

Glenn A. Lange
Best Chairs, Incorporated
One Best Drive
Ferdinand, Indiana 47532

Re: **123-11067**
First Minor Permit Modification to
Part 70 No.: T123-7891-00013

Dear Mr. Lange:

Best Chairs, Incorporated, was issued a Part 70 permit on January 14, 1999, for a wood furniture manufacturing plant. A letter requesting changes to this permit was received on May 11, 1999. Pursuant to the provisions of 326 IAC 2-7-12, a minor permit modification to this permit is hereby approved as described below:

The modification consists of constructing a new automatic flow coat booth in the surface coating operation.

As a result, the following changes have been made to the Part 70 operating permit (strikeout indicates deleted language, and new language is bolded);

- (1) The title page of the Part 70 permit has a second box added to identify the source modification. It appears as follows:

First Minor Permit Modification: 123-11067	Pages Affected: 5, 26, and 28
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

- (2) Part (b)(2) of Condition A.2, Emission Units and Pollution Control Equipment Summary, and the description in the Section D.2 description box, now read as follows:

~~Three (3) Dip Tanks~~ **One (1) Automatic Flow Coat Booth** B2, with a maximum rating of ~~450~~ **105** units per hour. Emissions shall be exhausted at Stack/Vent IDs ~~#B2a and #B2b~~ **#B1**.

- (3) Condition D.2.11, Particulate Matter, now includes coating booth B2, and reads as:

The dry filters for PM control shall be in operation at all times when the spray booths (B1, **B2**, B3, and B4) are in operation.

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, and replace the following revised permit pages.

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 at (800) 451-6027, press 0 and ask for Melissa Groch or extension 3-8397, or dial (317)233-8397.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

MMG

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

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

**Best Chairs, Inc.
Highway 66 E
Cannelton, Indiana 47520**

(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-123-7891-00013	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: January 14, 1999
First Minor Permit Modification: 123-11067	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Pages Affected: 5, 26, and 28
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 wood furniture manufacturing plant.

Responsible Official: **Mr. Joseph L. Lange**
Source Address: **Highway 66 E, Cannelton, IN 47520**
Mailing Address: **One Best Drive, Ferdinand, IN 47546**
SIC Code: **2515**
County Location: **Perry**
County Status: Attainment for all criteria pollutants
Source Status: Minor Source, under PSD Rules
Major Source, Part 70 Permit Program

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:

- (a) Woodworking Operations WW-1, with a maximum rating of 9000 pounds per hour. Emissions shall be controlled by Baghouse dust collector, then exhausted at Stack/Vent ID #BF-1.
- (b) Surface coating operations, consisting of the following:
 - (1) One (1) Toner Spray Booth B1, with a maximum rating of 150 units per hour. Emissions shall be controlled by dry filter, then exhausted at Stack/Vent ID #B1.
 - (2) One (1) Automatic Flow Coat Booth B2, with a maximum rating of 105 units per hour. Emissions shall be controlled by dry filter, then exhausted at Stack/Vent ID #B2.
 - (3) One (1) Sealer Spray Booth B3, with a maximum rating of 150 units per hour. Emissions shall be controlled by dry filter, then exhausted at Stack/Vent ID #B3.
 - (4) One (1) Lacquer Spray Booth B4, with a maximum rating of 150 units per hour. Emissions shall be controlled by dry filter, then exhausted at Stack/Vent ID #B4.

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 does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22).
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.2 FACILITY OPERATION CONDITIONS - Surface Coating Operations

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

- (1) One (1) Toner Spray Booth B1, with a maximum rating of 150 units per hour. Emissions shall be controlled by dry filter, then exhausted at Stack/Vent ID #B1.
- (2) One (1) Automatic Flow Coat Booth B2, with a maximum rating of 105 units per hour. Emissions shall be controlled by dry filter, then exhausted at Stack/Vent ID #B2.
- (3) One (1) Sealer Spray Booth B3, with a maximum rating of 150 units per hour. Emissions shall be controlled by dry filter, then exhausted at Stack/Vent ID #B3.
- (4) One (1) Lacquer Spray Booth B4, with a maximum rating of 150 units per hour. Emissions shall be controlled by dry filter, then exhausted at Stack/Vent ID #B4.

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

D.2.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The VOC input usage from the surface coating operations shall not exceed 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. This usage limit is required to limit the potential to emit of VOC to 250 tons per 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.2.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM overspray from each of the surface coating operations (B1 - B4) 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:

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

D.2.3 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.2.4 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.

- CFR 63.803(h).
- (h) Line cleaning.
 - (i) Gun cleaning.
 - (j) Washoff operations.
 - (k) Formulation assessment plan for finishing operations.

Compliance Determination Requirements

D.2.8 Testing Requirements [326 IAC 2-7-6(1),(6)] [40 CFR 63]

- (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) If the OAM requests, compliance with the limits specified in Conditions D.2.1, D.2.2, and D.2.5 shall be determined by performance tests conducted in accordance with Section C- Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

D.2.9 Volatile Organic Compounds (VOC)[326 IAC 8-1-4(a), 326 IAC 8-1-2(a)]

Compliance with the VOC content and usage limitations contained in Conditions D.2.1 and D.2.5 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) 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.2.10 VOC Emissions

Compliance with Condition D.2.1 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.

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

D.2.11 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the spray booths (B1, B2, B3, and B4) are in operation.

D.2.12 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 stacks and any presence of overspray on the nearby ground. These monthly inspections shall also be performed on the rooftops, except during inclement weather, and when any other maintenance is performed on the roof. The Compliance Response Plan for these units 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.2.13 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.1, the Permittee shall maintain records in accordance