permitted emission units, and change the PSD minor limits for new and permitted units..

The applicant intends to 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:

Elkhart Public Library – Main Branch
300 S. 2nd Street
Elkhart, Indiana 46516

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 SPM 039-43070-00324 in all correspondence.

Comments should be sent to:

L. David Cohen
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for L. David Cohen or (317) 233-9327
Or dial directly: (317) 233-9327
Fax: (317) 232-6749 attn: L. David Cohen
E-mail: LCohen@idem.IN.gov

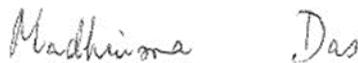
All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have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



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



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DRAFT

Mr. Favian Diaz
Patrick Industries, Inc. d.b.a. Adorn
1808 West Hively Ave.
Elkhart, Indiana 46517

Re: 039-43070-00324
Significant Permit Modification

Dear Mr. Diaz:

Patrick Industries, Inc. d.b.a. Adorn was issued Part 70 Operating Permit Renewal No. T039-41848-00324 on March 12, 2020 for a stationary wood countertop and cabinet manufacturing company located at 1808 West Hively Ave. & 57420 Nagy Dr., Elkhart, IN 46517. An application requesting changes to this permit was received on July 17, 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. The permit references the below listed attachment(s). Since this attachment has been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of this attachment with this modification:

Attachment A: 40 CFR 63, Subpart JJ, Wood Furniture Manufacturing Operations

Previously issued approvals for this source containing this attachment are available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

Previously issued approvals for this source are 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.

Federal rules under Title 40 of United States Code of Federal Regulations may also be found on the U.S. Government Printing Office's Electronic Code of Federal Regulations (eCFR) website, located on the Internet at: http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab_02.tpl.

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.

DRAFT

If you have any questions regarding this matter, please contact L. David Cohen, 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) 233-9327 or (800) 451-6027, and ask for L. David Cohen or (317) 233-9327.

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 Renewal OFFICE OF AIR QUALITY DRAFT

**Patrick Industries, Inc. d.b.a. Adorn
1808 West Hively Ave. & 57420 Nagy Dr.
Elkhart, Indiana 46517**

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

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.: T039-41848-00324	
Master Agency Interest ID.: 12647	
Issued by: Original signed by: Madhurima D. Moulik, Ph. D., Section Chief Permits Branch, Office of Air Quality	Issuance Date: March 12, 2020 Expiration Date: March 12, 2025

Significant Permit Modification No.: 039-43070-00324	
Issued by: Madhurima D. Moulik, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date: March 12, 2025

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**Attachment A: ...40 CFR 63, Subpart JJ, National Emission Standards for Hazardous Air Pollutants
for Wood Furniture Manufacturing Operations**

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 counter top and cabinet manufacturing plant.

Source Address:	1808 West Hively Ave. & 57420 Nagy Dr., Elkhart, Indiana 46517
General Source Phone Number:	(574) 206-7744
SIC Code:	2421 (Sawmills and Planing Mills, General), 2431 (Millwork), 2434 (Wood Kitchen Cabinets), 2541 (Wood Office and Store Fixtures, Partitions, Shelving, and Lockers)
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Rules Major 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:

Plant 130 (1808 West Hively Avenue)

- (a) One (1) sawdust storage silo, identified as S-1, constructed in 1997, with a maximum capacity of 690 cubic yards, collecting sawdust from the woodworking equipment through a cyclonic baghouse, identified as Baghouse 1-1, and exhausting to stack C1-1.
- (b) Woodworking equipment, identified as WW1a, constructed in 1995, with a maximum throughput capacity of 25,000 pounds of wood per hour, using three (3) cyclonic baghouses, identified as Baghouse 1-2, Baghouse 1-3, and Baghouse 1-8, respectively, to control particulate emissions, and exhausting to stacks C1-2, C1-3, and C1-8, respectively.
- (c) Woodworking equipment, identified as WW1b, constructed in 1995, with a maximum throughput capacity of 25,000 pounds of wood per hour, using two (2) cyclonic baghouses, identified as Baghouse 1-5 and Baghouse 1-6, respectively, to control particulate emissions, and exhausting to stacks C1-5 and C1-6, respectively.
- (d) Woodworking equipment, identified as WW1c, constructed in 2003, having a maximum throughput capacity of 5,000 pounds of wood per hour, using a cyclonic baghouse system, identified as Baghouse 1-7, to control particulate emissions, and exhausting to stack C1-7.

- (e) Two (2) denibbers for D1, identified as DN1a and DN1b, constructed in 2000, each with maximum capacities of 3,900 board feet per hour, using a cyclonic baghouse, identified as Baghouse 1-4, to control particulate emissions, and exhausting to stack C1-4.
- (f) One (1) denibber for D4, identified as DN4, constructed in 2000, with a maximum capacity of 3,900 board feet per hour, using a cyclonic baghouse, identified as Baghouse 1-4, to control particulate emissions, and exhausting to stack C1-4.
- (g) One (1) dualtech automated back sealing machine, identified as D1, constructed in 2000, with a maximum capacity of 3,900 board feet per hour, equipped with eight (8) airless/air assist spray guns, with particulate emissions controlled by low temperature dry fabric filters, identified as D1DF, exhausting to stack E1-2, and a hot air drying tunnel exhausting to stack E1-3.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (h) One (1) rototech automated front staining machine, identified as D3, constructed in 2000, with a maximum capacity of 3,900 board feet per hour, equipped with twenty (20) airless/air assist spray guns, with particulate emissions controlled by dry filters, exhausting to stack E1-4, and a forced air drying tunnel exhausting to stack E1-5.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (i) One (1) dualtech automated sealing machine, identified as D4, constructed in 2000, with a maximum capacity of 3,900 board feet per hour, equipped with eight (8) airless/air assist spray guns, with particulate emissions controlled by a water wall and water scrubber system, identified as D5, exhausting to stack E1-6, and a hot air/infrared drying tunnel exhausting to stack E1-7.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (j) One (1) dualtech automated topcoat machine, identified as D6, constructed in 2000, with a maximum capacity of 3,900 board feet per hour, equipped with eight (8) airless/air assist spray guns, with particulate emissions controlled by a dry fabric filter, identified as D7, exhausting to stack E1-8, a hot air drying tunnel exhausting to stack E1-9, and a non-heated cooling hood exhausting inside the building.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (k) One (1) manual touch up booth, identified as TU1, constructed in 2000, with a maximum capacity of one (1) gallon of stain, two (2) gallons of sealer, and two (2) gallons of topcoat per day, consisting of one (1) airless/air assist gun, with particulate emissions controlled by dry filters, exhausting to stack TU-1.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (l) One (1) rototech automated back staining machine, identified as D8, constructed in 2002, with a maximum capacity of 3,900 board feet per hour, equipped with twenty (20) HVLP spray guns used for coating cabinet doors and an infrared drying oven, with particulate emissions controlled by dry filters, and exhausting to stack E1-1.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (m) One (1) vacuum coater, identified as VC-1, constructed in 1995, with a maximum capacity of 5,000 linear feet of wood per hour, applying coatings containing no VOC or HAP to wood trim, utilizing an ultraviolet (UV) curing process, with particulate emissions controlled by dry filters, and exhausting to stack E1-11.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (n) One (1) vacuum coater, identified as VC-2, constructed in 2016, with a maximum capacity of 5 units per hour, using HVLP application method, using dry filters for particulate control, and exhausting to stack VC-2S.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (o) One (1) manual coating booth with two (2) HVLP spray guns, identified as D-9, constructed in 2009, with a maximum capacity of 1000 doors per day, with particulate emissions controlled by dry filters, exhausting to stack E1-12.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (p) One (1) spray coating line, identified as SCL-1, consisting of coating equipment and an electric dryer, with a maximum throughput capacity of 250 units per hour, using manual air assisted airless spray application method, venting to stack SCLS1, and using dry filters as control.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (q) One (1) flat wood coating line, identified as SCL-2, constructed in 2016, with a maximum capacity of 375 units per hour, using HVLP application method, using dry filters for particulate control, consisting of the following:

- (1) One (1) stain spray station, exhausting to stack SCL-2SS.
- (2) One (1) top coat spray station, exhausting to stack SCL-2TS.
- (3) Two (2) direct-fired natural gas-fired drying ovens, identified as SCL-2H1 and SCL-2H2, each with a maximum heat input capacity of 0.40 MMBtu per hour, exhausting to stacks SCL-2H1S and SCL-2H2S.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (r) Two (2) denibbers for D3, constructed in 2013, identified as DN3a and DN3b, with a maximum capacity of 3,900 board feet per hour, using a cyclonic baghouse, identified as Baghouse 1-4, to control particulate emissions, and exhausting to stack C1-4.
- (s) One (1) denibber for D6, constructed in 2013, identified as DN6, with a maximum capacity of 3,900 board feet per hour, using a portable baghouse, identified as PC1, to control particulate emissions, and exhausting inside the building.

- (t) One (1) auto glazing machine, identified as AG1, constructed in 2013, equipped with one HVLP applicator, with a maximum production rate of 30,000 linear feet per 8-hour day, using dry fabric filters as controls, and exhausting to AG1.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (u) Five (5) spray booths, identified as SB1 through SB5, constructed in 2016, with a maximum capacity of 30 units per hour, total; each using manual HVLP application method, each using dry filters for particulate control, and exhausting to stacks SB1S through SB5S.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (v) Two (2) Enclosed Spray Machines for Ultra Violet (UV) Waterborne Coating Spray line, identified as UVSL1 and UVSL2, using two (2) electric drying ovens, constructed in 2019, with a maximum throughput of 600 units per hour, using low temperature dry fabric filters, identified as UVSL1DF and UVSL2DF, as PM control, exhausting to stacks UVSL1S and UVSL2S.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

Plant 140 (57420 Nagy Drive)

- (w) Woodworking equipment, identified as WW2a, constructed in 1995, with a maximum throughput of 3,000 pounds of wood per hour, using a cyclonic baghouse, replaced in 2008, identified as Baghouse 2-1, to control particulate emissions, and exhausting to stack C2-1.

- (x) Woodworking equipment, identified as WW2b, constructed in 1995, with a maximum throughput of 5,000 pounds of wood per hour, using a cyclonic baghouse, replaced in 2015, identified as Baghouse 2-2, to control particulate emissions, and exhausting to stack C2-2.

- (y) Four (4) wood wrapping machines (woodworking and surface coating), identified as P2W1 through P2W4, each constructed in 1995, each with a maximum capacity of 280 pounds of wood styles per hour, each using water-based and hot melt adhesives, using a cyclonic baghouse, replaced in 2008, identified as Baghouse 2-1, to control particulate emissions, exhausting to stack C2-1.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (z) Two (2) wood wrapping machines (woodworking and surface coating), identified as P2W5 and P2W6, each constructed in 1995, each with a maximum capacity of 280 pounds of wood styles per hour, each using water-based and hot melt adhesives, using a cyclonic baghouse, replaced in 2015, identified as Baghouse 2-2, to control particulate emissions, exhausting to stack C2-2.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (aa) Two (2) wood wrapping machines (woodworking and surface coating), identified as P2W7 and P2W8, each constructed in 2013, each with a maximum capacity of 280

pounds of wood styles per hour, each using water-based and hot melt adhesives, using a cyclonic baghouse, replaced in 2015, identified as Baghouse 2-2, to control particulate emissions, exhausting to stack C2-2.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (bb) One (1) wood wrapping machine (woodworking and surface coating), identified as P2W9, constructed in 2013, with a maximum capacity of 280 pounds of wood styles per hour, using water-based and hot melt adhesives, using a portable baghouse, identified as PC2-1, to control particulate emissions, and exhausting inside the building.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (cc) One (1) wood wrapping machine (woodworking and surface coating), identified as P2W10, constructed in 2013, with a maximum capacity of 280 pounds of wood styles per hour, using water-based and hot melt adhesives, using a portable baghouse, identified as PC2-2, to control particulate emissions, and exhausting inside the building.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (dd) Seven (7) wood wrapping machines (woodworking and surface coating), identified as P2W11 through P2W17, each constructed in 2020, each with a maximum capacity of 280 pounds of wood styles per hour, each using water-based and hot melt adhesives, using a cyclonic baghouse as control, identified as C2-3, and exhausting to stack C2-3S.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (ee) Two (2) wood panel laminating machines (woodworking and surface coating), identified as WPL2A, constructed in 1995, each with a maximum capacity of 2,500 pounds of wood panels per hour, using a cyclonic baghouse as control, identified as C2-3, and exhausting to stack C2-3S.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (ff) Two (2) wood panel laminating machines (woodworking and surface coating), identified as WPL2B, constructed in 1995, each with a maximum capacity of 1,500 pounds of wood panels per hour, each using a portable cyclonic baghouse, identified as PC2-3 and PC2-4, as control, respectively, and exhausting indoors.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (gg) Two (2) wood panel laminating machines (woodworking and surface coating), identified as WPL2C, constructed in 2020, each with a maximum capacity of 1,500 pounds of wood panels per hour, each using a portable cyclonic baghouse, identified as PC2-5 and PC2-6 as control, respectively, and exhausting indoors.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (hh) One (1) wood chipping unit, identified as WC1, with a maximum throughput of 1 ton per

hour, uncontrolled, exhausting to enclosed semitrailers.

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
 - (1) Four (4) indirect-fired, natural gas-fired hot water boilers, identified as AB1, AB2, AB3, and AB4, constructed in 2000, with each rated at 1 MMBtu per hour and each having a liquid capacity of 50 gallons, exhausting to stacks AB1, AB2, AB3, and AB4, respectively.
 - (2) One (1) indirect-fired, natural gas-fired hot water heater, identified as WH1, constructed in 1995, rated at 0.12 MMBTU/hr, uncontrolled and exhausting indoors.

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
 - (1) Four (4) direct-fired, natural gas-fired air makeup units, identified as AM1 through AM4, each constructed in 1995, each rated at 4.12 MMBTU/hr, each uncontrolled and exhausting indoors.
 - (2) Five (5) direct-fired, natural gas-fired thermocycler furnaces, identified as TC1 through TC5, each constructed in 1995, each rated at 0.58 MMBTU/hr, each uncontrolled and exhausting indoors.
 - (3) Two (2) direct-fired, natural gas-fired thermocycler furnaces, identified as TC6 and TC7, respectively, each constructed in 1997, each rated at 3.12 MMBTU/hr, each uncontrolled and exhausting indoors.
 - (4) Three (3) direct-fired, natural gas-fired forced air furnaces, identified as F1, F2, and F3, respectively, each constructed in 1997, each rated at 0.09 MMBTU/hr, each uncontrolled and exhausting indoors.
 - (5) Two (2) natural gas-fired thermocycler furnaces, identified as TC8 and TC9, constructed in 2020, with each rated at 0.58 MMBtu/hr, using no control, and exhausting to stacks TC8S and TC9S, respectively.
- (b) One (1) acetone solvent recycling unit, identified as P130SR, constructed in 2020, with a maximum capacity of fifty-five (55.0) gallons, using no control, and exhausting indoors.

[Note: this unit uses acetone as a solvent, which is not identified as a HAP under Section 112(b) of the Clean Air Act and not delisted from that list or redefined under 40 CFR Part 63, Subpart C. Acetone is also not identified as a VOC under 40 CFR 51.100(s). There is, however, VOC emitted from residual stain that is mixed with solvent.

The VOC from this residual stain is included in the PTE for this source.]

A.5 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, T039-41848-00324, 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 5
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.

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 T039-41848-00324 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 5
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

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

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

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

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

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

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

- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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

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

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

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

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

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

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

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

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

- (a) The Permittee shall 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]

Pursuant to 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:

Plant 130 (1808 West Hively Avenue)

- (a) One (1) sawdust storage silo, identified as S-1, constructed in 1997, with a maximum capacity of 690 cubic yards, collecting sawdust from the woodworking equipment through a cyclonic baghouse, identified as Baghouse 1-1, and exhausting to stack C1-1.
- (b) Woodworking equipment, identified as WW1a, constructed in 1995, with a maximum throughput capacity of 25,000 pounds of wood per hour, using three (3) cyclonic baghouses, identified as Baghouse 1-2, Baghouse 1-3, and Baghouse 1-8, respectively, to control particulate emissions, and exhausting to stacks C1-2, C1-3, and C1-8, respectively.
- (c) Woodworking equipment, identified as WW1b, constructed in 1995, with a maximum throughput capacity of 25,000 pounds of wood per hour, using two (2) cyclonic baghouses, identified as Baghouse 1-5 and Baghouse 1-6, respectively, to control particulate emissions, and exhausting to stacks C1-5 and C1-6, respectively.
- (d) Woodworking equipment, identified as WW1c, constructed in 2003, having a maximum throughput capacity of 5,000 pounds of wood per hour, using a cyclonic baghouse system, identified as Baghouse 1-7, to control particulate emissions, and exhausting to stack C1-7.
- (e) Two (2) denibbers for D1, identified as DN1a and DN1b, constructed in 2000, each with maximum capacities of 3,900 board feet per hour, using a cyclonic baghouse, identified as Baghouse 1-4, to control particulate emissions, and exhausting to stack C1-4.
- (f) One (1) denibber for D4, identified as DN4, constructed in 2000, with a maximum capacity of 3,900 board feet per hour, using a cyclonic baghouse, identified as Baghouse 1-4, to control particulate emissions, and exhausting to stack C1-4.
- (r) Two (2) denibbers for D3, constructed in 2013, identified as DN3a and DN3b, with a maximum capacity of 3,900 board feet per hour, using a cyclonic baghouse, identified as Baghouse 1-4, to control particulate emissions, and exhausting to stack C1-4.
- (s) One (1) denibber for D6, constructed in 2013, identified as DN6, with a maximum capacity of 3,900 board feet per hour, using a portable baghouse, identified as PC1, to control particulate emissions, and exhausting inside the building.

Plant 140 (57420 Nagy Drive)

- (w) Woodworking equipment, identified as WW2a, constructed in 1995, with a maximum throughput of 3,000 pounds of wood per hour, using a cyclonic baghouse, replaced in 2008, identified as Baghouse 2-1, to control particulate emissions, and exhausting to stack C2-1.
- (x) Woodworking equipment, identified as WW2b, constructed in 1995, with a maximum throughput of 5,000 pounds of wood per hour, using a cyclonic baghouse, replaced in 2015, identified as Baghouse 2-2, to control particulate emissions, and exhausting to stack C2-2.
- (y) Four (4) wood wrapping machines (woodworking and surface coating), identified as P2W1 through P2W4, each constructed in 1995, each with a maximum capacity of 280 pounds of wood styles per hour, each using water-based and hot melt adhesives, using a cyclonic baghouse, replaced in 2008, identified as Baghouse 2-1, to control particulate emissions, exhausting to stack C2-1.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (z) Two (2) wood wrapping machines (woodworking and surface coating), identified as P2W5 and P2W6, each constructed in 1995, each with a maximum capacity of 280 pounds of wood styles per hour, each using water-based and hot melt adhesives, using a cyclonic baghouse, replaced in 2015, identified as Baghouse 2-2, to control particulate emissions, exhausting to stack C2-2.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (aa) Two (2) wood wrapping machines (woodworking and surface coating), identified as P2W7 and P2W8, each constructed in 2013, each with a maximum capacity of 280 pounds of wood styles per hour, each using water-based and hot melt adhesives, using a cyclonic baghouse, replaced in 2015, identified as Baghouse 2-2, to control particulate emissions, exhausting to stack C2-2.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (bb) One (1) wood wrapping machine (woodworking and surface coating), identified as P2W9, constructed in 2013, with a maximum capacity of 280 pounds of wood styles per hour, using water-based and hot melt adhesives, using a portable baghouse, identified as PC2-1, to control particulate emissions, and exhausting inside the building.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (cc) One (1) wood wrapping machine (woodworking and surface coating), identified as P2W10, constructed in 2013, with a maximum capacity of 280 pounds of wood styles per hour, using water-based and hot melt adhesives, using a portable baghouse, identified as PC2-2, to control particulate emissions, and exhausting inside the building.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (dd) Seven (7) wood wrapping machines (woodworking and surface coating), identified as P2W11 through P2W17, each constructed in 2020, each with a maximum capacity of 280 pounds of wood styles per hour, each using water-based and hot melt adhesives, using a cyclonic baghouse as control, identified as C2-3, and exhausting to stack C2-3S.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (ee) Two (2) wood panel laminating machines (woodworking and surface coating), identified as WPL2A, constructed in 1995, each with a maximum capacity of 2,500 pounds of wood panels per hour, using a cyclonic baghouse as control, identified as C2-3, and exhausting to stack C2-3S.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (ff) Two (2) wood panel laminating machines (woodworking and surface coating), identified as

WPL2B, constructed in 1995, each with a maximum capacity of 1,500 pounds of wood panels per hour, each using a portable cyclonic baghouse, identified as PC2-3 and PC2-4, as control, respectively, and exhausting indoors.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

(gg) Two (2) wood panel laminating machines (woodworking and surface coating), identified as WPL2C, constructed in 2020, each with a maximum capacity of 1,500 pounds of wood panels per hour, each using a portable cyclonic baghouse, identified as PC2-5 and PC2-6 as control, respectively, and exhausting indoors.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

(hh) One (1) wood chipping unit, identified as WC1, with a maximum throughput of 1 ton per hour, uncontrolled, exhausting to enclosed semitrailers.

(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 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

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

Compliance with these limits, combined with the total potential to emit PM, PM₁₀, and PM_{2.5} from all other emission units at this source, shall limit the potential to emit PM, PM₁₀, and PM_{2.5} from the entire source to less than 250 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-2 (PSD) not applicable.

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

(a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate matter (PM) from the listed woodworking operations shall not exceed the following limits when operating at the following process weight rates.

The pound 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:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
 P = process weight rate in tons per hour

Summary of Process Weight Rate Limits			
Emission Unit ID	Stack ID	P (lb/hr)	E (lb/hr)
S-1	C1-1	55,000	37.8
WW1a	C1-2	2,488	4.75
WW1a	C1-3	1,173	2.87

Summary of Process Weight Rate Limits			
Emission Unit ID	Stack ID	P (lb/hr)	E (lb/hr)
DN1a, DN1b, DN3a, DN3b, DN4	C1-4	6,500	9.03
WW1b	C1-5	12,000	13.6
WW1b	C1-6	13,000	14.4
WW1c	C1-7	5,000	7.58
WW1a	C1-8	14,839	15.7
WW2a, P2W1 - P2W4	C2-1	8,120	10.91
WW2b, P2W5 - P2W8	C2-2	6,120	8.7
P2W11 – P2W17, WPL2A	C2-3	6,960	9.45
WPL2B1	PC2-3	250	1.02
WPL2B2	PC2-4	250	1.02
WPL2C1	PC2-5	250	1.02
WPL2C2	PC2-6	250	1.02

- (b) In order to ensure that the denibber DN6 and wood wrapping P2W9 and P2W10 are exempt from the requirements of 326 IAC 6-3-2 (Particulate emission limitations, work practices, and control technologies), the baghouses associated with these units shall be in operation at all times that these units are in operation.

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

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

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

D.1.4 Particulate Control

- (a) In order to comply with Conditions D.1.1 and D.1.2, the baghouses for particulate control shall be in operation and control emissions from S-1, WW1a, WW1b, WW1c, DN1a, DN1b, DN3a, DN3b, DN4, DN6, WW2a, WW2b, P2W1 through P2W17, WPL2A, WPL2B, and WPL2C at all times S-1, WW1a, WW1b, WW1c, DN1a, DN1b, DN3a, DN3b, DN4, DN6, WW2a, WW2b, P2W1 through P2W17, WPL2A, WPL2B, and WPL2C are each in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, 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 S-1, WW1a, WW1b, WW1c, DN1a, DN1b, DN3a, DN3b, DN4, WW2a, WW2b, P2W1 through P2W8, and WPL2 stack exhausts (Stacks C1-1, C1-2, C1-3, C1-4, C1-5, C1-6, C1-7, C1-8, C2-1, C2-2, and C2-3) shall be performed once

per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take a reasonable response. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.1.6 Broken or Failed Bag Detection

- (a) For a single compartment baghouses 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 emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

D.1.7 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.5, the Permittee shall maintain daily records of the visible emission notations of the S-1, WW1a, WW1b, WW1c, DN1a, DN1b, DN3a, DN3b, DN4, WW2a, WW2b, P2W1 through P2W8, P2W11 through P2W17, and WPL2A stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (e.g., the process did not operate that day).
- (b) 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:

Plant 130 (1808 West Hively Avenue)

- (g) One (1) dualtech automated back sealing machine, identified as D1, constructed in 2000, with a maximum capacity of 3,900 board feet per hour, equipped with eight (8) airless/air assist spray guns, with particulate emissions controlled by low temperature dry fabric filters, identified as D1DF, exhausting to stack E1-2, and a hot air drying tunnel exhausting to stack E1-3.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (h) One (1) rototech automated front staining machine, identified as D3, constructed in 2000, with a maximum capacity of 3,900 board feet per hour, equipped with twenty (20) airless/air assist spray guns, with particulate emissions controlled by dry filters, exhausting to stack E1-4, and a forced air drying tunnel exhausting to stack E1-5.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (i) One (1) dualtech automated sealing machine, identified as D4, constructed in 2000, with a maximum capacity of 3,900 board feet per hour, equipped with eight (8) airless/air assist spray guns, with particulate emissions controlled by a water wall and water scrubber system, identified as D5, exhausting to stack E1-6, and a hot air/infrared drying tunnel exhausting to stack E1-7.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (j) One (1) dualtech automated topcoat machine, identified as D6, constructed in 2000, with a maximum capacity of 3,900 board feet per hour, equipped with eight (8) airless/air assist spray guns, with particulate emissions controlled by a dry fabric filter, identified as D7, exhausting to stack E1-8, a hot air drying tunnel exhausting to stack E1-9, and a non-heated cooling hood exhausting inside the building.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (k) One (1) manual touch up booth, identified as TU1, constructed in 2000, with a maximum capacity of one (1) gallon of stain, two (2) gallons of sealer, and two (2) gallons of topcoat per day, consisting of one (1) airless/air assist gun, with particulate emissions controlled by dry filters, exhausting to stack TU-1.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (l) One (1) rototech automated back staining machine, identified as D8, constructed in 2002, with a maximum capacity of 3,900 board feet per hour, equipped with twenty (20) HVLP spray guns used for coating cabinet doors and an infrared drying oven, with particulate emissions controlled by dry filters, and exhausting to stack E1-1.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (m) One (1) vacuum coater, identified as VC-1, constructed in 1995, with a maximum capacity of 5,000 linear feet of wood per hour, applying coatings containing no VOC or HAP to wood trim, utilizing an ultraviolet (UV) curing process, with particulate emissions controlled by dry filters, and exhausting to stack E1-11.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (n) One (1) vacuum coater, identified as VC-2, constructed in 2016, with a maximum capacity of 5 units per hour, using HVLP application method, using dry filters for particulate control, and exhausting to stack VC-2S.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (o) One (1) manual coating booth with two (2) HVLP spray guns, identified as D-9, constructed in 2009, with a maximum capacity of 1000 doors per day, with particulate emissions controlled by dry filters, exhausting to stack E1-12.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (p) One (1) spray coating line, identified as SCL-1, consisting of coating equipment and an electric dryer, with a maximum throughput capacity of 250 units per hour, using manual air assisted airless spray application method, venting to stack SCLS1, and using dry filters as control.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (q) One (1) flat wood coating line, identified as SCL-2, constructed in 2016, with a maximum capacity of 375 units per hour, using HVLP application method, using dry filters for particulate control, consisting of the following:

(1) One (1) stain spray station, exhausting to stack SCL-2SS.

(2) One (1) top coat spray station, exhausting to stack SCL-2TS.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (t) One (1) auto glazing machine, identified as AG1, constructed in 2013, equipped with one HVLP applicator, with a maximum production rate of 30,000 linear feet per 8-hour day, using dry fabric filters as controls, and exhausting to AG1.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (u) Five (5) spray booths, identified as SB1 through SB5, constructed in 2016, with a maximum capacity of 30 units per hour, total; each using manual HVLP application method, each using dry filters for particulate control, and exhausting to stacks SB1S through SB5S.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (v) Two (2) Enclosed Spray Machines for Ultra Violet (UV) Waterborne Coating Spray line, identified as UVSL1 and UVSL2, using two (2) electric drying ovens, constructed in 2019, with a maximum throughput of 600 units per hour, using low temperature dry fabric filters, identified as UVSL1DF and UVSL2DF, as PM control, exhausting to stacks UVSL1S and UVSL2S.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

Plant 140 (57420 Nagy Drive)

- (y) Four (4) wood wrapping machines (woodworking and surface coating), identified as P2W1 through P2W4, each constructed in 1995, each with a maximum capacity of 280 pounds of wood styles per hour, each using water-based and hot melt adhesives, using a cyclonic baghouse, replaced in 2008, identified as Baghouse 2-1, to control particulate emissions, exhausting to stack C2-1.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (z) Two (2) wood wrapping machines (woodworking and surface coating), identified as P2W5 and P2W6, each constructed in 1995, each with a maximum capacity of 280 pounds of wood styles per hour, each using water-based and hot melt adhesives, using a cyclonic baghouse, replaced in 2015, identified as Baghouse 2-2, to control particulate emissions, exhausting to stack C2-2.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (aa) Two (2) wood wrapping machines (woodworking and surface coating), identified as P2W7 and P2W8, each constructed in 2013, each with a maximum capacity of 280 pounds of wood styles per hour, each using water-based and hot melt adhesives, using a cyclonic baghouse, replaced in 2015, identified as Baghouse 2-2, to control particulate emissions, exhausting to stack C2-2.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (bb) One (1) wood wrapping machine (woodworking and surface coating), identified as P2W9, constructed in 2013, with a maximum capacity of 280 pounds of wood styles per hour, using water-based and hot melt adhesives, using a portable baghouse, identified as PC2-1, to control particulate emissions, and exhausting inside the building.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (cc) One (1) wood wrapping machine (woodworking and surface coating), identified as P2W10, constructed in 2013, with a maximum capacity of 280 pounds of wood styles per hour, using water-based and hot melt adhesives, using a portable baghouse, identified as PC2-2, to control particulate emissions, and exhausting inside the building.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (dd) Seven (7) wood wrapping machines (woodworking and surface coating), identified as P2W11 through P2W17, each constructed in 2020, each with a maximum capacity of 280 pounds of

wood styles per hour, each using water-based and hot melt adhesives, using a cyclonic baghouse as control, identified as C2-3, and exhausting to stack C2-3S.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (ee) Two (2) wood panel laminating machines (woodworking and surface coating), identified as WPL2A, constructed in 1995, each with a maximum capacity of 2,500 pounds of wood panels per hour, using a cyclonic baghouse as control, identified as C2-3, and exhausting to stack C2-3S.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (ff) Two (2) wood panel laminating machines (woodworking and surface coating), identified as WPL2B, constructed in 1995, each with a maximum capacity of 1,500 pounds of wood panels per hour, each using a portable cyclonic baghouse, identified as PC2-3 and PC2-4, as control, respectively, and exhausting indoors.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (gg) Two (2) wood panel laminating machines (woodworking and surface coating), identified as WPL2C, constructed in 2020, each with a maximum capacity of 1,500 pounds of wood panels per hour, each using a portable cyclonic baghouse, identified as PC2-5 and PC2-6 as control, respectively, and exhausting indoors.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

(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 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

The total VOC input to D1, D3, D4, D6, TU1, D8, VC-1, VC-2, D-9, SCL-1, SCL-2, AG1, P2W1 through P2W10, WPL2A, WPL2B, WPL2C, UVSL1, UVSL2, and SB1 through SB5, combined shall be less than 249 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

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

D.2.2 Particulate Emission Limitations [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from UVSL1, UVSL2, D1, D3, D4, D6, TU1, D8, VC-1, VC-2, D-9, SCL-1, SCL-2, SB1 through SB5, and AG1 shall be controlled by a dry particulate filter and/or water wall and water scrubber system, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.2.3 Volatile Organic Compounds (VOC) Limitations [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 UVSL2, D1, D3, D4, D6, TU1, D8, VC-2, D-9, SCL-1,

SCL-2, SB1 through SB5, AG1, P2W1 through P2W17, WPL2A, WPL2B, and WPL2C, the Permittee shall apply all coating material, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) of the following application methods:

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

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

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

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

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

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

- (a) 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.
- (b) If the amount of VOC in the waste collected by the spent acetone solvent recycling collection unit that is shipped offsite for recycling or disposal is deducted from the monthly VOC input reported, the Permittee shall determine the VOC content of the waste shipped offsite using one or a combination of the following methods:
- (1) On-Site Sampling
 - (A) VOC content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.
 - (B) A representative sample of the VOC containing waste to be shipped offsite shall be analyzed within 90 days of the issuance of this permit T039-41848-00324.
 - (C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.
 - (D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or

more decrease in the VOC content of the VOC containing waste. Such change could include, but is not limited to, the following:

- (i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or
- (ii) An operational change in the coating application or cleanup operations.

The new VOC content shall be used in calculating the amount of VOC shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

- (2) Certified Waste Report: The VOC reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of VOC in the waste.
- (3) Minimum Assumed VOC content: The VOC content of the waste shipped offsite may be assumed to be equal to the VOC content of the material with the lowest VOC content that could be present in the waste, as determined using the as supplied” and “as applied” VOC data sheets, for each month.
- (c) IDEM reserves the right to request a representative sample of the VOC containing waste stream and conduct an analysis for VOC content.
- (d) Compliance with the VOC input limitation contained in Condition D.2.1 shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compound input for the previous month, minus the amount VOC in the waste shipped out for recycling or disposal, and adding it to previous 11 months total VOC input, minus the amount VOC in the waste shipped out for recycling or disposal, so as to arrive at VOC input for the most recent twelve (12) consecutive month period.
- (e) The VOC input for a month shall be calculated using the following equation:

$$\text{VOC input} = \text{SCL} - \text{SR}$$

Where:

SCL = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents, at the coating booths; and

SR = The total amount of VOC, in tons, shipped out for either recycling or disposal, including coatings, dilution solvents, and cleaning solvents, from the coating booths.

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

D.2.6 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 UVSL1, UVSL2, D1, D3, D6, TU1, D8, VC-1, VC-2, D-9, SCL-1, SCL-2, SB1 through SB5, and AG1 stacks (E1-1 through E1-5, E1-8, E1-9, TU-1, E1-11, E1-12, VC-2S, SCLS1, SCL-2SS, SCL-2TS, AGI, SB1S through SB5S, UVSL1S, and UVSL2S) while one or more of the emission units are in operation. If a condition

exists which should result in a response, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.2.7 Monitoring

- (a) Daily inspections shall be performed to verify that the water level of the water wall/baffles meets the manufacturer's recommended level. To monitor the performance of the water wall/baffles, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. In addition, weekly observations shall be made of the overspray from the surface coating booth stacks (E1-6 and E1-7) while one or more of the booths are in operation. If a condition exists which should result in a response, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks (E1-6 and E1-7) and the presence of overspray on the rooftops and the nearby ground. If a condition exists which should result in a response, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.2.8 Scrubber Inspections

An inspection of the scrubbers controlling emissions from emission units D4 shall be performed semi-annually. Inspections required by this condition shall not be performed in consecutive months. Section B - Preventive Maintenance Plan, of this permit, contains the Permittee's obligations with regard to repairs or replacement of defective components.

D.2.9 Scrubber Malfunction

In the event that a scrubber malfunction has been observed:

- (a) The affected unit will be shut down immediately in accordance with safe operating procedures until the failed unit has been repaired or the appropriate components replaced.
- (b) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

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

D.2.10 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC input limitation established in Condition D.2.1 and to document the quantity of any VOC shipped offsite and deducted from total reported VOC usage. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC content of each coating material and solvent used.
 - (2) The amount of each coating material and solvent used on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (3) The total VOC usage, including coating, dilution solvents, and cleaning solvents, for each month and each compliance period.
 - (4) The total VOC emitted for each month and each compliance period.
 - (5) If the amount of VOC in waste material is being deducted from the VOC input as allowed in paragraph (b) of Condition D.2.5, then the following records shall be maintained:
 - (A) The amount of VOC containing waste shipped out to be recycled or disposed each month. If multiple cleanup solvent waste streams are collected and drummed separately, the amount shipped out shall be recorded separately for each used solvent stream.
 - (B) The VOC content of the waste and all records necessary to verify the amount and VOC content of the VOC containing waste shipped out for recycling or disposal.
 - (C) The weight of VOC input, minus the weight of VOC shipped out to be recycled or disposed, for each compliance period.
- (b) To document the compliance status with Condition D.2.2, D.2.6, and D.2.7, the Permittee shall maintain a log of weekly overspray observations, weekly observations of the water level in the pans, and daily and monthly inspections.
- (c) To document the compliance status with Condition D.2.8, the Permittee shall maintain records of the results of the inspections required under Condition D.2.8.
- (d) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

D.2.11 Reporting Requirements

A quarterly summary of the information to document the compliance status with 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 (35).

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Specifically Regulated Insignificant Activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
 - (1) Four (4) indirect-fired, natural gas-fired hot water boilers, identified as AB1, AB2, AB3, and AB4, constructed in 2000, with each rated at 1 MMBtu per hour and each having a liquid capacity of 50 gallons, exhausting to stacks AB1, AB2, AB3, and AB4, respectively.
 - (2) One (1) indirect-fired, natural gas-fired hot water heater, identified as WH1, constructed in 1995, rated at 0.12 MMBTU/hr, uncontrolled and exhausting indoors.

(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.3.1 Particulate Emissions [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from the natural gas-fired hot water boilers AB1 through AB4 and the hot water heater WH1 shall be limited to 0.6 pounds per MMBtu heat input.

D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

SECTION E.1

NESHAP

Emissions Unit Description:

Plant 130 (1808 West Hively Avenue)

- (g) One (1) dualtech automated back sealing machine, identified as D1, constructed in 2000, with a maximum capacity of 3,900 board feet per hour, equipped with eight (8) airless/air assist spray guns, with particulate emissions controlled by low temperature dry fabric filters, identified as D1DF, exhausting to stack E1-2, and a hot air drying tunnel exhausting to stack E1-3.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (h) One (1) rototech automated front staining machine, identified as D3, constructed in 2000, with a maximum capacity of 3,900 board feet per hour, equipped with twenty (20) airless/air assist spray guns, with particulate emissions controlled by dry filters, exhausting to stack E1-4, and a forced air drying tunnel exhausting to stack E1-5.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (i) One (1) dualtech automated sealing machine, identified as D4, constructed in 2000, with a maximum capacity of 3,900 board feet per hour, equipped with eight (8) airless/air assist spray guns, with particulate emissions controlled by a water wall and water scrubber system, identified as D5, exhausting to stack E1-6, and a hot air/infrared drying tunnel exhausting to stack E1-7.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (j) One (1) dualtech automated topcoat machine, identified as D6, constructed in 2000, with a maximum capacity of 3,900 board feet per hour, equipped with eight (8) airless/air assist spray guns, with particulate emissions controlled by a dry fabric filter, identified as D7, exhausting to stack E1-8, a hot air drying tunnel exhausting to stack E1-9, and a non-heated cooling hood exhausting inside the building.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (k) One (1) manual touch up booth, identified as TU1, constructed in 2000, with a maximum capacity of one (1) gallon of stain, two (2) gallons of sealer, and two (2) gallons of topcoat per day, consisting of one (1) airless/air assist gun, with particulate emissions controlled by dry filters, exhausting to stack TU-1.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (l) One (1) rototech automated back staining machine, identified as D8, constructed in 2002, with a maximum capacity of 3,900 board feet per hour, equipped with twenty (20) HVLP spray guns used for coating cabinet doors and an infrared drying oven, with particulate emissions controlled by dry filters, and exhausting to stack E1-1.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (m) One (1) vacuum coater, identified as VC-1, constructed in 1995, with a maximum capacity of 5,000 linear feet of wood per hour, applying coatings containing no VOC or HAP to wood trim, utilizing an ultraviolet (UV) curing process, with particulate emissions controlled by dry filters, and exhausting to stack E1-11.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (n) One (1) vacuum coater, identified as VC-2, constructed in 2016, with a maximum capacity of 5 units per hour, using HVLP application method, using dry filters for particulate control, and exhausting to stack VC-2S.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (o) One (1) manual coating booth with two (2) HVLP spray guns, identified as D-9, constructed in 2009, with a maximum capacity of 1000 doors per day, with particulate emissions controlled by dry filters, exhausting to stack E1-12.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (p) One (1) spray coating line, identified as SCL-1, consisting of coating equipment and an electric dryer, with a maximum throughput capacity of 250 units per hour, using manual air assisted airless spray application method, venting to stack SCLS1, and using dry filters as control.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (q) One (1) flat wood coating line, identified as SCL-2, constructed in 2016, with a maximum capacity of 375 units per hour, using HVLP application method, using dry filters for particulate control, consisting of the following:

(1) One (1) stain spray station, exhausting to stack SCL-2SS.

(2) One (1) top coat spray station, exhausting to stack SCL-2TS.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (t) One (1) auto glazing machine, identified as AG1, constructed in 2013, equipped with one HVLP applicator, with a maximum production rate of 30,000 linear feet per 8 hour day, using dry fabric filters as controls, and exhausting to AG1.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (u) Five (5) spray booths, identified as SB1 through SB5, constructed in 2016, with a maximum capacity of 30 units per hour, total; each using manual HVLP application method, each using dry filters for particulate control, and exhausting to stacks SB1S through SB5S.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (v) Two (2) Enclosed Spray Machines for Ultra Violet (UV) Waterborne Coating Spray line, identified as UVSL1 and UVSL2, using two (2) electric drying ovens, constructed in 2019, with a maximum throughput of 600 units per hour, using low temperature dry fabric filters, identified as UVSL1DF and UVSL2DF, as PM control, exhausting to stacks UVSL1S and UVSL2S.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

Plant 140 (57420 Nagy Drive)

- (y) Four (4) wood wrapping machines, identified as P2W1 through P2W4, each constructed in 1995, each with a maximum capacity of 280 pounds of wood styles per hour, each using water-based and hot melt adhesives, using a cyclonic baghouse, replaced in 2008, identified as Baghouse 2-1, to control particulate emissions, exhausting to stack C2-1.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (z) Two (2) wood wrapping machines, identified as P2W5 and P2W6, each constructed in 1995, each with a maximum capacity of 280 pounds of wood styles per hour, each using water-based and hot melt adhesives, using a cyclonic baghouse, replaced in 2015, identified as Baghouse 2-2, to control particulate emissions, exhausting to stack C2-2.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (aa) Two (2) wood wrapping machines, identified as P2W7 and P2W8, each constructed in 2013, each with a maximum capacity of 280 pounds of wood styles per hour, each using water-based and hot melt adhesives, using a cyclonic baghouse, replaced in 2015, identified as Baghouse 2-2, to control particulate emissions, exhausting to stack C2-2.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (bb) One (1) wood wrapping machine, identified as P2W9, constructed in 2013, with a maximum capacity of 280 pounds of wood styles per hour, using water-based and hot melt adhesives, using a portable baghouse, identified as PC2-1, to control particulate emissions, and exhausting inside the building.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (cc) One (1) wood wrapping machine, identified as P2W10, constructed in 2013, with a maximum capacity of 280 pounds of wood styles per hour, using water-based and hot melt adhesives, using a portable baghouse, identified as PC2-2, to control particulate emissions, and exhausting inside the building.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (dd) Seven (7) wood wrapping machines, identified as P2W11 through P2W17, each permitted in 2020, each with a maximum capacity of 280 pounds of wood styles per hour, each using water-based and hot melt adhesives, using a cyclonic baghouse as control, identified as C2-3, and exhausting to stack C2-3S.

	<p>Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.</p>
(ee)	<p>Two (2) wood panel laminating machines, identified as WPL2A, constructed in 1995, each with a maximum capacity of 2,500 pounds of wood panels per hour, using a cyclonic baghouse as control, identified as C2-3, and exhausting to stack C2-3S.</p> <p>Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.</p>
(ff)	<p>Two (2) wood panel laminating machines, identified as WPL2B, constructed in 1995, each with a maximum capacity of 1,500 pounds of wood panels per hour, each using a portable cyclonic baghouse, replaced in 2020, identified as PC2-3 and PC2-4, as control, respectively, and exhausting indoors.</p> <p>Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.</p>
(gg)	<p>Two (2) wood panel laminating machines, identified as WPL2C, permitted in 2020, each with a maximum capacity of 1,500 pounds of wood panels per hour, each using a portable cyclonic baghouse, identified as PC2-5 and PC2-6 as control, respectively, and exhausting indoors.</p> <p>Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.</p>
<p>(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)</p>	

**National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements
[326 IAC 2-7-5(1)]**

E.1.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart JJ.
- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports 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

E.1.2 National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations NESHAP [40 CFR Part 63, Subpart JJ] [326 IAC 20-14]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart JJ (included as Attachment A to the operating permit), which are incorporated by reference as 326 IAC 20-14, the emission unit(s) listed above:

- (1) 40 CFR 63.800 (except (f) and (g))
- (2) 40 CFR 63.801

- (3) 40 CFR 63.802 (except (b))
- (4) 40 CFR 63.803
- (5) 40 CFR 63.804 (except (d) and (e))
- (6) 40 CFR 63.805 (except (d)(7), (d)(9), (e)(4), and (e)(6))
- (7) 40 CFR 63.806
- (8) 40 CFR 63.807
- (9) 40 CFR 63.808
- (10) Table 1
- (11) Table 2
- (12) Table 3
- (13) Table 4
- (14) Table 5
- (15) Table 6

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

Source Name: Patrick Industries, Inc. d.b.a. Adorn
Source Address: 1808 West Hively Ave. & 57420 Nagy Dr., Elkhart, Indiana 46517
Part 70 Permit No.: T039-41848-00324

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: Patrick Industries, Inc. d.b.a. Adorn
Source Address: 1808 West Hively Ave. & 57420 Nagy Dr., Elkhart, Indiana 46517
Part 70 Permit No.: T039-41848-00324

This form consists of 2 pages

Page 1 of 2

- | |
|---|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <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: Patrick Industries, Inc. d.b.a. Adorn
 Source Address: 1808 West Hively Ave. & 57420 Nagy Dr., Elkhart, Indiana 46517
 Part 70 Permit No.: T039-41848-00324
 Facility: D1, D3, D4, D6, TU1, D8, VC-1, VC-2, D-9, SCL-1, SCL-2, AG1, P2W1 through P2W10, WPL2, UVSL1, UVSL2, and SB1 through SB5
 Parameter: Total VOC Input
 Limit: The total VOC input to D1, D3, D4, D6, TU1, D8, VC-1, VC-2, D-9, SCL-1, SCL-2, AG1, P2W1 through P2W10, WPL2A, WPL2CB, WPL2C, UVSL1, UVSL2, and SB1 through SB5, combined shall be less than 249 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
	Total VOC Input (tons)	Total VOC Input (tons)	Total VOC Input (tons)
	This Month	Previous 11 Months	12 Month Total

- 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: Patrick Industries, Inc. d.b.a. Adorn
Source Address: 1808 West Hively Ave. & 57420 Nagy Dr., Elkhart, Indiana 46517
Part 70 Permit No.: T039-41848-00324

Months: _____ to _____ Year: _____

Page 1 of 2

<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 Permit
Modification**

Source Description and Location

Source Name:	Patrick Industries, Inc. d.b.a. Adorn
Source Location:	1808 West Hively Ave. & 57420 Nagy Dr., Elkhart, IN 46517
County:	Elkhart County
SIC Code:	2421 (Sawmills and Planing Mills, General) 2431 (Millwork), 2434 (Wood Kitchen Cabinets) 2541 (Wood Office and Store Fixtures, Partitions, Shelving, and Lockers)
Operation Permit No.:	T039-41848-00324
Operation Permit Issuance Date:	March 12, 2020
Significant Permit Modification No.:	039-43070-00324
Permit Reviewer:	L. David Cohen

Source Definition

The wood countertop and cabinet manufacturing company consist of two (2) plants:

- (1) Plant 1 is located at 1808 West Hively Avenue, Elkhart, Indiana 46517; and
- (2) Plant 2 is located at 57420 Nagy Drive, Elkhart, Indiana 46517.

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

This determination was initially made under Part 70 Operating Permit No. T039-7650-00324, issued on June 3, 1996.

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. T039-41848-00324 on March 12, 2020. There have been no subsequent approvals issued.

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 July 20, 2012, for the 2008 8-hour ozone standard. ¹
PM _{2.5}	Unclassifiable or attainment effective April 15, 2015, for the annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 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.

- (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)								Total HAPs
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1, 2}	SO ₂	NO _x	VOC	CO	Single HAP ³	
Total PTE of Entire Source Excluding Fugitive Emissions*	190.91	191.67	191.67	0.08	13.38	<249.74	11.24	53.81 (Xylene)	130.54
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	--	--

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

²PM_{2.5} listed is direct PM_{2.5}.

³Single highest source-wide HAP

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

Woodworking controls are considered integral.

- (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 a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are equal to or greater than ten (10) tons per year for a single HAP and equal to or greater than twenty-five (25) tons per year for a combination of HAPs.
- (c) These emissions are based on the TSD of Part 70 Renewal No. T039-41848-00324, issued on March 12, 2020.

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed an application, submitted by Patrick Industries, Inc. d.b.a. Adorn on July 17, 2020, relating to the addition of emission units, addition of control devices to permitted emission units, and change in the PSD minor limits for new and permitted units.

The following is a list of the new and modified emission units and pollution control device(s):

New Units:

Plant 130

- (a) One (1) acetone solvent recycling unit, identified as P130SR, constructed in 2020, with a maximum capacity of fifty-five (55.0) gallons, using no control, and exhausting indoors.

[Note: this unit uses acetone as a solvent, which is not identified as a HAP under Section 112(b) of the Clean Air Act and not delisted from that list or redefined under 40 CFR Part 63, Subpart C. Acetone is also not identified as a VOC under 40 CFR 51.100(s). There is, however, VOC emitted from residual stain that is mixed with solvent.

The VOC from this residual stain is included in the PTE for this source.]

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- (b) Seven (7) wood wrapping machines (woodworking and surface coating), identified as P2W11 through P2W17, each constructed in 2020, each with a maximum capacity of 280 pounds of wood styles per hour, each using water-based and hot melt adhesives, using a cyclonic baghouse as control, identified as C2-3, and exhausting to stack C2-3S.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (c) Two (2) wood panel laminating machines (woodworking and surface coating), identified as WPL2C, constructed in 2020, each with a maximum capacity of 1,500 pounds of wood panels per hour, each using a portable cyclonic baghouse, identified as PC2-5 and PC2-6 as control, respectively, and exhausting indoors.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (d) Two (2) natural gas-fired thermocycler furnaces, identified as TC8 and TC9, constructed in 2020, with each rated at 0.58 MMBtu/hr, using no control, and exhausting to stacks TC8S and TC9S, respectively.

The descriptions and control devices of the following units have been updated. The total PTE of the wood panel laminating machines remain unchanged.

- (a) Two (2) wood panel laminating machines (woodworking and surface coating), identified as WPL2A, constructed in 1995, each with a maximum capacity of 1,500 pounds of wood panels per hour, using a cyclonic baghouse as control, identified as C2-3, and exhausting to stack C2-3S.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (b) Two (2) wood panel laminating machines, identified as WPL2B (woodworking and surface coating), constructed in 1995, each with a maximum capacity of 1,500 pounds of wood panels per hour, each using a portable cyclonic baghouse, identified as PC2-3 and PC2-4, as control, respectively, and exhausting indoors.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

“Integral Part of the Process” Determination

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

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

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

Permit Level Determination – Part 70 Modification to an Existing Source

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

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

	PTE Increases Due to the Modification (ton/year)								Total HAPs
	PM	PM ₁₀	PM _{2.5} ¹	SO ₂	NO _x	VOC	CO	Single HAP ²	
Total PTE Before Controls of the New Emission Units	3.51	3.54	3.54	0.003	0.50	0.99	0.42	3.72 (Glycol ether)	3.73
Total PTE of the Modification	3.51	3.54	3.54	0.003	0.50	0.99	0.42	3.72 (Glycol ether)	3.73

¹PM_{2.5} listed is direct PM_{2.5}.
²Single highest HAP.
 Woodworking controls are considered integral.

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

[Note: The total PTE of the proposed emission units are less than exemption thresholds in 326 IAC 2-1.1-3; therefore, a source modification is not required for this project]

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
Solvent Recycling Unit (P130SR)	-	-	-	-	-	-	-	-
Wrapping and Laminating Machines (P2W11-P2W17 and WPL2C)	-	-	-	-	-	0.96	-	-
Woodworking - New Plant 140	3.50	3.50	3.50	-	-	-	-	-
Natural Gas Combustion - New Plant 140	0.01	0.04	0.04	0.003	0.50	0.03	0.42	-

Process / Emission Unit	Project Emissions (ton/year)							
	PM	PM ₁₀	PM _{2.5} ¹	SO ₂	NO _x	VOC	CO	Other
Total for Modification	3.51	3.54	3.54	0.003	0.50	0.99	0.42	-
PSD Major Source Thresholds	250	250	250	250	250	250	250	-
¹ PM _{2.5} listed is direct PM _{2.5} . Woodworking controls are considered integral.								

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) and 326 IAC 2-3 (Emission Offset) 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*	200.33	201.12	201.12	0.083	13.87	<249.44	11.65	53.81 (Xylene)	130.55
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	--	--

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

²PM_{2.5} listed is direct PM_{2.5}.

³Single highest source-wide HAP

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

Woodworking controls are considered integral.

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. 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 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.
- (b) This existing major source of HAP will continue to be a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions will continue to be equal to or greater than ten (10) tons per

year for any single HAP and/or equal to or greater than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is a major 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) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc and 326 IAC 12, are not included in the permit for the natural gas-fired combustion sources, because each unit has a heat input capacity of less than ten (10) MMBtu per hour.
- (b) The requirements of the New Source Performance Standard for Surface Coating of Metal Furniture, 40 CFR 60, Subpart EE and 326 IAC 12, are not included in the permit for this source, because this source does not coat metal furniture. This source applies coatings to the surfaces of wood counter tops and cabinets.
- (c) There are no other New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included in the permit for this proposed modification.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (d) This source is subject to the National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations, 40 CFR 63, Subpart JJ, which is incorporated by reference as 326 IAC 20-14, because this is a major source of HAPs which manufactures wood furniture..

The units subject to this rule include the following:

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- (a) Seven (7) wood wrapping machines (woodworking and surface coating), identified as P2W11 through P2W17, each constructed in 2020, each with a maximum capacity of 280 pounds of wood styles per hour, each using water-based and hot melt adhesives, using a cyclonic baghouse as control, identified as C2-3, and exhausting to stack C2-3S.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (b) Two (2) wood panel laminating machines (woodworking and surface coating), identified as WPL2A, constructed in 1995, each with a maximum capacity of 1,500 pounds of wood panels per hour, using a cyclonic baghouse as control, identified as C2-3, and exhausting to stack C2-3S.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (c) Two (2) wood panel laminating machines, identified as WPL2B (woodworking and surface coating), constructed in 1995, each with a maximum capacity of 1,500 pounds of wood panels per hour, each using a portable cyclonic baghouse, identified as PC2-3 and PC2-4, as control, respectively, and exhausting indoors.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (d) Two (2) wood panel laminating machines (woodworking and surface coating), identified as WPL2C, constructed in 2020, each with a maximum capacity of 1,500 pounds of wood panels per hour, each using a portable cyclonic baghouse, identified as PC2-5 and PC2-6 as control, respectively, and exhausting indoors.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

This source is subject to the following portions of Subpart JJ:

- (1) 40 CFR 63.800 (except (f) and (g))
- (2) 40 CFR 63.801
- (3) 40 CFR 63.802 (except (b))
- (4) 40 CFR 63.803
- (5) 40 CFR 63.804 (except (d) and (e))
- (6) 40 CFR 63.805 (except (d)(7), (d)(9), (e)(4), and (e)(6))
- (7) 40 CFR 63.806
- (8) 40 CFR 63.807
- (9) 40 CFR 63.808
- (10) Table 1
- (11) Table 2
- (12) Table 3
- (13) Table 4
- (14) Table 5
- (15) Table 6

The requirements of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated as 326 IAC 20-1, apply to the source except as otherwise specified in 40 CFR 63, Subpart JJ.

- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Plywood and Composite Wood Products, 40 CFR 63, Subpart DDDD are not included in the permit for this source, since this wood counter top and cabinet manufacturing plant does not manufacture plywood or composite wood products, such as: plywood, veneer, particleboard, oriented strandboard, hardboard, fiberboard, medium density fiberboard, laminated strand lumber, laminated veneer lumber, wood I-joists, kiln-dried lumber, and glue-laminated beams.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Wood Building Products, 40 CFR 63, Subpart QQQQ and 326 IAC 20-79 are not included in the permit for this source, since this source does not coat wood building products. This source applies coatings to the surfaces of wood counter tops and cabinets.
- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Metal Furniture, 40 CFR 63, Subpart RRRR and 326 IAC 20-78 are not included in the permit for this source, since this source does not coat metal furniture. This source applies coatings to the surfaces of wood counter tops and cabinets.
- (h) There are no other National Emission Standards for Hazardous Air Pollutants under 40 CFR 63, 326 IAC 14 and 326 IAC 20 included 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.
- (b) Pursuant to 40 CFR 64.2(b)(1)(i), emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act are exempt from the requirements of CAM. Therefore, an evaluation was not conducted for any emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act.

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	Control Device	Applicable Emission Limitation	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
P2W11 / PM*	BH	326 IAC 6-3-2	> 100	< 100	N ⁵	N
P2W11 / PM	BH	326 IAC 2-2	> 100	< 100	N ^{4,5}	N
P2W11 / PM10	BH	326 IAC 2-2	> 100	< 100	N ⁵	N
P2W11 / PM2.5	BH	326 IAC 2-2	> 100	< 100	N ⁵	N
P2W12 / PM*	BH	326 IAC 6-3-2	> 100	< 100	N ⁵	N
P2W12 / PM	BH	326 IAC 2-2	> 100	< 100	N ^{4,5}	N
P2W12 / PM10	BH	326 IAC 2-2	> 100	< 100	N ⁵	N
P2W12 / PM2.5	BH	326 IAC 2-2	> 100	< 100	N ⁵	N
P2W13 / PM*	BH	326 IAC 6-3-2	> 100	< 100	N ⁵	N
P2W13 / PM	BH	326 IAC 2-2	> 100	< 100	N ^{4,5}	N
P2W13 / PM10	BH	326 IAC 2-2	> 100	< 100	N ⁵	N
P2W13 / PM2.5	BH	326 IAC 2-2	> 100	< 100	N ⁵	N
P2W14 / PM*	BH	326 IAC 6-3-2	> 100	< 100	N ⁵	N
P2W14 / PM	BH	326 IAC 2-2	> 100	< 100	N ^{4,5}	N
P2W14 / PM10	BH	326 IAC 2-2	> 100	< 100	N ⁵	N
P2W14 / PM2.5	BH	326 IAC 2-2	> 100	< 100	N ⁵	N
P2W15 / PM*	BH	326 IAC 6-3-2	> 100	< 100	N ⁵	N
P2W15 / PM	BH	326 IAC 2-2	> 100	< 100	N ^{4,5}	N
P2W15 / PM10	BH	326 IAC 2-2	> 100	< 100	N ⁵	N
P2W15 / PM2.5	BH	326 IAC 2-2	> 100	< 100	N ⁵	N
P2W16 / PM*	BH	326 IAC 6-3-2	> 100	< 100	N ⁵	N
P2W16 / PM	BH	326 IAC 2-2	> 100	< 100	N ^{4,5}	N
P2W16 / PM10	BH	326 IAC 2-2	> 100	< 100	N ⁵	N
P2W16 / PM2.5	BH	326 IAC 2-2	> 100	< 100	N ⁵	N
P2W17 / PM*	BH	326 IAC 6-3-2	> 100	< 100	N ⁵	N
P2W17 / PM	BH	326 IAC 2-2	> 100	< 100	N ^{4,5}	N
P2W17 / PM10	BH	326 IAC 2-2	> 100	< 100	N ⁵	N
P2W17 / PM2.5	BH	326 IAC 2-2	> 100	< 100	N ⁵	N

Emission Unit/Pollutant	Control Device	Applicable Emission Limitation	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
WPL2A / PM*	BH	326 IAC 6-3-2	> 100	< 100	N ⁵	N
WPL2A / PM	BH	326 IAC 2-2	> 100	< 100	N ^{4,5}	N
WPL2A / PM10	BH	326 IAC 2-2	> 100	< 100	N ⁵	N
WPL2A / PM2.5	BH	326 IAC 2-2	> 100	< 100	N ⁵	N
WPL2B / PM*	BH	326 IAC 6-3-2	> 100	< 100	N ⁵	N
WPL2B / PM	BH	326 IAC 2-2	> 100	< 100	N ^{4,5}	N
WPL2B / PM10	BH	326 IAC 2-2	> 100	< 100	N ⁵	N
WPL2B / PM2.5	BH	326 IAC 2-2	> 100	< 100	N ⁵	N
WPL2C / PM*	BH	326 IAC 6-3-2	> 100	< 100	N ⁵	N
WPL2C / PM	BH	326 IAC 2-2	> 100	< 100	N ^{4,5}	N
WPL2C / PM10	BH	326 IAC 2-2	> 100	< 100	N ⁵	N
WPL2C / PM2.5	BH	326 IAC 2-2	> 100	< 100	N ⁵	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.					
N ¹	CAM does not apply for PM because the uncontrolled PTE of PM is less than the major source threshold.					
N ²	CAM does not apply for PM10 because the uncontrolled PTE of PM10 is less than the major source threshold.					
N ³	CAM does not apply for PM2.5 because the uncontrolled PTE of PM2.5 is less than the major source threshold.					
N ⁴	Under 326 IAC 2-2, PM is not a surrogate for a regulated air pollutant. Therefore, CAM does not apply to these emission units for the 326 IAC 2-2 PM limitation.					
N ⁵	Pursuant to 40 CFR Part 64.1, the control devices are considered to be inherent process equipment. Therefore, based on the evaluation, the requirements of 40 CFR Part 64, CAM, are not applicable.					
Controls: BH = Baghouse, C = Cyclone, DC = Dust Collection System, RTO = Regenerative or Recuperative Thermal Oxidizer, WS = Wet Scrubber, ESP = Electrostatic Precipitator						
Emission units without air pollution controls are not subject to CAM. Therefore, they are not listed.						

Inherent Process Equipment (Woodworking)

Pursuant to 40 CFR Part 64.1, the definition of inherent process equipment is "equipment that is necessary for the proper or safe functioning of the process, or material recovery equipment that the owner or operator documents is installed and operated primarily for purposes other than compliance with air pollution regulations. Equipment that must be operated at an efficiency higher than that achieved during normal process operations in order to comply with the applicable emission limitation or standard is not inherent process equipment. For the purposes of this part, inherent process equipment is not considered subject to CAM."

The woodworking baghouse controls are determined to be necessary for the normal and proper operation of the woodworking operations (see the "Integral Part of the Process" Determination" section above for more detail). Therefore, the woodworking baghouses meet the criteria for inherent to the process for the purpose of determining CAM applicability, and are not considered control devices. Therefore, the requirements of 40 CFR Part 64.2, CAM, do not apply to the woodworking operations.

Based on this evaluation, the requirements of 40 CFR Part 64, CAM, are not applicable to any of the new/modified units as part of this modification.

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 PTE of the Entire Source After Issuance of the Part 70 Modification Section of this document.

PSD Minor Source Limits

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

- (a) The integral control devices for the woodworking units shall be in operation and control emissions from the woodworking units at all times the units are in operation.
- (b) The total VOC input to D1, D3, D4, D6, TU1, D8, VC-1, VC-2, D-9, SCL-1, SCL-2, AG1, P2W1 through P2W17, WPL2A, WPL2B, WPL2C, UVSL1, UVSL2, and SB1 through SB5, combined shall be less than 244 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit PM, PM10, PM2.5, and VOC from all other emission units at this source, shall limit the source-wide total potential to emit of PM, PM10, PM2.5, and VOC 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.

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

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

The operation of the surface coating units will emit greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 would apply to the surface coating units. However, pursuant to 326 IAC 2-4.1-1(b)(2), because the surface coating units are specifically regulated under NESHAP 40 CFR 63, Subpart JJ, which was issued pursuant to Section 112(d), 112(h), or 112(j) of the CAA, the surface coating units are exempt from the requirements of 326 IAC 2-4.1.

326 IAC 2-6 (Emission Reporting)

This source is subject to the requirements of 326 IAC 2-6 (Emission Reporting), since it is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program. Pursuant to 326 IAC 2-6-3(a)(2), the Permittee shall submit triennially, by July 1, an emission statement covering the previous calendar year in accordance with the compliance schedule in 326 IAC 2-6-3. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

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 5-1 (Opacity Limitations)

This source is subject to the opacity limitations specified in 326 IAC 5-1-2(1).

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

The source is subject to the requirements of 326 IAC 6-4, because the sawdust drop have the potential to emit fugitive particulate emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This source is not subject to the requirements of 326 IAC 6-5, because the source has potential fugitive particulate emissions of less than twenty-five (25) tons per year.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

Pursuant to 326 IAC 6.5-1-1(a), this source (located in Elkhart County) is not subject to the requirements of 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

326 IAC 6.8 (Particulate Matter Limitations for Lake County)

Pursuant to 326 IAC 6.8-1-1(a), this source (located in Elkhart County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.

State Rule Applicability – Individual Facilities

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

Woodworking

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

Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to the wood wrapping P2W11 – P2W17 and laminators WPL2A – WPL2C, 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 woodworking operations shall not exceed the following limits when operating at the following process weight rates. The pound per hour limitation was calculated with the following equation:

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

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

Summary of Process Weight Rate Limits			
Process / Emission Unit	Stack ID	P (lb/hr)	E (lb/hr)
P2W11 – P2W17, WPL2A	C2-3	6960.0	9.45
WPL2B1	PC2-3	250.0	1.02
WPL2B2	PC2-4	250.0	1.02
WPL2C1	PC2-5	250.0	1.02
WPL2C2	PC2-6	250.0	1.02

The baghouses shall be in operation at all times the woodworking operations are in operation, in order to comply with these limits.

Surface Coating

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

Pursuant to 326 IAC 6-3-1(b)(6), the surface coating operations at wood wrapping P2W11 – P2W17 and laminators WPL2A – WPL2C are not subject to the requirements of 326 IAC 6-3, since they use roll coating.

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

Even though, laminators WPL2A – WPL2C were each constructed after January 1, 1980, they are not subject to the requirements of 326 IAC 8-1-6 because their unlimited VOC potential emissions are each less than twenty-five (25) tons per year.

326 IAC 8-2-10 (Flat Wood Panels; Manufacturing Operations)

Laminators WPL2A through WPL2C are not subject to the requirements of 326 IAC 8-2-10, since they do not coat flat wood panels as defined in 326 IAC 8-2-10(a).

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

Pursuant to 326 IAC 8-2-1(a)(4), the wood wrapping machines P2W11 – P2W17 and laminators WPL2A – WPL2C are not subject to the requirements of 326 IAC 8-2-12, since they each have the potential to emit less than 15 pounds of VOC per day.

Natural Gas Combustion

326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating)

The thermocycler furnaces TC8 and TC9 are not subject to the requirements of 326 IAC 6-2, since they are each not a source of indirect heating.

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

Pursuant to 326 IAC 6-3-1(b)(1), the thermocycler furnaces TC8 and TC9 are not subject to the requirements of 326 IAC 6-3, since they are sources of indirect heating.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The natural gas-fired emission units are not subject to 326 IAC 326 IAC 7-1.1 because they each have a potential to emit sulfur dioxide (SO₂) of less than 25 tons per year or 10 pounds per hour.

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

Even though the natural gas-fired emission units were constructed after January 1, 1980, they are not subject to the requirements of 326 IAC 8-1-6 because their unlimited VOC potential emissions are less than twenty-five (25) tons per year, each.

326 IAC 9-1 (Carbon Monoxide Emission Limits)

The requirements of 326 IAC 9-1 do not apply to the natural gas-fired emission units, because this source does not operate a catalyst regeneration petroleum cracking system or a petroleum fluid coker, grey iron cupola, blast furnace, basic oxygen steel furnace, or other ferrous metal smelting equipment.

326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Categories)

The requirements of 326 IAC 10-3 do not apply to the natural gas-fired emission units, since these units are each not a blast furnace gas-fired boiler, a Portland cement kiln, or a facility specifically listed under 326 IAC 10-3-1(a)(2).

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:
- (1) The emission units P2W11 through P2W17 and WPL2A through WPL2C have applicable compliance determination conditions as specified below:
 - (A) In order to comply with the PM emissions limitations, the baghouses for particulate control shall be in operation and control emissions from P2W11 through P2W17 and WPL2A through WPL2C are each in operation.
 - (B) In the event that bag failure is observed in a multi-compartment baghouse, 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.
 - (2) The emission units P2W11 through P2W17 and WPL2A through WPL2C have applicable compliance determination conditions as specified below:
 - (A) Compliance with the VOC input limitation contained in the permit 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.
 - (B) If the amount of VOC in the waste collected by the spent acetone solvent recycling collection unit that is shipped offsite for recycling or disposal is deducted from the monthly VOC input reported, the Permittee shall determine the VOC content of the waste shipped offsite using one or a combination of the following methods:
 - (i) On-Site Sampling
 - a) VOC content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.
 - b) A representative sample of the VOC containing waste to be shipped offsite shall be analyzed within 90 days of the issuance of this modification 039-43070-00324.

- c) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.
- d) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the VOC content of the VOC containing waste. Such change could include, but is not limited to, the following:
 - 1) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or
 - 2) An operational change in the coating application or cleanup operations.

The new VOC content shall be used in calculating the amount of VOC shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

- (ii) Certified Waste Report: The VOC reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of VOC in the waste.
 - (iii) Minimum Assumed VOC content: The VOC content of the waste shipped offsite may be assumed to be equal to the VOC content of the material with the lowest VOC content that could be present in the waste, as determined using the "as supplied" and "as applied" VOC data sheets, for each month.
- (C) IDEM reserves the right to request a representative sample of the VOC containing waste stream and conduct an analysis for VOC content.
 - (D) Compliance with the VOC input limitation contained in Condition D.2.1 shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compound input for the previous month, minus the amount VOC in the waste shipped out for recycling or disposal, and adding it to previous 11 months total VOC input, minus the amount VOC in the waste shipped out for recycling or disposal, so as to arrive at VOC input for the most recent twelve (12) consecutive month period.
 - (E) The VOC input for a month shall be calculated using the following equation:

$$\text{VOC input} = \text{SCL} - \text{SR}$$

Where:

SCL = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents, at the coating booths; and

SR = The total amount of VOC, in tons, shipped out for either recycling or disposal, including coatings, dilution solvents, and cleaning solvents, from the coating booths.

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

Emission Units	Type of Parametric Monitoring	Frequency	Range or Specification
P2W11 through P2W17 and WPL2A through WPL2C	Visible emission notations	Daily	Verify whether emissions are normal or abnormal

These monitoring conditions are necessary because the baghouses for the units P2W11 through P2W17 and WPL2A through WPL2C must operate properly to assure compliance with 326 IAC 6-3 (Particulate Emissions Limitations for Manufacturing Processes) and in order to render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

Proposed Changes

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

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

- (1) Sections A.1 of the permit has been revised for clarification purposes.
- (2) Sections A.2 and A.4 of the permit have been modified to include the proposed new and modified emission units.
- (3) Sections D.1, D.2 and E.1 of the permit have been modified to include new and modified emission units and applicable requirements.
- (4) The quarterly report form has been updated to incorporate the proposed units.

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 counter top and cabinet manufacturing plant.

Source Address: 1808 West Hively Ave. & 57420 Nagy Dr., Elkhart, Indiana 46517

...

Source Location Status: Attainment for all criteria pollutants

Source Status: Part 70 Operating Permit Program
 Minor Source, under PSD and Emission Offset Rules
 Major 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:

Plant 130 (1808 West Hively Avenue)

...

- (v) Two (2) Enclosed Spray Machines for Ultra Violet (UV) Waterborne Coating Spray line, identified as UVSL1 and UVSL2, using two (2) electric drying ovens, constructed in 2019, with a maximum throughput of 600 units per hour, using low temperature dry fabric filters,

identified as UVSL1DF and UVSL2DF, as PM control, exhausting to stacks UVSL1S and UVSL2S.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

Plant 140 (57420 Nagy Drive)

...

- (y) Four (4) wood wrapping machines (**woodworking and surface coating**), identified as P2W1 through P2W4, each constructed in 1995, each with a maximum capacity of 280 pounds of wood styles per hour, each using water-based and hot melt adhesives, using a cyclonic baghouse, replaced in 2008, identified as Baghouse 2-1, to control particulate emissions, exhausting to stack C2-1.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (z) Two (2) wood wrapping machines (**woodworking and surface coating**), identified as P2W5 and P2W6, each constructed in 1995, each with a maximum capacity of 280 pounds of wood styles per hour, each using water-based and hot melt adhesives, using a cyclonic baghouse, replaced in 2015, identified as Baghouse 2-2, to control particulate emissions, exhausting to stack C2-2.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- ~~(aa) Four (4) wood panel laminating machines, identified as WPL2, constructed in 1995, each with a maximum capacity of 1,500 pounds of wood panels per hour, using a cyclonic baghouse, replaced in 2008, identified as Baghouse 2-1, to control particulate emissions, and exhausting to stack C2-1.~~

~~Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.~~

- ~~(bb-aa)~~ Two (2) wood wrapping machines (**woodworking and surface coating**), identified as P2W7 and P2W8, each constructed in 2013, each with a maximum capacity of 280 pounds of wood styles per hour, each using water-based and hot melt adhesives, using a cyclonic baghouse, replaced in 2015, identified as Baghouse 2-2, to control particulate emissions, exhausting to stack C2-2.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- ~~(cc-bb)~~ One (1) wood wrapping machine (**woodworking and surface coating**), identified as P2W9, constructed in 2013, with a maximum capacity of 280 pounds of wood styles per hour, using water-based and hot melt adhesives, using a portable baghouse, identified as PC2-1, to control particulate emissions, and exhausting inside the building.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- ~~(dd-cc)~~ One (1) wood wrapping machine (**woodworking and surface coating**), identified as P2W10, constructed in 2013, with a maximum capacity of 280 pounds of wood styles per hour, using water-based and hot melt adhesives, using a portable baghouse, identified as PC2-2, to control particulate emissions, and exhausting inside the building.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (dd) **Seven (7) wood wrapping machines (woodworking and surface coating), identified as P2W11 through P2W17, each constructed in 2020, each with a maximum capacity of 280 pounds of wood styles per hour, each using water-based and hot melt adhesives, using a cyclonic baghouse as control, identified as C2-3, and exhausting to stack C2-3S.**

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (ee) **Two (2) wood panel laminating machines (woodworking and surface coating), identified as WPL2A, constructed in 1995, each with a maximum capacity of 2,500 pounds of wood panels per hour, using a cyclonic baghouse as control, identified as C2-3, and exhausting to stack C2-3S.**

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (ff) **Two (2) wood panel laminating machines (woodworking and surface coating), identified as WPL2B, constructed in 1995, each with a maximum capacity of 1,500 pounds of wood panels per hour, each using a portable cyclonic baghouse, identified as PC2-3 and PC2-4, as control, respectively, and exhausting indoors.**

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (gg) **Two (2) wood panel laminating machines (woodworking and surface coating), identified as WPL2C, constructed in 2020, each with a maximum capacity of 1,500 pounds of wood panels per hour, each using a portable cyclonic baghouse, identified as PC2-5 and PC2-6 as control, respectively, and exhausting indoors.**

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (~~ee~~-hh) **One (1) wood chipping unit, identified as WC1, with a maximum throughput of 1 ton per hour, uncontrolled, exhausting to enclosed semitrailers.**

...

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
- (1) Four (4) direct-fired, natural gas-fired air makeup units, identified as AM1 through AM4, each constructed in 1995, each rated at 4.12 MMBTU/hr, each uncontrolled and exhausting indoors.

...

- (5) **Two (2) natural gas-fired thermocycler furnaces, identified as TC8 and TC9, constructed in 2020, with each rated at 0.58 MMBtu/hr, using no control, and exhausting to stacks TC8S and TC9S, respectively.**

- (b) **One (1) acetone solvent recycling unit, identified as P130SR, constructed in 2020, with a maximum capacity of fifty-five (55.0) gallons, using no control, and exhausting indoors.**

[Note: this unit uses acetone as a solvent, which is not identified as a HAP under Section 112(b) of the Clean Air Act and not delisted from that list or redefined under 40 CFR Part 63, Subpart C. Acetone is also not identified as a VOC under 40 CFR 51.100(s). There is, however, VOC emitted from residual stain that is mixed with solvent.

The VOC from this residual stain is included in the PTE for this source.]

...

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

...

- (y) Four (4) wood wrapping machines (**woodworking and surface coating**), identified as P2W1 through P2W4, each constructed in 1995, each with a maximum capacity of 280 pounds of wood styles per hour, each using water-based and hot melt adhesives, using a cyclonic baghouse, replaced in 2008, identified as Baghouse 2-1, to control particulate emissions, exhausting to stack C2-1.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (z) Two (2) wood wrapping machines (**woodworking and surface coating**), identified as P2W5 and P2W6, each constructed in 1995, each with a maximum capacity of 280 pounds of wood styles per hour, each using water-based and hot melt adhesives, using a cyclonic baghouse, replaced in 2015, identified as Baghouse 2-2, to control particulate emissions, exhausting to stack C2-2.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- ~~(aa) Four (4) wood panel laminating machines, identified as WPL2, constructed in 1995, each with a maximum capacity of 1,500 pounds of wood panels per hour, using a cyclonic baghouse, replaced in 2008, identified as Baghouse 2-1, to control particulate emissions, and exhausting to stack C2-1.~~

~~Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.~~

- ~~(bb-aa)~~ Two (2) wood wrapping machines (**woodworking and surface coating**), identified as P2W7 and P2W8, each constructed in 2013, each with a maximum capacity of 280 pounds of wood styles per hour, each using water-based and hot melt adhesives, using a cyclonic baghouse, replaced in 2015, identified as Baghouse 2-2, to control particulate emissions, exhausting to stack C2-2.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- ~~(ee)~~ **(bb)** One (1) wood wrapping machine (**woodworking and surface coating**), identified as P2W9, constructed in 2013, with a maximum capacity of 280 pounds of wood styles per hour, using water-based and hot melt adhesives, using a portable baghouse, identified as PC2-1, to control particulate emissions, and exhausting inside the building.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- ~~(dd)~~ **(cc)** One (1) wood wrapping machine (**woodworking and surface coating**), identified as P2W10, constructed in 2013, with a maximum capacity of 280 pounds of wood styles per hour, using water-based and hot melt adhesives, using a portable baghouse, identified as PC2-2, to control particulate emissions, and exhausting inside the building.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (dd)** Seven (7) wood wrapping machines (**woodworking and surface coating**), identified as P2W11 through P2W17, each constructed in 2020, each with a maximum capacity of 280 pounds of wood styles per hour, each using water-based and hot melt adhesives, using a cyclonic baghouse as control, identified as C2-3, and exhausting to stack C2-3S.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (ee)** Two (2) wood panel laminating machines (**woodworking and surface coating**), identified as WPL2A, constructed in 1995, each with a maximum capacity of 2,500 pounds of wood panels per hour, using a cyclonic baghouse as control, identified as C2-3, and exhausting to stack C2-3S.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (ff)** Two (2) wood panel laminating machines (**woodworking and surface coating**), identified as WPL2B, constructed in 1995, each with a maximum capacity of 1,500 pounds of wood panels per hour, each using a portable cyclonic baghouse, identified as PC2-3 and PC2-4, as control, respectively, and exhausting indoors.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (gg)** Two (2) wood panel laminating machines (**woodworking and surface coating**), identified as WPL2C, constructed in 2020, each with a maximum capacity of 1,500 pounds of wood panels per hour, each using a portable cyclonic baghouse, identified as PC2-5 and PC2-6 as control, respectively, and exhausting indoors.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- ~~(ee)~~ **(hh)** One (1) wood chipping unit, identified as WC1, with a maximum throughput of 1 ton per hour, uncontrolled, exhausting to enclosed semitrailers.

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

...

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

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate matter (PM) from the listed woodworking operations shall not exceed the following limits when operating at the following process weight rates.

The pound 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:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
 P = process weight rate in tons per hour

Summary of Process Weight Rate Limits			
Emission Unit ID	Stack ID	P (lb/hr)	E (lb/hr)
S-1	C1-1	55,000	37.8
WW1a	C1-2	2,488	4.75
WW1a	C1-3	1,173	2.87
DN1a, DN1b, DN3a, DN3b, DN4	C1-4	6,500	9.03
WW1b	C1-5	12,000	13.6
WW1b	C1-6	13,000	14.4
WW1c	C1-7	5,000	7.58
WW1a	C1-8	14,839	15.7
WW2a, P2W1 - P2W4, WPL2	C2-1	40,120 8,120	12.15 10.91
WW2b, P2W5 - P2W8	C2-2	6,120	8.7
P2W11 – P2W17, WPL2A	C2-3	6,960	9.45
WPL2B1	PC2-3	250	1.02
WPL2B2	PC2-4	250	1.02
WPL2C1	PC2-5	250	1.02
WPL2C2	PC2-6	250	1.02

- (b) In order to ensure that the denibber DN6 and wood wrapping P2W9 and P2W10 are exempt from the requirements of 326 IAC 6-3-2 (Particulate emission limitations, work practices, and control technologies), the baghouses associated with these units shall be in operation at all times that these units are in operation.

...

D.1.4 Particulate Control

- (a) In order to comply with Conditions D.1.1 and D.1.2, the baghouses for particulate control shall be in operation and control emissions from S-1, WW1a, WW1b, WW1c, DN1a, DN1b, DN3a, DN3b, DN4, DN6, WW2a, WW2b, P2W1 through P2W107, ~~and WPL2~~ **WPL2A, WPL2B, and WPL2C** at all times S-1, WW1a, WW1b, WW1c, DN1a, DN1b, DN3a, DN3b, DN4, DN6, WW2a, WW2b, P2W1 through P2W107, ~~and WPL2~~ **WPL2A, WPL2B, and WPL2C** are each in operation.

....

D.1.5 Visible Emissions Notations

- (a) Visible emission notations of the S-1, WW1a, WW1b, WW1c, DN1a, DN1b, DN3a, DN3b, DN4, WW2a, WW2b, P2W1 through P2W8, and WPL2 stack exhausts (Stacks C1-1, C1-2, C1-3, C1-4, C1-5, C1-6, C1-7, C1-8, C2-1, ~~and~~ C2-2, **and C2-3**) shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

...

D.1.7 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.5, the Permittee shall maintain daily records of the visible emission notations of the S-1, WW1a, WW1b, WW1c, DN1a, DN1b, DN3a, DN3b, DN4, WW2a, WW2b, P2W1 through P2W8, **P2W11 through P2W17**, and WPL2A stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (e.g., the process did not operate that day).

...

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Plant 130 (1808 West Hively Avenue)

- (g) One (1) dualtech automated back sealing machine, identified as D1, constructed in 2000, with a maximum capacity of 3,900 board feet per hour, equipped with eight (8) airless/air assist spray guns, with particulate emissions controlled by low temperature dry fabric filters, identified as D1DF, exhausting to stack E1-2, and a hot air drying tunnel exhausting to stack E1-3.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

...

Plant 140 (57420 Nagy Drive)

- (y) **Four (4) wood wrapping machines (woodworking and surface coating), identified as P2W1 through P2W4, each constructed in 1995, each with a maximum capacity of 280 pounds of wood styles per hour, each using water-based and hot melt adhesives, using a cyclonic baghouse, replaced in 2008, identified as Baghouse 2-1, to control particulate emissions, exhausting to stack C2-1.**

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (z) **Two (2) wood wrapping machines (woodworking and surface coating), identified as P2W5 and P2W6, each constructed in 1995, each with a maximum capacity of 280 pounds of wood styles per hour, each using water-based and hot melt adhesives, using a cyclonic baghouse, replaced in 2015, identified as Baghouse 2-2, to control particulate emissions, exhausting to stack C2-2.**

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- ~~(aa) Four (4) wood panel laminating machines, identified as WPL2, constructed in 1995, each with a maximum capacity of 1,500 pounds of wood panels per hour, using a cyclonic baghouse, replaced in 2008, identified as Baghouse 2-1, to control particulate emissions, and exhausting to stack C2-1.~~

~~Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.~~

- ~~(bb-aa) Two (2) wood wrapping machines (woodworking and surface coating), identified as P2W7 and P2W8, each constructed in 2013, each with a maximum capacity of 280 pounds of wood styles per hour, each using water-based and hot melt adhesives, using a cyclonic baghouse, replaced in 2015, identified as Baghouse 2-2, to control particulate emissions, exhausting to stack C2-2.~~

~~Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.~~

- ~~(cc-bb) One (1) wood wrapping machine (woodworking and surface coating), identified as P2W9, constructed in 2013, with a maximum capacity of 280 pounds of wood styles per~~

hour, using water-based and hot melt adhesives, using a portable baghouse, identified as PC2-1, to control particulate emissions, and exhausting inside the building.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (~~dd~~-cc) One (1) wood wrapping machine (woodworking and surface coating), identified as P2W10, constructed in 2013, with a maximum capacity of 280 pounds of wood styles per hour, using water-based and hot melt adhesives, using a portable baghouse, identified as PC2-2, to control particulate emissions, and exhausting inside the building.**

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (dd) Seven (7) wood wrapping machines (woodworking and surface coating), identified as P2W11 through P2W17, each constructed in 2020, each with a maximum capacity of 280 pounds of wood styles per hour, each using water-based and hot melt adhesives, using a cyclonic baghouse as control, identified as C2-3, and exhausting to stack C2-3S.**

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (ee) Two (2) wood panel laminating machines (woodworking and surface coating), identified as WPL2A, constructed in 1995, each with a maximum capacity of 2,500 pounds of wood panels per hour, using a cyclonic baghouse as control, identified as C2-3, and exhausting to stack C2-3S.**

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (ff) Two (2) wood panel laminating machines (woodworking and surface coating), identified as WPL2B, constructed in 1995, each with a maximum capacity of 1,500 pounds of wood panels per hour, each using a portable cyclonic baghouse, identified as PC2-3 and PC2-4, as control, respectively, and exhausting indoors.**

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (gg) Two (2) wood panel laminating machines (woodworking and surface coating), identified as WPL2C, constructed in 2020, each with a maximum capacity of 1,500 pounds of wood panels per hour, each using a portable cyclonic baghouse, identified as PC2-5 and PC2-6 as control, respectively, and exhausting indoors.**

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

(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 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

The total VOC input to D1, D3, D4, D6, TU1, D8, VC-1, VC-2, D-9, SCL-1, SCL-2, AG1, P2W1 through P2W107, WPL2A, **WPL2B**, **WPL2C**, UVSL1, UVSL2, and SB1 through SB5, combined shall be less than 249 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

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

...

D.2.3 Volatile Organic Compounds (VOC) Limitations [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 UVSL2, D1, D3, D4, D6, TU1, D8, VC-2, D-9, SCL-1, SCL-2, SB1 through SB5, and AG1, **P2W1 through P2W17, WPL2A, WPL2B, and WPL2C**, the Permittee shall apply all coating material, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) of the following application methods:

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

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

...

SECTION E.1

NESHAP

Emissions Unit Description:

....

Plant 140 (57420 Nagy Drive)

....

- (y) Four (4) wood wrapping machines (**woodworking and surface coating**), identified as P2W1 through P2W4, each constructed in 1995, each with a maximum capacity of 280 pounds of wood styles per hour, each using water-based and hot melt adhesives, using a cyclonic baghouse, replaced in 2008, identified as Baghouse 2-1, to control particulate emissions, exhausting to stack C2-1.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- (z) Two (2) wood wrapping machines (**woodworking and surface coating**), identified as P2W5 and P2W6, each constructed in 1995, each with a maximum capacity of 280 pounds of wood styles per hour, each using water-based and hot melt adhesives, using a cyclonic baghouse,

replaced in 2015, identified as Baghouse 2-2, to control particulate emissions, exhausting to stack C2-2.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- ~~(aa)~~ Four (4) wood panel laminating machines, identified as WPL2, constructed in 1995, each with a maximum capacity of 1,500 pounds of wood panels per hour, using a cyclonic baghouse, replaced in 2008, identified as Baghouse 2-1, to control particulate emissions, and exhausting to stack C2-1.

~~Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.~~

- ~~(bb)~~ **aa** Two (2) wood wrapping machines (**woodworking and surface coating**), identified as P2W7 and P2W8, each constructed in 2013, each with a maximum capacity of 280 pounds of wood styles per hour, each using water-based and hot melt adhesives, using a cyclonic baghouse, replaced in 2015, identified as Baghouse 2-2, to control particulate emissions, exhausting to stack C2-2.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- ~~(cc)~~ **bb** One (1) wood wrapping machine (**woodworking and surface coating**), identified as P2W9, constructed in 2013, with a maximum capacity of 280 pounds of wood styles per hour, using water-based and hot melt adhesives, using a portable baghouse, identified as PC2-1, to control particulate emissions, and exhausting inside the building.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- ~~(dd)~~ **cc** One (1) wood wrapping machine (**woodworking and surface coating**), identified as P2W10, constructed in 2013, with a maximum capacity of 280 pounds of wood styles per hour, using water-based and hot melt adhesives, using a portable baghouse, identified as PC2-2, to control particulate emissions, and exhausting inside the building.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- dd** Seven (7) wood wrapping machines (**woodworking and surface coating**), identified as P2W11 through P2W17, each constructed in 2020, each with a maximum capacity of 280 pounds of wood styles per hour, each using water-based and hot melt adhesives, using a cyclonic baghouse as control, identified as C2-3, and exhausting to stack C2-3S.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- ee** Two (2) wood panel laminating machines (**woodworking and surface coating**), identified as WPL2A, constructed in 1995, each with a maximum capacity of 2,500 pounds of wood panels per hour, using a cyclonic baghouse as control, identified as C2-3, and exhausting to stack C2-3S.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

- ff** Two (2) wood panel laminating machines (**woodworking and surface coating**), identified as WPL2B, constructed in 1995, each with a maximum capacity of 1,500 pounds of

wood panels per hour, each using a portable cyclonic baghouse, identified as PC2-3 and PC2-4, as control, respectively, and exhausting indoors.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

(gg) Two (2) wood panel laminating machines (woodworking and surface coating), identified as WPL2C, constructed in 2020, each with a maximum capacity of 1,500 pounds of wood panels per hour, each using a portable cyclonic baghouse, identified as PC2-5 and PC2-6 as control, respectively, and exhausting indoors.

Under 40 CFR 63, Subpart JJ, this is an affected facility that is engaged in the manufacture of wood furniture or wood furniture components.

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

...

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

Part 70 Quarterly Report

Source Name: Patrick Industries, Inc. d.b.a. Adorn
Source Address: 1808 West Hively Ave. & 57420 Nagy Dr., Elkhart, Indiana 46517
Part 70 Permit No.: T039-41848-00324
Facility: D1, D3, D4, D6, TU1, D8, VC-1, VC-2, D-9, SCL-1, SCL-2, AG1, P2W1 through P2W10, WPL2, UVSL1, UVSL2, and SB1 through SB5
Parameter: Total VOC Input
Limit: The total VOC input to D1, D3, D4, D6, TU1, D8, VC-1, VC-2, D-9, SCL-1, SCL-2, AG1, P2W1 through P2W10, WPL2A, **WPL2CB**, **WPL2C**, UVSL1, UVSL2, and SB1 through SB5, combined shall be less than 249 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 July 17, 2020.

The operation of this proposed modification shall be subject to the conditions of the attached proposed Significant Permit Modification No. 039-43073-00324.

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

IDEM Contact

- (a) If you have any questions regarding this permit, please contact L. David Cohen, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCM 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 233-9327 or (800) 451-6027, and ask for L. David Cohen or (317) 233-9327.
- (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**

Source Name: Patrick Industries, Inc. d/b/a Adorn
Source Address: Plant 130: 1808 West Hively Avenue, Elkhart, Indiana 46517
 Plant 140: 57420 Nagy Drive, Elkhart, Indiana 46517
Operating Permit No.: T039-41848-00324
Significant Permit Modification No.: 039-43070-00324
Permit Writer: L. David Cohen

Unlimited Potential to Emit (PTE) (tons/year) Before Integral Controls*									
Unit ID	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAP	Worst Single HAP (xylene)
Surface Coating	145.66	145.66	145.66	-	-	1,220.69	-	130.28	53.81
Woodworking	4,500.24	4,500.24	4,500.24	-	-	-	-	-	-
Natural Gas Combustion	0.25	1.02	1.02	0.08	13.38	0.74	11.24	0.25	-
Solvent Recycling Unit (P130SR)**	-	-	-	-	-	-	-	-	-
Wrapping and Laminating Machines (P2W11-P2W17 and WPL2C)*	0.00	0.00	0.00	-	-	0.96	-	-	-
Woodworking - New Plant 140	349.90	349.90	349.90	-	-	-	-	-	-
Natural Gas Combustion - New Plant 140	0.01	0.04	0.04	0.003	0.50	0.03	0.42	0.01	-
Non-Fugitive Total PTE	4,996.06	4,996.85	4,996.85	0.083	13.87	1,222.42	11.65	130.55	53.81
Fugitive Emissions									
Sawdust Drop-point	4.38	4.38	4.38	-	-	-	-	-	-
Outdoor Wood Chipper (WC1)	1.53	1.53	1.53	-	-	-	-	-	-
Total Fugitive	5.91	5.91	5.91	-	-	-	-	-	-
Total PTE	5,001.97	5,002.76	5,002.76	0.083	13.87	1,222.42	11.65	130.55	53.81

Unlimited Potential to Emit (PTE) (tons/year) After Integral Controls*									
Unit ID	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAP	Worst Single HAP (xylene)
Surface Coating	145.66	145.66	145.66	-	-	1,220.69	-	130.28	53.81
Woodworking	45.00	45.00	45.00	-	-	-	-	-	-
Natural Gas Combustion	0.25	1.02	1.02	0.08	13.38	0.74	11.24	0.25	-
Solvent Recycling Unit (P130SR)**	-	-	-	-	-	-	-	-	-
Wrapping and Laminating Machines (P2W11-P2W17 and WPL2C)	0.00	0.00	0.00	-	-	0.96	-	-	-
Woodworking - New Plant 140	3.50	3.50	3.50	-	-	-	-	-	-
Natural Gas Combustion - New Plant 140	0.01	0.04	0.04	0.003	0.50	0.03	0.42	0.01	-
Non-Fugitive Total PTE	194.42	195.21	195.21	0.083	13.87	1,222.42	11.65	130.55	53.81
Fugitive Emissions									
Sawdust Drop-point	4.38	4.38	4.38	-	-	-	-	-	-
Outdoor Wood Chipper (WC1)	1.53	1.53	1.53	-	-	-	-	-	-
Total Fugitive	5.91	5.91	5.91	-	-	-	-	-	-
total PTE	200.33	201.12	201.12	0.083	13.87	1,222.42	11.65	130.55	53.81

*The PTE of particulates included under woodworking

PSD Minor Limited Potential to Emit (tons/yr) After Integral Controls**									
Unit ID	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAP	Worst Single HAP (xylene)
Surface Coating	145.66	145.66	145.66	-	-	< 244	-	130.28	53.81
Woodworking	45.00	45.00	45.00	-	-	-	-	-	-
Natural Gas Combustion	0.25	1.02	1.02	0.08	13.38	0.74	11.24	0.25	-
Solvent Recycling Unit (P130SR)**	-	-	-	-	-	-	-	-	-
Wrapping and Laminating Machines (P2W11-P2W17 and WPL2C)	0.00	0.00	0.00	-	-	0.96	-	-	-
Woodworking - New Plant 140	3.50	3.50	3.50	-	-	-	-	-	-
Natural Gas Combustion - New Plant 140	0.01	0.04	0.04	0.003	0.50	0.03	0.42	0.01	-
Non-Fugitive Total PTE	194.42	195.21	195.21	0.083	13.87	< 249.44	11.65	130.55	53.81
Fugitive Emissions									
Sawdust Drop-point	4.38	4.38	4.38	-	-	-	-	-	-
Outdoor Wood Chipper (WC1)	1.53	1.53	1.53	-	-	-	-	-	-
Total Fugitive	5.91	5.91	5.91	-	-	-	-	-	-
total PTE	200.33	201.12	201.12	0.083	13.87	< 249.44	11.65	130.55	53.81

*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, potential emissions for 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).

**VOC input to Surface Coating is limited to render this source minor for PSD.

***[Note: this unit uses acetone as a solvent, which is not identified as a HAP under Section 112(b) of the Clean Air Act and not delisted from that list or redefined under 40 CFR Part 63, Subpart C. Acetone is also not identified as a VOC under 40 CFR 51.100(s). There is, however, VOC emitted from residual stain that is mixed with solvent. These VOC emissions are already accounted for in surface coating calculations and therefore are not included as PTE from the solvent recycling unit.

**Appendix A: Emissions Calculations
Modification Summary**

Source Name: Patrick Industries, Inc. d/b/a Adorn
Source Address: Plant 130: 1808 West Hively Avenue, Elkhart, Indiana 46517
 Plant 140: 57420 Nagy Drive, Elkhart, Indiana 46517
Operating Permit No.: T039-41848-00324
Significant Permit Modification No.: 039-43070-00324
Permit Writer: L. David Cohen

Unlimited Potential to Emit (PTE) (tons/year) Before Integral Controls*									
Unit ID	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAP	Worst Single HAP (Glycol Ether)
Solvent Recycling Unit (P130SR)	-	-	-	-	-	-	-	--	--
Wrapping and Laminating Machines (P2W11-P2W17 and WPL2C)	0.00	0.00	0.00	-	-	0.96	-	-	-
Woodworking - New Plant 140	349.90	349.90	349.90	-	-	-	-	-	-
Natural Gas Combustion - New Plant 140	0.01	0.04	0.04	0.003	0.50	0.03	0.42	0.01	-
Total PTE	349.91	349.94	349.94	0.003	0.50	0.99	0.42	0.01	0.00

Unlimited Potential to Emit (PTE) (tons/year) After Integral Controls*									
Unit ID	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAP	Worst Single HAP (Glycol Ether)
Solvent Recycling Unit (P130SR)	-	-	-	-	-	-	-	--	--
Wrapping and Laminating Machines (P2W11-P2W17 and WPL2C)	0.00	0.00	0.00	-	-	0.96	-	-	-
Woodworking - New Plant 140	3.50	3.50	3.50	-	-	-	-	-	-
Natural Gas Combustion - New Plant 140	0.01	0.04	0.04	0.003	0.50	0.03	0.42	0.01	-
Total PTE	3.51	3.54	3.54	0.003	0.50	0.99	0.42	0.01	0.00

*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, potential emissions for 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).

**Appendix A: Emissions Calculations
Solvent Recycling Unit (P130SR)**

Source Name: Patrick Industries, Inc. d/b/a Adorn
Source Address: Plant 130: 1808 West Hively Avenue, Elkhart, Indiana 46517
 Plant 140: 57420 Nagy Drive, Elkhart, Indiana 46517
Operating Permit No.: T039-41848-00324
Significant Permit Modification No.: 039-43070-00324
Permit Writer: L. David Cohen

Process Description: The recycling of acetone cleaning solvent contaminated with coating during the cleaning process.

Material	Material Density (lb/gal)	Weight Percent Organic VOC	Material VOC Content (lb VOC/gal)	Material Throughput (gal/hr)	VOC Throughput (lb VOC/hr)	Emission Loss 100% of VOC Content	Potential VOC Emissions (lb VOC/hr)	Potential VOC Emissions (lb VOC/day)	Potential VOC Emissions (TPY)
Waste Acetone Solvent	6.61	5.61%	0.371	2.29	0.85	100.00%	0.85	20.41	3.73
Totals							0.85	20.41	3.73

METHODOLOGY

Material = Waste Acetone Cleanup Solvent from Equipment Cleaning for Production Operations; VOC Content Based Upon Waste Profile and Weighted Average VOC Content of Coatings

VOC Throughput (lb VOC/hr) = Material Throughput (gal/hr) x Maximum Material VOC Content (lb VOC/gal)

Potential VOC Emissions (lb VOC/hr) = VOC Throughput (lb VOC/hr) x Presumed 100% Loss of VOC Content

Potential VOC Emissions (lb VOC/day) = Potential VOC Emissions (lb VOC/hr) x 24 (hr/day)

Potential VOC Emissions (tpy) = Potential VOC Emissions (lb VOC/hr) x 8,760 (hr/yr) x 1/2,000 (lb/ton)

Recycling waste stream does not contain hazardous air pollutants

Component	Volume Used For Cleaning (fl oz)	Percent by Volume	Density	Weight in Mixture	Percent by Weight	VOC Content by Weight in Component	Pounds VOC in Mixture	VOC Content in Mixture
Acetone Solvent	128.00	73.56%	6.61	4.86	73.24%	0.00%	0.00	0.00%
Stain Base	46.00	26.44%	6.72	1.78	26.76%	20.98%	0.37	5.61%
Totals	174.00			6.64			0.37	5.61%

***[Note: this unit uses acetone as a solvent, which is not identified as a HAP under Section 112(b) of the Clean Air Act and not delisted from that list or redefined under 40 CFR Part 63, Subpart C. Acetone is also not identified as a VOC under 40 CFR 51.100(s). There is, however, VOC emitted from residual stain that is mixed with solvent. These VOC emissions are already accounted for in surface coating calculations and therefore are not included as PTE from the solvent recycling unit.]

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

Source Name: Patrick Industries, Inc. d/b/a Adom
Source Address: Plant 130: 1828 West Hively Avenue, Elkhart, Indiana 46517
 Plant 140: 57420 Naav Drive, Elkhart, Indiana 46517
Operating Permit No.: T039-41848-00324
Significant Permit Modification No.: 039-43070-00324
Permit Writer: L. David Cohen

Material	Unit ID	Stack ID	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water and Exempt Solvents	Weight % Organics	Volume % Water and Exempt Solvents	Volume % Non-Volatiles (solids)	Gal of Mat. - gal/unit	Maximum unit/hour	Gallons of Coating per day	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	lb VOC/gal solids	Transfer Efficiency	Uncontrolled Particulate Potential (lb/hr)	PM Control Efficiency	Controlled Particulate Potential (lb/hr)	Uncontrolled Particulate Potential (ton/yr)	Controlled Particulate Potential (tons/yr)		
Plant 140																									
Swift-Tak 47910	P2W11 - P2W17 - Seven (7) Wrapping Machines	Fugitive	8.80	41.20%	41.20%	0.00%	43.47%	54.13%	0.050	1167	1,400.00	0	0	0	0	0	0	100%	0	100%	0	0	0		
PA401 Adhesive	WPL2C - Two (2) Panel Laminating Machines	Fugitive	8.80	45.00%	44.90%	0.10%	47.38%	50.01%	0.050	500	600.00	0.02	0.01	0.22	5.28	0.96	0.02	100%	0	100%	0	0	0		
Total:															0.96								0.00	0.00	0.00

Water is the cleaning materials used.

Adhesive application is roll coating

Methodology

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

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

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

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

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

PTE of PM10 Uncontrolled (tons/yr) = Density (lb/gal) x Weight % Solids x Max. Usage (gal/unit) x Max. Throughput (units/hr) x (1- Transfer Eff. (%)) x 8760 (hr/yr) x 1 ton/2000 lbs

PTE of PM10 Controlled (tons/yr) = Density (lb/gal) x Weight % Solids x Max. Usage (gal/unit) x Max. Throughput (units/hr) x (1- Transfer Eff. (%)) x (1-Control Eff. (%)) x 8760 (hr/yr) x 1 ton/2000 lbs

Adhesives do not contain hazardous air pollutants (HAP)

Appendix A: Emissions Calculations
Particulate Emissions From Woodworking Operations

Source Name: Patrick Industries, Inc. d/b/a Adorn
Source Address: Plant 130: 1808 West Hively Avenue, Elkhart, Indiana 46517
 Plant 140: 57420 Nagy Drive, Elkhart, Indiana 46517
Operating Permit No.: T039-41848-00324
Significant Permit Modification No.: 039-43070-00324
Permit Writer: L. David Cohen

Plant #	Emission Unit (Unit ID)	Control Device	Stack ID	Outlet Air Flow Rate (acfm)	Outlet Grain Loading (grain/dscf)	Control Efficiency (%)	PTE of PM/PM10/PM2.5 (Before Integral Controls ¹) (ton/yr)	PTE of PM/PM10/PM2.5 (After Integral Controls ²) (ton/yr)	Process Weight Rate (lbs/hr)	326 IAC 6-3-2 Allowable PM Emission Rate (lbs/hr)	PTE of PM (Before Integral Controls) (lbs/hr)	PTE of PM (After Integral Controls ²) (lbs/hr)
Plant 140	Two (2) Existing Laminators (WPL2A) and Seven (7) Wrapping Machines (P2W11 - P2W17) with Control Device Venting Outside	cyclonic baghouse system	C2-3S	29,000	0.003	99.0%	326.62	3.27	6,960	9.45	74.57	0.746
	Two (2) Existing Laminators Equipped with Portable Collectors Venting Indoors (WPL2B)	portable baghouse (PC2-3)	Exhausting Indoors	1,550	0.001	99.0%	5.82	0.06	2,500	NA	1.33	0.013
		portable baghouse (PC2-4)	Exhausting Indoors	1,550	0.001	99.0%	5.82	0.06	2,500	NA	1.33	0.013
	Two (2) New Laminators Equipped with Portable Collectors Venting Indoors (WPL2C)	portable baghouse (PC2-5)	Exhausting Indoors	1,550	0.001	99.0%	5.82	0.06	2,500	NA	1.33	0.013
		portable baghouse (PC2-6)	Exhausting Indoors	1,550	0.001	99.0%	5.82	0.06	2,500	NA	1.33	0.013
Totals							349.90	3.50				

Methodology:

NA = Not Applicable

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

Before Integral Controls¹ = The uncontrolled particulate emissions are calculated without consideration of the integral control devices for the purpose of determining 326 IAC 2-2 (PSD) applicability only.After Integral Controls² = The controlled particulate emissions are calculated with the consideration that the woodworking controls are integral to the processes and are used for Part 70 and 326 IAC 6-3 applicability.

PTE of PM/PM10/PM2.5 (After Control) (tons/yr) = [Outlet Air Flow Rate (acfm)] x [Outlet Grain Loading (grains/ascf)] x [60 min/hr] x [1/7000 lbs/grain] 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]

326 IAC 6-3-2 Allowable PM Emission Rate (lbs/hr) = 4.1 x (Process Weight Rate (lbs/hr) / 2000)*0.67

Process Weight Rates (lbs/hr) provided by the source.

PTE of PM (After Control) (lbs/hr) = [Outlet Air Flow Rate (acfm)] x [Outlet Grain Loading (grains/ascf)] x [60 min/hr] x [1/7000 lbs/grain]

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

Source Name: Patrick Industries, Inc. d/b/a Adorn
Source Address: Plant 130: 1808 West Hively Avenue, Elkhart, Indiana 46517
 Plant 140: 57420 Nagy Drive, Elkhart, Indiana 46517
Operating Permit No.: T039-41848-00324
Significant Permit Modification No.: 039-43070-00324
Permit Writer: L. David Cohen

Description	Plant #	# of Emission Units	Emission Unit ID	MMBTU/hr Input Capacity (each)	Total Heat Input Capacity (MMBTU/hr)
Thermocycler Furnaces	2	2	TC8, TC9	0.58	1.16

Heat Input Capacity MMBTU/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
1.16	1020	10.0

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	0.01	0.04	0.04	0.003	**see below	0.03	0.42

*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

HAPS Calculations

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	1.0E-05	6.0E-06	3.7E-04	0.01	1.7E-05	9.4E-03

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	2.5E-06	5.5E-06	7.0E-06	1.9E-06	1.0E-05	2.7E-05
					Total HAPs	0.01
					Worst HAP	0.01

Methodology is the same as above.

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

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

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

Source Name: Patrick Industries, Inc. d/b/a Adom Plant 130: 1826 West Hiway Avenue, Elkhart, Indiana 46517
Source Address: Plant 140: 57420 Naar Drive, Elkhart, Indiana 46517
Operating Permit No.: T039-41848-00324
Significant Permit Modification No.: 039-43070-00324
Permit Writer: L. David Cohen

Material	Unit ID	Stack ID	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water and Exempt Solvents	Weight % Organics	Volume % Water and Exempt Solvents	Volume % Non-Volatiles (solids)	Gal of Mat. - gal/unit	Maximum unit/hour	Gallons of Coating per day	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	lb VOC/gal solids	Transfer Efficiency	Uncontrolled Particulate Potential (lb/hr)	PM Control Efficiency	Controlled Particulate Potential (lb/hr)	Uncontrolled Particulate Potential (ton/yr)	Controlled Particulate Potential (tons/yr)											
Plant 130																																		
Sheen/Wood Ultra-Cure WB Stain Base	UVSL1	UVSL1S	8.43	88.80%	88.70%	0.10%	99.30%	9.70%	0.01500	600.000	216.00	0.09	0.01	0.08	1.82	0.33	0.00	95%	0.42	95%	0.02	1.86	0.09											
Ultra-Cure Waterborne UV Cure Topcoat, Off White	UVSL2	UVSL2S	9.84	58.50%	56.40%	2.10%	65.60%	31.70%	0.03000	600.000	432.00	0.59	0.20	3.64	87.45	15.96	0.00	95%	3.60	95%	0.18	15.77	0.79											
970-40LSV-435A-437-6446 MULTICURE Stain Base 4	DT	E1-2	7.40	79.14%	39.20%	39.94%	43.89%	20.80%	0.0081	1423.70	277.18	5.27	2.96	34.13	819.11	149.49	0.00	80%	3.57	95%	0.18	15.02	0.78											
970-10LSV-434-(437-6411)10 SHEEN MULTICURE	D4	E1-6	7.44	77.54%	38.80%	38.74%	43.67%	21.79%	0.007	1423.70	237.47	5.12	2.88	28.52	684.48	124.92	0.00	80%	3.31	80%	0.66	14.48	2.90											
370-72CSV-197S-CHEMRYN(L)546-51611	DE	E1-8	7.41	79.90%	54.24%	25.66%	60.80%	20.02%	0.007	1423.70	237.47	4.85	1.90	18.81	451.53	82.40	0.00	80%	2.95	95%	0.15	12.91	0.65											
970-40LSV-435A-437-6446 MULTICURE Stain Base 4	TU1	TU-1	7.40	79.14%	39.20%	39.94%	43.89%	20.80%	0.0081	1423.70	277.18	5.27	2.96	34.13	819.11	149.49	0.00	80%	3.57	80%	0.71	15.62	3.12											
Alcoz 973-FW-863	D8	E1-1	6.72	98.66%	77.68%	20.98%	78.97%	2.00%	0.0187	1423.70	640.19	6.71	1.41	37.61	902.66	164.74	70.50	80%	0.48	80%	0.10	2.10	0.43											
Multicure 45 Sheen - Topcoat Application	VC-1	E1-11	10.00	1.10%	0.00%	1.10%	0.00%	98.50%	0.001	500.00	6.00	0.11	0.11	0.03	0.66	0.12	0.00	80%	0.49	80%	0.10	2.17	0.43											
Acetone (Cleanup Solvent)	VC-2	VC-2S	7.38	66.67%	26.96%	39.70%	40.50%	16.64%	2.4270	5.00	291.24	4.92	2.93	35.56	853.33	155.73	17.61	95%	1.49	95%	0.07	6.54	0.33											
431-7050SPB Chemiquard II	D-9	E1-12	7.52	77.30%	17.60%	59.70%	20.02%	22.80%	0.013	125.00	39.00	5.61	4.49	7.30	175.09	31.95	0.00	2.00	100%	0.00	0	0	0											
PRIMER - WHITE NDS2002 - worst case VOC	SCL-1	SCL1S	8.79	59.49%	9.32%	50.17%	12.39%	40.51%	0.0160	250.00	96.00	5.03	4.41	17.64	423.35	77.26	10.89																	
																			These Calculations Excluded as Worst Case VOC is Represented Above															
PAINT - WHITE EG5570-90015 - Worst Case PM	SCL-1	SCL1S	9.87	54.23%	47.04%	7.19%	55.67%	45.77%	0.0480	250.00	288.00							80%	10.84	95%	0.54	47.49	2.37											
402010 Brown Pigment	SCL-2	SCL-2SS	8.13	98.66%	77.68%	20.98%	78.97%	2.00%	0.0059	375.00	53.10	6.70	1.41	3.12	74.86	13.66	70.49	95%	0.01	95%	4.98E-04	0.04	0.002											
402009 Red Pigment	SCL-2	SCL-2SS	8.14	80.00%	0.00%	80.00%	0.00%	15.00%	0.0001	375.00	0.90	6.51	6.51	0.24	5.86	1.07	43.41	95%	3.05E-03	95%	1.53E-04	0.01	0.001											
402007 White Pigment	SCL-2	SCL-2SS	8.83	65.00%	0.00%	65.00%	0.00%	17.00%	0.0002	375.00	1.80	6.39	6.39	0.48	11.50	2.10	37.59	95%	0.01	95%	6.45E-04	0.06	0.003											
402008 Yellow Pigment	SCL-2	SCL-2SS	8.14	80.00%	0.00%	80.00%	0.00%	15.00%	0.0001	375.00	0.90	6.51	6.51	0.24	5.86	1.07	43.41	95%	3.05E-03	95%	1.53E-04	0.01	0.001											
Multicure 45 Sheen - Topcoat Application	SCL-2	SCL-2TS	7.38	66.67%	26.96%	39.70%	40.50%	16.64%	0.0112	375.00	100.80	4.92	2.93	12.31	295.34	53.90	17.61	95%	0.52	95%	0.03	2.26	0.11											
Acetone (Cleanup Solvent)	SCL-2	SCL-2TS	6.61	100.00%	100.00%	0.00%	100.00%	0.00%	0.0008	375.00	7.20	0.00	0.00	0.00	0.00	0.00	0.00	100%	0.00	0%	0	0	0											
Stain Base 4	SB1 through SBS	SB1S through SBS5	6.72	98.66%	77.68%	20.98%	78.97%	2.00%	0.0120	30.00	8.64	6.70	1.41	0.51	12.18	2.22	70.49	75%	0.01	95%	4.05E-04	0.04	0.002											
402010 Brown Pigment	SB1 through SBS	SB1S through SBS5	8.13	80.00%	0.00%	80.00%	0.00%	15.00%	0.0001	30.00	0.07	6.50	6.50	0.02	0.47	0.09	43.36	75%	1.22E-03	95%	6.10E-05	0.01	2.67E-04											
402009 Red Pigment	SB1 through SBS	SB1S through SBS5	8.14	80.00%	0.00%	80.00%	0.00%	15.00%	0.0001	30.00	0.07	6.51	6.51	0.02	0.47	0.09	43.41	75%	1.22E-03	95%	6.11E-05	0.01	2.67E-04											
402007 White Pigment	SB1 through SBS	SB1S through SBS5	9.83	65.00%	0.00%	65.00%	0.00%	17.00%	0.0002	30.00	0.14	6.39	6.39	0.04	0.92	0.17	37.59	75%	0.01	95%	2.58E-04	0.02	0.001											
402008 Yellow Pigment	SB1 through SBS	SB1S through SBS5	8.14	80.00%	0.00%	80.00%	0.00%	15.00%	0.0001	30.00	0.07	6.51	6.51	0.02	0.47	0.09	43.41	75%	1.22E-03	95%	6.11E-05	0.01	2.67E-04											
Multicure 45 Sheen - Topcoat Application	SB1 through SBS	SB1S through SBS5	7.38	66.67%	26.96%	39.70%	40.50%	16.64%	0.0500	30.00	36.00	4.92	2.93	4.40	105.48	19.25	17.61	75%	0.92	95%	0.05	4.04	0.20											
Acetone (Cleanup Solvent)	SB1 through SBS	SB1S through SBS5	6.61	100.00%	100.00%	0.00%	100.00%	0.00%	0.0063	30.00	4.54	0.00	0.00	0.00	0.00	0.00	0.00	100%	0.00	0%	0	0	0											
Stain Base 4	Auto Glazing Machine (AG1)	AG1	6.72	98.66%	77.68%	20.98%	78.97%	2.00%	0.0002	3,750.00	18.00	6.71	1.41	1.06	25.38	4.63	70.50	95%	0.00	95%	1.7E-04	0.01	0.001											
402010 Brown Pigment	Auto Glazing Machine (AG1)	AG1	8.13	80.00%	0.00%	80.00%	0.00%	15.00%	0.0000	3,750.00	1.62	6.50	6.50	0.44	10.54	1.92	43.36	95%	0.01	95%	2.7E-04	0.02	0.001											
402011 Black Pigment	Auto Glazing Machine (AG1)	AG1	8.46	75.00%	0.00%	75.00%	0.00%	18.00%	0.0000	3,750.00	0.27	6.35	6.35	0.07	1.71	0.31	35.25	95%	0.00	95%	5.9E-05	5.2E-03	0.000											
Acetone Cleanup Solvent	Auto Glazing Machine (AG1)	AG1	6.61	100.00%	100.00%	0.00%	100.00%	0.00%	0.0000	3,750.00	2.70	0	0	0	0	0	NA	100%	0	0%	0	0	0											
Plant 140																																		
Swift-Tak 47910	P2W1-P2W4 (WR2a-WR2b)	Fugitive	8.80	41.20%	41.20%	0.00%	43.47%	54.13%	0.050	667	800.00	0	0	0	0	0	0	100%	0	100%	0	0	0	0										
Swift-Tak 47910	P2W5 (WR2a)	Fugitive	8.80	41.20%	41.20%	0.00%	43.47%	54.13%	0.050	167	200.00	0	0	0	0	0	0	100%	0	100%	0	0	0	0										
Swift-Therm 2H850	P2W6 (WR2b)	Fugitive	8.34	0.00%	0.00%	0.00%	0.00%	100.00%	0.050	500	800.00	0	0	0	0	0	0	100%	0	100%	0	0	0	0										
Swift-Tak 47910	P2W9	Fugitive	8.80	41.20%	41.20%	0.00%	43.47%	54.13%	0.050	167	200.00	0	0	0	0	0	0	100%	0	100%	0	0	0	0										
PA401 Adhesive	WFL2A & WP2B	Fugitive	8.80	45.00%	44.90%	0.10%	47.38%	50.01%	0.050	1000	1,200.00	0.02	0.01	0.44	10.56	1.93	0.02	100%	0	100%	0	0	0	0										
																Total:	1220.69																	

Acetone and n-Butyl acetate are the cleaning materials used.
 All stains and coatings are applied with airless/HPVLP equipment and controlled by dry particulate filters or a water wall and scrubber system.
 Adhesive application is roll coating

Methodology
 Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
 Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
 Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
 Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
 PTE of VOC (tons/yr) = Density (lb/gal) * Weight % Organics * Max. Usage (gal/unit) * Max. Throughput (units/hr) * 8760 (hr/yr) * 1 ton/2000 lbs
 PTE of PM10/10 Uncontrolled (tons/yr) = Density (lb/gal) * Weight % Solids * Max. Usage (gal/unit) * Max. Throughput (units/hr) * (1 - Transfer Eff. (%)) * 8760 (hr/yr) * 1 ton/2000 lbs
 PTE of PM10/10 Controlled (tons/yr) = Density (lb/gal) * Weight % Solids * Max. Usage (gal/unit) * Max. Throughput (units/hr) * (1 - Transfer Eff. (%)) * (1-Control Eff. (%)) * 8760 (hr/yr) * 1 ton/2000 lbs
 Note for SCL-1: Primer - maximum usage includes 3 coats on each side
 Paint - maximum usage includes 3 coats on each side

Amendment - Stain Base 3 was replaced with Stain Base 4, 40-003A adhesive was replaced with Swift-Tak 47910 for P2W1-P2W5, 40-003A adhesive was replaced with Swift-Tak 2H850 for P2W6, and 40-003A adhesive was replaced with PA401 Adhesive for WFL2

Appendix A: Emissions Calculations
HAP Emissions from Surface Coating Operations

Source Name: Patrick Industries, Inc. d/b/a Adom
Source Address: Plant 130: 1808 West Hively Avenue, Elkhart, Indiana 46517
Plant 140: 51420 Nagy Drive, Elkhart, Indiana 46517
Operating Permit No.: T039-41948-00324
Significant Permit Modification No.: 039-43070-00324
Permit Writer: L. David Cohen

Material	Unit ID	Stack ID	Density	Gal of Mat. -	Maximum	Weight % Toluene	Weight % Cumene	Weight % Formaldehyde	Weight % Ethylbenzene	Weight % Xylenes	Weight % Methyl Alcohol	Weight % Naphthalene	Toluene (ton/yr)	Cumene (ton/yr)	Formaldehyde (ton/yr)	Ethylbenzene (ton/yr)	Xylenes (ton/yr)	Methanol (ton/yr)	Naphthalene (ton/yr)																		
Plant 130																																					
Sher-Wood Ultra-Cure WB Stain Base	UVSL1	UVSL1S	8.43	0.015	600	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00																	
Ultra-Cure Waterborne UV Cure Topcoat, Off White	UVSL2	UVSL2S	9.64	0.03	600	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00																	
970-40LV-434-437-6446 MULTICURE	D1	E1-2	7.40	0.03911	1424	1.96%	0.004%	0.007%	0.552%	2.484%	0.000%	0.049%	7.35	0.01	0.03	2.15	9.30	0.00	0.18																		
Stain Base 4	D3	E1-4	6.72	0.01874	1424	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00																		
970-10LV-434-(437-6441)10 SHEEN MULTICURE	D4	E1-6	7.44	0.00695	1424	1.96%	0.004%	0.007%	0.579%	2.473%	0.00%	0.049%	6.32	0.01	0.02	1.87	7.97	0.00	0.16																		
370-72CSV-1975-CHEMWINYL546-51611	D6	E1-8	7.41	0.00695	1424	0.01%	0.01%	0.00%	0.50%	2.16%	0.00%	0.00%	0.04	0.02	0.00	1.62	6.94	0.00	0.00																		
970-40LV-433a-437-6446 MULTICURE	TI11	TI1-1	7.40	0.03911	1424	1.96%	0.004%	0.007%	0.552%	2.484%	0.00%	0.049%	7.35	0.01	0.03	2.15	9.30	0.00	0.18																		
Stain Base 4	D8	E1-1	6.72	0.01874	1424	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00																		
Akzo 973-F5W-863	VC-1	E1-11	10.00	0.00950	500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00																		
Multicure 45 Sheen - Topcoat Application	VC-2	VC-2S	7.38	2.42700	5	0.00%	0.00%	0.05%	0.00%	0.00%	0.00%	4.94%	0.00	0.00	0.20	0.00	0.00	0.00	19.38	0.00																	
Acetone (Cleanup Solvent)	VC-2S	VC-2S	6.61	0.04167	5	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00																	
431-7050SPB Chemiquard II	D-9	E1-12	7.52	0.01300	125	0.11%	0.009%	0.041%	2.14%	9.15%	17.20%	0.00%	0.06	0.00	0.02	1.15	4.90	9.21	0.00																		
PRIMER - WHITE NDS2002 - worst case VOC	SCL-1	SCL1S1	8.79	0.01600	250	0.00%	0.00%	0.00%	0.00%	10.00%	0.00%	0.00%	0.00	0.00	0.00	7.70	15.40	0.00	0.00																		
PAINT - WHITE EG5570-0015 - Worst Case PM	SCL-1	SCL1S1	9.87	0.04800	250	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00																		
Stain Base 4	SCL-2	SCL-2SS	6.72	0.00590	375	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00																		
402010 Brown Pigment	SCL-2	SCL-2SS	8.13	0.00010	375	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00																		
402009 Red Pigment	SCL-2	SCL-2SS	8.14	0.00010	375	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00																		
402007 White Pigment	SCL-2	SCL-2SS	8.83	0.00020	375	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00																		
402008 Yellow Pigment	SCL-2	SCL-2SS	8.14	0.00010	375	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00																		
Multicure 45 Sheen - Topcoat Application	SCL-2	SCL-2TS	7.38	0.01120	375	0.00%	0.00%	0.05%	0.00%	0.00%	4.94%	0.00%	0.00	0.00	0.07	0.00	0.00	6.71	0.00																		
Acetone (Cleanup Solvent)	SCL-2	SCL-2TS	6.61	0.00980	375	0.00%	0.00%	0.05%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00																		
Stain Base 4	SB1 through SB5	SB1S through SB5S	6.72	0.01200	30	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00																		
402010 Brown Pigment	SB1 through SB5	SB1S through SB5S	8.13	0.00010	30	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00																		
402009 Red Pigment	SB1 through SB5	SB1S through SB5S	8.14	0.00010	30	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00																		
402007 White Pigment	SB1 through SB5	SB1S through SB5S	9.83	0.00020	30	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00																		
402008 Yellow Pigment	SB1 through SB5	SB1S through SB5S	8.14	0.00010	30	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00																		
Multicure 45 Sheen - Topcoat Application	SB1 through SB5	SB1S through SB5S	7.38	0.05000	30	0.00%	0.00%	0.05%	0.00%	0.00%	4.94%	0.00%	0.00	0.00	0.02	0.00	0.00	2.40	0.00																		
Acetone (Cleanup Solvent)	SB1 through SB5	SB1S through SB5S	6.61	0.00630	30	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00																		
Stain Base 4	Auto Glazing Machine (AG1)	AG1	6.72	0.00020	3750	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00																		
402010 Brown Pigment	Auto Glazing Machine (AG1)	AG1	8.13	0.00002	3750	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00																		
402011 Black Pigment	Auto Glazing Machine (AG1)	AG1	8.46	0.00000	3750	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00																		
Acetone Cleanup Solvent	Auto Glazing Machine (AG1)	AG1	6.61	0.00003	3750	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00																		
Plant 140																																					
Swift-Tak 47910	P2W1-P2W4 (WR2a-WR2d)	Fugitive	8.80	0.05000	667	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00																	
Swift-Tak 47910	P2W5 (WR2e)	Fugitive	8.80	0.05000	167	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00																	
Swift-Therm 2H850	P2W6 (WR2f) - P2W9	Fugitive	8.94	0.05000	500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00																	
Swift-Tak 47910	P2W10	Fugitive	8.80	0.05000	167	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00																	
PA401 Adhesive	WPL2A & WPL2B	Fugitive	8.80	0.05000	1000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00																	
Single HAP Totals =														21.13	0.97	16.68	0.30	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00				
Combined HAPs Total =																		130.28																			

METHODOLOGY

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

Amendment - Stain Base 3 was replaced with Stain Base 4, 40-003A adhesive was replaced with Swift-Tak 47910 for P2W1-P2W5, 40-003A adhesive was replaced with Swift-Tak 2H850 for P2W6, and 40-003A adhesive was replaced with PA401 Adhesive for WPL2. The replacement of these coatings combined with the new units do not result in a change in HAP PTE from this source.

Appendix A: Emissions Calculations
Particulate Emissions From Woodworking Operations

Source Name: Patrick Industries, Inc. d/b/a Adorn
Source Address: Plant 130: 1808 West Hively Avenue, Elkhart, Indiana 46517
 Plant 140: 57420 Nagy Drive, Elkhart, Indiana 46517
Operating Permit No.: T039-41848-00324
Significant Permit Modification No.: 039-43070-00324
Permit Writer: L. David Cohen

Plant #	Emission Unit (Unit ID)	Control Device	Stack ID	Outlet Air Flow Rate (acfm)	Outlet Grain Loading (grain/dscf)	Control Efficiency (%)	PTE of PM/PM10/PM2.5 (Before Integral Controls ¹) (ton/yr)	PTE of PM/PM10/PM2.5 (After Integral Controls ²) (ton/yr)	Process Weight Rate (lbs/hr)	326 IAC 6-3-2 Allowable PM Emission Rate (lbs/hr)	PTE of PM (Before Integral Controls) (lbs/hr)	PTE of PM (After Integral Controls ²) (lbs/hr)
Plant 130	232RF8 Storage Silo (S-1)	cyclonic baghouse system	C1-1	23,090	0.003	99.0%	260	2.60	55,000	37.8	59.37	0.59
	276RF8 Mill Room (WW1a)	cyclonic baghouse system	C1-2	27,470	0.003	99.0%	309	3.09	2,488	4.75	70.64	0.71
	72RF8 Mill Room (WW1a)	cyclonic baghouse system	C1-3	19,000	0.003	99.0%	214	2.14	1,173	2.87	48.86	0.49
	484RF10 HWD (Denibbers DN1a, DN1b, DN3a, DN3b, and DN4)	cyclonic baghouse system	C1-4	60,190	0.003	99.0%	678	6.78	6,500	9.03	154.77	1.55
	156RF10 KC (WW1b)	cyclonic baghouse system	C1-5	19,400	0.003	99.0%	218	2.18	12,000	13.6	49.89	0.50
	276RF10 Grinder (WW1b)	cyclonic baghouse system	C1-6	34,330	0.003	99.0%	387	3.87	13,000	14.4	88.28	0.88
	Woodworking 1c (WW1c)	cyclonic baghouse system	C1-7	36,000	0.003	99.0%	405	4.05	5,000	7.58	92.57	0.93
	276RF8 and 72RF8 Mill Rooms (WW1a)	cyclonic baghouse system	C1-8	75,000	0.003	99.0%	845	8.45	14,839	15.7	192.86	1.93
Denibber (DN6)	portable baghouse (PC1)	Exhausting Indoors	3,240	0.000495	99.0%	6.02	0.06	6,500	NA	1.37	0.014	
Plant 140	276RF8 Mill Room (WW2a), Wood Wrapping P2W1 - P2W4 (WR2a - WR2d)	cyclonic baghouse system	C2-1	60,000	0.003	99.0%	676	6.76	10,120	12.15	154.29	1.54
	276RF8 Mill Room (WW2b) and Wood Wrapping P2W5 (WR2e), P2W6 (WR2f), P2W7, P2W8	cyclonic baghouse system	C2-2	44,000	0.003	99.0%	496	4.96	6,120	8.7	113.14	1.13
	Wood Wrapping P2W9	portable baghouse (PC2-1)	Exhausting Indoors	100	0.001	99.0%	0.38	0.004	280	NA	0.09	0.001
	Wood Wrapping P2W10	portable baghouse (PC2-2)	Exhausting Indoors	1,550	0.001	99.0%	5.82	0.06	280	NA	1.33	0.013
Totals							4,500	45.00				

Methodology:

NA = Not Applicable

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

Before Integral Controls¹ = The uncontrolled particulate emissions are calculated without consideration of the integral control devices for the purpose of determining 326 IAC 2-2 (PSD) applicability only.After Integral Controls² = The controlled particulate emissions are calculated with the consideration that the woodworking controls are integral to the processes and are used for Part 70 and 326 IAC 6-3 applicability.

PTE of PM/PM10/PM2.5 (After Control) (tons/yr) = [Outlet Air Flow Rate (acfm)] x [Outlet Grain Loading (grains/ascf)] x [60 min/hr] x [1/7000 lbs/grain] 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]

326 IAC 6-3-2 Allowable PM Emission Rate (lbs/hr) = 4.1 x (Process Weight Rate (lbs/hr) / 2000)^{0.67}

Process Weight Rates (lbs/hr) provided by the source.

PTE of PM (After Control) (lbs/hr) = [Outlet Air Flow Rate (acfm)] x [Outlet Grain Loading (grains/ascf)] x [60 min/hr] x [1/7000 lbs/grain]

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

Source Name: Patrick Industries, Inc. d/b/a Adorn
Source Address: Plant 130: 1808 West Hively Avenue, Elkhart, Indiana 46517
 Plant 140: 57420 Nagy Drive, Elkhart, Indiana 46517
Operating Permit No.: T039-41848-00324
Significant Permit Modification No.: 039-43070-00324
Permit Writer: L. David Cohen

Description	Plant #	# of Emission Units	Emission Unit ID	MMBTU/hr Input Capacity (each)	Total Heat Input Capacity (MMBTU/hr)
Natural Gas Fired Boiler	1	4	AB1 - AB4	1.00	4.00
Radiant Space Heaters	1	3	H1-H3	0.10	0.30
Hot Water Heater	1	1	WH1	0.125	0.125
Air Makeup Units	1	4	AM1 - AM4	4.125	16.50
Thermocycler Furnaces	1	5	TC1 - TC5	0.58	2.90
Thermocycler Furnaces	2	2	TC6, TC7	3.125	6.25
Forced Air Furnace	2	3	F1 - F3	0.092	0.276
Flat Line Drying Ovens	1	2	SCL-2H1, SCL-2H2	0.400	0.800

Heat Input Capacity MMBTU/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
31.15	1020	267.5

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	0.25	1.02	1.02	0.08	13.38	0.74	11.24

*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

HAPS Calculations

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	2.8E-04	1.6E-04	1.0E-02	0.24	4.5E-04	2.5E-01

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	6.7E-05	1.5E-04	1.9E-04	5.1E-05	2.8E-04	7.3E-04
					Total HAPs	0.25
					Worst HAP	0.24

Methodology is the same as above.

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

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

**Appendix A: Emission Calculations
Outdoor Wood Chipper**

Source Name: Patrick Industries, Inc. d/b/a Adorn
Source Address: Plant 130: 1808 West Hively Avenue, Elkhart, Indiana 46517
 Plant 140: 57420 Nagy Drive, Elkhart, Indiana 46517
Operating Permit No.: T039-41848-00324
Significant Permit Modification No.: 039-43070-00324
Permit Writer: L. David Cohen

Emission Unit	Maximum Throughput Rate (tons/hr)	PM Emission Factor (lbs/ton)	PM10/PM2.5* Emission Factor (lbs/ton)	PM PTE (lbs/hr)	PM PTE (tons/yr)	PM10/PM2.5* PTE (lbs/hr)	PM10/PM2.5* PTE (tons/yr)
Outdoor Wood Chipper (WC1)	1.0	0.35	0.35	0.35	1.53	0.35	1.53
Total					1.53		1.53

Methodology

*PM2.5 emissions assumed equal to PM10 emissions.

PM/PM₁₀ Emission Factor from AP 42, Fourth Edition, Volume I, 1985 (Table 10.3-1).

PM PTE (lbs/hr) = Maximum Throughput Rate (tons/hr) * Emission Factor (lbs/ton)

PM PTE (tons/yr) = (PM PTE (lbs/hr)) * (8760 hrs/yr) * (1 ton/2000 lbs)

PM10/PM2.5 PTE (lbs/hr) = Maximum Throughput Rate (tons/hr) * Emission Factor (lbs/ton)

PM10/PM2.5 PTE (tons/yr) = (PM10/PM2.5 PTE (lbs/hr)) * (8760 hrs/yr) * (1 ton/2000 lbs)

**Appendix A: Emissions Calculations
Saw-Dust Drop Point**

Source Name: Patrick Industries, Inc. d/b/a Adorn
Source Address: Plant 130: 1808 West Hively Avenue, Elkhart, Indiana 46517
 Plant 140: 57420 Nagy Drive, Elkhart, Indiana 46517
Operating Permit No.: T039-41848-00324
Significant Permit Modification No.: 039-43070-00324
Permit Writer: L. David Cohen

Emission Unit	Throughput (lbs/hr)	Emission Factor (lb/ton)	Potential Uncontrolled PM/PM10/PM2.5 Emissions (lb/hr)	Potential Uncontrolled PM/PM10/PM2.5 Emissions (tons/yr)
Woodworking Operation- sawdust drop point	2000	1.00	1.00	4.38

Methodology

Potential Uncontrolled PM/PM10/PM2.5 (lb/hr) = Throughput (lbs/hr) * Emission Factor (lb/ton)

Potential Uncontrolled PM/PM10/PM2.5 (tons/yr) = Potential Uncontrolled PM/PM10/PM2.5 (lb/hr) * 8760 hr/yr * 1 ton/2000 lbs

The emission factors used in the above table are from AP-42, 4th Edition, September 1985, Table 10.3-1.

The emission factor for sawdust handling is 1 pound per ton of sawdust.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

September 24, 2020

Favian Diaz
Patrick Industries, Inc. dba Adorn, Inc.
1808 West Hively Avenue
Elkhart, IN 46517

Re: Public Notice
Patrick Industries, Inc. dba Adorn, Inc.
Permit Level: Title V-Significant Permit Modification
Permit Number: 039-43070-00324

Dear Mr. Favian Diaz:

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 Elkhart Public Library, 300 South 2nd Street in Elkhart, IN 46516. 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 L. David Cohen, 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 3-9327 or dial (317) 233-9327.

Sincerely,

Kathy Bourquein

Kathy Bourquein
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter 8/10/2020



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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

September 24, 2020

To: Elkhart 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: Patrick Industries, Inc. DBA Adorn, Inc.
Permit Number: 039-43070-00324

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 24, 2020
Patrick Industries, Inc. DBA Adorn, Inc.
039-43070-00324

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



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Governor

Bruno L. Pigott
Commissioner

AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD DRAFT INDIANA AIR PERMIT

September 24, 2020

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

Permit Number: 039-43070-00324
Applicant Name: Patrick Industries, Inc. DBA Adorn, Inc.
Location: Elkhart, 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 9/24/2020 Patrick Industries Inc dba Adorn 039-43070-00324 (draft)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		Favian Diaz Patrick Industries Inc dba Adorn 1808 W Hively Ave Elkhart IN 46517 (Source CAATS)									
2		Doyle Stump Patrick Industries Inc dba Adorn PO Box 638 Elkhart IN 465150638 (RO CAATS)									
3		Elkhart City Council and Mayors Office 229 South Second Street Elkhart IN 46516 (Local Official)									
4		Elkhart Public Library 300 S 2nd St Elkhart IN 46516-3184 (Library)									
5		Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 (Health Department)									
6		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 (Local Official)									
7		Mr. Kevin Parks D & B Environmental Services, Inc. 401 Lincoln Way West Osceola IN 46561 (Consultant)									
8		Jeri Seely The Mail-Journal PO Box 188 Milford IN 46542 (Affected Party)									
9		Mr. Roger Schneider The Goshen News 114 S. Main St Goshen IN 46526 (Affected Party)									
10											
11											
12											
13											
14											
15											

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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