

Ms. Dawn Golden
The Kay Company, Inc.
509 West Barner Street
P.O. Box 429
Frankfort, Indiana 46041

Re: 023-10758
First Administrative Amendment to
Part 70 023-5664-00021

Dear Ms. Golden:

The Kay Company, Inc. was issued a permit on December 19, 1998 for a stationary hardboard and particle board part fabrication operation. A letter requesting a change to the Title V permit was received on March 16, 1999. Because the change does not increase the potential to emit, or change any requirements, pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows:

- (1) Two (2) roll coaters, identified as EU-1 and EU-2 and one (1) spray coater, identified as EU-3:
 - a) roll coater EU-1, with a maximum application capacity of six (6) gallons per hour of coating, exhausting to four (4) stack vents identified as S/V 1,2, 5, and 7, consists of:
 - (1) ~~three (3)~~ **six (6)** roll coating applicators,
 - (2) oven CE#1,
 - (3) a slave oven, and
 - (4) oven CE#2 with a direct flame that acts as a control.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages 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 Kimberly Titzer, at (800) 451-6027, press 0 and ask for extension (3-8396), or dial (317) 233-8396.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

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cc: File - Clinton County
U.S. EPA, Region V
Clinton County Health Department
Air Compliance Section Inspector - Eric Courtright
Compliance Data Section - Mindy Jones
Administrative and Development - Janet Mobley
Technical Support and Modeling - Nancy Landau

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**The Kay Company, Inc.
509 West Barner Street
Frankfort, IN 46041**

(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.: T023-5664-00021	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: December 19, 1998
First Administrative Amendment: AA023-10758-00021	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). 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(15)]

The Permittee owns and operates a stationary hardboard and particle board part fabrication operation.

Responsible Official: Michael S. Kay
Source Address: 509 West Barner Street, Frankfort, Indiana 46041
Mailing Address: P.O. Box 429, Frankfort, Indiana 46041
SIC Code: 2499, 3993, 2541
County Location: Clinton County
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD;
Major Source, Section 112 of the Clean Air Act

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:

- (1) Two (2) roll coaters, identified as EU-1 and EU-2 and one (1) spray coater, identified as EU-3:
 - a) roll coater EU-1, with a maximum application capacity of six (6) gallons per hour of coating, exhausting to four (4) stack vents identified as S/V 1,2, 5, and 7, consists of:
 - (1) six (6) roll coating applicators,
 - (2) oven CE#1,
 - (3) a slave oven, and
 - (4) oven CE#2 with a direct flame that acts as a control.
 - (b) roll coater EU-2, with a maximum application capacity of 0.76 gallons per hour of coating, exhausts to three (3) stack vents identified as S/V 4, 6, and 8, and consists of:
 - (1) one (1) roll coating applicator and
 - (2) one oven with a direct flame that acts as a control.
 - (c) spray booth EU-3, with a maximum application capacity of one and one half (1.5) gallons per hour of coating, is controlled by a dry filter wall, identified as CE#3, exhausting to one (1) stack vent, identified as S/V 3.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Two (2) roll coaters, identified as EU-1 and EU-2 and one (1) spray coater, identified as EU-3:

- a) roll coater EU-1, with a maximum application capacity of six (6) gallons per hour of coating, exhausting to four (4) stack vents identified as S/V 1,2, 5, and 7, consists of:
 - (1) six (6) roll coating applicators,
 - (2) oven CE#1,
 - (3) a slave oven, and
 - (4) oven CE#2 with a direct flame that acts as a control.

- (b) roll coater EU-2, with a maximum application capacity of 0.76 gallons per hour of coating, exhausts to three (3) stack vents identified as S/V 4, 6, and 8, and consists of:
 - (1) one (1) roll coating applicator and
 - (2) one oven with a direct flame that acts as a control.

- (c) spray booth EU-3, with a maximum application capacity of one and one half (1.5) gallons per hour of coating, is controlled by a dry filter wall, identified as CE#3, exhausting to one (1) stack vent, identified as S/V 3.

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

D.1.1 Usage Limit

Pursuant to 40 CFR 63.801(a) Incidental wood furniture manufacturer, this major source, for HAPs, is primarily engaged in the manufacture of products other than wood furniture or wood furniture components and shall use no more than 100 gallons per month of finishing material or adhesives when surface coating wood furniture or wood furniture components in EU 1 through 3. Therefore, the requirements of 40 CFR 63, Subpart JJ shall not apply.

D.1.2 Volatile Organic Compound (VOC) [326 IAC 8-6]

The amount of VOCs delivered to the applicators plus the amount of VOCs used for clean-up shall be limited to 99 tons per 12 consecutive month period, for two (2) emission units, identified as EU1 and 2 (the VOC input will be determined after the effect of the integral ovens). This is equivalent to the potential to emit of VOC of 99 tons per year for EU 1 and EU 2. Therefore, the requirements of 326 IAC 8-6 shall not apply.

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

Pursuant to 326 IAC 6-3-2, the PM from each of the surface coaters 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 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), for the emission unit, identified