NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a Significant Revision to a Federally Enforceable State Operating Permit (FESOP) for Lake Area Designs, LLC in LaGrange County

Significant Permit Revision No.: 087-43617-00678

The Indiana Department of Environmental Management (IDEM) has received an application from Lake Area Designs, LLC, located at 1260 N. Detroit St., LaGrange, IN 46761, for a significant revision of its FESOP issued on July 7, 2020. If approved by IDEM’s Office of Air Quality (OAQ), this proposed revision would allow Lake Area Designs, LLC to make certain changes at its existing source. Lake Area Designs, LLC has applied to remove three (3) existing spray booths (SB2, SB3, and SB4) and the addition of one new flat line (FL1).

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g., changes that add or modify synthetic minor emission limits). The potential to emit regulated air pollutants will continue to be limited to less than the Title V and PSD major threshold levels. 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:

LaGrange Public Library
203 W. Spring Street
LaGrange, IN 46761

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 SPR 087-43617-00678 in all correspondence.

Comments should be sent to:

William Altman  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for William Altman or (317) 233-9664  
Or dial directly: (317) 233-9664  
Fax: (317) 232-6749 attn: William Altman  
E-mail: WAltman@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](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](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 Northern Regional Office, 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 William Altman of my staff at the above address.

Madhurima D. Moulik, Ph.D., Section Chief  
Permits Branch  
Office of Air Quality
Dear Danny Wingard:

Lake Area Designs, LLC was issued a Federally Enforceable State Operating Permit (FESOP) No. F087-37015-00678, on July 7, 2016, for a stationary wood parts manufacturing and finishing plant located at 1260 N. Detroit St., LaGrange, IN 46761. On December 30, 2020, the Office of Air Quality (OAQ) received an application from the source requesting the removal of three (3) spray booths (SB2, SB3, and SB4) and the addition of one (1) new flat line (FL1). Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1 (f). Pursuant to the provisions of 326 IAC 2-8-11.1, a Significant Permit Revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

Pursuant to 326 IAC 2-8-11.1, the following emission unit is approved for construction at the source:

(a) One (1) Flat Line, identified as FL1, approved in 2021 for construction, with a maximum capacity of 60 units per hour, using dry filters as control, and exhausting to stack SVFL1.

The following construction conditions are applicable to the proposed project:

**General Construction Conditions**

1. The data and information supplied with the application shall be considered part of this permit revision approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

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

**Effective Date of the Permit**

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

**Commenced Construction**

4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the Significant Permit Revision into the permit.

All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire FESOP as revised.

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: https://www.in.gov/idem/airpermit/2400.htm; and the Citizens’ Guide to IDEM on the Internet at: https://www.in.gov/idem/6900.htm.

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

If you have any questions regarding this matter, please contact William Altman, 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) 233-9664 or (800) 451-6027, and ask for William Altman or (317) 233-9664.

Sincerely,

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

Attachments: Revised permit and Technical Support Document.

cc: File - LaGrange County
   LaGrange County Health Department
   U.S. EPA, Region 5
   Compliance and Enforcement Branch
   IDEM Northern Regional Office
(hence 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. 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 2-8 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. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-8-11.1, applicable to those conditions.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

<table>
<thead>
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<td>F087-37015-00678</td>
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<tr>
<td>Original Signed by:</td>
<td>Issuance Date: July 7, 2016</td>
</tr>
<tr>
<td>Nathan C. Bell, Section Chief</td>
<td></td>
</tr>
<tr>
<td>Permits Branch</td>
<td>Expiration Date: July 7, 2021</td>
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<td>Significant Permit Revision No.: 087-43617-00678</td>
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Issued by:

<table>
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<tr>
<th>Issuance Date:</th>
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</thead>
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Madhurima D. Moulik, Ph.D., Section Chief
Permits Branch
Office of Air Quality
Expiration Date: July 7, 2021
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### SECTION A  SOURCE SUMMARY

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

#### A.1 General Information [326 IAC 2-8-3(b)]

<table>
<thead>
<tr>
<th>Source Address:</th>
<th>1260 N. Detroit St., LaGrange, Indiana 46761</th>
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<tbody>
<tr>
<td>General Source Phone Number:</td>
<td>260-499-3222</td>
</tr>
<tr>
<td>SIC Code:</td>
<td>2431 (Wood Window and Door Manufacturing), 2511 (Wood Household Furniture)</td>
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<td>County Location:</td>
<td>Lagrange</td>
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<td>Source Location Status:</td>
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<td>Source Status:</td>
<td>Federally Enforceable State Operating Permit Program, Minor Source, under PSD Rules, Minor Source, Section 112 of the Clean Air Act, Not 1 of 28 Source Categories</td>
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#### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

1. **(a)** One woodworking operation, identified as WW1, constructed in 2014, with a maximum capacity of 1,000 pounds per hour, controlled by dust collector DC1 at a maximum air flow of 8,500 acfm, and exhausting indoors.

2. **(b)** One woodworking operation, identified as WW2, constructed in 2014, with a maximum capacity of 500 pounds per hour, controlled by dust collector DC2 at a maximum air flow of 4,000 acfm, and exhausting indoors.

3. **(c)** One Spray Booth Operation, identified as SB1, constructed in 2014, with a maximum capacity of 10 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB1.

4. **(d)** One Flat Line, identified as FL1, approved in 2021 for construction, with a maximum capacity of 60 units per hour, using dry filters as control, and exhausting to stack SVFL1.

5. **(e)** One Spray Booth Operation, identified as SB5, approved in 2016 for construction, with a maximum capacity of 12 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB5.

6. **(f)** One Spray Booth Operation, identified as SB6, approved in 2016 for construction, with a maximum capacity of 12 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB6.

7. **(g)** One Spray Booth Operation, identified as SB7, approved in 2016 for construction, with a maximum capacity of 12 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB7.

8. **(h)** One HVLP specialty surface coating booth, identified as CSB8, approved in 2019 for construction, with a maximum capacity of three (3) units per hour, using dry filters for overspray control, and exhausting indoors.
A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities:

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu (10 MMBtu) per hour, including the following:

(1) Ten (10) space heating units, located in Plant 1, each with a maximum heat input capacity of 0.06 MMBtu per hour, constructed in 2014, and exhausting at stack SH1S.

(2) Two (2) space heating units, located in Plant 2, each with a maximum heat input capacity of 0.08 MMBtu per hour, constructed in 2014, and exhausting at stack SH1S.

(3) One (1) space heating unit, located in Plant 2, with a maximum heat input capacity of 0.06 MMBtu per hour, constructed in 2014, and exhausting at stack SH1S.

(4) One (1) space heating units, located in Plant 3, each with a maximum heat input capacity of 4.54 MMBtu per hour, constructed in 2014, and exhausting at stack AM1S.

(5) One (1) space heating unit, located in the office, each with a maximum heat input capacity of 0.04 MMBtu per hour, constructed in 2014, and exhausting at stack SH2S.

(6) One (1) natural gas fired air makeup unit, identified as AM2, approved in 2016 for construction, with a maximum heat input capacity of 4.54 MMBtu/hr, and exhausting to stack SVAM2.

(b) Paved roads.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).
SECTION B  GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]

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 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, F087-37015-00678, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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

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

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

B.4 Enforceability [326 IAC 2-8-6][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 2-8-4(4)]

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 2-8-4(5)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(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 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

(1) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), 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) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

(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 2-8-4(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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.
B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]

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

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

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

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

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.12 Emergency Provisions [326 IAC 2-8-12]

(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 except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or 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 2-8-4(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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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 2-8-3(c)(6) 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 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) 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.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

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

(a) All terms and conditions of permits established prior to F087-37015-00678 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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 2-8-3(h) and 326 IAC 2-8-9.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State 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 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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 2-8-8(a)]

(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 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(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 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

(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 2-8-3. 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

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

(1) Submitted at least 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 2-8 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 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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:
Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (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 approval required by 326 IAC 2-8-11.1 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 2-8-15(b)(1) and (c). 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 2-8-15(b)(1) and (c).
(b) **Emission Trades [326 IAC 2-8-15(b)]**
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 2-8-15(b).

(c) **Alternative Operating Scenarios [326 IAC 2-8-15(c)]**
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 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

(d) 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.19 **Source Modification Requirement [326 IAC 2-8-11.1]**
A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.20 **Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]**
Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee’s right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

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

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

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

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

B.21 **Transfer of Ownership or Operational Control [326 IAC 2-8-10]**

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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:
Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-8-4(6)][326 IAC 2-8-16][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ no later than 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) 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.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][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

Emission Limitations and Standards  [326 IAC 2-8-4(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  Overall Source Limit  [326 IAC 2-8]

The purpose of this permit is to limit this source’s potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a)  Pursuant to 326 IAC 2-8:

(1)  The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(2)  The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3)  The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b)  Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c)  This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source’s potential to emit does not exceed the above specified limits.

(d)  Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3  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.4 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.5 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.6 Fugitive Dust Emissions [326 IAC 6-4]

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

C.7 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 2-8-
5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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.

Testing Requirements  [326 IAC 2-8-4(3)]

C.8 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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.9 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 2-8-4(1)][326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.11 Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-8-4(3)][326 IAC 2-8-5(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 2-8-4][326 IAC 2-8-5(a)(1)]

C.12 Risk Management Plan [326 IAC 2-8-4][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 2-8-4][326 IAC 2-8-5]

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 2-8-4][326 IAC 2-8-5]

(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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements  [326 IAC 2-8-4(3)]

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]

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

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.
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.16 General Reporting Requirements [326 IAC 2-8-4(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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(b) The address for report submittal is:

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

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

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

Stratospheric Ozone Protection

C.17 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:

(c) One Spray Booth Operation, identified as SB1, constructed in 2014, with a maximum capacity of 10 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB1.

(d) One (1) Flat Line, identified as FL1, approved in 2021 for construction, with a maximum capacity of 60 units per hour, using dry filters as control, and exhausting to stack SVFL1.

(e) One Spray Booth Operation, identified as SB5, approved in 2016 for construction, with a maximum capacity of 12 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB5.

(f) One Spray Booth Operation, identified as SB6, approved in 2016 for construction, with a maximum capacity of 12 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB6.

(g) One Spray Booth Operation, identified as SB7, approved in 2016 for construction, with a maximum capacity of 12 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB7.

(h) One (1) HVLP specialty surface coating booth, identified as CSB8, approved in 2019 for construction, with a maximum capacity of three (3) units per hour, using dry filters for overspray control, 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 2-8-4(1)]

D.1.1  FESOP Limitations [326 IAC 2-8-4]
Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render the requirements 326 IAC 2-7 (Part 70 Permits) not applicable, the total input of VOC to the five (5) spray booths (SB1, SB5 through SB7, and CSB8) and one (1) Flat Line (FL1) shall not exceed 99 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit shall limit VOC from the entire source to less than 100 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

D.1.2  Particulate [326 IAC 6-3-2]
Pursuant to 326 IAC 6-3-2(d), particulate from the five (5) spray booths (SB1, SB5 through SB7, and CSB8) and one (1) Flat Line (FL1) shall be controlled by dry particulate filters, waterwash, or an equivalent control device, and the Permittee shall operate each control device in accordance with manufacturer's specifications.

D.1.3  Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-12]
Pursuant to 326 IAC 8-2-12, when applying surface coatings to wood furniture and cabinets in the five (5) spray booths (SB1, SB5 through SB7, and CSB8) and one (1) Flat Line (FL1), the Permittee shall apply all coating material, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) or more of the following application methods:
Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

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

D.1.4 Hazardous Air Pollutants (HAPs) Limits [326 IAC 2-8-4][326 IAC 2-4.1]

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA), and render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable, the Permittee shall comply with the following:

(a) The total input of each single HAP delivered to the five (5) spray booths (SB1, SB5 through SB7, and CSB8) and the one (1) flat line (FL1), including coatings, catalysts, sealants, cleaners, and thinners, shall not exceed 9.90 tons per twelve (12) consecutive month periods, with compliance determined at the end of each month.

(b) The total input of a combination of HAPs delivered to the five (5) spray booths (SB1, SB5 through SB7, and CSB8) and the one (1) flat line (FL1), including coatings, catalysts, sealants, cleaners, and thinners, shall not exceed 24.5 tons per twelve (12) consecutive month periods, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit HAP from all other emission units at the source, shall limit the source-wide potential to emit single HAP to less than 10 tons per twelve (12) consecutive month period and the source-wide potential to emit total HAPs to less than 25 tons per twelve (12) consecutive month period, and shall render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA) and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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 2-8-4(1)]

D.1.6 Volatile Organic Compounds (VOC)[ 326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC input limit contained in Condition D.1.1 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” VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 Particulate Control

In order to comply with Condition D.1.2, the dry filters for particulate control shall be in operation at all times when the five (5) spray booths (SB1, SB5 through SB7, and CSB8) and the one (1) flat line (FL1) are in operation.
Compliance Monitoring Requirements  [326 IAC 2-8-4(1)][326 IAC 2-8-5(a)(1)]

D.1.8 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters associated with the five (5) spray booths (SB1, SB5 through SB7, and CSB8) and the one (1) flat line (FL1). To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating operations stacks while the operations are in operation. If a condition exists which should result in a response step, 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 and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

Record Keeping and Reporting Requirements  [326 IAC 2-8-4(3)]

D.1.9 Record Keeping Requirements

(a) To document the compliance status with Conditions D.1.1, D.1.4, and D.1.6, 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 and HAP input limit established in Conditions D.1.1, D.1.4 and D.1.6.

(1) The VOC and HAP content of each coating material and solvent used.

(2) The amount of coating material and solvent used on a monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(3) The cleanup solvent usage for each month.

(4) The total VOC, total single HAP, and total combination HAPs input for each month; and

(5) The total VOC, total single HAP, and total combination HAPs input for each compliance period.

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

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

D.1.10 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.1 and D.1.4 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 meet the
requirements of 326 IAC 2-8-5(a)(1) by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

**Emissions Unit Description:**

(a) One (1) woodworking operation, identified as WW1, constructed in 2014, with a maximum capacity of 1,000 pounds per hour, controlled by dust collector DC1 at a maximum air flow of 8,500 acfm, and exhausting indoors.

(b) One (1) woodworking operation, identified as WW2, constructed in 2014, with a maximum capacity of 500 pounds per hour, controlled by dust collector DC2 at a maximum air flow of 4,000 acfm, 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 2-8-4(1)]**

D.2.1 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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 2-8-4(1)]**

D.2.2 Particulate Control

In order to assure that the woodworking operations (WW1 and WW2) are exempt from the requirements of 326 IAC 6-3-2, the dust collectors (DC1 and DC2) for particulate control shall be in operation and control emissions from the woodworking operation at all times that the woodworking operation is in operation.
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION

Source Name: Lake Area Designs, LLC
Source Address: 1260 N. Detroit St., LaGrange, Indiana 46761
FESOP Permit No.: F087-37015-00678

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:

Date:
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Lake Area Designs, LLC
Source Address: 1260 N. Detroit St., LaGrange, Indiana 46761
FESOP Permit No.: F087-37015-00678

This form consists of 2 pages

☐ This is an emergency as defined in 326 IAC 2-7-1(12)
  • The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business
    hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
  • The Permittee must submit notice in writing or by facsimile within two (2) working days
    (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-8-12

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:
<table>
<thead>
<tr>
<th>If any of the following are not applicable, mark N/A</th>
<th>Page 2 of 2</th>
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<td>Date/Time Emergency started:</td>
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<td>Date/Time Emergency was corrected:</td>
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<td>Was the facility being properly operated at the time of the emergency?</td>
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<td>Describe:</td>
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<td>Type of Pollutants Emitted: TSP, PM-10, SO₂, VOC, NOₓ, CO, Pb, other:</td>
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<td>Estimated amount of pollutant(s) emitted during emergency:</td>
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<td>Describe the steps taken to mitigate the problem:</td>
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<td>Describe the corrective actions/response steps taken:</td>
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<td>Describe the measures taken to minimize emissions:</td>
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<td>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:</td>
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Form Completed by: __________________________

Title / Position: __________________________

Date: __________________________

Phone: __________________________
## FESOP Quarterly Report

**Source Name:** Lake Area Designs, LLC  
**Source Address:** 1260 N. Detroit St., LaGrange, Indiana 46761  
**FESOP Permit No.:** F087-37015-00678  
**Facility:** Spray Booths (SB1, SB5 through SB7, CSB8 and FL1)  
**Parameter:** VOC  
**Limit:** The total input of VOC to the five (5) spray booths (SB1, SB5 Through SB7, and CSB8) and one (1) Flat Line (FL1) shall not exceed 99 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

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<td>Previous 11 Months</td>
<td>12 Month Total</td>
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- □ No deviation occurred in this quarter.
- □ Deviation/s occurred in this quarter.  
  
  Deviation has been reported on: ___________________________

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

**OFFICE OF AIR QUALITY**

**COMPLIANCE AND ENFORCEMENT BRANCH**

**FESOP Quarterly Report**

Source Name: Lake Area Designs, LLC  
Source Address: 1260 N. Detroit St., LaGrange, Indiana 46761  
FESOP Permit No.: F087-37015-00678  
Facility: Spray Booths (SB1, SB5 through SB7, CSB8 and FL1)  
Parameter: Single HAP  
Limit: The total input of each single HAP delivered to the five (5) spray booths (SB1, SB5 through SB7, and CSB8) and the one (1) flat line (FL1), including coatings, catalysts, sealants, cleaners, and thinners, shall not exceed 9.90 tons per twelve (12) consecutive month periods, with compliance determined at the end of each month.

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

Submitted by: ____________________________  
Title / Position: ____________________________  
Signature: ____________________________  
Date: ____________________________  
Phone: ____________________________
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

FESOP Quarterly Report

Source Name: Lake Area Designs, LLC
Source Address: 1260 N. Detroit St., LaGrange, Indiana 46761
FESOP Permit No.: F087-37015-00678
Facility: Spray Booths (SB1, SB5 through SB7, CSB8, FL1, and CSB8)
Parameter: Combination of HAPs
Limit: The total input of a combination of HAPs delivered to the five (5) spray booths (SB1, SB5 through SB7, and CSB8) and the one (1) flat line (FL1), including coatings, catalysts, sealants, cleaners, and thinners, shall not exceed 24.5 tons per twelve (12) consecutive month periods, with compliance determined at the end of each month.

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☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.

Deviations has been reported on: ___________________________

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

- NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

- THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

Technical Support Document (TSD) for a Significant Permit Revision to a  
Federally Enforceable State Operating Permit (FESOP)

<table>
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<tr>
<th>Source Description and Location</th>
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<tr>
<td><strong>Source Location:</strong> 1260 N. Detroit St., LaGrange, IN 46761</td>
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<td><strong>County:</strong> LaGrange</td>
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</table>
| **SIC Code:**
  - 2431 (Wood Window and Door Manufacturing)
  - 2511 (Wood Household Furniture, Except Upholstered) |
| **Operation Permit No.:** F087-37015-00678 |
| **Operation Permit Issuance Date:** July 7, 2016 |
| **Significant Permit Revision No.:** 087-43617-00678 |
| **Permit Reviewer:** William Altman |

Existing Approvals

The source was issued FESOP No. F087-37015-00678 on July 7, 2016. The source has since received the following approval:

(a) FESOP SPR No. 087-41460-00678, issued on July 3, 2019; and

The source submitted an application for a FESOP Renewal on September 2, 2020. At this time, this application is under review.

County Attainment Status

The source is located in LaGrange County.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO₂</td>
<td>Better than national standards.</td>
</tr>
<tr>
<td>CO</td>
<td>Unclassifiable or attainment effective November 15, 1990.</td>
</tr>
<tr>
<td>O₃</td>
<td>Unclassifiable or attainment effective January 16, 2018, for the 2015 8-hour ozone standard.</td>
</tr>
<tr>
<td>PM₂₅</td>
<td>Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM₂₅ standard.</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>Unclassifiable effective November 15, 1990.</td>
</tr>
<tr>
<td>NO₂</td>
<td>Unclassifiable or attainment effective January 29, 2012, for the 2010 NO₂ standard.</td>
</tr>
<tr>
<td>Pb</td>
<td>Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.</td>
</tr>
</tbody>
</table>

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

(b) PM₂₅
LaGrange County has been classified as attainment for PM₂₅. Therefore, direct PM₂₅, SO₂, and
NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Other Criteria Pollutants
LaGrange 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 revision, after consideration of all enforceable limits established in the effective permits. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Source-Wide Emissions Prior to Revision (ton/year)</th>
<th>PM¹</th>
<th>PM₁₀¹</th>
<th>PM₂.₅¹,₂</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP³</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of Entire Source Excluding Fugitive Emissions*</td>
<td>38.33</td>
<td>38.58</td>
<td>38.58</td>
<td>0.03</td>
<td>4.27</td>
<td>99.23</td>
<td>3.59</td>
<td>5.98</td>
<td>11.99</td>
</tr>
</tbody>
</table>
### Source-Wide Emissions Prior to Revision (ton/year)

<table>
<thead>
<tr>
<th></th>
<th>PM$^1$</th>
<th>PM$_{10}^1$</th>
<th>PM$_{2.5}^1,2$</th>
<th>SO$_2$</th>
<th>NO$_X$</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP$^3$</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title V Major Source</td>
<td>NA</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>10</td>
<td>25</td>
<td></td>
</tr>
<tr>
<td>Thresholds</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PSD Major Source</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>25</td>
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<tr>
<td>Thresholds</td>
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<td></td>
</tr>
</tbody>
</table>

$^1$Under the Part 70 Permit program (40 CFR 70), PM$_{10}$ and PM$_{2.5}$, not particulate matter (PM), are each considered as a "regulated air pollutant."

$^2$PM$_{2.5}$ listed is direct PM$_{2.5}$.

$^3$Single highest source-wide HAP

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

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

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

(c) These emissions are based on the TSD of FESOP SPR No. 087-41460-00678, issued on July 3, 2019.

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### Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Lake Area Designs, LLC on December 30, 2020, relating to the removal of three existing spray booths and the addition of one flat line.

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

(a) One (1) Flat Line, identified as FL1, approved in 2021 for construction, with a maximum capacity of 60 units per hour, using dry filters as control, and exhausting to stack SVFL1.

As part of this permitting action, the following emission units are being removed the permit:

(a) One Spray Booth Operation, identified as SB2, constructed in 2014, with a maximum capacity of 10 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB2.

(b) One Spray Booth Operation, identified as SB3, constructed in 2014, with a maximum capacity of 10 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB3.

(c) One Spray Booth Operation, identified as SB4, constructed in 2015, with a maximum capacity of 10 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB4.

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### Enforcement Issues

There are no pending enforcement actions related to this revision.
Emission Calculations

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

Permit Level Determination – FESOP Significant Permit Revision

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 2-8-11.1 (Permit Revisions). This table reflects the PTE before controls of the proposed revision. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>PM</th>
<th>PM\textsubscript{10}</th>
<th>PM\textsubscript{2.5} \textsuperscript{1}</th>
<th>SO\textsubscript{2}</th>
<th>NO\textsubscript{X}</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP\textsuperscript{2}</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Flat Line (FL1)</td>
<td>4.67</td>
<td>4.67</td>
<td>4.67</td>
<td>0.00</td>
<td>0.00</td>
<td>116.59</td>
<td>0.00</td>
<td>7.95</td>
<td>8.70</td>
</tr>
<tr>
<td>Total PTE Before Controls of the New Emission Units:</td>
<td>4.67</td>
<td>4.67</td>
<td>4.67</td>
<td>0.00</td>
<td>0.00</td>
<td>116.59</td>
<td>0.00</td>
<td>7.95</td>
<td>8.70</td>
</tr>
</tbody>
</table>

\textsuperscript{1}PM\textsubscript{2.5} listed is direct PM\textsubscript{2.5}.

\textsuperscript{2}Single highest HAP.

Appendix A of this TSD reflects the detailed potential emissions of the proposed revision.

Pursuant to 326 IAC 2-8-11.1(f)(1)(E), this FESOP is being revised through a FESOP Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit revision and the proposed revision involves the construction of new emission units with potential to emit equal to or greater than twenty-five (25) tons per year of the following pollutants:

(i) Volatile Organic Compounds (VOC).

PTE of the Entire Source After Issuance of the FESOP Revision

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 revision, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Source-Wide Emissions After Issuance (ton/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM\textsuperscript{1}</td>
</tr>
<tr>
<td>-----------------------------------------------</td>
</tr>
<tr>
<td>Total PTE of Entire Source Excluding Fugitives\textsuperscript{*}</td>
</tr>
</tbody>
</table>

\textsuperscript{*}Total PTE excludes fugitive emissions.
### Source-Wide Emissions After Issuance (ton/year)

<table>
<thead>
<tr>
<th></th>
<th>PM¹</th>
<th>PM₁₀¹</th>
<th>PM₂.₅¹,₂</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP³</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title V Major Source</td>
<td>NA</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>10</td>
<td>25</td>
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<td>Thresholds</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>PSD Major Source</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
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</tr>
<tr>
<td>Thresholds</td>
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<td></td>
</tr>
</tbody>
</table>

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM₂.₅, not particulate matter (PM), are each considered as a "regulated air pollutant."
²PM₂.₅ listed is direct PM₂.₅.
³Single highest source-wide HAP

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

Appendix A of this TSD reflects the detailed potential to emit of the entire source after issuance.

The source opted to take VOC & HAP limit(s) in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to this source and to render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA). See Technical Support Document (TSD) State Rule Applicability - Entire Source section, 326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset), 326 IAC 2-8 (FESOP), and 326 IAC 20 (Hazardous Air Pollutants) for more information regarding the limit(s).

(a) This existing Title V minor stationary source will continue to be minor under 326 IAC 2-7 because the potential to emit regulated air pollutants and HAPs from the entire source will continue to be less than or limited to less than the Title V major source threshold levels. Therefore, the source is subject to the provisions of 326 IAC 2-8 (FESOP) and is an area source under Section 112 of the Clean Air Act (CAA).

(b) This existing minor PSD stationary source will continue to be minor under 326 IAC 2-2 because the potential to emit of all PSD regulated pollutants from the entire source will continue to be less than or limited to less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

#### Federal Rule Applicability Determination

Due to the proposed revision, federal rule applicability has been reviewed as follows:

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

(a) The requirements of the New Source Performance Standard for Spray of Metal Furniture, 40 CFR 60, Subpart EE (326 IAC 12), is not included in this proposed permit, since the flat line (FL1) only coat wood furniture and wood building products and not metal.

(b) The requirements of the New Source Performance Standard for Automobiles and Light Duty Truck Spray Operations, 40 CFR 60, Subpart MM (326 IAC 12), is not included in this proposed permit, since the flat line (FL1) only coat wood furniture and wood building products and not automobiles or light duty trucks.

(c) The requirements of the New Source Performance Standard for Industrial Spray: Large Appliances, 40 CFR 60, Subpart SS (326 IAC 12), is not included in this proposed permit, since the flat line (FL1) only coat wood furniture and wood building products and not large appliances.

(d) The requirements of the New Source Performance Standard for Metal Coil Spray, 40 CFR 60, Subpart TT (326 IAC 12), is not included in this proposed permit, since the flat line (FL1) only coat wood furniture and wood building products and not metal coils.
(e) The requirements of the New Source Performance Standard for the Beverage Can Spray Industry, 40 CFR 60, Subpart WW (326 IAC 12), is not included in this proposed permit, since the flat line (FL1) coat wood furniture and wood building products and not beverage cans.

(f) The requirements of the New Source Performance Standard for Industrial Spray: Spray of Plastic Parts for Business Machines, 40 CFR 60, Subpart TTT (326 IAC 12), is not included in this proposed permit, since the flat line (FL1) only coat wood furniture and wood building products and not plastic parts for business machines.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP):

(a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Wood Furniture Manufacturing Operations, 40 CFR 63, Subpart JJ (326 IAC 20-14), is not included in this permit since the source is not a major source of HAPs.

(b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Spray of Automobiles and Light-Duty Trucks, 40 CFR 63.3080, Subpart IIII (326 IAC 20-85), are not included in this proposed permit, since the flat line (FL1) is not located in or part of a major source of HAPs and do not coat automobiles or light duty trucks.

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Spray of Metal Cans, 40 CFR 63.3480, Subpart KKKK (326 IAC 20-86), are not included in this proposed permit, since the flat line (FL1) is not located in or part of a major source of HAPs and do not coat metal cans.

(d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Spray of Miscellaneous Metal Parts and Products, 40 CFR 63.3880, Subpart MMMM (326 IAC 20-80), are not included in this proposed permit, since the flat line (FL1) is not located in or part of a major source of HAPs and do not coat metal parts or products.

(e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Spray of Large Appliances, 40 CFR 63.4080, Subpart NNNN (326 IAC 20-63), are not included in this proposed permit, since the flat line (FL1) is not located in or part of a major source of HAPs and do not coat large appliances.

(f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Spray of Plastic Parts and Products, 40 CFR 63.4480, Subpart PPPP (326 IAC 20-81), are not included in this proposed permit, since the flat line (FL1) is not located in or part of a major source of HAPs and do not coat plastic parts or products.

(g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Spray of Wood Building Products, 40 CFR 63.4680, Subpart QQQQ (326 IAC 20-79), are not included in this proposed permit, since the flat line (FL1) is not located in or part of a major source of HAPs.

(h) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Spray of Metal Furniture, 40 CFR 63.4880, Subpart RRRR (326 IAC 20-78), are not included in this proposed permit, since the flat line (FL1) is not located in or part of a major source of HAPs and do not coat metal furniture.

(i) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Spray of Metal Coil, 40 CFR 63.5080, Subpart SSSS (326 IAC 20-64), are not included in this
proposed permit, since the flat line (FL1) is not located in or part of a major source of HAPs and do not coat metal coil.

(j) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Paint Stripping and Miscellaneous Spray Operations at Area Sources, 40 CFR 63.11169, Subpart HHHHH (6H), are not included in this proposed permit, since the flat line (FL1) does not have a paint stripping operation that utilizes chemical strippers that contain methylene chloride, do not coat or refinish auto bodies, or use coatings that contain chromium, lead, manganese, nickel, or cadmium to coat metal or plastic parts.

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

Compliance Assurance Monitoring (CAM):

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

<table>
<thead>
<tr>
<th>State Rule Applicability - Entire Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>326 IAC 2-2 (PSD)</td>
</tr>
<tr>
<td>PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP Revision section of this document.</td>
</tr>
</tbody>
</table>

| 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)) |
| The new emission unit(s) will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply. |

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

| 326 IAC 2-8-4 (FESOP) and 326 IAC 20 (Hazardous Air Pollutants) |
| FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP Revision section of this document. |

FESOP VOC Limit(s)

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits), not applicable, the Permittee shall comply with the following:

(a) Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render the requirements 326 IAC 2-7 (Part 70 Permits) not applicable, the total input of VOC to the five (5) spray booths (SB1, SB5 through SB7, and CSB8) and the one (1) flat line (FL1) shall not exceed 99 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 VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 100 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.
FESOP HAP Limit(s)

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA), and render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable, the Permittee shall comply with the following:

(a) The total input of each single HAP delivered to the five (5) spray booths (SB1, SB5 through SB7, and CSB8) and the one (1) flat line (FL1), including coatings, catalysts, sealants, cleaners, and thinners, shall not exceed 9.90 tons per twelve (12) consecutive month periods, with compliance determined at the end of each month.

(b) The total input of a combination of HAPs delivered to the five (5) spray booths (SB1, SB5 through SB7, and CSB8) and the one (1) flat line (FL1), including coatings, catalysts, sealants, cleaners, and thinners, shall not exceed 24.5 tons per twelve (12) consecutive month periods, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit HAP from all other emission units at the source, shall limit the source-wide potential to emit single HAP to less than 10 tons per twelve (12) consecutive month period and the source-wide potential to emit total HAPs to less than 25 tons per twelve (12) consecutive month period, and shall render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA) and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

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

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

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

326 IAC 6-4 (Fugitive Dust Emissions Limitations)
The source is subject to the requirements of 326 IAC 6-4, because the paved roads 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 LaGrange 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 LaGrange County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.

326 IAC 6.8 (Lake County: Fugitive Particulate Matter)
Pursuant to 326 IAC 6.8-10-1, this source (located in LaGrange County) is not subject to the requirements of 326 IAC 6.8-10 because it is not located in Lake County.
State Rule Applicability – Individual Facilities

Due to the proposed revision, state rule applicability has been reviewed as follows:

Flatline (FL1)

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 flat line (FL1), 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).

Particulate from the surface coating shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer’s specifications.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Even though, this flat line (FL1) was constructed after January 1, 1980, it is not subject to the requirements of 326 IAC 8-1-6 because its unlimited VOC potential emissions are less than twenty-five (25) tons per year.

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)
Pursuant to 326 IAC 8-2-1(a)(4), the flat line (FL1) are subject to 326 IAC 8-2-12, because each unit was constructed after July 1, 1990, the actual VOC emissions before controls for each unit are greater than fifteen (15) pounds per day, and it applies surface coating to wood furnishings as defined in 326 IAC 8-2-12(a).

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), when applying surface coatings to wood furniture and cabinets in the flat line (FL1), the Permittee shall apply all coating material, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) or more of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application
- High Volume Low Pressure (HVLP) Spray Application

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.

The flat line (FL1) is equipped with HVLP spray applicators. Therefore, the flat line (FL1) is able to comply with this rule.

326 IAC 8-11 (Wood Furniture Coatings)
Pursuant to 326 IAC 8-11-1, the flatline (FL1) is not subject to the requirements of 326 IAC 8-11 because the source is not located in one of the following counties: Lake Porter, Clark, or Floyd County.
Compliance Determination and Monitoring Requirements

(a) The Compliance Monitoring Requirements applicable to this proposed revision are as follows:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Type of Parametric Monitoring</th>
<th>Frequency</th>
<th>Range or Specification</th>
</tr>
</thead>
<tbody>
<tr>
<td>Flat Line (FL1)</td>
<td>Dry Filter Inspections</td>
<td>Daily</td>
<td>Verify the placement, integrity and particle loading of the filters</td>
</tr>
<tr>
<td></td>
<td>Observations for stack overspray</td>
<td>Weekly</td>
<td>Verify if there is an overspray condition that should result in a response</td>
</tr>
<tr>
<td></td>
<td>Inspections for stack emissions and presence of overspray</td>
<td>Monthly</td>
<td>Verify if there is a noticeable change in overspray emissions or evidence of overspray</td>
</tr>
</tbody>
</table>

These monitoring conditions are necessary because the dry filter for the flat line (FL1) must operate properly to assure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

Proposed Changes

The following changes listed below are due to the proposed revision. Deleted language appears as strikethrough text and new language appears as bold text:

(1) Section A.2 has been modified to show the removal of existing units that have been removed and the inclusion of the new flat line

(2) Section D has been modified to show the removal of existing units that have been removed and the inclusion of the new flat line and include HAP limits for the surface coating units and add the compliance requirements for FL1.

(3) Recordkeeping requirements have been revised to include FL1 and report forms have been added for the new single HAP limit and combination of HAPs limit

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

(a) One (1) woodworking operation, identified as WW1, constructed in 2014, with a maximum capacity of 1,000 pounds per hour, controlled by dust collector DC1 at a maximum air flow of 8,500 acfm, and exhausting indoors.

(b) One (1) woodworking operation, identified as WW2, constructed in 2014, with a maximum capacity of 500 pounds per hour, controlled by dust collector DC2 at a maximum air flow of 4,000 acfm, and exhausting indoors.

(c) One Spray Booth Operation, identified as SB1, constructed in 2014, with a maximum capacity of 10 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB1.

(d) One Spray Booth Operation, identified as SB2, constructed in 2014, with a maximum capacity of 10 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB2.
(e) One Spray Booth Operation, identified as SB3, constructed in 2014, with a maximum capacity of 10 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB3.

(f) One Spray Booth Operation, identified as SB4, constructed in 2015, with a maximum capacity of 10 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB4.

(d) Flat Line, identified as FL1, approved in 2021 for construction, with a maximum capacity of 60 units per hour, using dry filters as control, and exhausting to stack SVFL1.

(ge) One Spray Booth Operation, identified as SB5, approved in 2016 for construction, with a maximum capacity of 12 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB5.

(hf) One Spray Booth Operation, identified as SB6, approved in 2016 for construction, with a maximum capacity of 12 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB6.

(ih) One Spray Booth Operation, identified as SB7, approved in 2016 for construction, with a maximum capacity of 12 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB7.

(jh) One (1) HVLP specialty surface coating booth, identified as CSB8, approved in 2019 for construction, with a maximum capacity of three (3) units per hour, using dry filters for overspray control, and exhausting indoors.

*****

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

<table>
<thead>
<tr>
<th>Emissions Unit Description:</th>
</tr>
</thead>
<tbody>
<tr>
<td>(c) One Spray Booth Operation, identified as SB1, constructed in 2014, with a maximum capacity of 10 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB1.</td>
</tr>
<tr>
<td>(d) One Spray Booth Operation, identified as SB2, constructed in 2014, with a maximum capacity of 10 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB2.</td>
</tr>
<tr>
<td>(e) One Spray Booth Operation, identified as SB3, constructed in 2014, with a maximum capacity of 10 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB3.</td>
</tr>
<tr>
<td>(f) One Spray Booth Operation, identified as SB4, constructed in 2015, with a maximum capacity of 10 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB4.</td>
</tr>
<tr>
<td>(d) One (1) Flat Line, identified as FL1, approved in 2021 for construction, with a maximum capacity of 60 units per hour, using dry filters as control, and exhausting to stack SVFL1.</td>
</tr>
</tbody>
</table>
(ge) One Spray Booth Operation, identified as SB5, approved in 2016 for construction, with a maximum capacity of 12 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB5.

(hf) One Spray Booth Operation, identified as SB6, approved in 2016 for construction, with a maximum capacity of 12 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB6.

(ig) One Spray Booth Operation, identified as SB7, approved in 2016 for construction, with a maximum capacity of 12 units per hour, using high volume low pressure (HVLP) spray application, using dry filters for particulate control, and exhausting to stack SVSB7.

(jh) One (1) HVLP specialty surface coating booth, identified as CSB8, approved in 2019 for construction, with a maximum capacity of three (3) units per hour, using dry filters for overspray control, 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 2-8-4(1)]

D.1.1 FESOP Limitations [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render the requirements 326 IAC 2-7 (Part 70 Permits) not applicable, the total input of VOC to the eight (8) five (5) spray booths (SB1, through SB5 through SB7, and CSB8) and the one (1) flat line (FL1) shall not exceed 99 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit shall limit VOC from the entire source to less than 100 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

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

Pursuant to 326 IAC 6-3-2(d), particulate from the eight (8) five (5) spray booths (SB1, through SB5 through SB7, and CSB8) and the one (1) flat line (FL1) shall be controlled by dry particulate filters, waterwash, or an equivalent control device, and the Permittee shall operate each control device in accordance with manufacturer's specifications.

D.1.3 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12, when applying surface coatings to wood furniture and cabinets in the eight (8) five (5) spray booths (SB1, through SB5 through SB7, and CSB8) and the one (1) flat line (FL1), the Permittee shall apply all coating material, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) or more of the following application methods:

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

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

D.1.5 Hazardous Air Pollutants (HAPs) Limits [326 IAC 2-8-4][326 IAC 2-4.1]

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA), and render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable, the Permittee shall comply with the following:

(a) The total input of each single HAP delivered to the five (5) spray booths (SB1, SB5 through SB7, and CSB8) and the one (1) flat line (FL1), including coatings, catalysts, sealants, cleaners, and thinners, shall not exceed 9.90 tons per twelve (12) consecutive month periods, with compliance determined at the end of each month.

(b) The total input of a combination of HAPs delivered to the five (5) spray booths (SB1, SB5 through SB7, and CSB8) and the one (1) flat line (FL1), including coatings, catalysts, sealants, cleaners, and thinners, shall not exceed 24.5 tons per twelve (12) consecutive month periods, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit HAP from all other emission units at the source, shall limit the source-wide potential to emit single HAP to less than 10 tons per twelve (12) consecutive month period and the source-wide potential to emit total HAPs to less than 25 tons per twelve (12) consecutive month period, and shall render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA) and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

D.1.45 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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 2-8-4(1)]

D.1.56 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC input limit contained in Condition D.1.1 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" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.67 Particulate Control

In order to comply with Condition D.1.2, the dry filters for particulate control shall be in operation at all times when the eight (8) five (5) spray booths (SB1, through SB5 through SB7, and CSB8) and the one (1) flat line (FL1) are in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4(1)][326 IAC 2-8-5(a)(1)]

D.1.78 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters associated with the eight (8) five (5) spray booths (SB1, through SB5 through SB7, and CSB8) and the one (1) flat line (FL1). To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating operations stacks while the operations are in operation. If a condition exists which should result in a response step, 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 and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

Record Keeping and Reporting Requirements  [326 IAC 2-8-4(3)]

D.1.89 Record Keeping Requirements

(a) To document the compliance status with Conditions D.1.1, and D.1.54 and D.1.6 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 and the HAP input limit established in Conditions D.1.1 and D.1.4.

(1) The VOC and HAP content of each coating material and solvent used.

(2) The amount of coating material and solvent used on a monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(3) The cleanup solvent usage for each month.

(4) The total VOC, total single HAP, and total combination of HAPs input for each month; and

(5) The total VOC, total single HAP, and total combination of HAPs input for each compliance period.

(b) To document the compliance status with Condition D.1.78, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.

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

D.1.910 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.1 and D.1.5 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 meet the requirements of 326 IAC 2-8-5(a)(1) by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
FESOP Quarterly Report

Source Name: Lake Area Designs, LLC
Source Address: 1260 N. Detroit St., LaGrange, Indiana 46761
FESOP Permit No.: F087-37015-00678
Facility: Spray Booths (SB1, SB5 through SB7, and CSB8, and FL1)
Parameter: VOC
Limit: The total input of VOC to the eight (8) spray booths (SB1, through SB5 through SB7, and CSB8) and the one (1) flat line (FL1). shall not exceed 99 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

*****

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

FESOP Quarterly Report

Source Name: Lake Area Designs, LLC
Source Address: 1260 N. Detroit St., LaGrange, Indiana 46761
FESOP Permit No.: F087-37015-00678
Facility: Spray Booths (SB1, SB5 through SB7, CSB8, FL1, and CSB8)
Parameter: Single HAP
Limit: The total input of each single HAP delivered to the five (5) spray booths (SB1, SB5 through SB7, and CSB8) and the one (1) flat line (FL1), including coatings, catalysts, sealants, cleaners, and thinners, shall not exceed 9.90 tons per twelve (12) consecutive month periods, with compliance determined at the end of each month.

QUARTER: __________ YEAR: ________________

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 1 + Column 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>This Month (tons)</td>
<td>Previous 11 Months (tons)</td>
<td>12 Month Total (tons)</td>
<td></td>
</tr>
<tr>
<td></td>
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<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
No deviation occurred in this quarter.
Deviation/s occurred in this quarter.
Deviation has been reported on: ___________________________

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

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 December 30, 2020.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 087-43617-00678. The staff recommends to the Commissioner that the FESOP Significant Permit Revision be approved.

IDEEM Contact

(a) If you have any questions regarding this permit, please contact William Altman, 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) 233-9664 or (800) 451-6027, and ask for William Altman or (317) 233-9664.

(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 IDEEM Air Permits page on the Internet at: https://www.in.gov/idem/airpermit/2400.htm; and the Citizens' Guide to IDEEM on the Internet at: https://www.in.gov/idem/6900.htm.
### Potential to Emit Summary

**Appendix A: Emissions Calculations**

**Company Name:** Lake Area Designs, LLC  
**Source Address:** 1260 N. Detroit St., LaGrange, IN 46761  
**Operating Permit Number:** F087-37015-00678  
**SPR Number:** 087-43617-00678  
**Permit Writer:** William Atman

#### Unlimited Potential to Emit Integral Woodworking Before Controls (ton/yr)*

<table>
<thead>
<tr>
<th>Emission Unit/ID</th>
<th>PM</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}$</th>
<th>SO$_2$</th>
<th>NO$_x$</th>
<th>CO</th>
<th>HAP</th>
<th>Worst Single HAP (Toluene)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Woodworking WW1</td>
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<td>99.74</td>
<td>99.74</td>
<td>-</td>
<td>-</td>
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<tr>
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<td>45.05</td>
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<td>-</td>
<td>-</td>
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</tr>
<tr>
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<td>5.02</td>
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<td>-</td>
<td>-</td>
<td>0.77</td>
<td>0.77 Methanol</td>
</tr>
<tr>
<td>Spray Booth SB5</td>
<td>5.88</td>
<td>5.88</td>
<td>5.88</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>1.91</td>
<td>1.94 Toluene</td>
</tr>
<tr>
<td>Spray Booth SB6</td>
<td>5.88</td>
<td>5.88</td>
<td>5.88</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>1.91</td>
<td>1.94 Toluene</td>
</tr>
<tr>
<td>Spray Booth SB8</td>
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<td>-</td>
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<td>-</td>
<td>1.91</td>
<td>1.94 Toluene</td>
</tr>
<tr>
<td>Custom Spray Booth SB5</td>
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<td>5.24</td>
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<td>0.26 Toluene</td>
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<tr>
<td>Total (non-fugitive)</td>
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<td>169.9</td>
<td>169.9</td>
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<td>20.13</td>
<td>1.60</td>
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<td>0.03</td>
<td>0.01</td>
<td>-</td>
<td>-</td>
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<td>-</td>
</tr>
</tbody>
</table>

#### Unlimited Potential to Emit After Integral Woodworking Controls (ton/yr)*

<table>
<thead>
<tr>
<th>Emission Unit/ID</th>
<th>PM</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}$</th>
<th>SO$_2$</th>
<th>NO$_x$</th>
<th>CO</th>
<th>HAP</th>
<th>Worst Single HAP (Toluene)</th>
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<tbody>
<tr>
<td>Woodworking WW1</td>
<td>0.96</td>
<td>0.96</td>
<td>0.96</td>
<td>-</td>
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<td>Woodworking WW2</td>
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<tr>
<td>Spray Booth SB7</td>
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<td>0.77</td>
<td>0.77 Methanol</td>
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<tr>
<td>Spray Booth SB5</td>
<td>5.88</td>
<td>5.88</td>
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<td>Spray Booth SB6</td>
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<td>-</td>
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<td>1.94 Toluene</td>
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<tr>
<td>Custom Spray Booth SB5</td>
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<td>1.47</td>
<td>1.47</td>
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<td>NG Combustion</td>
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<td>12.49 Toluene</td>
</tr>
<tr>
<td>Paved Roads (fugitive)</td>
<td>0.15</td>
<td>0.03</td>
<td>0.01</td>
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#### Limited Potential to Emit After Integral Woodworking Controls (ton/yr)*

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<th>Emission Unit/ID</th>
<th>PM</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}$</th>
<th>SO$_2$</th>
<th>NO$_x$</th>
<th>CO</th>
<th>HAP</th>
<th>Worst Single HAP (Toluene)</th>
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<td>-</td>
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<td>1.94 Toluene</td>
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<td>1.94 Toluene</td>
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<td>5.24</td>
<td>-</td>
<td>0.82</td>
<td>0.26 Toluene</td>
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<td>0.32</td>
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<td>0.23</td>
<td>3.59</td>
<td>0.08 Toluene</td>
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<tr>
<td>Total (non-fugitive)</td>
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<td>30.55</td>
<td>30.55</td>
<td>0.03</td>
<td>4.27</td>
<td>20.08</td>
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<td>9.96 Toluene</td>
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*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 were calculated after consideration of the controls for purposes of determining operating permit level and for determining the applicability of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes ) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

**Pursuant to 326 IAC 2-6-4 (FESOP) and in order to render the requirements 326 IAC 2-7 (Part 70 Permits) not applicable, total VOC input to the seven (7) spray booths shall not exceed 99 tons per twelve (12) month consecutive period**
Appendix A: Emissions Calculations
Particulate from Woodworking Operations

Company Name: Lake Area Designs, LLC
Source Address: 1260 N. Detroit St., LaGrange, IN 46761
Operating Permit Number: F087-37015-00678
SPR Number: 087-43617-00678
Permit Writer: William Altman

<table>
<thead>
<tr>
<th>Unit</th>
<th>Maximum Air Flow (acfm)</th>
<th>Design Outlet Grain Loading (grains/acfm)</th>
<th>Overall Control Efficiency</th>
<th>PTE of PM/PM10/PM2.5 After Control (lb/hr)</th>
<th>PTE of PM/PM10/PM2.5 After Control (tons/yr)</th>
<th>PTE of PM/PM10/PM2.5 Before Control (lb/hr)</th>
<th>PTE of PM/PM10/PM2.5 Before Control (tons/yr)</th>
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<tr>
<td>WW1</td>
<td>8500</td>
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<td>0.22</td>
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<td>WW2</td>
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<td>45.05</td>
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Methodology:
PM10 and PM2.5 emissions assumed equal to PM emissions
PTE of PM/PM10/PM2.5 After Control (lb/hr) = Design Outlet Grain Loading (grains/acfm) * Maximum Air Flow (acfm) * 60 min/hr / 7000 grains/lb
PTE of PM/PM10/PM2.5 After Control (ton/yr) = [PTE of PM/PM10/PM2.5 After Control (lb/hr)] * 8760 hrs / 2000 lbs/ton
PTE of PM/PM10/PM2.5 Before Control (lb/hr) = [PTE of PM/PM10/PM2.5 After Control (lb/hr)] / (1 - control efficiency)
PTE of PM/PM10/PM2.5 Before Control (ton/yr) = [PTE of PM/PM10/PM2.5 Before Control (lb/hr)] * 8760 hrs / 2000 lbs/ton
# Appendix A: Emissions Calculations

## VOC and Particulate

### From Surface Coating Operations

**Company Name:** Lake Area Designs, LLC  
**Source Address:** 1260 N. Detroit St., LaGrange, IN 46761  
**Operating Permit Number:** F087-37015-00678  
**SPR Number:** 087-43617-00678  
**Permit Writer:** William Altman

### Spray Booth SB1

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Weight % Volatile (H2O &amp; Organics)</th>
<th>Weight % Water</th>
<th>Weight % Organics</th>
<th>Volume % Non-Volatiles (solids)</th>
<th>Volume % Water</th>
<th>Gal of Mat (gal/unit)</th>
<th>Maximum (unit/hour)</th>
<th>Maximum (gal/day)</th>
<th>Pounds VOC per gallon of coating less water</th>
<th>Pounds VOC per gallon of coating</th>
<th>Potential VOC pounds per hour</th>
<th>Potential VOC pounds per day</th>
<th>Potential VOC tons per year</th>
<th>Particulate Potential (ton/yr)</th>
<th>lb VOC/gal solids</th>
<th>Transfer Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stain FG-2689 Stain</td>
<td>7.22</td>
<td>63.52%</td>
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<td>63.52%</td>
<td>0.00%</td>
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<td>10.00</td>
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<td>4.58</td>
<td>109.96</td>
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<tr>
<td>Sealer Aristocoat Premium 30</td>
<td>7.85</td>
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<td>9.90%</td>
<td>48.31%</td>
<td>0.00%</td>
<td>33.01%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>5.9999</td>
<td>10.00</td>
<td>23.98</td>
<td>3.79</td>
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<td>3.79</td>
<td>90.93</td>
<td>16.59</td>
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<tr>
<td>Topcoat Aristocoat Premium 30</td>
<td>7.85</td>
<td>58.21%</td>
<td>9.90%</td>
<td>48.31%</td>
<td>0.00%</td>
<td>33.01%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>5.9999</td>
<td>10.00</td>
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<td>3.79</td>
<td>3.79</td>
<td>3.79</td>
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<td>5.02</td>
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<tr>
<td>Cleanup Solvent Acetone</td>
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<td>100.00%</td>
<td>0.00%</td>
<td>100.00%</td>
<td>0.00%</td>
<td>100.00%</td>
<td>100.00%</td>
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<td>0.00</td>
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### Total Potential to Emit (Worst Case Surface Coating + Cleanup Solvent)

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<tr>
<th>Material</th>
<th>Ethylbenzene Emissions (ton/yr)</th>
<th>Methanol Emissions (ton/yr)</th>
<th>Total HAP Emissions (ton/yr)</th>
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<td>Cleanup Solvent Acetone</td>
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</tr>
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</table>

### Total Potential to Emit (Worst Case Surface Coating + Cleanup Solvent) (unit/hour) 0.34 0.77 0.77

#### METHODOLOGY

- HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
- Surface coating materials listed are worst case materials.
## Appendix A: Emissions Calculations
### VOC and Particulate
From Surface Coating Operations

**Company Name:** Lake Area Designs, LLC  
**Source Address:** 1260 N. Detroit St., LaGrange, IN 46761  
**Operating Permit Number:** F087-37015-00678  
**SPR Number:** 087-43617-00678  
**Permit Writer:** William Altman

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Weight % Volatile (H2O &amp; Organics)</th>
<th>Weight % Water</th>
<th>Weight % Organics</th>
<th>Volume % Water</th>
<th>Volume % Non-Volatiles (solids)</th>
<th>Gal of Mat (gal/unit)</th>
<th>Maximum (unit/hour)</th>
<th>Maximum (gal/day)</th>
<th>Pounds VOC per gallon of coating less water</th>
<th>Pounds VOC per gallon of coating</th>
<th>Potential VOC pounds per hour</th>
<th>Potential VOC pounds per day</th>
<th>Potential VOC tons per year</th>
<th>Potential Particulate (ton/yr)</th>
<th>Potential lb VOC/gal solids</th>
<th>Transfer Efficiency</th>
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<td>26.82</td>
<td>638.84</td>
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<td>116.59</td>
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<tr>
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<tr>
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Total Potential to Emit (Worst Case Surface Coating + Cleanup Solvent) 26.62 638.84 116.59 4.67

### METHODOLOGY

#### VOC

- **Pounds of VOC per Gallon Coating less Water** = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
- **Pounds of VOC per Gallon Coating** = (Density (lb/gal) * Weight % Organics)
- **Potential VOC Pounds per Hour** = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
- **Potential VOC Pounds per Day** = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
- **Potential VOC Tons per Year** = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hrs/yr) * (1 ton/2000 lbs)

#### Particulate

- **Total HAP Emissions (ton/yr)** = (Pounds VOC per Gallon of Solids * (Volume % solids) / Total Weight % Volatiles) * (1-Transfer efficiency) * 8760 hrs/yr * (1 ton/2000 lbs)

### Total Potential to Emit

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<tbody>
<tr>
<td>Stain FS-17888</td>
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<td>0.0969</td>
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<td>0.00%</td>
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<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
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<tr>
<td>Topcoat Aristocoat</td>
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<td>1.74</td>
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</tbody>
</table>

Total Potential to Emit (Worst Case Surface Coating + Cleanup Solvent) 1.47 0.12 0.27 7.95 8.70

### METHODOLOGY

- **HAPS emission rate (ton/yr)** = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
- Surface coating materials listed are worst case materials.
## Appendix A: Emissions Calculations
### VOC and Particulate

#### From Surface Coating Operations

**Company Name:** Lake Area Designs, LLC  
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**SPR Number:** 087-43617-00678  
**Permit Writer:** William Altman

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Weight % Volatile (H2O &amp; Organics)</th>
<th>Weight % Water</th>
<th>Weight % Organics</th>
<th>Volume % Water</th>
<th>Volume % Non-Volatiles (solids)</th>
<th>Gal of Mat (gal/unit)</th>
<th>Maximum (unit/ hour)</th>
<th>Maximum (gal/day)</th>
<th>Pounds VOC per gallon of coating less water</th>
<th>Pounds VOC per gallon of coating</th>
<th>Potential VOC pounds per hour</th>
<th>Potential VOC pounds per day</th>
<th>Potential VOC tons per year</th>
<th>Particulate Potential (ton/yr)</th>
<th>VOC/gal solids</th>
<th>Transfer Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Spray Booth SB5</strong></td>
<td></td>
<td></td>
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<tr>
<td>Stain</td>
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<td>26.90%</td>
<td>70.36%</td>
<td>16.46%</td>
<td>1.90%</td>
<td>0.0399</td>
<td>12.00</td>
<td>25.89</td>
<td>6.01</td>
<td>1.90</td>
<td>2.05</td>
<td>49.10</td>
<td>8.96</td>
<td>0.54</td>
<td>105.51</td>
<td>65%</td>
</tr>
<tr>
<td>Precoated Sealer</td>
<td>7.40</td>
<td>76.99%</td>
<td>36.77%</td>
<td>40.22%</td>
<td>16.46%</td>
<td>1.90%</td>
<td>0.0399</td>
<td>12.00</td>
<td>25.89</td>
<td>4.55</td>
<td>2.72</td>
<td>2.94</td>
<td>70.45</td>
<td>12.88</td>
<td>2.82</td>
<td>16.53</td>
<td>65%</td>
</tr>
<tr>
<td>Aristocoat Topcoat 30</td>
<td>8.00</td>
<td>55.51%</td>
<td>0.00%</td>
<td>55.51%</td>
<td>16.46%</td>
<td>1.90%</td>
<td>0.0399</td>
<td>12.00</td>
<td>25.89</td>
<td>4.44</td>
<td>4.44</td>
<td>4.79</td>
<td>114.93</td>
<td>20.98</td>
<td>5.88</td>
<td>12.47</td>
<td>65%</td>
</tr>
<tr>
<td>Acetone</td>
<td>6.61</td>
<td>100.00%</td>
<td>100.00%</td>
<td>0.00%</td>
<td>100.00%</td>
<td>0.00%</td>
<td>0.0020</td>
<td>12.00</td>
<td>0.57</td>
<td>--</td>
<td>--</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>n/a</td>
<td>100%</td>
</tr>
</tbody>
</table>

**Total Potential to Emit (Worst Case Surface Coating + Cleanup Solvent):** 4.79 114.93 20.98 5.88

### METHODOLOGY

- **HAPS emission rate (tons/yr):** 
  \[
  \text{Density (lb/gal)} \times \text{Gal of Material (gal/unit)} \times \text{Maximum (units/hr)} \times \text{Weight % HAP} \times 8760 \text{ hrs/yr} \times 1 \text{ ton/2000 lbs}
  \]
- Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % Organics) / (Volume % solids)

**Total Potential to Emit (Worst Case Surface Coating + Cleanup Solvent):** 0.26 1.04 1.43 0.05 1.91

### METHODOLOGY

- **HAPS emission rate (tons/yr):** 
  \[
  \text{Density (lb/gal)} \times \text{Gal of Material (gal/unit)} \times \text{Maximum (units/hr)} \times \text{Weight % HAP} \times 8760 \text{ hrs/yr} \times 1 \text{ ton/2000 lbs}
  \]
- Surface coating materials listed are worst case materials.
Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Lake Area Designs, LLC
Source Address: 1260 N. Detroit St., LaGrange, IN 46761
Operating Permit Number: F087-37015-00678
SPR Number: 087-43617-00678
Permit Writer: William Altman

Spray Booth SB6

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Weight % Volatile (H20 &amp; Organics)</th>
<th>Weight % Water</th>
<th>Weight % Organics</th>
<th>Volume % Water</th>
<th>Volume % Non-Volatiles (solids)</th>
<th>Gal of Mat. (gal/unit)</th>
<th>Maximum (unit/hour)</th>
<th>Maximum (gal/day)</th>
<th>Pounds VOC per gallon of coating less water</th>
<th>Pounds VOC per gallon of coating</th>
<th>Potential VOC pounds per hour</th>
<th>Potential VOC pounds per day</th>
<th>Potential VOC tons per year</th>
<th>Particulate Potential (ton/yr)</th>
<th>VOC/gal solids</th>
<th>Transfer Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stain FS-17888</td>
<td>7.05</td>
<td>95.36%</td>
<td>68.46%</td>
<td>26.90%</td>
<td>68.46%</td>
<td>1.80%</td>
<td>0.0899</td>
<td>12.00</td>
<td>25.89</td>
<td>6.01</td>
<td>1.90</td>
<td>2.05</td>
<td>49.10</td>
<td>8.96</td>
<td>0.54</td>
<td>105.51</td>
<td>65%</td>
</tr>
<tr>
<td>Sealer Precatalyzed</td>
<td>7.40</td>
<td>76.99%</td>
<td>40.22%</td>
<td>30.77%</td>
<td>16.46%</td>
<td>0.0899</td>
<td>12.00</td>
<td>25.89</td>
<td>4.55</td>
<td>272</td>
<td>2.94</td>
<td>7.04</td>
<td>12.88</td>
<td>2.82</td>
<td>16.53</td>
<td>65%</td>
<td></td>
</tr>
<tr>
<td>Topcoat Aristocoat 30</td>
<td>8.00</td>
<td>55.51%</td>
<td>55.51%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>12.00</td>
<td>25.89</td>
<td>4.44</td>
<td>4.44</td>
<td>4.79</td>
<td>114.93</td>
<td>20.98</td>
<td>5.88</td>
<td>12.47</td>
<td>65%</td>
</tr>
<tr>
<td>Cleanup Solvent</td>
<td>6.61</td>
<td>100.00%</td>
<td>100.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>12.00</td>
<td>25.89</td>
<td>0.00</td>
<td>--</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>n/a</td>
<td>100%</td>
</tr>
</tbody>
</table>

Total Potential to Emit (Worst Case Surface Coating + Cleanup Solvent) 4.79 114.93 20.98 5.88

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)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1 - Weight % Volatiles) * (1 - Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

\[
Pounds\ VOC\ per\ Gallon\ of\ Solids = (Density\ (lbs/gal) * Weight\ %\ Organics) / (Volume\ % solids)
\]

Total Potential to Emit (Worst Case Surface Coating + Cleanup Solvent) 0.26 1.04 1.43 0.05 1.91

METHODOLOGY

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

Surface coating materials listed are worst case materials.
### Appendix A: Emissions Calculations

#### VOC and Particulate

From Surface Coating Operations

**Company Name:** Lake Area Designs, LLC  
**Source Address:** 1260 N. Detroit St., LaGrange, IN 46761  
**Operating Permit Number:** F087-37015-00678  
**SPR Number:** 087-43617-00678  
**Permit Writer:** William Altman

#### Spray Booth SB7

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Weight % Volatile (H2O &amp; Organics)</th>
<th>Weight % Water</th>
<th>Weight % Organics</th>
<th>Volume % Water</th>
<th>Volume % Non-Volatiles (solids)</th>
<th>Gal of Mat. (gal/unit)</th>
<th>Maximum (unit/hour)</th>
<th>Maximum (gal/day)</th>
<th>Pounds VOC per gallon of coating less water</th>
<th>Pounds VOC per gallon of coating</th>
<th>Potential VOC pounds per hour</th>
<th>Potential VOC pounds per day</th>
<th>Potential VOC tons per year</th>
<th>Particulate Potential (ton/yr)</th>
<th>lb VOC/gal solids</th>
<th>Transfer Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stain FS-17888 Stain</td>
<td>7.05</td>
<td>85.36%</td>
<td>68.46%</td>
<td>26.00%</td>
<td>68.46%</td>
<td>1.80%</td>
<td>0.0899</td>
<td>12.00</td>
<td>25.89</td>
<td>6.01</td>
<td>0.90</td>
<td>2.05</td>
<td>9.86</td>
<td>0.54</td>
<td>105.51</td>
<td>65%</td>
<td></td>
</tr>
<tr>
<td>Sealer Precatalyzed Sealer</td>
<td>7.40</td>
<td>76.99%</td>
<td>40.22%</td>
<td>36.77%</td>
<td>40.22%</td>
<td>16.45%</td>
<td>0.0899</td>
<td>12.00</td>
<td>25.89</td>
<td>4.55</td>
<td>2.72</td>
<td>2.94</td>
<td>70.45</td>
<td>12.86</td>
<td>2.82</td>
<td>16.53</td>
<td>65%</td>
</tr>
<tr>
<td>Topcoat Aristocoat Topcoat 30</td>
<td>8.00</td>
<td>55.51%</td>
<td>55.51%</td>
<td>0.00%</td>
<td>55.51%</td>
<td>0.00%</td>
<td>0.0899</td>
<td>12.00</td>
<td>25.89</td>
<td>4.44</td>
<td>4.44</td>
<td>4.79</td>
<td>114.93</td>
<td>20.98</td>
<td>5.88</td>
<td>12.47</td>
<td>65%</td>
</tr>
<tr>
<td>Cleanup Solvent Acetone</td>
<td>6.61</td>
<td>100.00%</td>
<td>100.00%</td>
<td>0.00%</td>
<td>100.00%</td>
<td>0.00%</td>
<td>0.0020</td>
<td>12.00</td>
<td>0.57</td>
<td>--</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>n/a</td>
</tr>
</tbody>
</table>

#### MethODOLOGY

**Total Potential to Emit (Worst Case Surface Coating + Cleanup Solvent):** 4.79 114.93 20.98 5.88

**METHODOLOGY**

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

Surface coating materials listed are worst case materials.
Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name:
Lake Area Designs, LLC

Source Address:
1260 N. Detroit St., LaGrange, IN 46761

Operating Permit Number:
F087-37015-00678

SPR Number:
087-43617-00678

Permit Writer:
William Altman

Spray Booth CSB8

Material | Density (lb/gal) | Gallons of Material (gal/unit) | Maximum cont/hr | Weight % Ethylbenzene | Ethylbenzene Emissions (ton/yr) | Weight % Xylenes | Xylenes Emissions (ton/yr) | Weight % Toluene | Toluene Emissions (ton/yr) | Weight % Formaldehyde | Formaldehyde Emissions (ton/yr) | Total HAP Emissions (ton/yr) |
--- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
Stain | FS-17888 Stain | 7.05 | 0.0899 | 3.00 | 0.07 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
Sealer | Precatalyzed Sealer | 7.40 | 0.0899 | 3.00 | 0.07 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
Topcoat | Aristocoat Topcoat 30 | 8.00 | 0.0899 | 3.00 | 0.07 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
Cleanup Solvent | Acetone | 6.61 | 0.0020 | 3.00 | 0.07 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

Total Potential to Emit (Worst Case Surface Coating + Cleanup Solvent):
- Ethylbenzene: 0.07 tons/yr
- Xylenes: 0.26 tons/yr
- Toluene: 0.13 tons/yr
- Formaldehyde: 0.01 tons/yr
- Total HAP: 0.82 tons/yr

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

Surface coating materials listed are worst case materials.
### Appendix A: Emissions Calculations

#### Natural Gas Combustion Only

**MM BTU/HR <100**

| Company Name: | Lake Area Designs, LLC |
| Source Address: | 1260 N. Detroit St., LaGrange, IN 46761 |
| Operating Permit Number: | F087-37015-00678 |
| SPR Number: | 087-43617-00678 |
| Permit Writer: | William Altman |

#### Heat Input Capacity

<table>
<thead>
<tr>
<th>Unit</th>
<th>Heat Input Capacity (MMBtu/hr)</th>
<th>Potential Throughput</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plt. 1 Space Heating Units</td>
<td>0.60</td>
<td>10 units at 0.06 MMBtu/hr each</td>
</tr>
<tr>
<td>Plt. 2 Space Heating Units</td>
<td>0.16</td>
<td>2 units at 0.08 MMBtu/hr each</td>
</tr>
<tr>
<td>Plt. 2 Space Heating Unit</td>
<td>0.06</td>
<td>1 unit at 0.06 MMBtu/hr</td>
</tr>
<tr>
<td>Plt. 3 Space Heating Unit</td>
<td>4.54</td>
<td>1 unit at 4.54 MMBtu/hr</td>
</tr>
<tr>
<td>Office Space Heating Unit</td>
<td>0.04</td>
<td>1 unit at 0.04 MMBtu/hr</td>
</tr>
<tr>
<td>Air Make Up Unit</td>
<td>4.54</td>
<td>1 unit at 4.54 MMBtu/hr</td>
</tr>
</tbody>
</table>

#### Pollutant Emission Factor in lb/MMCF

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>PM*</th>
<th>PM10*</th>
<th>direct PM2.5*</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMCF</td>
<td>1.9</td>
<td>7.6</td>
<td>7.6</td>
<td>0.6</td>
<td>100</td>
<td>5.5</td>
<td>84</td>
</tr>
</tbody>
</table>

**PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined. PM2.5 emission factor is filterable and condensable PM2.5 combined.**

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

#### Methodology

All emission factors are based on normal firing.

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

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

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

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

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

#### HAPS Calculations

**HAPS - Organics**

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

**Potential Emission in tons/yr**

| 9.0E-05                   | 5.1E-05 | 3.2E-03         |

**Total - Organics**

| 0.08|

**HAPS - Metals**

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

**Potential Emission in tons/yr**

| 2.1E-05 | 4.7E-05 | 6.0E-05 | 1.6E-05 | 9.0E-05 |

**Total HAPs**

| 0.00|

**Worst HAP**

| 0.08|

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
Fugitive Dust Emissions - Paved Roads

Company Name: Lake Area Designs, LLC
Source Address: 1260 N. Detroit St., LaGrange, IN 46761
Operating Permit Number: F087-37015-00678
SPR Number: 087-43617-00678
Permit Writer: William Altman

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

Vehicle Information (provided by source)

<table>
<thead>
<tr>
<th>Type</th>
<th>Maximum number of vehicles per day</th>
<th>Number of one-way trips per day per vehicle</th>
<th>Maximum trips per day (trip/day)</th>
<th>Maximum Weight Loaded per day (tons/trip)</th>
<th>Total Weight driven per day (ton/day)</th>
<th>Maximum one-way distance (feet/trip)</th>
<th>Maximum one-way distance (miles/trip)</th>
<th>Maximum one-way miles (miles/day)</th>
<th>Maximum one-way miles (miles/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle (entering plant)</td>
<td>10.0</td>
<td>10.0</td>
<td>10.0</td>
<td>15.0</td>
<td>150.0</td>
<td>175</td>
<td>0.033</td>
<td>0.3</td>
<td>121.0</td>
</tr>
<tr>
<td>Vehicle (leaving plant)</td>
<td>10.0</td>
<td>10.0</td>
<td>10.0</td>
<td>15.0</td>
<td>150.0</td>
<td>175</td>
<td>0.033</td>
<td>0.3</td>
<td>121.0</td>
</tr>
<tr>
<td>Totals</td>
<td>10.0</td>
<td></td>
<td></td>
<td></td>
<td>150.0</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Average Vehicle Weight Per Trip = 15.0 tons/trip
Average Miles Per Trip = 0.03 miles/trip

Unmitigated Emission Factor, $Ef = [k * (sL)^0.91 * (W)^1.02]$ (Equation 1 from AP-42 13.2.1)

<table>
<thead>
<tr>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.011</td>
<td>0.0022</td>
<td>0.00054</td>
</tr>
</tbody>
</table>

$W = 15.0$ tons = average vehicle weight (provided by source)
$sL = 9.7$ g/m² = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3

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

<table>
<thead>
<tr>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.25</td>
<td>0.252</td>
<td>0.0618</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Process</th>
<th>Unmitigated PTE of PM (tons/yr)</th>
<th>Unmitigated PTE of PM10 (tons/yr)</th>
<th>Unmitigated PTE of PM2.5 (tons/yr)</th>
<th>Mitigated PTE of PM (tons/yr)</th>
<th>Mitigated PTE of PM10 (tons/yr)</th>
<th>Mitigated PTE of PM2.5 (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle (entering plant)</td>
<td>0.08</td>
<td>0.02</td>
<td>0.00</td>
<td>0.08</td>
<td>0.02</td>
<td>0.00</td>
</tr>
<tr>
<td>Vehicle (leaving plant)</td>
<td>0.08</td>
<td>0.02</td>
<td>0.00</td>
<td>0.08</td>
<td>0.02</td>
<td>0.00</td>
</tr>
<tr>
<td>Totals</td>
<td>0.17</td>
<td>0.03</td>
<td>0.01</td>
<td>0.15</td>
<td>0.03</td>
<td>0.01</td>
</tr>
</tbody>
</table>

Methodology

- Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
- Maximum one-way distance (miles/day) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
- Average Vehicle Weight Per Trip (ton/trip) = [SUM(Total Weight driven per day (ton/day))] / [SUM(Maximum trips per day (trip/day))]
- Average Miles Per Trip (miles/trip) = [SUM(Maximum one-way miles (miles/day))] / [SUM(Maximum trips per day (trip/day))]
- Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
- Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
- Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] * [1 - Dust Control Efficiency]
January 25, 2021

Danny Wingard  
Lake Area Designs LLC  
PO Box 298  
Lagrange IN 46761

Re: Public Notice  
Lake Area Designs, LLC  
Permit Level: FESOP Significant Permit Rev  
(Minor PSD/EO) (120)  
Permit Number: 087-43617-00678

Dear Danny Wingard:

Enclosed is the Notice of 30-Day Period for Public Comment for your draft air permit.

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 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 preliminary findings, including the draft permit, technical support document, emission calculations, and other supporting documents, are available electronically at:

IDEM’s online searchable database: [http://www.in.gov/apps/idem/caats/](http://www.in.gov/apps/idem/caats/) . Choose Search Option by Permit Number, then enter permit 43617

and

IDEM’s Virtual File Cabinet (VFC): [http://www.IN.gov/idem](http://www.IN.gov/idem) . Enter VFC in the search box, then search for permit documents using a variety of criteria, such as Program area, date range, permit #, Agency Interest Number, or Source ID.

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](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 LaGrange County Public Library, 203 W Spring St, Lagrange IN 46761-1899. 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 draft permit 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 William Altman, 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 3-9664 or dial (317) 233-9664.

Sincerely,

L. Pogost

L. Pogost
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter access via website 8/10/2020
January 25, 2021

To: LaGrange County Public Library 203 W Spring St Lagrange IN 46761-1899

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: Lake Area Designs, LLC
Permit Number: 087-43617-00678

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

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

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

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

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

Enclosures
PN Library updated 4/2019
Notice of Public Comment

January 25, 2021
Lake Area Designs, LLC
087-43617-00678

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.
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<th>Article Number</th>
<th>Name, Address, Street and Post Office Address</th>
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<td>Danny Wingard, Lake Area Designs LLC PO Box 298, Lagrange IN 46761 (Source CAATS)</td>
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<td>Mr. Doug Elliott, D &amp; B Environmental Services, Inc., 401 Lincoln Way, West Osceola IN 46561 (Consultant)</td>
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<td>LaGrange Town Council, 1201 N Townline Road, LaGrange IN 46761 (Local Official)</td>
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<td>Bobiyya Real Estate, Inc., 6329 Shady Creek Ct, Fort Wayne IN 46814 (Affected Party)</td>
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**Mail Code 61-53**

**Name and address of Sender**: IDEM Staff, LPOGOST 1/25/2021

**Name and address of Sender**: Lake Area Designs LLC, 087-43617-00678 draft/

**Type of Mail**: CERTIFICATE OF MAILING ONLY

**Destination Address**: Indiana Department of Environmental Management, Office of Air Quality – Permits Branch, 100 N. Senate, Indianapolis, IN 46204

**Postage**: 

**Handing Charges**: 

**Act. Value (If Registered)**:  

**Insured Value**:  

**Due Send if COD**:  

**R.R. Fee**:  

**S.D. Fee**:  

**S.H. Fee**:  

**Remarks**:  

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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 mail 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 insured and COD mail. See *International Mail Manual* for limitations of coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.