

Mr. Charles Schnurpel  
Woodcrest Manufacturing, Inc.  
217 E. Canal St.  
P.O. Box 848  
Peru, IN 46970

Re: MMT 103-10266  
First Minor Modification to  
**Part 70 T103-6056-00027**

Dear Mr. Schnurpel:

Woodcrest Manufacturing, Inc. was issued a permit on October 7, 1998 for the wood furniture surface coating operation. A letter requesting changes to this permit was received on August 27, 1998. Pursuant to the provisions of 326 IAC 2-7-12 a minor modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of moving the surface coating unit EU-X from line SC-3 to line SC-2. In addition surface coating unit EU-02M has been removed from service.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification to the front of the original permit.

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 Bryan Sheets, of my staff, at the above address; or by phone at 317-233-0431 or 1-800-451-6027 (ext 3-0431).

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Management

Attachments

bjs

cc: File - Peru County  
U.S. EPA, Region V  
Peru County Health Department  
Air Compliance Section Inspector - Ryan Hillman  
Compliance Data Section - Jerri Curless  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Nancy Landau

**PART 70 OPERATING PERMIT  
and ENHANCED NEW SOURCE REVIEW  
OFFICE OF AIR MANAGEMENT**

**Woodcrest Manufacturing, Inc.  
150 East Washington Street  
Peru , Indiana 46970**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 and contains the conditions and provisions specified in 326 IAC 2-8 and 40 CFR Part 70.6 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments) and IC 13-15 and IC 13-17 (prior to July 1, 1996, IC 13-1-1-4 and IC 13-7-10).

Operation Permit No.: T103-6056-00027	
Original issued by Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: October 7, 1998
First Minor Permit Modification: MMT103-10266	Pages Affected: 2, 4, 6, 19, 20, 29, 30, 32, 33, 36, 44 and 45
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

## TABLE OF CONTENTS

<b>A</b>	<b>SOURCE SUMMARY</b>	5
A.1	General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]	5
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]	5
A.3	Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]	6
A.4	Part 70 Permit Applicability [326 IAC 2-7-2]	7
<b>B</b>	<b>GENERAL CONDITIONS</b>	8
B.1	Permit No Defense [326 IAC 2-1-10] [IC 13]	8
B.2	Definitions [326 IAC 2-7-1]	8
B.3	Permit Term [326 IAC 2-7-5(2)]	8
B.4	Enforceability [326 IAC 2-7-7(a)]	8
B.5	Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]	8
B.6	Severability [326 IAC 2-7-5(5)]	8
B.7	Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]	8
B.8	Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]	8
B.9	Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]	9
B.10	Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]	9
B.11	Annual Compliance Certification [326 IAC 2-7-6(5)]	9
B.12	Preventive Maintenance Plan [326 IAC 2-7-5(1),(3)and (13)][326 IAC 2-7-6(1)and(6)]	10
B.13	Emergency Provisions [326 IAC 2-7-16]	11
B.14	Permit Shield [326 IAC 2-7-15]	12
B.15	Multiple Exceedances [326 IAC 2-7-5(1)(E)]	13
B.16	Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]	13
B.17	Permit Modification, Reopening, Revocation and Reissuance, or Termination	14
B.18	Permit Renewal [326 IAC 2-7-4]	15
B.19	Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]	15
B.20	Permit Revision Under Economic Incentives and Other Programs	16
B.21	Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]	16
B.22	Operational Flexibility [326 IAC 2-7-20]	16
B.23	Construction Permit Requirement [326 IAC 2]	18
B.24	Inspection and Entry [326 IAC 2-7-6(2)]	18
B.25	Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]	18
B.26	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]	19
B.27	Enhanced New Source Review [326 IAC 2]	19
<b>C</b>	<b>SOURCE OPERATION CONDITIONS</b>	20
	<b>Emission Limitations and Standards [326 IAC 2-7-5(1)]</b>	
C.1	Major Source	20
C.2	Particulate Matter Emission Limitations For Processes with Process Weight Rates	20
C.3	Opacity [326 IAC 5-1]	20
C.4	Open Burning [326 IAC 4-1] [IC 13-17-9]	20
C.5	Incineration [326 IAC 4-2] [326 IAC 9-1-2]	20
C.6	Fugitive Dust Emissions [326 IAC 6-4]	20
C.7	Operation of Equipment [326 IAC 2-7-6(6)]	20
C.8	Stack Height [326 IAC 1-7]	20
C.9	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]	21

<b>Testing Requirements [326 IAC 2-7-6(1)]</b>	
C.10 Performance Testing [326 IAC 3-6]	22
<b>Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]</b>	
D.2.5 Visible Emissions Notations	36
D.2.6 Baghouse Inspections	36
D.2.7 Broken or Failed Bag Detection	36
<b>Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]</b>	
D.2.8 Record Keeping Requirements	37
<b>D.3 FACILITY OPERATION CONDITIONS - Insignificant Activities</b>	<b>38</b>
Boiler	38
Degreasing Operations	38
Process Weight Activities	39
Certification Form	40
Emergency/Deviation Occurrence Report	41
Quarterly Report Form	43
Quarterly Report Form	44
Quarterly Report Form	45
Semi-Annual Report Form	46
Compliance Monitoring Report Form	47

- (4) One (1) dip tank, identified as EU-X, with a maximum capacity of 6.25 units per hour, and exhausting to general ventilation.
- (b) One (1) surface coating line, designated as SC3, coating wooden furniture, consisting of the following equipment:
  - (1) One (1) dip tank, identified as EU-BB, with a maximum capacity of 16.25 units per hour, and exhausting to general ventilation.
  - (2) One (1) flowcoating booth, identified as EU-02N, with a maximum capacity of 8.13 units per hour, and exhausting to Stack ID S-01.
- (c) Woodworking operations consisting of the following:
  - (1) Line W-1, with a maximum capacity of 4050 pounds per hour, which has emissions controlled by one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1;
  - (2) Line W-2, with a maximum capacity of 1416 pounds per hour, which has emissions controlled by one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1;
  - (3) Line W-3, with a maximum capacity of 1789 pounds per hour, which has emissions controlled by one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1;
  - (4) Line W-4, with a maximum capacity of 654 pounds per hour, which has emissions controlled by one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1;
  - (5) Line W-5, with a maximum capacity of 3152 pounds per hour, which has emissions controlled by one (1) baghouse, identified as BH-1 or one (1) six bag portable collector, exhausting to Stack ID BH-1 or general ventilation, respectively; and
  - (6) Line W-6, with a maximum capacity of 2684 pounds per hour, which has emissions controlled by one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

---

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour (One (1) boiler, with a heat input capacity of 1.5 MMBtu/hr).
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 (Petroleum hydrocarbon degreaser, with a throughput of 0.6 gallons per day).

- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM, shall reserve the right to issue a new permit.

**B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]**

---

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

**B.27 Enhanced New Source Review [326 IAC 2]**

---

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

**SECTION C SOURCE OPERATION CONDITIONS**

**Entire Source**

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

**C.1 Major Source**

---

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21, this source is a major source.

**C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]**

---

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

**C.3 Opacity [326 IAC 5-1]**

---

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

- (a) Opacity shall not exceed an average of thirty percent (30%) 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 overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

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

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

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

## SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] The following surface coating equipment:

- (a) One (1) surface coating line, designated as SC1, coating wood furniture with a maximum capacity of 107.5 units per hour, consisting of the following equipment:
  - (1) One (1) flowcoating booth, identified as EU-02D, and exhausting to Stack ID S-02D.
  - (2) One (1) spray booth, identified as EU-02F, utilizing an air assisted airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID S-02F.
  - (3) One (1) spray booth, identified as EU-02G, utilizing an air assisted airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID S-02G.
  - (4) One (1) spray booth, identified as EU-02H, utilizing an air assisted airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID S-02H.
- (a) One (1) surface coating line, designated as SC2, coating wooden furniture with a maximum capacity of 18.74 units per hour, consisting of the following equipment:
  - (1) One (1) dip tank, identified as EU-02A, and exhausting to general ventilation.
  - (2) One (1) dip tank, identified as EU-02I, and exhausting to general ventilation.
  - (3) One (1) spray booth, identified as EU-02C, utilizing an air assisted airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID S-02C.
  - (4) One (1) dip tank, identified as EU-X, with a maximum capacity of 6.25 units per hour, and exhausting to general ventilation.
- (b) One (1) surface coating line, designated as SC3, coating wooden furniture, consisting of the following equipment:
  - (1) One (1) dip tank, identified as EU-BB, with a maximum capacity of 16.25 units per hour, and exhausting to general ventilation.
  - (2) One (1) flowcoating booth, identified as EU-02N, with a maximum capacity of 8.13 units per hour, and exhausting to Stack ID S-01.

### 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 in lines SC1, SC2 and SC3 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 Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- (a) Pursuant to CP-103-2222-00027, issued on January 22, 1992, coating line SC1 (EU-02D, EU-02F, EU-02G and EU-02H) shall use less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.
- (b) Coating line SC2 (EU-02A, EU-02I, EU-02C and EU-X) shall use less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.
- (c) Pursuant to CP-103-8824-00027, issued on November 18, 1997, coating line SC3 (EU-BB and EU-02N) shall use less than 40 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the PM from the four (4) paint booths (EU-02F, EU-02G, EU-02H and EU-02C) shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.1.4 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

- (a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of December 7, 1998.
- (b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:

- (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:

**D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

---

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

**Compliance Determination Requirements**

**D.1.7 Testing Requirements [326 IAC 2-7-6(1),(6)] [40 CFR 63, Subpart JJ]**

---

- (a) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 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.
- (b) The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**D.1.8 VOC Emissions**

---

Compliance with Condition D.1.2 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

**D.1.9 Volatile Organic Compounds (VOC)**

---

Compliance with the VOC usage limitations contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**D.1.10 Particulate Matter (PM)**

---

Pursuant to CP-103-2222-00027, CP-103-4481-00027 and CP-103-8824-00027, issued on January 22, 1992, April 24, 1995 and November 18, 1997, respectively, the dry filters for PM control shall be in operation at all times when the four (4) paint booths (EU-02F, EU-02G, EU-02H and EU-02C) are in operation.

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

**D.1.11 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 booth stacks while the associated booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan 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.

The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

#### **D.1.12 Record Keeping Requirements**

---

- (a) To document compliance with Condition D.1.2, 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 usage 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 usage for each month; and
  - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.4, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.1.4.
  - (1) Certified Product Data Sheet for each finishing material and thinner.
  - (2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials.
  - (3) The VHAP content in weight percent of each thinner used.
  - (4) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (c) To document compliance with Condition D.1.5, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.

- (d) To document compliance with Condition D.1.11, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.13 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

### **Compliance Determination Requirements**

#### D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### D.2.4 Particulate Matter (PM)

Pursuant to CP-103-2222-00027 and CP-103-4481-00027, issued on January 22, 1992 and April 24, 1995, respectively, the baghouse BH-1 and six bag portable collector for PM control shall be in operation at all times when the associated facilities are in operation and exhausting to the outside atmosphere.

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

#### D.2.5 Visible Emissions Notations

- (a) Daily visible emission notations of the woodworking stack BH-1 exhaust shall be performed during normal daylight operations when exhausted 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) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

#### D.2.6 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

#### D.2.7 Broken or Failed Bag Detection

---

In the event that bag failure has been observed.

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. 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 single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have 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).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: Woodcrest Manufacturing, Inc.  
Source Address: 150 East Washington Street, Peru, Indiana 46970  
Mailing Address: P.O. Box 848, Peru, Indiana 46970  
Part 70 Permit No.: T103-6056-00027  
Facility: Surface Coating Line SC2 (EU-02A, EU-02I, EU-02C and EU-X)  
Parameter: VOC  
Limit: Less than 250 tons per 12 consecutive month period

YEAR: \_\_\_\_\_

Month	VOC Usage This Month (tons)	VOC Usage Previous 11 Months (tons)	Total VOC Usage 12 Month Period (tons)

- 9 No deviation occurred in this quarter.
- 9 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 DATA SECTION

### Part 70 Quarterly Report

Source Name: Woodcrest Manufacturing, Inc.  
Source Address: 150 East Washington Street, Peru, Indiana 46970  
Mailing Address: P.O. Box 848, Peru, Indiana 46970  
Part 70 Permit No.: T103-6056-00027  
Facility: Surface Coating Line SC3 (EU-BB and EU-02N)  
Parameter: VOC  
Limit: Less than 40 tons per 12 consecutive month period

YEAR: \_\_\_\_\_

Month	VOC Usage This Month (tons)	VOC Usage Previous 11 Months (tons)	Total VOC Usage 12 Month Period (tons)

- 9 No deviation occurred in this quarter.
- 9 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

## Technical Support Document for First Minor Permit Modification of the Part 70 Operating Permit

### Source Background and Description

Source Name:	Woodcrest Manufacturing, Inc.	
Source Location:	150 East Washington St., Peru, Indiana 46970	
County:	Miami	
Permit No.:	T103-6056-00027	Issued: October 7, 1998
Revision No.	MMT 103-10266	
SIC Code:	2512	
Permit Reviewer:	Bryan Sheets	

### Source Definition

Woodcrest Manufacturing, Inc. (Woodcrest) operates a wood furniture manufacturing operation. The operations consist of three separate coating lines designated as SC1, SC2, and SC3. Each coating line has more than one booth or coating machine.

### History

On October 8, 1998, Woodcrest was issued a Title V permit to operate the above mentioned coating lines. Conditions imposed in the permit restricts usage from the coating lines to 249, 249 and 40 tons per year, respectively. On August 27, 1998, Woodcrest Manufacturing submitted comments to their Title V permit stating that one of their coating booths had been moved from line SC3 to SC2 and that another booth had been removed from the plant. However, the permit had already been proposed to EPA and was in the process of being issued. Since it was decided that the changes were minor and the permit was on schedule to be issued, the changes could be made after the permit was issued.

### Changes Proposed

The Office of Air Management (OAM) has reviewed the application from Woodcrest relating to the requested revisions of their Part 70 Permit and is proposing the following changes:

#### Condition A.2 (Emission Units and Pollution Control Equipment Summary)

The description of equipment for lines SC2 and SC3 will be changed to reflect that surface coating unit EU-X has been moved from line SC3 to SC2 and surface coating unit EU-02M has been removed from SC2.

#### Section D.1 - Description of Equipment

The description of equipment for lines SC2 and SC3 will be changed to reflect that surface coating unit EU-X has been moved from line SC3 to SC2 and surface coating unit EU-02M has been removed from SC2.

#### Condition D.1.2 (PSD Minor Limit)

The conditions in (a) and (b) will be revised to reflect that surface coating unit EU-X has been moved from line SC3 to SC2 and surface coating unit EU-02M has been removed from SC2. The limits for lines SC1, SC2 and SC3 will remain the same.

#### Condition D.1.3 (Particulate Matter (PM))

The condition has been revised to reflect that surface coating unit EU-02M has been removed. Therefore, there are only four (4) surface coating booths remaining at the plant which will have PM emissions limited by 326 IAC 6-3-2.

#### Condition D.1.10 (Particulate Matter)

The condition has been revised to reflect that surface coating unit EU-02M has been removed. Therefore, there are only four (4) surface coating booths remaining at the plant which require dry filter controls.

#### Report Forms for VOC Usage at Lines SC2 and SC3

The report forms have been revised to reflect that surface coating unit EU-X has been moved from line SC3 to SC2 and surface coating unit EU-02M has been removed from SC2.

The OAM has also made some revisions to standard conditions in the Part 70 Permits and is proposing the following changes:

#### Condition B.28 (Credible Evidence)

IDEM is removing this provision from the permit. IDEM now believes that it is not necessary to include this condition in the permit. The issues regarding credible evidence can be adequately addressed when a showing of compliance or noncompliance is made. Indiana's air pollution control laws allow the use of any credible evidence in determining compliance or noncompliance. An explicit statement is not required in the permit. Although the permit may set out specific methods to determine compliance, any other method or other credible evidence may be admissible to demonstrate compliance or noncompliance.

#### Condition C.3 (Opacity)

The rule 326 IAC 5-1 was recently revised. Condition C.3 will be changed to include the updated language.

#### Condition D.1.11 (Monitoring)

Woodcrest's Part 70 permit includes daily filter checks, daily visible observations, and weekly checks for abnormal over spray accumulation at the exhaust. This can require a significant amount of resources at a plant with a large number of spray booths. The daily filter checks are one of the very few examples of a direct check on the air pollution control equipment that is included in our compliance monitoring provisions. The OAM believes that this is a very effective means of ensuring ongoing compliance. Additional monitoring of emissions is still useful to ensure that the filter is operating as designed; however, this can be done less frequently.

The revised condition requires weekly, rather than daily, visible observations and monthly, rather than weekly, rooftop over spray checks.

Condition D.2.7 (Broken Bag or Failure Detection)

This condition addresses what actions a permittee must take when bag failure is observed. A number of comments have been especially directed at the provision that applies to single compartment baghouses requiring that the baghouse and the process shut down. The new condition is reformatted to lessen the confusion between multi- and single compartment baghouses. Language has also been added to clarify that the emergency provisions of the Title V rule and general permit condition may take precedence if applicable.

**Enforcement Issue**

None.

**Recommendation**

The staff recommends to the Commissioner that the modification be approved.

Information, unless otherwise stated, used in this review was derived from the application and additional information submitted by the applicant.

**Emissions Calculations**

No new calculations were made for this modification.

**Total Potential and Allowable Emissions**

See Technical Support Document of original Part 70 permit.

**Federal Rule Applicability**

There are no changes in Federal rule applicability from the original Part 70 permit.

**State Rule Applicability**

There are no changes in State rule applicability from the original Part 70 permit.

**Air Toxic Emissions**

There are no changes in the air toxic emissions due to this modification.

**Conclusion**

The modifications of this source will be subject to the conditions of the attached proposed **Part 70 Minor Modification Permit No. MMT 103-10266-00027**.