

Mr. Ed Thomas
Miller Door and Trim
1702 East Monroe
Goshen, Indiana 46526

Re: **039-10393**
First Minor Permit Modification to
Part 70 No.: T 039-7365-00155

Dear Mr. Thomas:

Miller Door and Trim was issued a Part 70 Operating Permit on September 24, 1998, for a stationary door, wood trim and furniture manufacturing plant. A letter requesting an amendment to this permit regarding the applicability of 40 CFR 63, Subpart JJ, was received on November 17, 1998. Under direction of the OAM compliance inspector assigned to the source, and since there are no expected increases or changes in emissions, and pursuant to the provisions of 326 IAC 2-7-12, a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document.

These changes are made as a result of Miller Door and Trim's determination that they are an incidental wood furniture manufacturer, and OAM's re-evaluation that they are not subject to 40 CFR 63, Subpart JJ. Therefore, based on this, Miller Door and Trim is not subject to the Federal NESHAPs for Wood Furniture Manufacturing Operations, 40 CFR Subpart JJ. They are now, however, subject to the usage limit listed in the definition of this subpart for an incidental wood furniture manufacturer.

All other conditions not listed in this document's Technical Support Document remain unchanged and in effect. Please attach a copy of this First Minor Permit 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 Melissa Groch, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call 1-800-451-6027 (press 0 and ask for extension 3-8397), or dial 317/233-8397.

Sincerely,

Janet G. McCabe, Assistant Commissioner
Office of Air Management

Attachments

MMG

cc: File -Elkhart County

U.S. EPA, Region V

Elkhart County Health Department

Air Compliance- Greg Wingstrom

Compliance Data Section - Jerri Curless

Administrative and Development - Janet Mobley

Technical Support and Modeling - Nancy Landau

Indiana Department of Environmental Management Office of Air Management

Technical Support Document for First Minor Permit Modification of the Part 70 Title V State Operating Permit

Source Background and Description

Source Name:	Miller Door and Trim		
Source Location:	1702 East Monroe, Goshen, Indiana 46526		
County:	Elkhart		
Permit No.:	T039-7365-00155	Issued:	September 24, 1998
Revision No.	039-10393		
SIC Code:	2499		
Permit Reviewer:	Melissa Groch		

History

On November 17, 1998, on behalf of Miller Door and Trim, DeRolf Environmental Consulting Agency, Inc., requested an amendment to the Permittee's Part 70 operating permit. The following changes were made as the First Minor Permit Modification for this source:

Changes

The Office of Air Management (OAM) has reviewed the letter from Miller Door and Trim relating to the requested revisions of their Part 70 Title V operating permit and is making the following changes:

- (1) Conditions D.1.3, Wood Furniture NESHAP [40 CFR 63, Subpart JJ], D.1.5, Work Practice Standards [40 CFR 63.803], and D.1.11, Reporting Requirements, have been deleted and replaced by new conditions because this source is an incidental wood furniture manufacturer pursuant to the definition on page 62938 of the Federal Register for 40 CFR Part 63, Wood Furniture Manufacturing Operations.
- (2) Due to the non-applicability of 40 CFR 63 Subpart JJ, the Semi-Annual Compliance Monitoring Report Form for HAPs usage, page 34 of 35, is no longer applicable.
- (3) A new Condition, listed as D.1.3, Usage Limit, is added because it has been determined that this source is an incidental wood furniture manufacturer. It reads as follows:

D.1.3 Usage Limit

To avoid applicability of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14 (40 CFR Part 63, Subpart JJ), the surface coating booths, identified as B-1 and B-2, shall use no more than 100 gallons per month of finishing material or adhesives in the manufacture of wood furniture or wood furniture components. This limit is established in the definition of an incidental wood furniture manufacturer, pursuant to 40 CFR Part 63, Subpart JJ.

- (4) Condition D.1.6, now D.1.5, Testing Requirements, is revised to read as:

D.1.6 5 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(e)(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 3-6.3-6.~~
- (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 limits specified in Conditions D.1.1 ~~and D.1.3~~ shall be determined by performance tests conducted in accordance with Section C- Performance Testing.
- (5) Condition D.1.7, now D.1.6, Volatile Organic Compounds (VOC), is revised to read:
- Compliance with the VOC ~~content and~~ usage limitations contained in Condition D.1.3 shall be determined **through record keeping**. ~~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.~~
- (6) Condition D.1.10, Record Keeping Requirements, is now D.9, and reads as follows:
- (a) To document compliance with Condition D.1.3, the Permittee shall maintain **on site** records in accordance with (1) **and (2)** ~~through (5)~~ below. Records maintained for (1) **and (2)** ~~through (5)~~ shall be complete and sufficient to establish compliance with the ~~VHAP~~ usage limits established in Condition D.1.3.
- (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
- (2) ~~The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used~~ **Monthly usage records of gallons used.**
- (3) ~~The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.~~
- (4) ~~The VHAP content in weight percent of each thinner used.~~
- (5) ~~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.~~
- (b) ~~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.~~
- (c) To document compliance with Condition D.1. ~~9 8~~, the Permittee shall maintain a log of ~~daily~~ **weekly** overspray observations, daily and ~~weekly~~ **monthly** inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d)(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Decisions to revise the conditions below were made by the IDEM after the issuance of this Permittee's Part 70 Title V Operating permit. They are as follows:

- (7) IDEM now believes that Condition B.28, Credible Evidence, is not necessary and has removed it from the permit. The issues regarding credible evidence can be adequately addressed during a showing of compliance or noncompliance. Indiana's statutes, and the rules adopted under their authority, govern the admissibility of evidence in any proceeding. Indiana law contains no provisions that limit the use

of any credible evidence and an explicit statement is not required in the permit.

~~B.28 Credible Evidence [326 IAC 2-7-5(3)] [62 Federal Register 8313] [326 IAC 2-7-6]
Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non-compliance.~~

- (8) The last sentence of Condition C.3, has been deleted and the condition has been revised to reflect current rule language. The condition has been changed to:

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

- (a) ~~Visible emissions Opacity~~ shall not exceed an average of forty percent (40%) ~~opacity in twenty-four (24) consecutive readings,~~ **any one (1) six (6) minute averaging period** as determined in 326 IAC 5-1-4.
- (b) ~~Visible emissions Opacity~~ shall not exceed sixty percent (60%) ~~opacity~~ 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.
- (9) Condition D.1.9, now D.1.8, Monitoring, parts (a) and (b), have recently been revised by the IDEM. The OAM has re-evaluated the other compliance monitoring provisions related to evidence of actual emissions from the paint booths and believes that less resource intensive provisions are appropriate. The frequency of visible emissions evaluations has been changed from daily to weekly. The frequency of inspections of rooftops or other surfaces for a noticeable change in solids deposition has been changed from weekly to monthly. As a result, the second sentence of part (a) now reads as:

To monitor the performance of the dry filters, ~~daily~~ **weekly** observations shall be made of the overspray while one or more of the booths are in operation.

And the first sentence of part (b) has been changed to read:

~~Weekly~~ **Monthly** inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground.

- (10) The Table of Contents has been revised to reflect all above changes.

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 November 17, 1998 amendment request letter submitted by the applicant's consultant.

Emissions Calculations

No new calculations were created for this modification.

Total Potential and Allowable Emissions

See Technical Support Document of original Title V operating permit.

Federal Rule Applicability

Spray booths, B-1 and B-2, are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart JJ due to the designation of this source as an incidental wood furniture manufacturer as defined in this NESHAP.

State Rule Applicability

There are no changes in State rule applicability from the original Title V operating permit.

Compliance Monitoring

Because of recent revisions made by the IDEM to all sources with surface coating booths, the frequencies of the monitoring for booths, B-1 and B-2, have been modified as listed in item 6 of this document.

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 **First Minor Permit Modification No. 039-10393-00155**.

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

**Miller Door and Trim
1702 East Monroe
Goshen, Indiana 46526**

(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.

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 and 326 IAC 2-1-3.2 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.: T-039-7365-00155	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date: September 24, 1998

First Minor Permit Modification 039-10393-00155	Pages Affected: 2, 3, 16, 17, 25, 26, 27, and 28 of 35
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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- (2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (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 in 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 forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (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

SECTION D.1 FACILITY OPERATION CONDITIONS - Two (2) surface coating booths

Facility Description [326 IAC 2-7-5(15)]: Two (2) surface coating booths, identified as B1 and B2, each with three (3) airless and air assisted airless spray guns. Emissions shall be controlled by dry filter, then exhausted at Stack/Vent ID #S1, S2, S3, S4, and S5.

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

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the PM from each of the two (2) paint booths, identified as B1 and B2 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.1.2 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 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.1.3 Usage Limit

To avoid applicability of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14 (40 CFR Part 63, Subpart JJ), the surface coating booths, identified as B-1 and B-2, shall use no more than 100 gallons per month of finishing material or adhesives in the manufacture of wood furniture or wood furniture components. This limit is established in the definition of an incidental wood furniture manufacturer, pursuant to 40 CFR Part 63, Subpart JJ.

D.1.4 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 this facility and any control devices.

Compliance Determination Requirements

D.1.5 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 limit specified in Condition D.1.1 shall be determined by performance tests conducted in accordance with Section C- Performance Testing.

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limit contained in Condition D.1.3 shall be determined through record keeping.

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

D.1.7 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the two (2) paint booths, identified as B1 and B2 are in operation.

D.1.8 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 while one or more of the booths are 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)]

D.1.9 Record Keeping Requirements

- (a) To document compliance with Condition D.1.3, the Permittee shall maintain on site records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be complete and sufficient to establish compliance with the usage limits established in Condition D.1.3.
 - (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
 - (2) Monthly usage records of gallons used.
- (b) To document compliance with Condition D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.