



Indiana Department of Environmental Management

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

To: Interested Parties

Date: December 19, 2016

From: Matthew Stuckey, Chief
Permits Branch
Office of Air Quality

Source Name: American Woodmark Corporation

Permit Level: Title V Significant Permit Modification

Permit Number: 053-37603-00058

Source Location: 5300 Eastside Parkway Dr Gas City IN 46933

Type of Action Taken: Modification at an existing source

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the matter referenced above.

The final decision is available on the IDEM website at: <http://www.in.gov/apps/idem/caats/>
To view the document, select Search option 3, then enter permit 37603.

If you would like to request a paper copy of the permit document, please contact IDEM's central file room:

Indiana Government Center North, Room 1201
100 North Senate Avenue, MC 50-07
Indianapolis, IN 46204
Phone: 1-800-451-6027 (ext. 4-0965)
Fax (317) 232-8659

Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

(continues on next page)

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.



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Michael R. Pence
Governor

Carol S. Comer
Commissioner

Brian Campbell
American Woodmark Corporation
5300 East Side Parkway Drive
Gas City, Indiana 46933

December 19, 2016

Re: 053-37603-00058
Significant Permit Modification to
Part 70 Renewal T053-32368-00058

Dear Mr. Campbell:

American Woodmark Corporation was issued a Part 70 Permit Renewal No. T053-32368-00058 on February 5, 2013 for a stationary wood kitchen cabinet and countertop manufacturing source located at source 5300 East Side Parkway Drive, Gas City, Indiana 46933. An application requesting changes to this permit was received on September 9, 2016. Pursuant to the provisions of 326 IAC 2-7-12, a Significant Permit Modification to this permit is hereby approved as described in the attached Technical Support Document.

Please find attached the entire Part 70 Operating Permit as modified. The permit references Attachment A for 40 CFR 63, Subpart JJ, NESHAP for Wood Furniture Manufacturing Operations. Since this attachment has been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of this attachment with this modification.

Previously issued approvals for this source containing these attachments are available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. Federal rules under Title 40 of United States Code of Federal Regulations may also be found on the U.S. Government Printing Office's Electronic Code of Federal Regulations (eCFR) website, located on the Internet at: http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab_02.tpl.

A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Allen Reimer of my staff, at 317-233-0863 or 1-800-451-6027, and ask for extension 3-0863.

Sincerely,

Nathan C. Bell, Section Chief
Permits Branch
Office of Air Quality

Attachment(s): Modified Permit, Technical Support Document and Appendix A
NB/AR

cc: File - Grant County
Grant County Health Department
U.S. EPA, Region 5
Compliance and Enforcement Branch



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Commissioner

Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**American Woodmark Corporation
5300 Eastside Parkway Drive
Gas City, Indiana 46933**

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

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

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

Operation Permit No. T053-32368-00058	
Original Issued by: Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: February 5, 2013 Expiration Date: February 5, 2018

Administrative Amendment No. 053-34727-00058, issued August 11, 2014;
Administrative Amendment No. 053-34978-00058, issued November 14, 2014; and
Administrative Amendment No. 053-35440-00058, issued May 7, 2015

Significant Permit Modification No. 053-37603-00058	
Issued by:  Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: December 19, 2016 Expiration Date: February 5, 2018

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

SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary wood kitchen cabinet and countertop manufacturing source.

Source Address:	5300 Eastside Parkway Drive, Gas City, Indiana 46933
General Source Phone Number:	(765) 667-1690
SIC Code:	2434
County Location:	Grant
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under PSD Rules Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(15)]

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

- (a) One (1) Finishing Line 1 (Main Line), constructed in 2000, consisting of the following units:
- (1) One (1) roller coater, identified as EU-17, with a maximum capacity of 17 gallons per hour.
 - (2) Seven (7) spray booths, five (5) which, identified as EU-1-3, EU-1-15, EU-1-18, EU-1-23, and EU-1-28, utilize air assisted airless spray application, are controlled by a water wash system, and two (2) which, identified as EU-1-9 and EU-1-11, utilize HVLP spray application techniques, are controlled by dry filters. Each booth has a capacity of seventeen (17) gallons per hour. All seven (7) spray booths are vented to a common thermal oxidizer, identified as CD-01, with a total heat input capacity of eleven (11) million British thermal units per hour. If the thermal oxidizer is not in operation, the seven (7) spray booths can vent to stacks S-EU-1-15, S-EU-1-18, S-EU-1-23, S-EU-1-28, S-EU-1-3, S-EU-1-9, and S-EU-1-11, respectively.
 - (3) One (1) stain wiping machine, identified as EU-1-4, with a maximum capacity of 17 gallons per hour, and vented to the thermal oxidizer, identified as CD-01. If the thermal oxidizer is not in operation, the one (1) stain wiping machine can vent to stack S-EU-1-3.
 - (4) Seven (7) ovens (hot water to air heat exchangers), identified as EU-1-5, EU-1-10, EU-1-13, EU-1-16, EU-1-19, EU-1-24, and EU-1-29, powered by the insignificant heaters, all vented back to the spray booths, with cool down sections on four (4) of the ovens vented to the atmosphere. Ovens EU-1-16, EU-1-19, EU-1-24, and EU-1-29 vent to stacks S-EU-1-16, S-EU-1-19, S-EU-1-24, and S-EU-1-29, respectively. The air flow from the remaining ovens is sent back to the

booth preceding the oven and used as a part of the air necessary for the spraying process.

Under 40 CFR Part 63, Subpart JJ, Finishing Line 1 is considered an affected facility.

- (b) One (1) Finishing Line 2, constructed in 2000 and modified in 2002 to increase capacity, with a maximum capacity of 4,000 pounds of wood components per hour, consisting of the following units:
- (1) Three (3) spray booths, identified as EU-2-12, EU-2-19 and EU-2-24, one which, identified as EU-2-12, is controlled by dry filters and utilizes HVLP spray application techniques, with a maximum capacity of eight (8) gallons of coating per hour, and two (2) which, identified as EU-2-19, and EU-2-24, are controlled by water washes, each with a maximum capacity of eight (8) gallons of coating per hour and one (1) gallon of cleaner per hour, utilizing air assisted airless spray application techniques. All three (3) spray booths are vented to a common thermal oxidizer, identified as CD-01, which is also used to control emissions from Finishing Line 1, with a total heat input capacity of eleven (11) million British thermal units per hour. If the thermal oxidizer is not in operation, the three (3) spray booths can vent to the atmosphere through stacks S-EU-2-12, S-EU-2-19 and S-EU-2-24, respectively.
 - (2) One (1) roller coater, identified as EU-2-14, with a maximum capacity of 0.5 gallons of coating per hour, with emissions vented back to spray booth EU-2-12.
 - (3) Three (3) ovens (hot water to air heat exchangers), identified as EU-2-16, EU-2-19, and EU-2-24, powered by the insignificant heaters, constructed in 2009, all vented back to the spray booths EU-2-12, EU-2-19, and EU-2-24, respectively, with cool down sections for EU-2-19 and EU-2-24 vented to the atmosphere via stacks S-EU-2-19 and S-EU-2-24, respectively.
 - (4) One (1) ultraviolet light oven, constructed in 2009, vented outside the building through stack S-EU-2-15.

Under 40 CFR Part 63, Subpart JJ, Finishing Line 2 is considered an affected facility.

- (c) One (1) Finishing Line 3 (Expedite System), consisting of the following units:
- (1) One (1) spray booth, identified as EU-3-2, with a maximum capacity of 2.6 gallons per hour, constructed in 2000, utilizing HVLP spray application techniques, controlled by a dry filter, vented to stack S-EU-3-2.
 - (2) One (1) oven (hot water to air heat exchanger), constructed in 2008, identified as EU-3-3, powered by the insignificant heaters, and one (1) infrared light oven, constructed in 2009, both vented to stack S-EU-3-3.

Under 40 CFR Part 63, Subpart JJ, Finishing Line 3 is considered an affected facility.

- (d) Two (2) woodworking operations, associated with two (2) finishing lines as follows:
- (1) One (1) woodworking operation associated with Finishing Line 1, constructed in 2000, with a maximum capacity of 4,000 pounds per hour, consisting of five (5) panel cleaning machines, two (2) hand sand conveyors, and five (5) automated sanding machines, with particulate emissions controlled by a baghouse (BH-2) which is vented inside or outside of the building through stacks S-EU-BH-2-A and S-EU-BH-2-B.

- (2) One (1) woodworking operation associated with Finishing Line 2, constructed in 2000 and modified in 2002, with a maximum capacity of 4,000 pounds of wood cabinet components per hour, with particulate emissions controlled by a baghouse (BH-3), vented inside or outside of the building through stack S-EU-BH-3.
- (e) One (1) woodworking operation, not directly associated with Finishing Lines 1 or 2, constructed in 2000, with a maximum capacity of 1.25 tons per hour, with particulate emissions controlled by a baghouse (BH-1), which is vented inside or outside of the building through stack S-EU-BH-1.
- (f) One (1) Framing Line, consisting of the following units:
 - (1) Four (4) edge stain manual spray booths, identified as ESB1, ESB2, ESB3 and ESB4, approved in 2012 for construction, utilizing high volume low pressure (HVLP) coating application method, using dry filters for particulate control, each booth with a capacity of 2.0 gallons of coating per hour, vented to stacks S-ESB1, S-ESB2, S-ESB3 and S-ESB4, respectively.
 - (2) Two (2) pairs of back stain single roller coaters (push-in/out - cannot be operated at the same time), identified as BCC1 through BCC4, approved in 2012 for construction, with a total maximum capacity of 4.0 gallons of coating per hour.
 - (3) One (1) pair of face tone double roller coaters (push-in/out - cannot be operated at the same time), identified as FTC1 and FTC2, approved in 2012 for construction, with a total maximum capacity of 4.0 gallons of coating per hour.
 - (4) One (1) pair of brush stain single roller coaters (push-in/out - cannot be operated at the same time), identified as BSC1 and BSC2, approved in 2012 for construction, with a total maximum capacity of 2.0 gallons of coating per hour.
 - (5) One (1) pair of brush stain double roller coaters (push-in/out - cannot be operated at the same time), identified as BSC3 and BSC4, approved in 2012 for construction, with a total maximum capacity of 4.0 gallons of coating per hour.
 - (6) Three (3) pairs of sealer single roller coaters (push-in/out - cannot be operated at the same time), identified as SC1 through SC6, approved in 2012 for construction, with a total maximum capacity of 0.75 gallons of coating per hour.
 - (7) One (1) pair of top coat double roller coaters (push-in/out - cannot be operated at the same time), identified as TCC1 and TCC2, approved in 2012 for construction, with a total maximum capacity of 0.5 gallons of coating per hour.
 - (8) One (1) top coat Roll Coating unit, identified as TCC3, approved in 2012 for construction, with a total maximum capacity of 0.5 gallons of coating per hour.
 - (9) Two (2) direct fired natural gas ovens, identified as ESBO1 and ESBO2, with a combined heat rating of 0.96 MMBtu per hour, vented to stacks S-ESBO1 and S-ESBO2, respectively.
 - (10) One (1) sanding operation, consisting of 3 sanders, identified as SAND, approved in 2012 for construction, having a maximum capacity of less than 3.74 tons per hour, with emissions controlled by a baghouse (BH-4), and exhausting inside or outside of the building through stack S-EU-BH-4.
 - (11) Six (6) UV curing lamps, identified as CL1 through CL6, approved in 2012 for construction.

- (12) One (1) cooling tunnel, approved in 2012 for construction.
- (13) One (1) pair of back stain single roller coaters (push-in/out - cannot be operated at the same time), identified as BCC5 and BCC6, with a total maximum capacity of 0.1875 gallons per hour.
- (14) One (1) pair of top coat single roller coaters push-in/out - cannot be operated at the same time), identified as TCC4 and TCC5, with a total maximum capacity of 0.1875 gallon per hour.
- (15) One (1) base single roller coater (push-in/out - cannot be operated at the same time), identified as BCC7, approved in 2016 for construction, with a total maximum capacity of 0.5 gallons of coating per hour.
- (16) One (1) sealer single roller coater (push-in/out - cannot be operated at the same time), identified as SC7, approved in 2016 for construction, with a total maximum capacity of 0.5 gallons of coating per hour.
- (17) One (1) pair of top coat double roller coaters (push-in/out - cannot be operated at the same time), identified as TCC6 and TCC7, approved in 2016 for construction, with a total maximum capacity of 0.5 gallons of coating per hour.

Under 40 CFR Part 63, Subpart JJ, the Framing Line is considered an affected facility.

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour:
- (b) Three (3) natural gas-fired water heaters, constructed in 1999, with a combined capacity of 9.6 million British thermal units per hour [326 IAC 6-2-4]
- (c) Finishing Room touch-up and repair operations, including the following:
 - (1) Woodworking, including sanding and shaping, with a maximum throughput of 420 pounds of wood products per hour, with particulate emissions controlled using downdraft tables equipped with particulate filtration systems, and exhausting inside the building; and
 - (2) Touch-up coating, with a maximum aerosol coating usage rate of 0.078 gallons per hour, with particulate emissions controlled using downdraft tables equipped with particulate filtration systems, and exhausting inside the building.

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

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

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

- (c) It is an affected source under Title IV (Acid Deposition Control) of the Clean Air Act, as defined in 326 IAC 2-7-1(3);

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, T053-32368-00058, 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 or of permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control).
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:
- (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(34), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(34).

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

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

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

and

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

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

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, 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

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

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

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

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

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

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

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

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

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

be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

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

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

- (a) All terms and conditions of permits established prior to T053-32368-00058 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit, except for permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control)

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

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

B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12][40 CFR 72]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Pursuant to 326 IAC 2-7-11(b) and 326 IAC 2-7-12(a), administrative Part 70 operating permit amendments and permit modifications for purposes of the acid rain portion of a Part 70 permit shall be governed by regulations promulgated under Title IV of the Clean Air Act. [40 CFR 72]
- (c) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

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

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (c) without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

- (4) The Permittee notifies the:

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

and

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

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

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

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

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

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

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.
- (f) This condition does not apply to emission trades of SO₂ or NO_x under 326 IAC 21 or 326 IAC 10-4.

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

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

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

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

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

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

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

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)][40 CFR 64][326 IAC 3-8]

- (a) For new units:

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

- (b) For existing units:

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

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) For monitoring required by CAM, at all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

- (d) For monitoring required by CAM, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the Permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

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

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

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

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

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

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

C.12 Risk Management Plan [326 IAC 2-7-5(12)][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 [40 CFR 64][326 IAC 3-8][326 IAC 2-7-5][326 IAC 2-7-6]

- (l) Upon detecting an excursion where a response step is required by the D Section, or an exceedance of a limitation, not subject to CAM, 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.
- (II)
 - (a) *CAM Response to excursions or exceedances.*
 - (1) Upon detecting an excursion or exceedance, subject to CAM, the Permittee shall restore operation of the pollutant-specific emissions unit (including the 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 emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
 - (2) 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, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.
 - (b) If the Permittee identifies a failure to achieve compliance with an emission limitation, subject to CAM, or standard, subject to CAM, for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the Permittee shall promptly notify the IDEM, OAQ and, if necessary, submit a proposed significant permit modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

- (c) Based on the results of a determination made under paragraph (II)(a)(2) of this condition, the EPA or IDEM, OAQ may require the Permittee to develop and implement a Quality Improvement Plan (QIP). The Permittee shall develop and implement a QIP if notified to in writing by the EPA or IDEM, OAQ.
- (d) Elements of a QIP:
The Permittee shall maintain a written QIP, if required, and have it available for inspection. The plan shall conform to 40 CFR 64.8 b (2).
- (e) If a QIP is required, the Permittee shall develop and implement a QIP as expeditiously as practicable and shall notify the IDEM, OAQ if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.
- (f) Following implementation of a QIP, upon any subsequent determination pursuant to paragraph (II)(a)(2) of this condition the EPA or the IDEM, OAQ may require that the Permittee make reasonable changes to the QIP if the QIP is found to have:
 - (1) Failed to address the cause of the control device performance problems;
or
 - (2) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (g) Implementation of a QIP shall not excuse the Permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.
- (h) *CAM recordkeeping requirements.*
 - (1) The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to paragraph (II)(c) of this condition and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this condition (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.
 - (2) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements

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

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ

that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline

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

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

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

The statement must be submitted to:

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

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

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

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

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

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

makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.
- (c) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A), 326 IAC 2-2-8 (b)(6)(B), 326 IAC 2-3-2 (l)(6)(A), and/or 326 IAC 2-3-2 (l)(6)(B)) that a "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:
 - (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(pp)(2)(A)(iii) and/or 326 IAC 2-3-1 (kk)(2)(A)(iii); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (d) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A) and/or 326 IAC 2-3-2 (l)(6)(A)) that a "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:
 - (1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
 - (2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)][326 IAC 2-1.1-11][326 IAC 2-2][40 CFR 64][326 IAC 3-8]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B -Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:
- Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (e) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (oo) and/or 326 IAC 2-3-1 (jj)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
- (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (ww) and/or 326 IAC 2-3-1 (pp), for that regulated NSR pollutant, and
- (2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).
- (f) The report for project at an existing emissions unit shall be submitted no later than sixty (60) days after the end of the year and contain the following:
- (1) The name, address, and telephone number of the major stationary source.
- (2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.

- (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
- (4) Any other information that the Permittee wishes to include in this report such as an explanation as to why the emissions differ from the preconstruction projection.

Reports required in this part 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

- (g) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) Finishing Line 1 (Main Line), constructed in 2000, consisting of the following units:
- (1) One (1) roller coater, identified as EU-17, with a maximum capacity of 17 gallons per hour.
 - (2) Seven (7) spray booths, five (5) which, identified as EU-1-3, EU-1-15, EU-1-18, EU-1-23, and EU-1-28, utilize air assisted airless spray application, are controlled by a water wash system, and two (2) which, identified as EU-1-9 and EU-1-11, utilize HVLP spray application techniques, are controlled by dry filters. Each booth has a capacity of seventeen (17) gallons per hour. All seven (7) spray booths are vented to a common thermal oxidizer, identified as CD-01, with a total heat input capacity of eleven (11) million British thermal units per hour. If the thermal oxidizer is not in operation, the seven (7) spray booths can vent to stacks S-EU-1-15, S-EU-1-18, S-EU-1-23, S-EU-1-28, S-EU-1-3, S-EU-1-9, and S-EU-1-11, respectively.
 - (3) One (1) stain wiping machine, identified as EU-1-4, with a maximum capacity of 17 gallons per hour, and vented to the thermal oxidizer, identified as CD-01. If the thermal oxidizer is not in operation, the one (1) stain wiping machine can vent to stack S-EU-1-3.
 - (4) Seven (7) ovens (hot water to air heat exchangers), identified as EU-1-5, EU-1-10, EU-1-13, EU-1-16, EU-1-19, EU-1-24, and EU-1-29, powered by the insignificant heaters, all vented back to the spray booths, with cool down sections on four (4) of the ovens vented to the atmosphere. Ovens EU-1-16, EU-1-19, EU-1-24, and EU-1-29 vent to stacks S-EU-1-16, S-EU-1-19, S-EU-1-24, and S-EU-1-29, respectively. The air flow from the remaining ovens is sent back to the booth preceding the oven and used as a part of the air necessary for the spraying process.
- Under 40 CFR Part 63, Subpart JJ, Finishing Line 1 is considered an affected facility.
- (b) One (1) Finishing Line 2, constructed in 2000 and modified in 2002 to increase capacity, with a maximum capacity of 4,000 pounds of wood components per hour, consisting of the following units:
- (1) Three (3) spray booths, identified as EU-2-12, EU-2-19 and EU-2-24, one which, identified as EU-2-12, is controlled by dry filters and utilizes HVLP spray application techniques, with a maximum capacity of eight (8) gallons of coating per hour, and two (2) which, identified as EU-2-19, and EU-2-24, are controlled by water washes, each with a maximum capacity of eight (8) gallons of coating per hour and one (1) gallon of cleaner per hour, utilizing air assisted airless spray application techniques. All three (3) spray booths are vented to a common thermal oxidizer, identified as CD-01, which is also used to control emissions from Finishing Line 1, with a total heat input capacity of eleven (11) million British thermal units per hour. If the thermal oxidizer is not in operation, the three (3) spray booths can vent to the atmosphere through stacks S-EU-2-12, S-EU-2-19 and S-EU-2-24, respectively.
 - (2) One (1) roller coater, identified as EU-2-14, with a maximum capacity of 0.5 gallons of coating per hour, with emissions vented back to spray booth EU-2-12.

- (3) Three (3) ovens (hot water to air heat exchangers), identified as EU-2-16, EU-2-19, and EU-2-24, powered by the insignificant heaters, constructed in 2009, all vented back to the spray booths EU-2-12, EU-2-19, and EU-2-24, respectively, with cool down sections for EU-2-19 and EU-2-24 vented to the atmosphere via stacks S-EU-2-19 and S-EU-2-24, respectively.
- (4) One (1) ultraviolet light oven, constructed in 2009, vented outside the building through stack S-EU-2-15.

Under 40 CFR Part 63, Subpart JJ, Finishing Line 2 is considered an affected facility.

- (c) One (1) Finishing Line 3 (Expedite System), consisting of the following units:

- (1) One (1) spray booth, identified as EU-3-2, with a maximum capacity of 2.6 gallons per hour, constructed in 2000, utilizing HVLP spray application techniques, controlled by a dry filter, vented to stack S-EU-3-2.
- (2) One (1) oven (hot water to air heat exchanger), constructed in 2008, identified as EU-3-3, powered by the insignificant heaters, and one (1) infrared light oven, constructed in 2009, both vented to stack S-EU-3-3.

Under 40 CFR Part 63, Subpart JJ, Finishing Line 3 is considered an affected facility.

- (f) One (1) Framing Line, consisting of the following units:

- (1) Four (4) edge stain manual spray booths, identified as ESB1, ESB2, ESB3 and ESB4, approved in 2012 for construction, utilizing high volume low pressure (HVLP) coating application method, using dry filters for particulate control, each booth with a capacity of 2.0 gallons of coating per hour, vented to stacks S-ESB1, S-ESB2, S-ESB3 and S-ESB4, respectively.
- (2) Two (2) pairs of back stain single roller coaters (push-in/out - cannot be operated at the same time), identified as BCC1 through BCC4, approved in 2012 for construction, with a total maximum capacity of 4.0 gallons of coating per hour.
- (3) One (1) pair of face tone double roller coaters (push-in/out - cannot be operated at the same time), identified as FTC1 and FTC2, approved in 2012 for construction, with a total maximum capacity of 4.0 gallons of coating per hour.
- (4) One (1) pair of brush stain single roller coaters (push-in/out - cannot be operated at the same time), identified as BSC1 and BSC2, approved in 2012 for construction, with a total maximum capacity of 2.0 gallons of coating per hour.
- (5) One (1) pair of brush stain double roller coaters (push-in/out - cannot be operated at the same time), identified as BSC3 and BSC4, approved in 2012 for construction, with a total maximum capacity of 4.0 gallons of coating per hour.
- (6) Three (3) pairs of sealer single roller coaters (push-in/out - cannot be operated at the same time), identified as SC1 through SC6, approved in 2012 for construction, with a total maximum capacity of 0.75 gallons of coating per hour.

- (7) One (1) pair of top coat double roller coaters (push-in/out - cannot be operated at the same time), identified as TCC1 and TCC2, approved in 2012 for construction, with a total maximum capacity of 0.5 gallons of coating per hour.
- (8) One (1) top coat Roll Coating unit, identified as TCC3, approved in 2012 for construction, with a total maximum capacity of 0.5 gallons of coating per hour.
- (9) Two (2) direct fired natural gas ovens, identified as ESBO1 and ESBO2, with a combined heat rating of 0.96 MMBtu per hour, vented to stacks S-ESBO1 and S-ESBO2, respectively.
- (10) One (1) sanding operation, consisting of 3 sanders, identified as SAND, approved in 2012 for construction, having a maximum capacity of less than 3.74 tons per hour, with emissions controlled by a baghouse (BH-4), and exhausting inside or outside of the building through stack S-EU-BH-4.
- (11) Six (6) UV curing lamps, identified as CL1 through CL6, approved in 2012 for construction.
- (12) One (1) cooling tunnel, approved in 2012 for construction.
- (13) One (1) pair of back stain single roller coaters (push-in/out - cannot be operated at the same time), identified as BCC5 and BCC6, with a total maximum capacity of 0.1875 gallons per hour.
- (14) One (1) pair of top coat single roller coaters push-in/out - cannot be operated at the same time), identified as TCC4 and TCC5, with a total maximum capacity of 0.1875 gallon per hour.
- (15) One (1) base single roller coater (push-in/out - cannot be operated at the same time), identified as BCC7, approved in 2016 for construction, with a total maximum capacity of 0.5 gallons of coating per hour.
- (16) One (1) sealer single roller coater (push-in/out - cannot be operated at the same time), identified as SC7, approved in 2016 for construction, with a total maximum capacity of 0.5 gallons of coating per hour.
- (17) One (1) pair of top coat double roller coaters (push-in/out - cannot be operated at the same time), identified as TCC6 and TCC7, approved in 2016 for construction, with a total maximum capacity of 0.5 gallons of coating per hour.

Under 40 CFR Part 63, Subpart JJ, the Framing Line is considered an affected facility.

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

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

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

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one 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 Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.2 VOC PSD Minor Limit [326 IAC 2-2]

Pursuant to permit number T053-14234-00058, issued on December 9, 2002, the VOC input to Finishing Lines 1, 2, and 3, shall be limited to less than one thousand seven hundred and seventeen (1,717) tons per twelve (12) consecutive month period including coatings, dilution solvents, and cleaning solvents, with compliance determined at the end of each month. The following equations shall be used to calculate the total VOC input:

- (a) If thermal oxidizer is in operation:
$$\text{VOC input (ton/year)} = \text{VOC input (ton) to Finishing Line 1} + \text{VOC input (ton) to Finishing Line 2} + (6.9 * \text{VOC input (ton) to Finishing Line 3}) < 1,717 \text{ ton/yr}$$
- (b) If thermal oxidizer is not in operation:
$$\text{VOC input (ton/year)} = (6.9 * \text{VOC input (ton) to Finishing Line 1}) + (6.9 * \text{VOC input (ton) to Finishing Line 2}) + (6.9 * \text{VOC input (ton) to Finishing Line 3}) < 1,717 \text{ ton/yr}$$

Compliance with this VOC limit, combined with the emissions from the combustions units permitted under permit number T053-14234-00058, shall limit VOC emissions from all units permitted under permit number T053-14234-00058 to less than two hundred fifty (250) tons per year, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to all units permitted under permit number T053-14234-00058.

D.1.3 VOC PSD Minor Limit [326 IAC 2-2]

The total input of volatile organic compounds (VOC) at Edge Stain Booths (ESB1 - ESB4), Back Coat Roll Coaters (BCC1 - BCC4), Face Tone Roll Coaters (FTC1 - FTC2), Brush Stain Roll Coaters (BSC1 - BSC4), Sealer Roll Coaters (SC1 - SC6), Top Coat Roll Coaters (TCC1, TCC2 and TCC3), Base Single Roller Coater (BCC7), Sealer Single Roller Coater (SC7), and Top-Coat Double Roller Coaters (TCC6 and TCC7), including coatings, dilution solvents, and cleaning solvents including the wipe on-wipe off solvent cleaning, shall be limited to less than 249.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limit shall limit the VOC emissions from the modifications approved under SSM 053-31301-00058 and SPM 053-37603-00058 to less than 250 tons per twelve (12) consecutive month period and render the requirements of 326 IAC 2-2 (PSD) not applicable to the modifications permitted under SSM No. 053-31301-00058 and SPM No. 053-37603-00058.

D.1.4 Particulate Matter PSD Minor Limit [326 IAC 2-2][40 CFR 52.21][326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d) and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to all units permitted under permit number T053-14234-00058, the dry filters of EU-1-3, EU-1-9, EU-1-11, EU-2-12, and EU-3-2 and water washes of EU-1-15, EU-1-18, EU-1-23, EU-1-28, EU-2-19, and EU-2-24 for particulate control shall be in operation at all times that the spray booths are in operation.

Compliance with this condition in conjunction with the emissions from the woodworking operations in Section D.2.2, shall limit the PM and PM-10 emissions from all units permitted under permit number T053-14234-00058 to less than two hundred and fifty (250) tons per year and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to all units permitted under permit number T053-14234-00058.

D.1.5 Particulate Matter Limit [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from ESB1 - ESB4 shall be controlled by dry particulate filters, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.6 Preventative Maintenance Plan [326 IAC 2-7-5(12)]

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

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

D.1.7 Thermal Oxidizer

When the thermal oxidizer is used to demonstrate compliance with Condition D.1.2, the oxidizer shall be required to operate at a minimum overall control efficiency of 85.5%, pursuant to permit number T053-14234-00058, issued on December 9, 2002. The thermal oxidizer, identified as CD-01, shall maintain a minimum zone operating temperature of 1200°F or a minimum zone operating temperature and fan amperage as determined from the most recent compliant stack test, as approved by IDEM. The oxidizer shall capture at least 90% and thermally oxidize at a minimum of 95% of the VOC from Finishing Line 1 and Finishing Line 2 when in operation.

D.1.8 Particulate Matter

The dry filters for particulate control on spray booths EU-1-3, EU-1-9, EU-1-11, EU-2-12, and EU-3-2 shall be in operation at all times that the spray booth is in operation in order to comply with Condition D.1.4.

D.1.9 Water Wash System

The water wash system for particulate control on spray booths EU-1-15, EU-1-18, EU-1-23, EU-1-28, EU-2-19 and EU-2-24 shall be in operation at all times that the spray booths are in operation in order to comply with Condition D.1.4.

D.1.10 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

- (a) Not later than five (5) years from the most recent compliant stack test, in order to demonstrate compliance with Condition D.1.7, the Permittee shall perform VOC control efficiency testing of thermal oxidizer CD-01 controlling VOC emissions from Finishing Line 1 and Finishing Line 2 utilizing methods as approved by the Commissioner.. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Section C- Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.
- (b) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.

D.1.11 Volatile Organic Compounds (VOC)

Compliance with the VOC input limitations contained in Condition D.1.2 and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.12 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks S-EU-1-3, S-EU-1-9, S-EU-1-11, S-EU-2-12, S-EU-3-2, S-ESB1, S-ESB2, S-ESB3, and S-ESB4 while one or more of the booths is in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the surface coating booth stacks S-EU-1-3, S-EU-1-9, S-EU-1-11, S-EU-2-12, S-EU-3-2, S-ESB1, S-ESB2, S-ESB3, and S-ESB4 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.
- (c) Daily inspections shall be performed to verify that the water level of the water wash system meet the manufacturer's recommended level. To monitor the performance of the water wash system, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. In addition, weekly observations shall be made of the overspray from the surface coating booth stacks S-EU-1-15, S-EU-1-18, S-EU-1-23, S-EU-1-28, S-EU-2-19, and S-EU-2-24 while one or more of the booths are in operation. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.
- (d) Monthly inspections shall be performed of the coating emissions from the surface coating booth stacks S-EU-1-15, S-EU-1-18, S-EU-1-23, S-EU-1-28, S-EU-2-19, and S-EU-2-24 and the presence of overspray on the rooftops and the nearby ground. Section C - Response to Excursions or Exceedances for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.1.13 Parametric Monitoring

- (a) A continuous monitoring system, when used to comply with Condition D.1.2, shall be calibrated, maintained, and operated on the thermal oxidizer, identified as CD-01, for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be at or above the hourly average temperature of 1200°F or the temperature from the most recent compliance stack.
- (b) The fan amperage or duct pressure shall be observed at least once per week when the thermal oxidizer is in operation. This pressure or amperage shall be maintained with a range as established in the most compliant stack test.
- (c) If abnormal emissions are 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 of this permit.

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

D.1.14 Record Keeping Requirement

- (a) To document the compliance status with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (8) below. Records maintained for (1) through (8) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC input limits established in Condition D.1.2.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC input for each month for each finishing line;
 - (5) The total VOC input for the month using the following equations:
 - (A) If thermal oxidizer is in operation:
VOC input (ton/month) = VOC input (ton/month) to Finishing Line 1 + VOC input (ton/month) to Finishing Line 2 + (6.9 * VOC input (ton/month) to Finishing Line 3);
 - (B) If thermal oxidizer is not in operation:
VOC input (ton/month) = (6.9 * VOC input (ton/month) to Finishing Line 1) + (6.9 * VOC input (ton/month) to Finishing Line 2) + (6.9 * VOC input (ton/month) to Finishing Line 3)
 - (6) The total VOC input for each compliance period;
 - (7) The continuous temperature records for the thermal oxidizer and the temperature used to demonstrate compliance during the most recent compliance stack test; and
 - (8) Weekly records of the fan amperage or duct negative pressure.
- (b) To document the compliance status with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC input limits established in Condition D.1.3.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;

- (4) The total VOC input for each month; and
- (5) The total VOC input for each compliance period.
- (c) To document the compliance status with Conditions D.1.12(a) and (b), the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections for surface coating booths EU-1-3, EU-1-9, EU-1-11, EU-2-12, EU-3-2, ESB1, ESB2, ESB3 and ESB4.
- (d) To document the compliance status with Condition D.1.12(c) and (d), the Permittee shall maintain a log of weekly overspray observations, daily observations of the water level in the water wash system, and monthly inspections for surface coating booths EU-1-15, EU-1-18, EU-1-23, EU-1-28, EU-2-19, and EU-2-24.
- (e) To document the compliance status with Condition D.1.13, the Permittee shall maintain records of the continuous monitoring system's temperature output and the fan amperage or duct negative pressure weekly measurements.
- (f) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

D.1.15 Reporting Requirements

Quarterly summaries of the information to document the compliance status with Conditions D.1.2 and D.1.3 shall be submitted, using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting Requirements contains the Permittee's obligation with regard to the reporting required by this condition. The reports submitted by the Permittee do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official," as defined by 326 IAC 2-7-1(34)

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (d) Two (2) woodworking operations, associated with two (2) finishing lines as follows:
 - (1) One (1) woodworking operation associated with Finishing Line 1, constructed in 2000, with a maximum capacity of 4,000 pounds per hour, consisting of five (5) panel cleaning machines, two (2) hand sand conveyors, and five (5) automated sanding machines, with particulate emissions controlled by a baghouse (BH-2) which is vented inside or outside of the building through stacks S-EU-BH-2-A and S-EU-BH-2-B.
 - (2) One (1) woodworking operation associated with Finishing Line 2, constructed in 2000 and modified in 2002, with a maximum capacity of 4,000 pounds of wood cabinet components per hour, with particulate emissions controlled by a baghouse (BH-3), vented inside or outside of the building through stack S-EU-BH-3.
- (e) One (1) woodworking operation, not directly associated with Finishing Lines 1 or 2, constructed in 2000, with a maximum capacity of 1.25 tons per hour, with particulate emissions controlled by a baghouse (BH-1), which is vented inside or outside of the building through stack S-EU-BH-1.
- (f) One (1) Framing Line, consisting of the following units:
 - (10) One (1) sanding operation, consisting of 3 sanders, identified as SAND, approved in 2012 for construction, having a maximum capacity of less than 3.74 tons per hour, with emissions controlled by a baghouse (BH-4), and exhausting inside or outside of the building through stack S-EU-BH-4.

Under 40 CFR Part 63, Subpart JJ, the Framing Line is considered an affected facility.

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

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

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices, and Control Technologies), the particulate emissions from the listed woodworking and sanding operations shall be limited as follows when operating at the listed process weight rate:

Operation	Process Weight Rate (ton/hr)	Particulate Emission Limit (lb/hr)
Woodworking associated with Finishing Line 1	2.00	6.52
Woodworking associated with Finishing Line 2	2.00	6.52
Woodworking not associated with the Finishing lines	1.25	4.76
Sanding operations, identified as SAND	3.74	9.92

The limits were calculated using the following equation:

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

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

D.2.2 PSD Minor Limit [326 IAC 2-2]

In order to render 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to all units permitted under permit number T053-14234-00058, PM and PM10 emissions from the below operations shall not exceed the emission limits specified in the table below:

Operation	Control Device	PM Emission Limit (lbs/hr)	PM10 Emission Limit (lbs/hr)
Woodworking associated with Finishing Line 1	Baghouse BH-2	5.57	5.57
Woodworking associated with Finishing Line 2	Baghouse BH-3	3.86	3.86
Woodworking not associated with the Finishing lines	Baghouse BH-1	3.86	3.86

Compliance with these limits in conjunction with the PM and PM10 emissions from the spray booths in Section D.1.4, shall limit the PM and PM-10 emissions from all units permitted under permit number T053-14234-00058 to less than two hundred and fifty (250) tons per year and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to all units permitted under permit number T053-14234-00058.

D.2.3 Preventative Maintenance Plan [326 IAC 2-7-5(12)]

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

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

D.2.4 Particulate Matter (PM)

- (a) In order to comply with Conditions D.2.1 and D.2.2, the baghouses for PM and PM10 control shall be in operation and control emissions from the woodworking and sanding operations at all times that the woodworking and sanding operations are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.2.5 Visible Emissions Notations

- (a) Visible emission notations of the baghouse stack exhausts (S-EU-BH-2-A, S-EU-BH-2-B, S-EU-BH-3, S-EU-BH-1, and S-EU-BH-4) associated with the woodworking operations and sanding operations, identified as SAND, shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response 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.

D.2.6 Baghouse Inspections

Semiannual inspections shall be performed on the bags in baghouses (BH-1, BH-2, BH-3, and BH-4) controlling particulate emissions from the woodworking operations and sanding operations, identified as SAND, when venting indoors. All defective bags shall be replaced.

D.2.7 Broken or Failed Bag Detection

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

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

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

D.2.8 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.5, the Permittee shall maintain daily records of the visible emission notations of the baghouse stack exhausts (S-EU-BH-2-A, S-EU-BH-2-B, S-EU-BH-3, S-EU-BH-1, and S-EU-BH-4). The Permittee shall include it its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6.
- (c) Section C - General Record Keeping Requirements, of this permit contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour:
- (b) Three (3) natural gas-fired water heaters, constructed in 1999, with a combined capacity of 9.6 million British thermal units per hour [326 IAC 6-2-4]

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

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

D.3.1 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(d)), the particulate matter (PM) from a facility with a source maximum operating capacity of less than 10 MMBtu/hr shall not exceed 0.6 lb/MMBtu. PM emissions from the insignificant activities, the three (3) natural gas-fired water heaters with a combined capacity of 9.6 MMBtu per hour, shall be limited to 0.6 pounds of particulate matter emitted per million Btu heat input.

SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) Finishing Line 1 (Main Line), constructed in 2000, consisting of the following units:
- (1) One (1) roller coater, identified as EU-17, with a maximum capacity of 17 gallons per hour.
 - (2) Seven (7) spray booths, five (5) which, identified as EU-1-3, EU-1-15, EU-1-18, EU-1-23, and EU-1-28, utilize air assisted airless spray application, are controlled by a water wash system, and two (2) which, identified as EU-1-9 and EU-1-11, utilize HVLP spray application techniques, are controlled by dry filters. Each booth has a capacity of seventeen (17) gallons per hour. All seven (7) spray booths are vented to a common thermal oxidizer, identified as CD-01, with a total heat input capacity of eleven (11) million British thermal units per hour. If the thermal oxidizer is not in operation, the seven (7) spray booths can vent to stacks S-EU-1-15, S-EU-1-18, S-EU-1-23, S-EU-1-28, S-EU-1-3, S-EU-1-9, and S-EU-1-11, respectively.
 - (3) One (1) stain wiping machine, identified as EU-1-4, with a maximum capacity of 17 gallons per hour, and vented to the thermal oxidizer, identified as CD-01. If the thermal oxidizer is not in operation, the one (1) stain wiping machine can vent to stack S-EU-1-3.
 - (4) Seven (7) ovens (hot water to air heat exchangers), identified as EU-1-5, EU-1-10, EU-1-13, EU-1-16, EU-1-19, EU-1-24, and EU-1-29, powered by the insignificant heaters, all vented back to the spray booths, with cool down sections on four (4) of the ovens vented to the atmosphere. Ovens EU-1-16, EU-1-19, EU-1-24, and EU-1-29 vent to stacks S-EU-1-16, S-EU-1-19, S-EU-1-24, and S-EU-1-29, respectively. The air flow from the remaining ovens is sent back to the booth preceding the oven and used as a part of the air necessary for the spraying process.
- Under 40 CFR Part 63, Subpart JJ, Finishing Line 1 is considered an affected facility.
- (b) One (1) Finishing Line 2, constructed in 2000 and modified in 2002 to increase capacity, with a maximum capacity of 4,000 pounds of wood components per hour, consisting of the following units:
- (1) Three (3) spray booths, identified as EU-2-12, EU-2-19 and EU-2-24, one which, identified as EU-2-12, is controlled by dry filters and utilizes HVLP spray application techniques, with a maximum capacity of eight (8) gallons of coating per hour, and two (2) which, identified as EU-2-19, and EU-2-24, are controlled by water washes, each with a maximum capacity of eight (8) gallons of coating per hour and one (1) gallon of cleaner per hour, utilizing air assisted airless spray application techniques. All three (3) spray booths are vented to a common thermal oxidizer, identified as CD-01, which is also used to control emissions from Finishing Line 1, with a total heat input capacity of eleven (11) million British thermal units per hour. If the thermal oxidizer is not in operation, the three (3) spray booths can vent to the atmosphere through stacks S-EU-2-12, S-EU-2-19 and S-EU-2-24, respectively.
 - (2) One (1) roller coater, identified as EU-2-14, with a maximum capacity of 0.5 gallons of coating per hour, with emissions vented back to spray booth EU-2-12.

- (3) Three (3) ovens (hot water to air heat exchangers), identified as EU-2-16, EU-2-19, and EU-2-24, powered by the insignificant heaters, constructed in 2009, all vented back to the spray booths EU-2-12, EU-2-19, and EU-2-24, respectively, with cool down sections for EU-2-19 and EU-2-24 vented to the atmosphere via stacks S-EU-2-19 and S-EU-2-24, respectively.
- (4) One (1) ultraviolet light oven, constructed in 2009, vented outside the building through stack S-EU-2-15.

Under 40 CFR Part 63, Subpart JJ, Finishing Line 2 is considered an affected facility.

- (c) One (1) Finishing Line 3 (Expedite System), consisting of the following units:

- (1) One (1) spray booth, identified as EU-3-2, with a maximum capacity of 2.6 gallons per hour, constructed in 2000, utilizing HVLP spray application techniques, controlled by a dry filter, vented to stack S-EU-3-2.
- (2) One (1) oven (hot water to air heat exchanger), constructed in 2008, identified as EU-3-3, powered by the insignificant heaters, and one (1) infrared light oven, constructed in 2009, both vented to stack S-EU-3-3.

Under 40 CFR Part 63, Subpart JJ, Finishing Line 3 is considered an affected facility.

- (f) One (1) Framing Line, consisting of the following units:

- (1) Four (4) edge stain manual spray booths, identified as ESB1, ESB2, ESB3 and ESB4, approved in 2012 for construction, utilizing high volume low pressure (HVLP) coating application method, using dry filters for particulate control, each booth with a capacity of 2.0 gallons of coating per hour, vented to stacks S-ESB1, S-ESB2, S-ESB3 and S-ESB4, respectively.
- (2) Two (2) pairs of back stain single roller coaters (push-in/out - cannot be operated at the same time), identified as BCC1 through BCC4, approved in 2012 for construction, with a total maximum capacity of 4.0 gallons of coating per hour.
- (3) One (1) pair of face tone double roller coaters (push-in/out - cannot be operated at the same time), identified as FTC1 and FTC2, approved in 2012 for construction, with a total maximum capacity of 4.0 gallons of coating per hour.
- (4) One (1) pair of brush stain single roller coaters (push-in/out - cannot be operated at the same time), identified as BSC1 and BSC2, approved in 2012 for construction, with a total maximum capacity of 2.0 gallons of coating per hour.
- (5) One (1) pair of brush stain double roller coaters (push-in/out - cannot be operated at the same time), identified as BSC3 and BSC4, approved in 2012 for construction, with a total maximum capacity of 4.0 gallons of coating per hour.
- (6) Three (3) pairs of sealer single roller coaters (push-in/out - cannot be operated at the same time), identified as SC1 through SC6, approved in 2012 for construction, with a total maximum capacity of 0.75 gallons of coating per hour.

- (7) One (1) pair of top coat double roller coaters (push-in/out - cannot be operated at the same time), identified as TCC1 and TCC2, approved in 2012 for construction, with a total maximum capacity of 0.5 gallons of coating per hour.
- (8) One (1) top coat Roll Coating unit, identified as TCC3, approved in 2012 for construction, with a total maximum capacity of 0.5 gallons of coating per hour.
- (9) Two (2) direct fired natural gas ovens, identified as ESBO1 and ESBO2, with a combined heat rating of 0.96 MMBtu per hour, vented to stacks S-ESBO1 and S-ESBO2, respectively.
- (10) One (1) sanding operation, consisting of 3 sanders, identified as SAND, approved in 2012 for construction, having a maximum capacity of less than 3.74 tons per hour, with emissions controlled by a baghouse (BH-4), and exhausting inside or outside of the building through stack S-EU-BH-4.
- (11) Six (6) UV curing lamps, identified as CL1 through CL6, approved in 2012 for construction.
- (12) One (1) cooling tunnel, approved in 2012 for construction.
- (13) One (1) pair of back stain single roller coaters (push-in/out - cannot be operated at the same time), identified as BCC5 and BCC6, with a total maximum capacity of 0.1875 gallons per hour.
- (14) One (1) pair of top coat single roller coaters push-in/out - cannot be operated at the same time), identified as TCC4 and TCC5, with a total maximum capacity of 0.1875 gallon per hour.
- (15) One (1) base single roller coater (push-in/out - cannot be operated at the same time), identified as BCC7, approved in 2016 for construction, with a total maximum capacity of 0.5 gallons of coating per hour.
- (16) One (1) sealer single roller coater (push-in/out - cannot be operated at the same time), identified as SC7, approved in 2016 for construction, with a total maximum capacity of 0.5 gallons of coating per hour.
- (17) One (1) pair of top coat double roller coaters (push-in/out - cannot be operated at the same time), identified as TCC6 and TCC7, approved in 2016 for construction, with a total maximum capacity of 0.5 gallons of coating per hour.

Under 40 CFR Part 63, Subpart JJ, the Framing Line is considered an affected facility.

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

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

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

- (a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR 63, Subpart A -- General Provisions, which are incorporated by reference as 326 IAC 20-1, for emissions units listed above, except as otherwise specified in 40 CFR 63, Subpart JJ.

- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

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

E.1.2 Wood Furniture Manufacturing Operations NESHAP [40 CFR Part 63, Subpart JJ][326 IAC 20-14]

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

- (1) 40 CFR 63.800 (a), (d) and (f)
- (2) 40 CFR 63.801
- (3) 40 CFR 63.802 (b)
- (4) 40 CFR 63.803
- (5) 40 CFR 63.804 (d) through (g)
- (6) 40 CFR 63.805
- (5) 40 CFR 63.806
- (7) 40 CFR 63.807
- (8) 40 CFR 63.808
- (9) Tables 1 through 6

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

Source Name: American Woodmark Corporation
Source Address: 5300 Eastside Parkway Drive, Gas City, Indiana 46933
Part 70 Permit No.: T053-32368-00058

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: American Woodmark Corporation
Source Address: 5300 Eastside Parkway Drive, Gas City, Indiana 46933
Part 70 Permit No.: T053-32368-00058

This form consists of 2 pages

Page 1 of 2

- 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) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

Part 70 Quarterly Report

Source Name: American Woodmark
 Source Address: 5300 Eastside Parkway Drive, Indiana 46933
 Part 70 Permit No.: T053-32368-00058
 Facility: Finishing Line 1, 2, 3, combined
 Parameter: VOC Input
 Limit: Less than 1,717 tons per consecutive twelve (12) month period, with compliance determined at the end of each month.

The following equations shall be used to calculate the total VOC input:

- (a) If thermal oxidizer is in operation:

$$\text{VOC input (ton/year)} = \text{VOC input (ton) to Finishing Line 1} + \text{VOC input (ton) to Finishing Line 2} + (6.9 * \text{VOC input (ton) to Finishing Line 3}) < 1,717 \text{ ton/yr}$$
- (b) If thermal oxidizer is not in operation:

$$\text{VOC input (ton/year)} = (6.9 * \text{VOC input (ton) to Finishing Line 1}) + (6.9 * \text{VOC input (ton) to Finishing Line 2}) + (6.9 * \text{VOC input (ton) to Finishing Line 3}) < 1,717 \text{ ton/yr}$$

QUARTER: _____

YEAR: _____

Month	Finishing Line	Column 1	Column 2	Column 1 + Column 2
		This Month	Previous 11 Months	12 Month Total
	Finishing Line 1			
	Finishing Line 2			
	Finishing Line 3			
	Total			
	Finishing Line 1			
	Finishing Line 2			
	Finishing Line 3			
	Total			
	Finishing Line 1			
	Finishing Line 2			
	Finishing Line 3			
	Total			

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

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

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

**PART 70 OPERATING PERMIT
 Semi-Annual Report**

VOC and VHAP usage - Wood Furniture NESHAP

Source Name: American Woodmark
 Source Address: 5300 Eastside Parkway Drive, Gas City, Indiana 46933
 Part 70 Permit No.: T053-32368-00058
 Facility: Surface Coating
 Parameter: VOC and VHAPs - NESHAP
 Limit: (1) Finishing operations: 0.8 lb VHAP/lb Solids
 (2) Thinners used for on-site formulation of washcoats, basecoats and enamels - 3% VHAP content by weight
 (3) All other thinner mixtures - 10% VHAP content by weight
 (4) Foam adhesives meeting the upholstered seating flammability requirements - 0.2 lb VHAP/lb Solids
 (5) All other contact adhesives - 0.2 lb VHAP/lb Solids
 (6) Strippable spray booth material - 0.8 pounds VOC per pound solids

QUARTER: _____ YEAR: _____

Month	Finishing Operations (lb VHAP/lb Solid)	Thinners used for on-site formulation (% by weight)	All other thinner mixtures (% by weight)	Foam adhesives (upholstered) (lb VHAP/lb Solid)	Contact adhesives (lb VHAP/lb Solid)	Strippable spray booth material (lb VOC/lb Solid)

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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

Part 70 Quarterly Report

Source Name: American Woodmark Corporation
Source Address: 5300 Eastside Parkway Drive, Gas city, Indiana 46933
Part 70 Permit No.: T053-32368-00058
Facility: Edge Stain Booths (ESB1 - SB4), Back Coat Roll Coaters (BCC1 - BCC4), Face Tone Roll Coaters (FTC1 - FTC2), Brush Stain Roll Coaters (BSC1 - BSC4), Sealer Roll Coaters (SC1 - SC6), Top Coat Double Roll Coaters (TCC1, TCC2 and TCC3), Base Single Roller Coater (BCC7), Sealer Single Roller Coater (SC7), and Top-Coat Double Roller Coaters (TCC6 and TCC7)
Parameter: Total Volatile Organic Compounds (VOC) Usage
Limit: Less than 249.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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

Source Name: American Woodmark Corporation
 Source Address: 5300 Eastside Parkway Drive, Gas City, Indiana 46933
 Part 70 Permit No.: T053-32368-00058

Months: _____ **to** _____ **Year:** _____

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

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

Source Description and Location

Source Name: American Woodmark Corporation
Source Location: 5300 Eastside Parkway Drive, Gas City, IN 46933
County: Grant
SIC Code: 2434 (Wood Kitchen Cabinets)
Operation Permit No.: T053-32368-00058
Operation Permit Issuance Date: February 5, 2013
Significant Permit Modification No.: 053-37603-00058
Permit Reviewer: Allen Reimer

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. T053-32368-00058 on February 5, 2013. The source has since received the following approvals:

Permit Type	Permit Number	Issuance Date
Administrative Amendment	053-34727-00058	August 11, 2014
Administrative Amendment	053-34978-00058	November 14, 2014
Administrative Amendment	053-35440-00058	May 7, 2015

County Attainment Status

The source is located in Grant County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. ¹
PM _{2.5}	Unclassifiable or attainment effective April 5, 2005, for the annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.

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

- (a) **Ozone Standards**
 Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Grant County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
 Grant County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**
 Grant 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, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Greenhouse Gas (GHG) Emissions

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

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

Source Status - Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

Process / Emission Unit	Source-Wide Emissions Before Modification (ton/year)								
	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Single HAP* (Toluene)	Combined HAPs
Limited by Permit No. 053-14234-00058									
Finishing Lines 1, 2, and 3**	25.12	25.12	25.12	-	-	<249.00	-	789.1	1367.8
Thermal Oxidizer	0.09	0.37	0.37	0.03	4.82	0.26	4.05	1.6E-04	0.09
Insignificant Natural Gas Combustion Units	0.08	0.32	0.32	0.03	4.20	0.23	3.53	1.4E-04	0.08
Woodworking	58.19	58.19	58.19	-	-	-	-	-	-
Total	83.48	84.00	84.00	0.05	9.02	<249.50	7.58	789.1	1368.0
Limited by Significant Source Modification No. 053-31301-00058									
Framing Line	18.54	18.54	18.54	-	-	<249.90	-	-	28.80
Sanders	4.42	4.42	4.42	-	-	-	-	-	-
Ovens	0.01	0.03	0.03	0.003	0.42	0.02	0.35	1.4E-05	0.01
Total	22.97	22.99	22.99	0.003	0.42	<249.92	0.35	1.4E-05	28.81
Administrative Amendment No. 053-35440-00058									
Finishing Room Touch-up and Repair Operations	0.65	0.52	0.52	-	-	1.72	-	-	0.70
Total for Source	107.11	107.51	107.51	0.06	9.44	<501.14	7.93	789.11	1397.5
PSD Major Source Thresholds	250	250	250	250	250	250	250	--	--

*Single highest source-wide HAP.

**after dry filter control as required by 326 IAC 6-3-2

- (a) This existing source is a major stationary source, under PSD (326 IAC 2-2), because a PSD regulated pollutant, VOC, is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is a major source of HAPs, as defined in 40 CFR 63.2, because HAP emissions are equal to or greater than ten (10) tons per year for a single HAP and equal to or greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).
- (c) These emissions are based on Appendix A.1 of Administrative Amendment No. 053-35440-00058, issued May 7, 2015.

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed an application, submitted by American Woodmark Corporation on September 9, 2016, relating to the addition of four (4) roll coaters to the Framing Line, to modify the exhaust information for the one (1) woodworking operation associated with Finishing Line 1, the one (1) woodworking operation associated with Finishing Line 2, the one (1) woodworking operation not directly associated with Finishing Lines 1 or 2, and the one (1) sanding operation in the Framing Line, and to modify the exhaust information for the one (1) ultraviolet light oven in Finishing Line 2. The following is a list of the modified emission units and pollution control devices:

- (a) One (1) Finishing Line 2, constructed in 2000 and modified in 2002 to increase capacity, with a maximum capacity of 4,000 pounds of wood components per hour, consisting of the following units:
 - (4) One (1) ultraviolet light oven, constructed in 2009, vented outside the building through stack S-EU-2-15.
- (b) Two (2) woodworking operations, associated with two (2) finishing lines as follows:
 - (1) One (1) woodworking operation associated with Finishing Line 1, constructed in 2000, with a maximum capacity of 4,000 pounds per hour, consisting of five (5) panel cleaning machines, two (2) hand sand conveyors, and five (5) automated sanding machines, with particulate emissions controlled by a baghouse (BH-2) which is vented inside or outside of the building through stacks S-EU-BH-2-A and S-EU-BH-2-B.
 - (2) One (1) woodworking operation associated with Finishing Line 2, constructed in 2000 and modified in 2002, with a maximum capacity of 4,000 pounds of wood cabinet components per hour, with particulate emissions controlled by a baghouse (BH-3), vented inside or outside of the building through stack S-EU-BH-3.
- (c) One (1) woodworking operation, not directly associated with Finishing Lines 1 or 2, constructed in 2000, with a maximum capacity of 1.25 tons per hour, with particulate emissions controlled by a baghouse (BH-1), which is vented inside or outside of the building through stack S-EU-BH-1.
- (d) One (1) Framing Line, consisting of the following units:
 - (10) One (1) sanding operation, consisting of 3 sanders, identified as SAND, approved in 2012 for construction, having a maximum capacity of less than 3.74 tons per hour, with emissions controlled by a baghouse (BH-4), and exhausting inside or outside of the building through stack S-EU-BH-4.
 - (15) One (1) base single roller coater (push-in/out - cannot be operated at the same time), identified as BCC7, approved in 2016 for construction, with a total maximum capacity of 0.5 gallons of coating per hour.

- (16) One (1) sealer single roller coater (push-in/out - cannot be operated at the same time), identified as SC7, approved in 2016 for construction, with a total maximum capacity of 0.5 gallons of coating per hour.
- (17) One (1) pair of top coat double roller coaters (push-in/out - cannot be operated at the same time), identified as TCC6 and TCC7, approved in 2016 for construction, with a total maximum capacity of 0.5 gallons of coating per hour.

Under 40 CFR Part 63, Subpart JJ, the Framing Line is considered an affected facility.

“Integral Part of the Process” Determination

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

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

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

Permit Level Determination –Part 70 Modification to an Existing Source

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

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5 and 326 IAC 2-7-11. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit. If the control equipment has been determined to be integral, the table reflects the PTE after consideration of the integral control device.

Process / Emission Unit	PTE Before Controls of the New Emission Units (ton/year)								
	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Single HAP*	Combined HAPs
Framing Line									
BCC7	0.0	0.0	0.0	-	-	0.06	-	-	-
SC7	0.0	0.0	0.0	-	-	0.30	-	0.30	0.30
TCC6 and TCC7	0.0	0.0	0.0	-	-	0.36	-	0.36	0.36
Total:	0.0	0.0	0.0	-	-	0.72	-	0.66	0.66

*2(2-ethoxyethoxy)ethyl acrylate

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

Pursuant to 326 IAC 2-7-12(d)(1), this change to the permit is being made through a Significant Permit Modification because this modification makes a significant change to existing monitoring conditions.

Permit Level Determination – PSD

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of the Part 70 permit modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process / Emission Unit	Project Emissions (ton/year)						
	PM	PM ₁₀	PM _{2.5} *	SO ₂	NO _x	VOC	CO
Framing Line							
BCC7	0.0	0.0	0.0	-	-	0.06	-
SC7	0.0	0.0	0.0	-	-	0.30	-
TCC6 and TCC7	0.0	0.0	0.0	-	-	0.36	-
Total for Modification	0.0	0.0	0.0	-	-	0.72	-
PSD Significant Levels	25	15	10	40	40	40	100

*PM_{2.5} listed is direct PM_{2.5}.

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

Source-Wide Emissions After Issuance

The table below summarizes the source-wide potential to emit, reflecting all limits, of the emission units. The four (4) new rollers (BCC7, SC7, TCC6, and TCC7) will be included in the existing VOC minor PSD limit of 249.9 tons of VOC per twelve (12) consecutive month period for the Framing Line.

Process / Emission Unit	PTE of Existing Emission Units after Issuance (ton/year)								Combined HAPs
	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Single HAP* (Toluene)	
Limited by Permit No. 053-14234-00058									
Finishing Lines 1, 2, and 3**	25.12	25.12	25.12	-	-	<249.00	-	789.1	1367.8
Thermal Oxidizer	0.09	0.37	0.37	0.03	4.82	0.26	4.05	1.6E-04	0.09
Insignificant Natural Gas Combustion Units	0.08	0.32	0.32	0.03	4.20	0.23	3.53	1.4E-04	0.08
Woodworking	58.19	58.19	58.19	-	-	-	-	-	-
Total	83.48	84.00	84.00	0.05	9.02	<249.50	7.58	789.1	1368.0
Limited by Significant Source Modification No. 053-31301-00058 and Significant Permit Modification No. 053-37603-00058									
Framing Line	18.54	18.54	18.54	-	-	<249.90	-	-	29.46
Sanders	4.42	4.42	4.42	-	-	-	-	-	-
Ovens	0.01	0.03	0.03	0.003	0.42	0.02	0.35	1.4E-05	0.01
Total	22.97	22.99	22.99	0.003	0.42	<249.92	0.35	1.4E-05	29.47
Administrative Amendment No. 053-35440-00058									
Finishing Room Touch-up and Repair Operations	0.65	0.52	0.52	-	-	1.72	-	-	0.70
Total for Source	107.11	107.51	107.51	0.06	9.44	<501.14	7.93	789.11	1398.1
PSD Major Source Thresholds	250	250	250	250	250	250	250	--	--

*Single highest source-wide HAP.

**after dry filter control as required by 326 IAC 6-3-2

PM, PM10, and PM2.5

- (a) Pursuant to 326 IAC 6-3-2(d) and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to all units permitted under permit number T053-14234-00058, the dry filters of EU-1-3, EU-1-9, EU-1-11, EU-2-12, and EU-3-2 and water washes

of EU-1-15, EU-1-18, EU-1-23, EU-1-28, EU-2-19, and EU-2-24 for particulate control shall be in operation at all times that the spray booths are in operation.

Compliance with this condition in conjunction with the emissions from the woodworking operations in Section D.2.2, shall limit the PM and PM-10 emissions from all units permitted under permit number T053-14234-00058 to less than two hundred and fifty (250) tons per year and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to all units permitted under permit number T053-14234-00058.

- (b) In order to render 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to all units permitted under permit number T053-14234-00058, PM and PM10 emissions from the below operations shall not exceed the emission limits specified in the table below:

Operation	Control Device	PM Emission Limit (lbs/hr)	PM10 Emission Limit (lbs/hr)
Woodworking associated with Finishing Line 1	Baghouse BH-2	5.57	5.57
Woodworking associated with Finishing Line 2	Baghouse BH-3	3.86	3.86
Woodworking not associated with the Finishing lines	Baghouse BH-1	3.86	3.86

Compliance with these limits in conjunction with the PM and PM10 emissions from the spray booths in Section D.1.4, shall limit the PM and PM-10 emissions from all units permitted under permit number T053-14234-00058 to less than two hundred and fifty (250) tons per year and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to all units permitted under permit number T053-14234-00058.

VOC

- (a) Pursuant to permit number T053-14234-00058, issued on December 9, 2002, the VOC input to Finishing Lines 1, 2, and 3, shall be limited to less than one thousand seven hundred and seventeen (1,717) tons per twelve (12) consecutive month period including coatings, dilution solvents, and cleaning solvents, with compliance determined at the end of each month. The following equations shall be used to calculate the total VOC input:

- (1) If thermal oxidizer is in operation:

$$\text{VOC input (ton/year)} = \text{VOC input (ton) to Finishing Line 1} + \text{VOC input (ton) to Finishing Line 2} + (6.9 * \text{VOC input (ton) to Finishing Line 3}) < 1,717 \text{ ton/yr}$$
- (2) If thermal oxidizer is not in operation:

$$\text{VOC input (ton/year)} = (6.9 * \text{VOC input (ton) to Finishing Line 1}) + (6.9 * \text{VOC input (ton) to Finishing Line 2}) + (6.9 * \text{VOC input (ton) to Finishing Line 3}) < 1,717 \text{ ton/yr}$$

Compliance with this VOC limit, combined with the emissions from the combustions units permitted under permit number T053-14234-00058, shall limit VOC emissions from all units permitted under permit number T053-14234-00058 to less than two hundred fifty (250) tons per year, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to all units permitted under permit number T053-14234-00058.

- (b) The total input of volatile organic compounds (VOC) at Edge Stain Booths (ESB1 - ESB4), Back Coat Roll Coaters (BCC1 - BCC4), Face Tone Roll Coaters (FTC1 - FTC2), Brush Stain Roll Coaters (BSC1 - BSC4), Sealer Roll Coaters (SC1 - SC6), Top Coat Roll Coaters (TCC1, TCC2 and TCC3), Base Single Roller Coater (BCC7), Sealer Single Roller Coater (SC7), and Top-Coat Double Roller Coaters (TCC6 and TCC7), including coatings, dilution solvents, and cleaning solvents including the wipe on-wipe off solvent cleaning, shall be limited to less than 249.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limit shall limit the VOC emissions from the modifications approved under SSM 053-31301-00058 and SPM 053-37603-00058 to less than 250 tons per twelve (12) consecutive month period and render the requirements of 326 IAC 2-2 (PSD) not applicable to the Modifications permitted under SSM No. 053-31301-00058 and SPM No. 053-37603-00058.

Federal Rule Applicability Determination

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

New Source Performance Standards (NSPS):

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

National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (b) The Base Single Roller Coater (BCC7), Sealer Single Roller Coater (SC7), and Top-Coat Double Roller Coaters (TCC6 and TCC7), which are part of the Framing Line, are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Wood Furniture Manufacturing Operations, 40 CFR 63, Subpart JJ, which is incorporated by reference as 326 IAC 20-14. The Framing Line is located at a Major Source of HAPs and is engaged in the manufacture of wood furniture or wood furniture components. The units subject to this rule include the following:

- (f) One (1) Framing Line, consisting of the following units:

- (15) One (1) base single roller coater (push-in/out - cannot be operated at the same time), identified as BCC7, approved in 2016 for construction, with a total maximum capacity of 0.5 gallons of coating per hour.
- (16) One (1) sealer single roller coater (push-in/out - cannot be operated at the same time), identified as SC7, approved in 2016 for construction, with a total maximum capacity of 0.5 gallons of coating per hour.
- (17) One (1) pair of top coat double roller coaters (push-in/out - cannot be operated at the same time), identified as TCC6 and TCC7, approved in 2016 for construction, with a total maximum capacity of 0.5 gallons of coating per hour.

Non applicable portions of the NESHAP will not be included in the permit. This source is subject to the following portions of Subpart JJ.

- (1) 40 CFR 63.800 (a), (d) and (f)
 - (2) 40 CFR 63.801
 - (3) 40 CFR 63.802 (b)
 - (4) 40 CFR 63.803
 - (5) 40 CFR 63.804 (d) through (g)
 - (6) 40 CFR 63.805
 - (5) 40 CFR 63.806
 - (7) 40 CFR 63.807
 - (8) 40 CFR 63.808
 - (9) Tables 1 through 6
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Wood Building Products, 40 CFR 63, Subpart QQQQ (326 IAC 20-79) are not included in the permit for the Base Single Roller Coater (BCC7), Sealer Single Roller Coater (SC7), and Top-Coat Double Roller Coaters (TCC6 and TCC7), since this source does not coat wood building products as defined in §63.4681(a)(1) through (a)(5). This source coats wood kitchen cabinets and countertops.

- (c) There are no other National Emission Standards for Hazardous Air Pollutants under 40 CFR 63, 326 IAC 14 and 326 IAC 20 included for this proposed modification .

Compliance Assurance Monitoring (CAM):

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing pollutant-specific emission unit that meets the following criteria:
- (1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;
 - (2) is subject to an emission limitation or standard for that pollutant; and
 - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.
- (b) Pursuant to 40 CFR 64.2(b)(1)(i), emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act are exempt from the requirements of CAM. Therefore, an evaluation was not conducted for any emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act.
- (c) Pursuant to 40 CFR 64.2(b)(1)(iii), Acid Rain requirements pursuant to Sections 404, 405, 406, 407(a), 407(b), or 410 of the Clean Air Act are exempt emission limitations or standards. Therefore, CAM was not evaluated for emission limitations or standards for SO₂ and NO_x under the Acid Rain Program.
- (d) Pursuant to 40 CFR 64.3(d), if a continuous emission monitoring system (CEMS) is required pursuant to other federal or state authority, the owner or operator shall use the CEMS to satisfy the requirements of CAM according to the criteria contained in 40 CFR 64.3(d).

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

Emission Unit / Pollutant	Control Device	Applicable Emission Limitation	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Woodworking BH1 (PM10/PM2.5)	BH	326 IAC 6-3-2	1689.4	16.89	N ¹	N
Woodworking BH2 (PM10/PM2.5)	BH	326 IAC 6-3-2	2440.3	24.40	N ¹	N
Woodworking BH3 (PM10/PM2.5)	BH	326 IAC 6-3-2	1689.4	16.89	N ¹	N
Sanding Operations (SAND) (PM10/PM2.5)	BH	326 IAC 6-3-2	442.42	4.42	N ¹	N
Uncontrolled PTE (tpy) and controlled PTE (tpy) are evaluated against the Major Source Threshold for each pollutant. Major Source Threshold for criteria pollutants (PM10, PM2.5, SO2, NOX, VOC and CO) is 100 tpy, for a single HAP ten (10) tpy, and for total HAPs twenty-five (25) tpy. Even though under the Part 70 Permit program (40 CFR 70), PM is not a regulated pollutant, PM is still evaluated for CAM under 326 IAC 6-3-2 . However, PM10 and PM2.5 are used as surrogate for PM. Therefore, PM10 and PM2.5 PTE is used as PM PTE for this evaluation.						
N ¹ Pursuant to 40 CFR Part 64.1, the control devices are considered to be inherent process equipment. Therefore, based on the evaluation, the requirements of 40 CFR Part 64, CAM, are not applicable.						
Controls: BH = Baghouse, C = Cyclone, DC = Dust Collection System, RTO = Regenerative or Recuperative Thermal Oxidizer, WS = Wet Scrubber, ESP = Electrostatic Precipitator						
Emission units without air pollution controls are not subject to CAM. Therefore, they are not listed.						

Inherent Process Equipment (Woodworking)

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

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

The Base Single Roller Coater (BCC7), Sealer Single Roller Coater (SC7), and Top-Coat Double Roller Coaters (TCC6 and TCC7), which are part of the Framing Line, do not have control devices. Therefore, the requirements of 40 CFR 64, CAM, are not applicable to the Base Single Roller Coater (BCC7), Sealer Single Roller Coater (SC7), and Top-Coat Double Roller Coaters (TCC6 and TCC7). In addition, the requirements of 40 CFR 64, CAM, are not applicable to the Base Single Roller Coater (BCC7), Sealer Single Roller Coater (SC7), and Top-Coat Double Roller Coaters (TCC6 and TCC7), since these units are subject to 40 CFR 63 (NESHAP) Subpart JJ, which was proposed after November 15, 1990 (40 CFR 64.2(b)(1)(i)).

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

State Rule Applicability Determination

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

- (a) 326 IAC 2-2 (PSD) and 2-3 (Emission Offset)
PSD applicability is discussed under the Permit Level Determination – PSD.
- (b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The operation of the Framing Line will emit equal to or greater than ten (10) tons per year for a single HAP and equal to or greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 would apply to the Framing Line, however, pursuant to 326 IAC 2-4.1-1(b)(2), because the Framing Line is specifically regulated by NESHAP 40 CFR 63, Subpart JJ, which was issued pursuant to Section 112(d), 112(h), or 112(j) of the CAA, this facility is exempt from the requirements of 326 IAC 2-4.1.
- (c) 326 IAC 2-6 (Emission Reporting)
Since this source has a potential to emit VOC greater than or equal to twenty-five (25) tons per year, an emission statement covering the previous calendar year must be submitted by July 1 of each year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.
- (d) 326 IAC 2-7-6(5) (Annual Compliance Certification)
The U.S. EPA Federal Register 79 FR 54978 notice does not exempt Title V Permittees from the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D), but the submittal of the Title V annual compliance certification to IDEM satisfies the requirement to submit the Title V annual compliance certifications to EPA. IDEM does not intend to revise any permits since the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D) still apply, but Permittees can note on their Title V annual compliance certifications that submission to IDEM has satisfied reporting to EPA per Federal Register 79 FR 54978. This only applies to Title V Permittees and Title V compliance certifications.

Woodworking Operations

- (e) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The requirements of 326 IAC 6-3-2 have not changed due to this modification.

Framing Line (BCC7, SC7, TCC6, and TCC7)

- (f) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(6), the requirements of 326 IAC 6-3 are not applicable to the Base Single Roller Coater (BCC7), Sealer Single Roller Coater (SC7), and Top-Coat Double Roller Coaters (TCC6 and TCC7), since each unit applies coatings using roll coating.
- (g) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Pursuant to 326 IAC 8-1-6(1), the requirement to reduce VOC emissions using the Best Available Control Technology (BACT) does not apply to the Base Single Roller Coater (BCC7), Sealer Single Roller Coater (SC7), and Top-Coat Double Roller Coaters (TCC6 and TCC7), since the units associated with the Framing Line are subject to 326 IAC 8-2-12.
- (h) 326 IAC 8-2-10 (Flat Wood Panels: Manufacturing Operations)
Pursuant to 326 IAC 8-2-10(a), the requirements of 326 IAC 8-2-12 are not applicable to the Framing Line, since this source does not apply coatings to flat wood panels. This source applies coatings to wood cabinets.
- (i) 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)
This rule applies to surface coating of wood furnishings, including cabinets (kitchen, bath, and vanity), tables, beds, chairs, sofas (non-upholstered), art objects, and any other coated furnishings made of solid wood, wood composition, or simulated wood material. The units associated with the Framing Line are subject to 326 IAC 8-2-12, because the units were constructed after July 1, 1990, apply surface coatings to wood furnishings, and have actual VOC emissions greater than 15 pounds per day.

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the Permittee shall perform surface coating of wood furniture and cabinets, 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 systems:

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. Since the framing line uses HVLP spray application and roller coating, it is in compliance with 326 IAC 8-2-12.

The applicability of all other state rules has not changed due to this modification.

Compliance Determination and Monitoring Requirements

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

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

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

Emission Unit/Control	Operating Parameters	Frequency
Woodworking Operations BH-1, BH-2, and BH-3	Visible Emission Notations (when exhausting to the atmosphere)	Daily
	Baghouse Inspections (when exhausting indoors)	Semi-Annually
Sanding Operations (SAND) BH-4	Visible Emission Notations (when exhausting to the atmosphere)	Daily
	Baghouse Inspections (when exhausting indoors)	Semi-Annually

These monitoring conditions are necessary because the baghouses for the woodworking operations and the baghouse for the sanding operations must each operate properly to assure compliance with 326 IAC 6-3.

Proposed Changes

The following changes listed below are due to the proposed modification. Deleted language appears as ~~striketrough~~ text and new language appears as **bold** text:

- (1) Condition A.2 - Emission Units and Pollution Control Equipment Summary has been modified to include the modified unit descriptions for the three (3) woodworking operations, the sanding operation, identified as SAND, and Finishing Line 2. Additionally this condition has been modified to include the unit descriptions for the four (4) new roller coaters in the Framing Line.
- (2) Section D.1 - Emissions Unit Description has been modified to include the modified unit descriptions for the sanding operations, identified as SAND, and Finishing Line 2, and to include the unit descriptions for the four (4) new roller coaters in the Framing Line.
- (3) Condition D.1.3 - VOC PSD Minor Limit has been modified to include the four (4) new roller coaters to the existing VOC PSD Minor Limit that was approved under 053-31301-00058.
- (4) Section D.2 - Emissions Unit Description has been modified to include the modified unit descriptions for the three (3) woodworking operations and the sanding operations, identified as SAND. Additionally this Section has been modified to only include the units in the framing line that have requirements in the Section.
- (5) Section D.2.4 - Particulate Matter (PM) has been modified to include the Permittee's responsibilities in the event that bag failure is observed in a multi-compartment baghouse.

- (6) Added Condition D.2.5 - Visible Emission Notations to clarify the Permittee's responsibilities when the woodworking operations and the sanding operations, identified as SAND, are exhausted outdoors.
- (7) Existing Condition D.2.5, renumbered as D.2.6, has been modified to specify that semi-annual baghouse inspections are required when the woodworking operations and the sanding operations, identified as SAND, vent indoors.
- (8) Existing Condition D.2.7, renumbered as D.2.8, has been modified to include the visible emission notations recordkeeping requirements and to clarify the baghouse inspections recordkeeping requirements.
- (9) Section E.1 - Emissions Unit Description has been modified to include the modified unit descriptions for the sanding operations, identified as SAND, and Finishing Line 2, and to include the unit descriptions for the four (4) new roller coaters in the Framing Line. Additionally, IDEM revised Section E.1 for clarity.
- (10) The Quarterly Report form for the units in the Framing Line has been modified to include the four (4) new roller coaters. Additionally, the Quarterly Report form has been modified to remove the numbered months. The Permittee should state which months are being reported

A.2 Emission Units and Pollution Control Equipment Summary
[326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(15)]

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

- (b) One (1) Finishing Line 2, constructed in 2000 and modified in 2002 to increase capacity, with a maximum capacity of 4,000 pounds of wood components per hour, consisting of the following units:

 - (3) Three (3) ovens (hot water to air heat exchangers), identified as EU-2-16, EU-2-19, and EU-2-24, powered by the insignificant heaters, ~~and one (1) ultraviolet light oven,~~ constructed in 2009, all vented back to the spray booths EU-2-12, EU-2-19, and EU-2-24, respectively, with cool down sections for EU-2-19 and EU-2-24 vented to the atmosphere via stacks S-EU-2-19 and S-EU-2-24, respectively.
 - (4) **One (1) ultraviolet light oven, constructed in 2009, vented outside the building through stack S-EU-2-15.**

- (d) Two (2) woodworking operations, associated with two (2) finishing lines as follows:
 - (1) One (1) woodworking operation associated with Finishing Line 1, constructed in 2000, with a maximum capacity of 4,000 pounds per hour, consisting of five (5) panel cleaning machines, two (2) hand sand conveyors, and five (5) automated sanding machines, with particulate emissions controlled by a baghouse (BH-2) which is vented ~~within~~ **inside or outside of the building through stacks S-EU-BH-2-A and S-EU-BH-2-B.**
 - (2) One (1) woodworking operation associated with Finishing Line 2, constructed in 2000 and modified in 2002, with a maximum capacity of 4,000 pounds of wood cabinet components per hour, with particulate emissions controlled by a baghouse (BH-3), vented ~~within~~ **inside or outside of the building through stack S-EU-BH-3.**
- (e) One (1) woodworking operation, not directly associated with Finishing Lines 1 or 2, constructed in 2000, with a maximum capacity of 1.25 tons per hour, with particulate

emissions controlled by a baghouse (BH-1), which is vented ~~within~~ **inside or outside of** the building **through stack S-EU-BH-1**.

- (f) One (1) Framing Line, consisting of the following units:

- (10) One (1) sanding operation, consisting of 3 sanders, identified as SAND, approved in 2012 for construction, having a maximum capacity of less than 3.74 tons per hour, with emissions controlled by a baghouse (**BH-4**), and exhausting inside **or outside of** the building **through stack S-EU-BH-4**.

- (15) **One (1) base single roller coater (push-in/out - cannot be operated at the same time), identified as BCC7, approved in 2016 for construction, with a total maximum capacity of 0.5 gallons of coating per hour.**

- (16) **One (1) sealer single roller coater (push-in/out - cannot be operated at the same time), identified as SC7, approved in 2016 for construction, with a total maximum capacity of 0.5 gallons of coating per hour.**

- (17) **One (1) pair of top coat double roller coaters (push-in/out - cannot be operated at the same time), identified as TCC6 and TCC7, approved in 2016 for construction, with a total maximum capacity of 0.5 gallons of coating per hour.**

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (b) One (1) Finishing Line 2, constructed in 2000 and modified in 2002 to increase capacity, with a maximum capacity of 4,000 pounds of wood components per hour, consisting of the following units:

- (3) Three (3) ovens (hot water to air heat exchangers), identified as EU-2-16, EU-2-19, and EU-2-24, powered by the insignificant heaters, ~~and one (1) ultraviolet light oven,~~ constructed in 2009, all vented back to the spray booths EU-2-12, EU-2-19, and EU-2-24, respectively, with cool down sections for EU-2-19 and EU-2-24 vented to the atmosphere via stacks S-EU-2-19 and S-EU-2-24, respectively.

- (4) **One (1) ultraviolet light oven, constructed in 2009, vented outside the building through stack S-EU-2-15.**

- (f) One (1) Framing Line, consisting of the following units:

- (10) One (1) sanding operation, consisting of 3 sanders, identified as SAND, approved in 2012 for construction, having a maximum capacity of less than 3.74 tons per hour, with emissions controlled by a baghouse (**BH-4**), and exhausting inside **or outside of** the building **through stack S-EU-BH-4**.

- (15) **One (1) base single roller coater (push-in/out - cannot be operated at the same time), identified as BCC7, approved in 2016 for construction, with a total maximum capacity of 0.5 gallons of coating per hour.**

- (16) **One (1) sealer single roller coater (push-in/out - cannot be operated at the same time), identified as SC7, approved in 2016 for construction, with a total maximum capacity of 0.5 gallons of coating per hour.**
- (17) **One (1) pair of top coat double roller coaters (push-in/out - cannot be operated at the same time), identified as TCC6 and TCC7, approved in 2016 for construction, with a total maximum capacity of 0.5 gallons of coating per hour.**

Under 40 CFR Part 63, Subpart JJ, the Framing Line is considered an affected facility.

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

D.1.3 VOC PSD Minor Limit [326 IAC 2-2]

The total input of volatile organic compounds (VOC) at Edge Stain Booths (ESB1 - ESB4), Back Coat Roll Coaters (BCC1 - BCC4), Face Tone Roll Coaters (FTC1 - FTC2), Brush Stain Roll Coaters (BSC1 - BSC4), Sealer Roll Coaters (SC1 - SC6) ~~and~~, Top Coat Roll Coaters (TCC1, TCC2 and TCC3), **Base Single Roller Coater (BCC7), Sealer Single Roller Coater (SC7), and Top-Coat Double Roller Coaters (TCC6 and TCC7)**, including coatings, dilution solvents, and cleaning solvents including the wipe on-wipe off solvent cleaning, shall be limited to less than 249.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limit shall limit the VOC emissions from the modifications approved under **SSM 053-31301-00058 and SPM 053-37603-00058** to less than 250 tons per twelve (12) consecutive month period and render the requirements of 326 IAC 2-2 (**PSD**) not applicable to the **modifications permitted under SSM No. 053-31301-00058 and SPM No. 053-37603-00058.**

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (d) Two (2) woodworking operations, associated with two (2) finishing lines as follows:
 - (1) One (1) woodworking operation associated with Finishing Line 1, constructed in 2000, with a maximum capacity of 4,000 pounds per hour, consisting of five (5) panel cleaning machines, two (2) hand sand conveyors, and five (5) automated sanding machines, with particulate emissions controlled by a baghouse (BH-2) which is vented ~~within~~ **inside or outside of the building through stacks S-EU-BH-2-A and S-EU-BH-2-B.**
 - (2) One (1) woodworking operation associated with Finishing Line 2, constructed in 2000 and modified in 2002, with a maximum capacity of 4,000 pounds of wood cabinet components per hour, with particulate emissions controlled by a baghouse (BH-3), vented ~~within~~ **inside or outside of the building through stack S-EU-BH-3.**
- (e) One (1) woodworking operation, not directly associated with Finishing Lines 1 or 2, constructed in 2000, with a maximum capacity of 1.25 tons per hour, with particulate emissions controlled by a baghouse (BH-1), which is vented ~~within~~ **inside or outside of the building through stack S-EU-BH-1.**
- (f) One (1) Framing Line, consisting of the following units:

- (1) ~~Four (4) edge stain manual spray booths, identified as ESB1, ESB2, ESB3 and ESB4, approved in 2012 for construction, utilizing high volume low pressure (HVLP) coating application method, using dry filters for particulate control, each booth with a capacity of 2.0 gallons of coating per hour, vented to stacks S-ESB1, S-ESB2, S-ESB3 and S-ESB4, respectively.~~
- (2) ~~Two (2) pairs of back stain single roller coaters (push-in/out - cannot be operated at the same time), identified as BCC1 through BCC4, approved in 2012 for construction, with a total maximum capacity of 4.0 gallons of coating per hour.~~
- (3) ~~One (1) pair of face tone double roller coaters (push-in/out - cannot be operated at the same time), identified as FTC1 and FTC2, approved in 2012 for construction, with a total maximum capacity of 4.0 gallons of coating per hour.~~
- (4) ~~One (1) pair of brush stain single roller coaters (push-in/out - cannot be operated at the same time), identified as BSC1 and BSC2, approved in 2012 for construction, with a total maximum capacity of 2.0 gallons of coating per hour.~~
- (5) ~~One (1) pair of brush stain double roller coaters (push-in/out - cannot be operated at the same time), identified as BSC3 and BSC4, approved in 2012 for construction, with a total maximum capacity of 4.0 gallons of coating per hour.~~
- (6) ~~Three (3) pairs of sealer single roller coaters (push-in/out - cannot be operated at the same time), identified as SC1 through SC6, approved in 2012 for construction, with a total maximum capacity of 0.75 gallons of coating per hour.~~
- (7) ~~One (1) pair of top coat double roller coaters (push-in/out - cannot be operated at the same time), identified as TCC1 and TCC2, approved in 2012 for construction, with a total maximum capacity of 0.5 gallons of coating per hour.~~
- (8) ~~One (1) top coat Roll Coating unit, identified as TCC3, approved in 2012 for construction, with a total maximum capacity of 0.5 gallons of coating per hour.~~
- (9) ~~Two (2) direct fired natural gas ovens, identified as ESBO1 and ESBO2, with a combined heat rating of 0.96 MMBtu per hour, vented to stacks S-ESBO1 and S-ESBO2, respectively.~~
- (10) One (1) sanding operation, consisting of 3 sanders, identified as SAND, approved in 2012 for construction, having a maximum capacity of less than 3.74 tons per hour, with emissions controlled by a baghouse (**BH-4**), and exhausting inside **or outside of the building through stack S-EU-BH-4.**
- (11) ~~Six (6) UV curing lamps, identified as CL1 through CL6, approved in 2012 for construction.~~
- (12) ~~One (1) cooling tunnel, approved in 2012 for construction.~~
- (13) ~~One (1) pair of back stain single roller coaters (push-in/out - cannot be operated at the same time), identified as BCC5 and BCC6, with a total maximum capacity of 0.1875 gallons per hour.~~

(14) ~~One (1) pair of top coat single roller coaters push in/out - cannot be operated at the same time), identified as TCC4 and TCC5, with a total maximum capacity of 0.1875 gallon per hour.~~

Under 40 CFR Part 63, Subpart JJ, the Framing Line is considered an affected facility.

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

D.2.4 Particulate Matter (PM)

- (a) In order to comply with Conditions D.2.1 and D.2.2, the baghouses for PM and PM10 control shall be in operation and control emissions from the woodworking and sanding operations at all times that the woodworking and sanding operations are in operation.
- (b) **In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.**

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

D.2.5 Visible Emissions Notations

- (a) **Visible emission notations of the baghouse stack exhausts (S-EU-BH-2-A, S-EU-BH-2-B, S-EU-BH-3, S-EU-BH-1, and S-EU-BH-4) associated with the woodworking operations and sanding operations, identified as SAND, shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.**
- (b) **For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.**
- (c) **In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.**
- (d) **A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.**
- (e) **If abnormal emissions are observed, the Permittee shall take reasonable response 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.**

D.2.56 Baghouse Inspections

~~An inspection shall be performed each calendar quarter of all bags controlling the woodworking and sanding operations. All defective bags shall be replaced.~~

Semiannual inspections shall be performed on the bags in baghouses (BH-1, BH-2, BH-3, and BH-4) controlling particulate emissions from the woodworking operations and sanding operations, identified as SAND, when venting indoors. All defective bags shall be replaced.

D.2.67 Broken or Failed Bag Detection

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

D.2.78 Record Keeping Requirements

- (a) **To document the compliance status with Condition D.2.5, the Permittee shall maintain daily records of the visible emission notations of the baghouse stack exhausts (S-EU-BH-2-A, S-EU-BH-2-B, S-EU-BH-3, S-EU-BH-1, and S-EU-BH-4). The Permittee shall include it its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day.**
- (ab) To document compliance with Condition D.2.56, the Permittee shall maintain records of **the results of the quarterly baghouse inspections required under Condition D.2.6.**
- (bc) Section C - General Record Keeping Requirements, of this permit contains the Permittee's obligations with regard to the records required by this condition.

SECTION E.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (b) One (1) Finishing Line 2, constructed in 2000 and modified in 2002 to increase capacity, with a maximum capacity of 4,000 pounds of wood components per hour, consisting of the following units:
- ***
- (3) Three (3) ovens (hot water to air heat exchangers), identified as EU-2-16, EU-2-19, and EU-2-24, powered by the insignificant heaters, ~~and one (1) ultraviolet light oven,~~ constructed in 2009, all vented back to the spray booths EU-2-12, EU-2-19, and EU-2-24, respectively, with cool down sections for EU-2-19 and EU-2-24 vented to the atmosphere via stacks S-EU-2-19 and S-EU-2-24, respectively.
- (4) **One (1) ultraviolet light oven, constructed in 2009, vented outside the building through stack S-EU-2-15.**
- ***
- (f) One (1) Framing Line, consisting of the following units:
- ***
- (10) One (1) sanding operation, consisting of 3 sanders, identified as SAND, approved in 2012 for construction, having a maximum capacity of less than 3.74 tons per hour, with emissions controlled by a baghouse (BH-4), and exhausting inside **or outside of the building through stack S-EU-BH-4.**
- ***
- (15) **One (1) base single roller coater (push-in/out - cannot be operated at the same time), identified as BCC7, approved in 2016 for construction, with a total maximum capacity of 0.5 gallons of coating per hour.**
- (16) **One (1) sealer single roller coater (push-in/out - cannot be operated at the same time), identified as SC7, approved in 2016 for construction, with a total maximum capacity of 0.5 gallons of coating per hour.**

- (17) One (1) pair of top coat double roller coaters (push-in/out - cannot be operated at the same time), identified as TCC6 and TCC7, approved in 2016 for construction, with a total maximum capacity of 0.5 gallons of coating per hour.**

Under 40 CFR Part 63, Subpart JJ, the Framing Line is considered an affected facility.

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

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

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

~~The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart JJ.~~

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

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

E.1.2 Wood Furniture Manufacturing Operations NESHAP [40 CFR Part 63, Subpart JJ] [326 IAC 20-14][40 CFR Part 63, Subpart JJ]

~~Pursuant to CFR Part 63, Subpart JJ,~~ The Permittee shall comply with the **following** provisions of 40 CFR Part 63, Subpart JJ (included as Attachment A of this **to the operating** permit), which are incorporated as 326 IAC 20-14, for the ~~Finishing Lines 1, 2 and 3 and Framing Line~~ **emission units listed above:**

- (1) 40 CFR 63.800 (a), (d) and (f)
- (2) 40 CFR 63.801
- (3) 40 CFR 63.802 (b)
- (4) 40 CFR 63.803
- (5) 40 CFR 63.804 (d) through (g)
- (6) 40 CFR 63.805
- (5) 40 CFR 63.806
- (7) 40 CFR 63.807
- (8) 40 CFR 63.808
- (9) Tables 1 through 6

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

Part 70 Quarterly Report

Source Name: American Woodmark Corporation
Source Address: 5300 Eastside Parkway Drive, Gas city, Indiana 46933
Part 70 Permit No.: T053-32368-00058
Facility: Edge Stain Booths (ESB1 - SB4), Back Coat Roll Coaters (BCC1 - BCC4), Face
Tone Roll Coaters (FTC1 - FTC2), Brush Stain Roll Coaters (BSC1 - BSC4),
Sealer Roll Coaters (SC1 - SC6) and, Top Coat Double Roll Coaters (TCC1,
TCC2 and TCC3), **Base Single Roller Coater (BCC7), Sealer Single Roller
Coater (SC7), and Top-Coat Double Roller Coaters (TCC6 and TCC7)**
Parameter: Total Volatile Organic Compounds (VOC) Usage
Limit: Less than 249.9 tons per twelve (12) consecutive month period, with compliance
determined at the end of each month

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Additional Changes

IDEM, OAQ made additional changes to the permit as described below in order to update the language to match the most current version of the applicable rule, to eliminate redundancy within the permit, and to provide clarification regarding the requirements of these conditions.

- (1) IDEM, OAQ revised the CAM portion of the Section C.13 Response to Excursions or Exceedances to provide clarity. In paragraph (II)(c), the acronym QIP is being spelled out as Quality Improvement Plan (QIP) because this is the first time it is mentioned in the condition. In paragraphs (II)(f) and (II)(h)(1), the reference to paragraph (II)(a)(2) is being changed to paragraph (II)(c). Referencing paragraph (II)(a)(2) is correct, however IDEM, OAQ believes that referencing paragraph (II)(c) provides clarity.
- (2) 326 IAC 2-7-1 was updated on August 1, 2014. This rule update changed the rule cite for the definition of "Regulated Pollutant" used only for purposes of "Emission Reporting". Therefore, Section C.15 Emission Statement has been updated accordingly.
- (3) IDEM added the rule citation 326 IAC 2-7-5(1) to the Compliance Determination Requirements subsection title in Sections D.1 and D.2 to clarify the authority of these conditions.

C.13 Response to Excursions or Exceedances [40 CFR 64][326 IAC 3-8][326 IAC 2-7-5]
[326 IAC 2-7-6]

(II)

- (c) Based on the results of a determination made under paragraph (II)(a)(2) of this condition, the EPA or IDEM, OAQ may require the Permittee to develop and implement a ~~QIP~~ **Quality Improvement Plan (QIP)**. The Permittee shall develop and implement a QIP if notified to in writing by the EPA or IDEM, OAQ.

(h) *CAM recordkeeping requirements.*

- (1) The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to paragraph (II)(~~a~~)(2)(c) of this condition and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this condition (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

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

Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(~~3233~~) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

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

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

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 September 9, 2016. Additional information was received on September 16, 2016 and September 20, 2016.

The operation of this proposed modification shall be subject to the conditions of the attached Significant Permit Modification. The staff recommends to the Commissioner that the Part 70 Significant Permit Modification be approved.

g

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Allen Reimer at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCM 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-0863 or toll free at 1-800-451-6027, extension 3-0863.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A.1: Emissions Calculations
Emissions Summary**

**Company Name: American Woodmark Corporation
Source Address: 5300 Eastside Parkway Drive, Gas City, IN 46933
Permit Number: T053-32368-00058
Significant Permit Modification No.: 053-37603-00058
Reviewer: Allen Reimer**

Uncontrolled/Unlimited Emissions in Tons/Year											
Emission Units/Operation	PM (tons/yr)	PM ₁₀ (tons/yr)	PM _{2.5} (tons/yr)	SO ₂ (tons/yr)	NO _x (tons/yr)	VOC (tons/yr)	CO (tons/yr)	GHGs/CO ₂ e (tons/yr)	Total HAPs (tons/yr)	Worst Single HAP (Toluene) (tons/yr)	
Finishing Lines 1, 2, and 3	251.2	251.2	251.2	-	-	3810.5	-	-	1367.8	789.1	Toluene
Thermal Oxidizer	0.09	0.37	0.37	0.03	4.82	0.26	4.05	5817	0.09	1.6E-04	Toluene
Insignificant Natural Gas Combustion Units	0.08	0.32	0.32	0.03	4.20	0.23	3.53	5076	0.08	1.4E-04	Toluene
Woodworking	5819.1	5819.1	5819.1	-	-	-	-	-	-	-	-
Framing Line	18.54	18.54	18.54	-	-	335.8	-	-	29.46	25.10	MIBK
Sanders	442.4	442.4	442.4	-	-	-	-	-	-	-	-
Ovens	0.01	0.03	0.03	0.003	0.42	0.02	0.35	508	0.01	1.4E-05	Toluene
Finishing Room Touch-up and Repair Operations	0.65	0.52	0.52	0	0	1.72	0	0	0.70	0.69	Xylenes
Total	6,532.1	6,532.5	6,532.5	0.06	9.44	4,148.5	7.93	11,400.9	1,398.1	789.1	Toluene

Unlimited Potential to Emit After Integral Controls for Woodworking and Sanders (tons/year)											
Emission Units/Operation	PM (tons/yr)	PM ₁₀ (tons/yr)	PM _{2.5} (tons/yr)	SO ₂ (tons/yr)	NO _x (tons/yr)	VOC (tons/yr)	CO (tons/yr)	GHGs/CO ₂ e (tons/yr)	Total HAPs (tons/yr)	Worst Single HAP (Toluene) (tons/yr)	
Finishing Lines 1, 2, and 3	251.2	251.2	251.2	-	-	3810.5	-	-	1367.8	789.1	Toluene
Thermal Oxidizer	0.09	0.37	0.37	0.03	4.82	0.26	4.05	5817	0.09	1.6E-04	Toluene
Insignificant Natural Gas Combustion Units	0.08	0.32	0.32	0.03	4.20	0.23	3.53	5076	0.08	1.4E-04	Toluene
Woodworking*	58.19	58.19	58.19	-	-	-	-	-	-	-	-
Framing Line	18.54	18.54	18.54	-	-	335.8	-	-	29.46	25.10	MIBK
Sanders*	4.42	4.42	4.42	-	-	-	-	-	-	-	-
Ovens	0.01	0.03	0.03	0.003	0.42	0.02	0.35	508	0.01	1.4E-05	Toluene
Finishing Room Touch-up and Repair Operations	0.65	0.52	0.52	0	0	1.72	0	0	0.70	0.69	Xylenes
Total	333.20	333.60	333.60	0.06	9.44	4,148.5	7.93	11,400.9	1,398.1	789.11	Toluene

*In October of 1993 a Final Order Granting Summary Judgment was signed by an Administrative Law Judge ("ALJ") Garrettson resolving an appeal filed by Kimball Hospitality Furniture Inc. (Cause Nos. 92-A-J-730 and 91-A-J-833) related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls are necessary for the facility to produce its normal product and are integral to the normal operation of the facility, and therefore, potential emissions should be calculated after controls. Based on this ruling, potential emissions for particulate matter from woodworking operations can be calculated after consideration of the controls for purposes of determining permit level. However, for purposes of determining the applicability of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), potential particulate matter emissions from the woodworking operations were calculated before consideration of the controls.

**Appendix A.1: Emissions Calculations
Emissions Summary (continued)**

Unlimited Potential to Emit After All Controls in (tons/year)											
Emission Units/Operation	PM (tons/yr)	PM ₁₀ (tons/yr)	PM _{2.5} (tons/yr)	SO ₂ (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	GHGs/CO ₂ e (tons/yr)	Total HAPs (tons/yr)	Worst Single HAP (Toluene) (tons/yr)	
Finishing Lines 1, 2, and 3	25.12	25.12	25.12	-	-	216.9	-	-	1367.8	789.1	Toluene
Thermal Oxidizer	0.09	0.37	0.37	0.03	4.82	0.26	4.05	5817	0.09	1.6E-04	Toluene
Insignificant Natural Gas Combustion Units	0.08	0.32	0.32	0.03	4.20	0.23	3.53	5076	0.08	1.4E-04	Toluene
Woodworking*	58.19	58.19	58.19	-	-	-	-	-	-	-	-
Framing Line	0.93	0.93	0.93	-	-	335.8	-	-	29.46	25.10	MBK
Sanders*	4.42	4.42	4.42	-	-	-	-	-	-	-	-
Ovens	0.01	0.03	0.03	0.003	0.42	0.02	0.35	508	0.01	1.4E-05	Toluene
Finishing Room Touch-up and Repair Operations	0.65	0.52	0.52	0	0	1.72	0	0	0.70	0.69	Xylenes
Total	89.50	89.90	89.90	0.06	9.44	554.90	7.93	11,400.9	1,398.1	789.11	Toluene

Potential to Emit After Issuance of Modification (tons/year)											
Emission Units/Operation	PM (tons/yr)	PM ₁₀ (tons/yr)	PM _{2.5} (tons/yr)	SO ₂ (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	GHGs/CO ₂ e (tons/yr)	Total HAPs (tons/yr)	Worst Single HAP (Toluene) (tons/yr)	
Limited by Permit No. 053-14234-00058											
Finishing Lines 1, 2, and 3	25.12	25.12	25.12	-	-	249.00	-	-	1367.8	789.1	Toluene
Thermal Oxidizer	0.09	0.37	0.37	0.03	4.82	0.26	4.05	5817	0.09	1.6E-04	Toluene
Insignificant Natural Gas Combustion Units	0.08	0.32	0.32	0.03	4.20	0.23	3.53	5076	0.08	1.4E-04	Toluene
Woodworking*	58.19	58.19	58.19	-	-	-	-	-	-	-	-
Total	83.48	84.00	84.00	0.05	9.02	249.50	7.58	10893	1368.0	789.1	Toluene
Limited by Significant Source Modification No. 053-31301-00058											
Framing Line	18.54	18.54	18.54	-	-	249.90	-	-	29.46	25.10	MBK
Sanders*	4.42	4.42	4.42	-	-	-	-	-	-	-	-
Ovens	0.01	0.03	0.03	0.003	0.42	0.02	0.35	508	0.01	1.4E-05	Toluene
Total	22.97	22.99	22.99	0.003	0.42	249.92	0.35	508	29.47	1.4E-05	Toluene
Finishing Room Touch-up and Repair Operations	0.65	0.52	0.52	0	0	1.72	0	0	0.70	0.69	Xylenes
Total PTE of Entire Source	107.11	107.51	107.51	0.06	9.44	501.14	7.93	11,400.9	1,398.12	789.11	Toluene

*In October of 1993 a Final Order Granting Summary Judgment was signed by an Administrative Law Judge ("ALJ") Garretson resolving an appeal filed by Kimball Hospitality Furniture Inc. (Cause Nos. 92-A-J-730 and 91-A-J-833) related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls are necessary for the facility to produce its normal product and are integral to the normal operation of the facility, and therefore, potential emissions should be calculated after controls. Based on this ruling, potential emissions for particulate matter from woodworking operations can be calculated after consideration of the controls for purposes of determining permit level. However, for purposes of determining the applicability of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), potential particulate matter emissions from the woodworking operations were calculated before consideration of the controls.

**Appendix A.1: Emissions Calculations
VOC and Particulate
From Modification Surface Coating Operations**

Company Name: American Woodmark Corporation
Source Address: 5300 Eastside Parkway Drive, Gas City, IN 46933
Permit Number: T053-32368-00058
Significant Permit Modification No.: 053-37603-00058
Reviewer: Allen Reimer

Spray Booth	Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Framing Line																	
Single Roll Coater (BCC7)	Cashmere UV Primer	11.49	0.22%	0.0%	0.2%	0.0%	99.78%	0.5	1.0	0.03	0.03	0.01	0.30	0.06	0.00	0.03	100%
Single Roll Coater (SC7)	Cashmere UV Top Coat	11.51	1.20%	0.0%	1.2%	0.0%	98.80%	0.5	1.0	0.14	0.14	0.07	1.66	0.30	0.00	0.14	100%
Double Roll Coaters (TCC6 and TCC7)	H/G Stone Gray UV Top Coat	11.70	1.40%	0.0%	1.4%	0.0%	98.60%	0.5	1.0	0.16	0.16	0.08	1.97	0.36	0.00	0.17	100%

Modification Total before dry filters: 0.16 3.93 0.72 0.00
Modification Total after dry filters: 0.16 3.93 0.72 0.00

METHODOLOGY

* Emissions after dry filters calculated using an efficiency of 90% for dry filters
Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

**Appendix A.1: Emissions Calculations
Modification HAP Emission Calculations**

Company Name: American Woodmark Corporation
Source Address: 5300 Eastside Parkway Drive, Gas City, IN 46933
Permit Number: T053-32368-00058
Significant Permit Modification No.: 053-37603-00058
Reviewer: Allen Reimer

Framing Line

Spray Booth	Material	Density	Gallons of Material	Maximum	Weight %	Weight %	2(2-ethoxyethoxy) ethyl acrylate	Other*
		(Lb/Gal)	(gal/unit)	(unit/hour)	2(2-ethoxyethoxy) ethyl acrylate	Other*	(ton/yr)	(ton/yr)
Single Roll Coater (BCC7)	Cashmere UV Primer	11.49	0.5	1.0	0.00%	0	0.00	0
Single Roll Coater (SC7)	Cashmere UV Top Coat	11.51	0.5	1.0	1.20%	negligible	0.30	negligible
Double Roll Coaters (TCC6 and TCC7)	H/G Stone Gray UV Top Coat	11.70	0.5	1.0	1.40%	0	0.36	0
Total =							0.66	negligible

Note: Percent (%) HAPs were not provided. As a worst case assumption, VOC content is assumed to be 100% HAP.
 Note: List 2-(2-ethoxyethoxy)ethyl acrylate, show % in one column, title next column Other HAPs (list HAPs), show % (assume difference between % VOC and % ethyl acrylate)
 *Percent HAPs were not provided for all HAPs in the Cashmere UV Topcoat for the following HAPs: 2-propenoic acid, toluene, xylene, and cumene. VOC content is assumed to be 100% HAPs.

METHODOLOGY

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

**Appendix A.1: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: American Woodmark Corporation
Source Address: 5300 Eastside Parkway Drive, Gas City, IN 46933
Permit Number: T053-32368-00058
Significant Permit Modification No.: 053-37603-00058
Reviewer: Allen Reimer

Spray Booth	Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency	
Finishing Line 1																		
Stain Booth 1 (EU 1-3)	93322 Honey Oak Dispersion	6.91	98.06%	0.0%	98.06%	0.0%	1.14%	16.0	1.0	6.78	6.78	108.42	2601.96	474.86	2.35	594.38	75%	
	93107 Band Cleaner	6.88	100.00%	0.0%	100.00%	0.0%	0.00%	1.0	1.0	6.88	6.88	6.88	165.12	30.13	0.00	0.00	75%	
Toner Booth (EU 1-9)	93057 Hickory Spice Sap	6.76	99.16%	0.0%	99.16%	0.0%	0.40%	16.0	1.0	6.70	6.70	107.25	2574.03	469.76	0.99	1675.80	75%	
	93107 Band Cleaner	6.88	100.00%	0.0%	100.00%	0.0%	0.00%	1.0	1.0	6.88	6.88	6.88	165.12	30.13	0.00	0.00	75%	
Stain Booth 2 (EU1-11)	93322 Honey Oak Dispersion	6.91	98.06%	0.0%	98.06%	0.0%	1.14%	16.0	1.0	6.78	6.78	108.42	2601.96	474.86	2.35	594.38	75%	
	93107 Band Cleaner	6.88	100.00%	0.0%	100.00%	0.0%	0.00%	1.0	1.0	6.88	6.88	6.88	165.12	30.13	0.00	0.00	75%	
Sealer Booth 1 (EU 1-15)	93001 Catalyzed Sealer	7.51	79.82%	0.0%	79.82%	0.0%	14.47%	16.0	1.0	5.99	5.99	95.91	2301.88	420.09	26.55	41.43	75%	
	93107 Band Cleaner	6.88	100.00%	0.0%	100.00%	0.0%	0.00%	1.0	1.0	6.88	6.88	6.88	165.12	30.13	0.00	0.00	75%	
Sealer Booth 2 (EU 1-18)	93001 Catalyzed Sealer	7.51	79.82%	0.0%	79.82%	0.0%	14.47%	16.0	1.0	5.99	5.99	95.91	2301.88	420.09	26.55	41.43	75%	
	93107 Band Cleaner	6.88	100.00%	0.0%	100.00%	0.0%	0.00%	1.0	1.0	6.88	6.88	6.88	165.12	30.13	0.00	0.00	75%	
Top Coat Booth 1 (EU 1-23)	9305 Hi Solids Topcoat	7.91	50.05%	0.0%	50.05%	0.0%	44.38%	16.0	1.0	3.96	3.96	63.34	1520.24	277.44	69.22	8.92	75%	
	93107 Band Cleaner	6.88	100.00%	0.0%	100.00%	0.0%	0.00%	1.0	1.0	6.88	6.88	6.88	165.12	30.13	0.00	0.00	75%	
Top Coat Booth 2 (EU 1-28)	9305 Hi Solids Topcoat	7.91	50.05%	0.0%	50.05%	0.0%	44.38%	16.0	1.0	3.96	3.96	63.34	1520.24	277.44	69.22	8.92	75%	
	93107 Band Cleaner	6.88	100.00%	0.0%	100.00%	0.0%	0.00%	1.0	1.0	6.88	6.88	6.88	165.12	30.13	0.00	0.00	75%	
Finishing Line 1 Total before dry filters:												690.75	16578.04	3025.49	197.24			
*Finishing Line 1 Total after dry filters:												690.75	16578.04	3025.49	197.24			
Finishing Line 1 Total after dry filters and thermal oxidizer:														151.27	19.72			
Spray Booths EU 2-12, EU 2-19, and EU 2-24	Maple Frost Stain	7.79	84.98%	0.0%	84.98%	0.0%	4.54%	8.00000	1.000	6.62	6.62	52.96	1271.03	231.96	10.25	145.81	75%	
	White Primer	8.36	83.01%	0.0%	83.01%	0.0%	20.92%	8.0	1.0	6.94	6.94	55.52	1332.41	243.16	12.44	33.17	75%	
	Rel Plaz Topcoat	7.81	64.40%	0.0%	64.40%	0.0%	27.22%	8.0	1.0	5.03	5.03	40.24	965.69	176.24	24.36	18.48	75%	
	Band Cleaner	6.91	100.00%	0.0%	100.00%	0.0%	0.00%	3.5	1.0	6.91	6.91	24.19	580.44	105.93	0.00	0.00	75%	
Finishing Line 2 Total before dry filters:												172.90	4149.57	757.30	47.05			
*Finishing Line 2 Total after dry filters:												172.90	4149.57	757.30	47.05			
Finishing Line 2 Total after dry filters and thermal oxidizer:														37.86	4.70			
Finishing Line 3																		
Topcoat Booth (EU 3-2)	93051 Hi Solids Topcoat	7.91	50.05%	0.0%	50.05%	0.0%	44.36%	1.6	1.0	3.96	3.96	6.33	152.02	27.74	6.92	8.92	75%	
Finishing Line 3 Total before dry filters:												6.33	152.02	27.74	6.92			
*Finishing Line 3 Total after dry filters:												6.33	152.02	27.74	0.69			
Framing Line																		
Edge Stain Booths (ESB1 - ESB4)	Cherry Spice Stain	7.26	82.03%	3.9%	78.1%	4.0%	13.22%	4.0	1.0	5.91	5.67	22.69	544.58	99.39	9.14	42.91	60%	
	Maple Cognac Edge BC	7.27	81.56%	4.3%	77.3%	4.6%	13.46%	4.0	1.0	5.89	5.62	22.48	539.48	98.45	9.39	41.75	60%	
Back Coat Roll Coaters (BCC1 - BCC4)	Cherry Spice Back Coat	9.41	1.46%	1.3%	0.2%	1.8%	97.96%	4.0	1.0	0.02	0.02	0.07	1.66	0.30	0.00	0.02	100%	
Face Tone Roll Coaters (FTC1 - FTC2)	Maple Espresso RC Stain (976-D6V-75)	7.97	81.63%	40.1%	41.6%	38.4%	12.39%	4.0	1.0	5.38	3.31	13.25	318.11	58.06	0.00	26.74	100%	
Brush Stain Roll Coaters (BSC1 - BSC4)	Cherry Bordeaux Rollcoat Brush (976-D6V-101)	7.86	84.87%	46.9%	37.9%	44.4%	11.47%	6.0	1.0	5.37	2.98	17.89	429.26	78.34	0.00	25.99	100%	
Sealer Roll Coaters (SC1 - SC6)	UV Rollcoat Sealer	9.69	1.11%	0.0%	1.1%	0.0%	98.59%	0.8	1.0	0.11	0.11	0.08	1.94	0.35	0.00	0.11	100%	
Top Coat Roll Coaters (TCC1, TCC2 and TCC3)	60 Sheen UV Top Coat	9.10	0.00%	0.0%	0.0%	0.0%	100.00%	0.5	1.0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%	
Back Stain Single Roller Coaters (BC5 & BC6)	820 Stone Gray UV Top Coat	12.47	1.57%	0.3%	1.3%	0.4%	97.89%	0.2	1.0	0.16	0.16	0.03	0.73	0.13	0.00	0.17	100%	
Top Coat Single Roller Coaters (TCC4 & TCC5)	524 Stone Gray UV R/C Primer	12.20	0.25%	0.0%	0.3%	0.0%	99.55%	0.2	1.0	0.03	0.03	0.01	0.14	0.03	0.00	0.03	100%	
Single Roll Coater (BCC7)	Cashmere UV Primer	11.49	0.22%	0.0%	0.2%	0.0%	99.78%	0.5	1.0	0.03	0.03	0.01	0.30	0.06	0.00	0.03	100%	
Single Roll Coater (SC7)	Cashmere UV Top Coat	11.51	1.20%	0.0%	1.2%	0.0%	98.80%	0.5	1.0	0.14	0.14	0.07	1.66	0.30	0.00	0.14	100%	
Double Roll Coaters (TCC6 and TCC7)	H/G Stone Gray UV Top Coat	11.70	1.40%	0.0%	1.4%	0.0%	98.60%	0.5	1.0	0.16	0.16	0.08	1.97	0.36	0.00	0.17	100%	
Framing Line Total before dry filters:												76.66	1839.84	335.77	18.54			
Framing Line Total after dry filters:												76.66	1839.84	335.77	0.93			
Total emissions before dry filters:												946.64	22719.47	4146.30	269.75			
*Total emissions after dry filters:												946.64	22719.47	4146.30	26.05			
Total emissions after dry filters and thermal oxidizer:														552.65	26.05			
														VOC	PM/PM10/PM2.5			

METHODOLOGY

* Emissions after dry filters calculated using an efficiency of 90% for dry filters
Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lb/gal) * (1-Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

**Appendix A.1: Emissions Calculations
HAP Emission Calculations
From Surface Coating Operations**

Company Name: American Woodmark Corporation
Source Address: 5300 Eastside Parkway Drive, Gas City, IN 46933
Permit Number: T053-32368-00058
Significant Permit Modification No.: 053-37603-00058
Reviewer: Allen Reimer

Spray Booth	Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Methyl Isobutyl Ketone (MIBK)	Weight % Ethylbenzene	Weight % Xylene	Weight % Formaldehyde	Weight % Methanol	Weight % Toluene	Methyl Isobutyl Ketone (MIBK) (ton/yr)	Ethylbenzene (ton/yr)	Xylene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Methanol Emissions (ton/yr)	Toluene Emissions (ton/yr)
Finishing Line 1																
Stain Booth 1 (EU 1-3)	93322 Honey Oak Dispersion	6.91	16.0	1.0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
	93107 Band Cleaner	6.88	1.0	1.0	0.00%	0.00%	0.00%	0.00%	13.80%	35.20%	0.00	0.00	0.00	0.00	4.16	10.61
Toner Booth (EU 1-9)	93057 Hickory Spice Sap	6.76	16.0	1.0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
	93107 Band Cleaner	6.88	1.0	1.0	0.00%	0.00%	0.00%	0.00%	13.80%	35.20%	0.00	0.00	0.00	0.00	4.16	10.61
Stain Booth 2 (EU1-11)	93322 Honey Oak Dispersion	6.91	16.0	1.0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
	93107 Band Cleaner	6.88	1.0	1.0	0.00%	0.00%	0.00%	0.00%	13.80%	35.20%	0.00	0.00	0.00	0.00	4.16	10.61
Sealer Booth 1 (EU 1-15)	93001 Catalyzed Sealer	7.51	16.0	1.0	0.00%	0.00%	0.30%	0.20%	15.00%	0.00%	0.00	0.00	1.58	1.05	78.95	0.00
	93107 Band Cleaner	6.88	1.0	1.0	0.00%	0.00%	0.00%	0.00%	13.80%	35.20%	0.00	0.00	0.00	0.00	4.16	10.61
Sealer Booth 2 (EU 1-18)	93001 Catalyzed Sealer	7.51	16.0	1.0	0.00%	0.00%	0.30%	0.20%	15.00%	0.00%	0.00	0.00	1.58	1.05	78.95	0.00
	93107 Band Cleaner	6.88	1.0	1.0	0.00%	0.00%	0.00%	0.00%	13.80%	35.20%	0.00	0.00	0.00	0.00	4.16	10.61
Top Coat Booth 1 (EU-1-23)	9305 Hi Solids Topcoat	7.91	16.0	1.0	0.00%	0.00%	0.18%	0.02%	0.00%	37.85%	0.00	0.00	1.00	0.11	0.00	209.81
	93107 Band Cleaner	6.88	1.0	1.0	0.00%	0.00%	0.00%	0.00%	13.80%	35.20%	0.00	0.00	0.00	0.00	4.16	10.61
Top Coat Booth 2 (EU 1-28)	9305 Hi Solids Topcoat	7.91	16.0	1.0	0.00%	0.00%	0.18%	0.02%	0.00%	37.85%	0.00	0.00	1.00	0.11	0.00	209.81
	93107 Band Cleaner	6.88	1.0	1.0	0.00%	0.00%	0.00%	0.00%	13.80%	35.20%	0.00	0.00	0.00	0.00	4.16	10.61
Totals =											0.00	0.00	5.15	2.33	187.00	493.88
Total Combined HAPs for Finishing Line 1 =											688.4					
Finishing Line 2																
Spray Booths EU 2-12, EU 2-19, and EU 2-24	Maple Frost Stain	7.79	8.0	1.0	32.73%	5.52%	23.36%	0.00%	0.00%	10.01%	89.34	15.07	63.76	0.00	0.00	27.32
	White Primer	8.36	8.0	1.0	1.56%	0.00%	2.39%	0.00%	0.00%	5.02%	4.57	0.00	7.00	0.00	0.00	14.71
	Rel Plaz Topcoat	7.81	8.0	1.0	0.00%	6.15%	25.74%	0.10%	0.00%	0.00%	0.00	16.83	70.44	0.27	0.00	0.00
	Band Cleaner	6.91	3.5	1.0	0.00%	0.00%	0.00%	0.00%	16.06%	40.96%	0.00	0.00	0.00	0.00	17.01	43.39
Totals =											93.91	31.90	141.21	0.27	17.01	85.42
Total Combined HAPs for Finishing Line 2 =											369.7					
Finishing Line 3																
Topcoat Booth (EU 3-2)	93051 Hi Solids Topcoat	7.91	16.0	1.0	0.00%	0.00%	18.00%	0.02%	0.00%	37.85%	0.00	0.00	99.78	0.11	0.00	209.81
Totals =											0.00	0.00	99.78	0.11	0.00	209.81
Total Combined HAPs for Finishing Line 3 =											0.00					
Total Single HAPs for Finishing Lines 1, 2, and 3 =											93.91	31.90	246.1	2.71	204.0	789.1
Total Combined HAPs for Finishing Lines 1, 2, and 3 =											1367.8					

METHODOLOGY

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

Appendix A.1: Emissions Calculations
HAP Emission Calculations

Company Name: American Woodmark Corporation
Source Address: 5300 Eastside Parkway Drive, Gas City, IN 46933
Permit Number: T053-32368-00058
Significant Permit Modification No.: 053-37603-00058
Reviewer: Allen Reimer

Framing Line

Spray Booth	Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Methyl Isobutyl Ketone (MIBK)	Weight % Ethylbenzene	Weight % Xylene	Weight % Triethylamine	Weight % Glycol Ether	Weight % Solids	Methyl Isobutyl Ketone (MIBK) (ton/yr)	Ethylbenzene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Triethylamine Emissions (tons/yr)	Glycol Ether Emissions (tons/yr)	VHAP content (lb VHAP/lb solids)
Edge Stain Booths (ESB1 - ESB4)	Cherry Spice Stain	7.26	4.00	1.00	9.97%	0.17%	0.00%	0.00%	0.00%	17.97%	12.68	0.22	0.00	0.00	0.00	0.56
	Maple Cognac BC	7.27	4.00	1.00	9.75%	0.16%	0.00%	0.00%	0.00%	12.70%	12.42	0.20	0.00	0.00	0.00	0.78
Back Coat Roll Coaters (BCC1 - BCC4)	Cherry Spice Back Coat	9.41	4.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	98.54%	0.00	0.00	0.00	0.00	0.00	0.00
Face Tone Roll Coaters (FTC1 - FTC2)	Maple Espresso RC Stain	7.97	4.00	1.00	0.00%	0.00%	0.00%	0.35%	1.29%	18.37%	0.00	0.00	0.00	0.49	1.80	0.00
Brush Stain Roll Coaters (BSC1 - BSC4)	Cherry Bordeaux Rollcoat Brush	7.86	6.00	1.00	0.00%	0.00%	0.00%	0.48%	0.00%	15.13%	0.00	0.00	0.00	0.99	0.00	0.00
Sealer Roll Coaters (SC1 - SC6)	UV Rollcoat Sealer	9.69	0.75	1.00	0.00%	0.00%	0.02%	0.00%	0.00%	98.89%	0.00	0.00	0.01	0.00	0.00	0.00
Top Coat Roll Coaters (TCC1, TCC2 and TCC3)	60 Sheen UV Top Coat	9.10	0.50	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	100.00%	0.00	0.00	0.00	0.00	0.00	0.00
Back Stain Single Roller Coaters (BCC5 & BCC6)	820 Stone Gray UV Top Coat	12.47	0.19	1.00	0.00%	0.00%	0.001%	0.00%	0.00%	98.44%	0.00	0.00	1.02E-04	0.00	0.00	0.00
Top Coat Single Roller Coaters (TCC4 & TCC5)	524 Stone Gray UV R/C Primer	12.20	0.19	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	99.75%	0.00	0.00	0.00	0.00	0.00	0.00
Total =											25.10	0.42	0.01	1.48	1.80	

Spray Booth	Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % 2(2-ethoxyethoxy) ethyl acrylate	Weight % Other*	2(2-ethoxyethoxy) ethyl acrylate (ton/yr)	Other* (ton/yr)
Single Roll Coater (BCC7)	Cashmere UV Primer	11.49	0.5	1.0	0.00%	0	0.00	0
Single Roll Coater (SC7)	Cashmere UV Top Coat	11.51	0.5	1.0	1.20%	negligible	0.30	negligible
Double Roll Coaters (TCC6 and TCC7)	H/G Stone Gray UV Top Coat	11.70	0.5	1.0	1.40%	0	0.36	0
Total =							0.66	negligible

*Percent HAPs were not provided for all HAPs in the Cashmere UV Topcoat for the following HAPs: 2-propenoic acid, toluene, xylene, and cumene. VOC content is assumed to be 100% HAPs.

Total Combined HAPs for Framing Line = 29.46

MIBK (tons/yr)	Ethylbenzene (ton/yr)	Xylene (ton/yr)	Triethylamine (ton/yr)	Glycol Ether (ton/yr)	Formaldehyde (ton/yr)	Methanol (ton/yr)	Toluene (ton/yr)	2(2-ethoxyethoxy) ethyl acrylate (ton/yr)
119.0	32.32	246.1	1.48	1.80	2.71	204.0	789.1	0.66

Total Single HAPs Finishing Lines 1, 2, 3 and Framing Line = 1397.2

METHODOLOGY

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

**Appendix A.1: Emissions Calculations
Woodworking Emission Calculations**

**Company Name: American Woodmark Corporation
Source Address: 5300 Eastside Parkway Drive, Gas City, IN 46933
Permit Number: T053-32368-00058
Significant Permit Modification No.: 053-37603-00058
Reviewer: Allen Reimer**

Process	Baghouse	Air Flow Rate (acfm)	Outlet Grain Loading (grain/ascf)	Control Efficiency (%)	Uncontrolled PM Emissions* (ton/yr)	Controlled PM Emissions* (ton/yr)	326 IAC 2-2 PM/PM10 Limit (lbs/hr)
Woodworking Operation Not Associated with a Finishing Line	BH-1	45000	0.01	99.00%	1689.4	16.89	3.86
Woodworking operation associated with Finishing Line 1	BH-2	65000	0.01	99.00%	2440.3	24.40	5.57
Woodworking Operation Associated with Finishing Line 2	BH-3	45000	0.01	99.00%	1689.4	16.89	3.86
Total:					5819.1	58.19	13.29

Methodology

*Uncontrolled PM Emissions (ton/yr) = Air Flow Rate (acfm) * Outlet Grain Loading (gr/ascf) / 7000 (gr/lb) * 60 (min/hr) * 8760 (hr/yr) / 2000 (lb/ton) / (1 - Control Efficiency)

**Controlled PM Emissions (ton/yr) = Air Flow Rate (acfm) * Outlet Grain Loading (gr/ascf) / 7000 (gr/lb) * 60 (min/hr) * 8760 (hr/yr) / 2000 (lb/ton)

**Appendix A.1: Emissions Calculations
Woodworking Emission Calculations**

Company Name: American Woodmark Corporation
Source Address: 5300 Eastside Parkway Drive, Gas City, IN 46933
Permit Number: T053-32368-00058
Significant Permit Modification No.: 053-37603-00058
Reviewer: Allen Reimer

Sanding Operation Emissions

Based on the amount of dust collected and control efficiency of the control device.

Amount collected: this is the amount of dust collected from the control device in pounds per hour (lb/hr).

Efficiency: a percent and is based on the manufactures specifications

Amount collected: 100 lbs per hour

Efficiency: 99%

Uncontrolled emissions (lbs/hr) = (Amount collected lb/hr) / (control efficiency)

$$\begin{aligned} \text{Uncontrolled emissions} &= (100 \text{ lbs/hr}) / (0.99) \\ &= 101.01 \text{ lbs/hr} \end{aligned}$$

$$\begin{aligned} \text{Uncontrolled emissions (tons/yr)} &= (101.01 \text{ lbs/hr}) \times (8760 \text{ hrs/yr}) \times (\text{ton}/2000 \text{ lbs}) \\ &= \mathbf{442.42 \text{ tons/yr}} \end{aligned}$$

Controlled emissions (lbs/hr) = (Uncontrolled emission rate lb/hr) x (1- control efficiency)

$$\begin{aligned} \text{Controlled emissions (tons/yr)} &= (101.01 \text{ lb/hr}) \times (1- 99\%) \times (8760 \text{ hrs/yr}) \times (\text{ton}/2000 \text{ lbs}) \\ &= \mathbf{4.42 \text{ tons/yr}} \end{aligned}$$

**Appendix A.1: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

**Company Name: American Woodmark Corporation
Source Address: 5300 Eastside Parkway Drive, Gas City, IN 46933
Permit Number: T053-32368-00058
Significant Permit Modification No.: 053-37603-00058
Reviewer: Allen Reimer**

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
11.0	1000	96.4

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
Potential Emission in tons/yr	0.09	0.37	0.37	0.03	**see below	0.26	4.05

*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/1,000 MMBtu

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

Hazardous Air Pollutants (HAPs)

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.0E-04	5.8E-05	3.6E-03	8.7E-02	1.6E-04

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	2.4E-05	5.3E-05	6.7E-05	1.8E-05	1.0E-04

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

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

Greenhouse Gases (GHGs)

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120,000	2.3	2.2
Potential Emission in tons/yr	5,782	0.11	0.11
Summed Potential Emissions in tons/yr	5,782		
CO2e Total in tons/yr	5,817		

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.

Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.

Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

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

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O

Potential Emission ton/yr x N2O GWP (310).

**Appendix A.1: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

**Company Name: American Woodmark Corporation
Source Address: 5300 Eastside Parkway Drive, Gas City, IN 46933
Permit Number: T053-32368-00058
Significant Permit Modification No.: 053-37603-00058
Reviewer: Allen Reimer**

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
0.96	1000	8.4

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Potential Emission in tons/yr	7.99E-03	0.03	0.03	2.52E-03	0.42	0.02	0.35

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

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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

Hazardous Air Pollutants (HAPs)

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Potential Emission in tons/yr	8.8E-06	5.0E-06	3.2E-04	7.6E-03	1.4E-05

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Potential Emission in tons/yr	2.1E-06	4.6E-06	5.9E-06	1.6E-06	8.8E-06

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

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

Greenhouse Gases (GHGs)

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
Potential Emission in tons/yr	505	0.010	0.009
Summed Potential Emissions in tons/yr	505		
CO2e Total in tons/yr	508		

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.

Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.

Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

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

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

**Appendix A.1: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

**Company Name: American Woodmark Corporation
Source Address: 5300 Eastside Parkway Drive, Gas City, IN 46933
Permit Number: T053-32368-00058
Significant Permit Modification No.: 053-37603-00058
Reviewer: Allen Reimer**

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
9.6	1000	84.1

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Potential Emission in tons/yr	0.08	0.32	0.32	0.03	4.20 **see below	0.23	3.53

*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/1,000 MMBtu

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

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Potential Emission in tons/yr	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
	8.8E-05	5.0E-05	3.2E-03	7.6E-02	1.4E-04

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Potential Emission in tons/yr	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
	2.1E-05	4.6E-05	5.9E-05	1.6E-05	8.8E-05

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

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

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
Potential Emission in tons/yr	120,000	2.3	2.2
Summed Potential Emissions in tons/yr	5,046	0.10	0.09
CO2e Total in tons/yr	5,046	5,076	

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.

Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.

Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

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

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

Appendix A.1: Emissions Calculations
Volatile Organic Compound (VOC) and Hazardous Air Pollutant (HAP) Emissions
from the Finishing Room Touch-up and Repair Operations
Touch-up Coating (TRC)

Company Name: American Woodmark Corporation
 Source Address: 5300 Eastside Parkway Drive, Gas City, IN 46933
 Permit Number: T053-32368-00058
 Significant Permit Modification No.: 053-37603-00058
 Reviewer: Allen Reimer

Particulate and Volatile Organic Compounds (VOCs) Emissions

Material	Material Density (lbs/gal)	Material Usage (gal/hr)	Material Usage (gal/day)	Weight % Solids	Transfer Efficiency (%)	PM Emissions (lbs/hr)	PM Emissions (ton/yr)	Weight % Organics	VOC Emissions (lbs/hr)	VOC Emissions (ton/yr)
REL PLAZ TOPCOAT #830-55L6-1650-93001	7.81	0.078	1.88	35.6%	65%	0.076	0.333	64.44%	0.39	1.72

Hazardous Air Pollutant (HAPs) Emissions

Material	Density (Lb/Gal)	Material Usage (gal/hr)	Weight % Xylenes	Weight % Toluene	Weight % Formaldehyde	Weight % 2-Phenoxy ethanol	Individual HAP Emission Rates				Total HAPs (tons/yr)
							Xylenes Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	2-Phenoxy ethanol Emissions (ton/yr)	
REL PLAZ TOPCOAT #830-55L6-1650-93001	7.81	0.078	25.817%	0.160%	0.130%	0.050%	0.69	4.3E-03	3.5E-03	1.3E-03	0.70

NOTES

American Woodmark Corporation reports actual coating usage as 339.22 gallons, while operating 4,336 hours, per the last 12 months. This coating is applied by hand using an aerosol spray can. The transfer efficiency is assumed to be 65%. Total emissions based on rated capacity at 8,760 hours/year. PM10 and PM 2.5 emissions are assumed equal to PM emissions. Coating data taken from Regulatory Constant Report for the coating submitted by the source.

METHODOLOGY

Material Usage (gal/day) = Material Usage (gal/hr) * 24 hrs/day
 PM Emission rate (lbs/hr) = Density (lbs/gal) * Material Usage (gal/hr) * Weight % Solids * (1 - Transfer Efficiency (%))
 VOC Emission rate (lbs/hr) = Density (lbs/gal) * Material Usage (gal/hr) * Weight % Organics
 PM/VOC Emission rate (tons/yr) = Emission rate (lbs/hr) * 8760 hrs/yr * 1 ton/2000 lbs
 Individual HAP Emission rate (tons/yr) = Density (lbs/gal) * Material Usage (gal/hr) * Weight % HAP
 Total HAPs (tons/yr) = SUM(Individual HAP Emission rates (tons/yr))

**Appendix A.1: Emissions Calculations
Finishing Room Touch-up and Repair Operations
Woodworking - Sanding & Shaping (TRWW)**

**Company Name: American Woodmark Corporation
Source Address: 5300 Eastside Parkway Drive, Gas City, IN 46933
Permit Number: T053-32368-00058
Significant Permit Modification No.: 053-37603-00058
Reviewer: Allen Reimer**

Unit ID	Maximum Capacity (lbs wood products /hr)*	Pollutant	Emission Factor (lbs/ton)**	Emission Rate before Controls (lbs/hr)	Emission Rate before Controls (tons/yr)
Woodworking (TRWW)	420.0	PM	0.35	0.07	0.32
		PM10 ⁽¹⁾ / PM2.5 ⁽²⁾	0.20	0.04	0.18

Methodology

Uncontrolled Emission Rate (lbs/hr) = Maximum Capacity (lbs wood/hr) * Emission Factor (lbs/ton) * (1 ton/2000 lbs)

Uncontrolled Emission Rate (tons/yr) = Uncontrolled Emission Rate (lbs/hr) * (8760 hours/1 year) *(1 ton/2000 lbs)

Notes

* According to American Woodmark Corporation, a maximum of 60 wood pieces are processed per hour, with a worst-case weight of 7.0 pounds per piece.

** Emission Factors are from EPA FIRE Version 5.0 Source Classification Codes and Emission Factor Listing for Criteria Pollutants, EPA 454/R-95-012, August 1995, pg EF-77, for Sawmill Operations (SCC 3-07-008-02, Log Sawing).

⁽¹⁾ Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.

⁽²⁾ PM 2.5 emissions are assumed equal to PM10 emissions.



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

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SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Brian Campbell
American Woodmark Corporation
5300 Eastside Pkwy Dr
Gas City, IN 46933

DATE: December 19, 2016

FROM: Matt Stuckey, Branch Chief
Permits Branch
Office of Air Quality

SUBJECT: Final Decision
American Woodmark Corporation
053-37603-00058

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because 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.

A copy of the final decision and supporting materials has also been sent via standard mail to:
Alic Bent (August Mack Environmental)
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 2/17/2016



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

December 19, 2016

TO: Gas City Mill Twp County Public Library

From: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Subject: **Important Information for Display Regarding a Final Determination**

Applicant Name: American Woodmark Corporation
Permit Number: 053-37603-00058

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library.dot 2/17/2016

Mail Code 61-53

IDEM Staff	CDENNY 12/19/2016 American Woodmark Corporation 053-37603-00058 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

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											Remarks
1		Brian Campbell American Woodmark Corporation 5300 Eastside Pkwy Dr Gas City IN 46933 (Source CAATS)									
2		Christopher Binning EHS Mgr American Woodmark Corporation 5300 Eastside Pkwy Dr Gas City IN 46933 (RO CAATS)									
3		Gas City Mill Twp Public Library 135 E Main St Gas City IN 46933-1496 (Library)									
4		Marion City Council and Mayors Office 301 S. Branson Street Marion IN 46952-4052 (Local Official)									
5		Ms. Mary Shipley 10968 E 100 S Marion IN 46953 (Affected Party)									
6		Grant County Health Department 401 S. Adams St, Courthouse Complex Marion IN 46953-2031 (Health Department)									
7		Mr. Thomas Lee Clevenger 4005 South Franks Lane Selma IN 47383 (Affected Party)									
8		Gas City - City Council and Mayors Office 211 E. Main St. Gas City IN 26933 (Local Official)									
9		Mr. Alic Bent August Mack Environmental, Inc. 1302 N Meridian St, Suite 300 Indianapolis IN 46202 (Consultant)									
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