

Mr. John Wirthwein  
Executive Furniture  
P.O. Box 167  
Huntingburg, Indiana 47542

Re: 037-11056-00054  
First Minor Permit Modification to  
Part 70 No.: T 037-5915-00054

Dear Mr. Wirthwein:

Executive Furniture, Inc., was issued a permit on December 17, 1998 for wood furniture manufacturing plant. A letter requesting changes to this permit was received on June 7, 1999. Pursuant to the provisions of 326 IAC 2-7-12 a minor permit modification to this permit is hereby approved as described below (bolded language has been added to the permit, the language with a line through it has been deleted from the permit).

(a) The Emission Units and Pollution Control Equipment Summary on Page 6 and the Facility Description on page 29 has been changed as follows:

- (7) ~~Two (2)~~ **One (1)** Deburg varnish booths identified as emission unit E2 and **one (1) downdraft booth identified as emission unit F**, with a maximum capacity of 18.32 units per hour, using dry filters as control and exhausting to stack #8 and #9, respectively.
- (13) ~~One (1) Rhodes washcoat booth, identified as emission unit O2, with a maximum capacity of 18.32 units per hour, using dry filters as control and exhausting to stack #11.~~
- (14) ~~One (1) Rhodes varnish booth~~ **downdraft booth**, identified as emission unit Q, with a maximum capacity of 18.32 units per hour, using dry filters as control and exhausting to stack #14.

(b) 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, (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 Pollutant (VHAP) emissions from finishing operations as follows:

(A) Achieve a weighted average VHAP content across all coatings of 1.0 pound VHAP per pound solids, **as applied**; or

(B) Use compliance finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of 1.0 pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a 3.0 percent maximum VHAP content by weight. All other thinners have a 10.0 percent maximum VHAP content by weight; or

- (C) Use a control device to limit emissions; or
  - (D) Use **any** combination of (A), (B), and (C).
- (2) Limit VHAP emissions **from** contact adhesives as follows:
- (A) **Use compliant contact adhesives as follows:**
    - (i) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pounds VHAP per pound solids.
    - ~~(B)~~ (ii) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed 1.0 pound VHAP per pound solid.
- or**
- ~~(B)~~ Use a control device to limit emissions.
- (3) The strippable spray booth material shall have a maximum VOC content of 0.8 pounds VOC per pound solids.

~~A copy of this rule is enclosed.~~

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification 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 Karen Purtell, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Karen Purtell or extension (3-2803), or dial (317) 233-2803.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Management

Attachments

klp

cc: File - Dubois County  
U.S. EPA, Region V  
Dubois County Health Department  
Air Compliance Section Inspector - Ray Schick  
Compliance Data Section - Mindy Jones  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner

**PART 70 OPERATING PERMIT**  
**OFFICE OF AIR MANAGEMENT**

**Executive Furniture, Inc.**  
**4611 S. 400 West**  
**Huntingburg, Indiana 47542**

(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.: T037-5915-00054	
Original Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: December 17, 1998
First Minor Permit Modification 037-11056	Affected pages 6, 29, 30, 31 and 40
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

- (7) One (1) Deburg varnish booth identified as emission unit E2 and one (1) downdraft booth identified as emission unit F, with a maximum capacity of 18.32 units per hour, using dry filters as control and exhausting to stack #8 and #9, respectively.
  - (8) One (1) Rhodes stain booth, identified as emission unit G, with a maximum capacity of 18.32 units per hour, using dry filters as control and exhausting to stack #12.
  - (9) One (1) Rhodes sealer booth, identified as emission unit H, with a maximum capacity of 18.32 units per hour, using dry filters as control and exhausting to stack #13.
  - (10) One (1) Deburg washcoat booth, identified as emission unit K, with a maximum capacity of 18.32 units per hour, using dry filters as control and exhausting to stack #4.
  - (11) One (1) Warehouse edgecoat booth, identified as emission unit M, with a maximum capacity of 18.32 units per hour, using dry filters as control and exhausting to stack #17.
  - (12) One (1) Rhodes NGR booth, identified as emission unit O1, with a maximum capacity of 18.32 units per hour, using dry filters as control and exhausting to stack #10.
  - (13) One (1) downdraft booth, identified as emission unit Q, with a maximum capacity of 18.32 units per hour, using dry filters as control and exhausting to stack #14.
  - (14) One (1) Rhodes varnish 2 booth, identified as emission unit R1, with a maximum capacity of 18.32 units per hour, using dry filters as control and exhausting to stack #15.
  - (15) One (1) Rhodes shades booth, identified as emission unit R2, with a maximum capacity of 18.32 units per hour, using dry filters as control and exhausting to stack #16.
  - (16) One (1) glue booth, identified as emission unit S, with a maximum capacity of 1 unit per hour, using dry filters as control and exhausting to stack #19.
  - (17) One (1) finishing line, identified as emission unit U, with a maximum capacity of 2.44 units per hour, using dry filters as control and exhausting to stack 18.
- (b) Two (2) woodworking operations, identified as emission units X and Z, with a maximum capacity of 2400 pounds per hour each, using baghouses as control and exhausting to stacks #20 and 21, respectively.

## SECTION D.1 FACILITY OPERATION CONDITIONS - SURFACE COATING OPERATIONS

### Facility Description [326 IAC 2-7-5(15)]

The following surface coating operations:

- (1) One (1) finish booth, identified as emission unit A, with a maximum capacity of 1.52 units per hour, using dry filters as control, and exhausting to stack #1.
- (2) One (1) Deburg NGR booth, identified as emission unit B1, with a maximum capacity of 18.32 units per hour, using dry filters as control, and exhausting to stack #2.
- (3) One (1) Deburg SAP booth, identified as emission unit B2, with a maximum capacity of 18.32 units per hour, using dry filters as control, and exhausting to stack #3.
- (4) One (1) Deburg stain booth, identified as emission unit C, with a maximum capacity of 18.32 units per hour, using dry filters as control, and exhausting to stack #5.
- (5) One (1) Deburg sealer booth, identified as emission unit D, with a maximum capacity of 18.32 units per hour, using dry filters as control, and exhausting to stack #6.
- (6) One (1) Deburg shade booth, identified as emission unit E1, with a maximum capacity of 18.32 units per hour, using dry filters as control, and exhausting to stack #7.
- (7) One (1) Deburg varnish booth identified as emission unit E2 and one (1) downdraft booth identified as emission unit F, with a maximum capacity of 18.32 units per hour, using dry filters as control and exhausting to stack #8 and #9, respectively.
- (8) One (1) Rhodes stain booth, identified as emission unit G, with a maximum capacity of 18.32 units per hour, using dry filters as control and exhausting to stack #12.
- (9) One (1) Rhodes sealer booth, identified as emission unit H, with a maximum capacity of 18.32 units per hour, using dry filters as control and exhausting to stack #13.
- (10) One (1) Deburg washcoat booth, identified as emission unit K, with a maximum capacity of 18.32 units per hour, using dry filters as control and exhausting to stack #4.
- (11) One (1) Warehouse edgecoat booth, identified as emission unit M, with a maximum capacity of 18.32 units per hour, using dry filters as control and exhausting to stack #17.
- (12) One (1) Rhodes NGR booth, identified as emission unit O1, with a maximum capacity of 18.32 units per hour, using dry filters as control and exhausting to stack #10.
- (13) One (1) downdraft booth, identified as emission unit Q, with a maximum capacity of 18.32 units per hour, using dry filters as control and exhausting to stack #14.
- (14) One (1) Rhodes varnish 2 booth, identified as emission unit R1, with a maximum capacity of 18.32 units per hour, using dry filters as control and exhausting to stack #15.
- (15) One (1) Rhodes shades booth, identified as emission unit R2, with a maximum capacity of 18.32 units per hour, using dry filters as control and exhausting to stack #16.
- (16) One (1) glue booth, identified as emission unit S, with a maximum capacity of 1 unit per hour, using dry filters as control and exhausting to stack #19.
- (17) One (1) finishing line, identified as emission unit U, with a maximum capacity of 2.44 units per hour, using dry filters as control and exhausting to stack 18.

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

#### D.1.1 PSD Minor Limit [326 IAC 2-2][40 CFR 52.21]

Pursuant to CP 037-3133-00054, issued on August 3, 1994, the surface coating operations shall use no more than 247.8 tons of VOC, including coatings, dilution solvents, cleaning solvents and solvents used in top rubbing, 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.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, 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 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the allowable particulate matter (PM) emission rate from each of the surface coating booths 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:

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

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, (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 Pollutant (VHAP) emissions from finishing operations as follows:
    - (A) Achieve a weighted average VHAP content across all coatings of 1.0 pound VHAP per pound solids, as applied; or
    - (B) Use compliance finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of 1.0 pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a 3.0 percent maximum VHAP content by weight. All other thinners have a 10.0 percent maximum VHAP content by weight; or

- (C) Use a control device to limit emissions; or
  - (D) Use any combination of (A), (B), and (C).
- (2) Limit VHAP emissions from contact adhesives as follows:
- (A) Use compliant contact adhesives as follows:
    - (i) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pounds VHAP per pound solids.
    - (ii) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed 1.0 pound VHAP per pound solid.
  - or
  - (B) Use a control device to limit emissions.
- (3) The strippable spray booth material shall have a maximum VOC content of 0.8 pounds VOC per pound solids.

**D.1.5 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.

**D.1.6 Work Practice Standards [40 CFR 63.803]**

The owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

- (a) Operator training course
- (b) Leak inspection and maintenance plan
- (c) Cleaning and washoff solvent accounting system
- (d) Chemical composition of cleaning and washoff solvents
- (e) Spray booth cleaning
- (f) Storage requirements
- (g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h)
- (h) Line cleaning
- (i) Gun cleaning
- (j) Washoff operations
- (k) Formulation assessment plan for finishing operations

**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.

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

### Part 70 Quarterly Report

Source Name: Executive Furniture, Inc.  
Source Address: 4611 S. 400 West, Huntingburg, Indiana 47542  
Mailing Address: P.O. Box 167, Huntingburg, Indiana 47542  
Part 70 Permit No.: T037-5915-00054  
Facility: Surface Coating Operations, Emission units: A, B1, B2, C, D, E1, E2, F, G, H, K, M, O1, Q, R1, R2, S and U  
Parameter: VOC  
Limit: 247.8 tons per twelve (12) consecutive month period.

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

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

- 9 No deviation occurred in this month.
- 9 Deviation/s occurred in this month.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_