



JM.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Mr. Jeff Cochren
JOFCO, Inc.
P.O. Box 71
Jasper, Indiana 47547-0071

August 16, 1999

Re: 037-11060
First Administrative Amendment to
Part 70 037-5984-00107

Dear Mr. Cochren:

JOFCO, Inc. was issued a permit on August 6, 1999 for a manufacturing process for wood office furniture. A letter requesting a change to remove an emission unit and move a stack ID was received on June 15, 1999. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows:

Stack number SC-6 from the Fillwipe Stain Spray Booth will be moved to Plant to for the Touch-Up Spray Booth and renamed as stack ID SC-21. Fillwipe Stain Spray Booth is being taken out of service and will no longer be an emission unit at the source.

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:

PLANT 1

- (1) Fourteen-(14) **Thirteen (13)** surface coating booths, identified as SB-1 through SB-14, excluding SB-6, with dry filters for particulate control, exhausting to stacks SC-1 through SC-30, excluding SC-6.

PLANT 2

- (1) Twelve (12) surface coaters exhausting to stacks SC-1 through ~~SC-20~~ SC-21, with dry filters for particulate control, consisting of the following:

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Fourteen-(14) **Thirteen (13)** surface coating booths, identified as SB-1 through SB-14, excluding SB-6, with dry filters for particulate control, exhausting to stacks SC-1 through SC-30, excluding SC-6.

D.1.9 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the fourteen-(14) **thirteen (13)** spray booths (SB-1 through SB-14, excluding SB-6) are in operation.

SECTION D.4

FACILITY OPERATION CONDITIONS

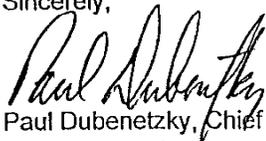
Facility Description [326 IAC 2-7-5(15)] Twelve (12) surface coaters exhausting to stacks SC-1 through ~~SC-20~~ **SC-21**, with dry filters for particulate control, consisting of the following:

- (a) seven (7) spray booths identified as SB-1 through SB-7, constructed in 1983;
- (b) three (3) spray booths identified as SB-8 through SB-10, constructed in 1988;
- (c) one (1) spray booth identified as SB-11, constructed in 1991; and
- (d) one (1) dip tank, constructed in 1988.

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

kt

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



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PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

JOFCO, Inc.
Plant 1, ID037-00009
404-424 East 13th Street
Jasper, Indiana 47547 and

and

JOFCO, Inc.
Plant 2, ID037-00024
305 East 12th Street
Jasper, Indiana 47547

(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 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.: T037-5984-00107	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: August 6, 1999
First Administrative Amendment: AA037-11060 revised pages: 7, 32, 34, 42	
Issued by: <i>Paul Dubenetzky</i> Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: August 16, 1999

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 source manufacturing process for wood office furniture. JOFCO, Inc. Plant 1 has been combined with JOFCO, Inc. Plant 2 as one Title V source. The combined source ID is 037-00107.

Responsible Official: Jerry Olinger
Source Address: Plant 1: 404-424 East 13th Street, Jasper, Indiana 47547
Source Address: Plant 2: 305 East 12th Street, Jasper, Indiana 47547
Mailing Address: Plant 1 and Plant 2: PO Box 71, Jasper, Indiana 47547
SIC Code: 2521
County Location: Jasper
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major 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:

PLANT 1

- (1) Thirteen (13) surface coating booths, identified as SB-1 through SB-14, excluding SB-6, with dry filters for particulate control, exhausting to stacks SC-1 through SC-30, excluding SC-6.
- (2) One (1) woodworking operation, identified as W-1, with a maximum capacity of 3,000 pounds per hour, with three (3) Carter day baghouses for particulate control, exhausting to stacks DC-1 through DC-3.
- (3) One (1) wood and coal-fired spreader-stoker boiler, identified as B-1, with a maximum capacity of ten million (10,000,000) Btu per hour, with a flyash cyclone collector for particulate control, exhausting to stack BS-1.

PLANT 2

- (1) Twelve (12) surface coaters exhausting to stacks SC-1 through SC-21, with dry filters for particulate control, consisting of the following:
 - (a) seven (7) spray booths identified as SB-1 through SB-7, constructed in 1983;
 - (b) three (3) spray booths identified as SB-8 through SB-10, constructed in 1988;

PLANT #1

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Thirteen (13) surface coating booths, identified as SB-1 through SB-14, excluding SB-6, with dry filters for particulate control, exhausting to stacks SC-1 through SC-30, excluding SC-6.

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

D.1.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR 63, Subpart A]

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

D.1.2 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 or 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:
 - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or
 - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or
 - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or
 - (D) Use a combination of (A), (B), and (C).
 - (2) Limit VHAP emissions contact adhesives as follows:
 - (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed (1.8) pound VHAP per pound solids.
 - (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.
 - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.

D.1.8 Volatile Organic Compounds (VOC)

Compliance with the VOC content and 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.1.9 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the thirteen (13) spray booths (SB-1 through SB-14, excluding SB-6) are in operation.

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

D.1.10 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 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. During periods of inclement weather, these inspections shall be performed as weather permits. 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.1.11 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 complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.1.2.
 - (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.

PLANT #2

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Twelve (12) surface coaters exhausting to stacks SC-1 through SC-21, with dry filters for particulate control, consisting of the following:

- (a) seven (7) spray booths identified as SB-1 through SB-7, constructed in 1983;
- (b) three (3) spray booths identified as SB-8 through SB-10, constructed in 1988;
- (c) one (1) spray booth identified as SB-11, constructed in 1991; and
- (d) one (1) dip tank, constructed in 1988.

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

D.4.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR 63, Subpart A]

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

D.4.2 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:
 - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) for existing or eight-tenths (0.8) for new source) pound VHAP per pound solids; or
 - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or
 - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or
 - (D) Use a combination of (A), (B), and (C).