

Ms. Penny Bachman, NESHAP Coordinator
 Child Craft Industries, Inc.
 P.O. Box 444
 Salem, IN 47167-0444

Re: **175-11299**
 First Administrative Amendment to
Part 70 175-7877-00001

Dear Ms. Bachman:

Child Craft Industries, Inc. was issued a permit on July 26, 1999 for a stationary wood furniture manufacturing facility and a dimension mill. A letter requesting removal of certain equipment from the permit was received on September 1, 1999. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended to accommodate the removal of the roll coating equipment.

As a result of this administrative amendment, 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 this administrative amendment. It appears as follows:

First Administrative Amendment: 039-11299	Pages Affected: 8, 36 and 38
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

Also on this page, the IDEM has deleted a rule cite that is no longer necessary in the second paragraph. This paragraph now reads as follows:

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.

2. Condition A.2, Emission Units and Pollution Control Equipment Summary, part (d) has a deletion in the first sentence of the description as follows:

Eight (8) spray booths, four (4) dip tanks, ~~one (1) roll coater~~, one (1) skin tank, and three (3) patch areas as identified in the following table.

Also, this equipment has been deleted in the first line of the table as shown below:

Roll Coat ————— roll coating ————— 1 ————— ~~03, 04~~

These deletions are also reflected in the facility description box of Section D.4.

3. Because of this removal of equipment, condition D.4.7, Monitoring, has a deletion in the first sentence which now reads as follows:

Monthly inspections shall be performed of the emissions from the spray coating stacks (B3, B9, B10, B13, B21, B22, B23, B24, B28, B29, B30, B59, B85, B86, B87, B88, ~~O3, O4~~) and any presence of overspray on the rooftops and the nearby ground.

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 Melissa Groch, 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 - Washington County
U.S. EPA, Region V
Washington 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

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Child Craft Industries, Inc. (Main Plant)
501 East Market Street
Salem, Indiana 47167**

and

**Child Craft Industries, Inc. (East Plant)
1900 Highway 56 East
Salem, Indiana 47167**

(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 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-175-7877-00001	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: July 26, 1999
First Administrative Amendment: 039-11299	Pages Affected: 8, 36 and 38
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

(6) Packing- Cribs & Etc.17, with a maximum rating of 14,363 pounds per hour of finished product. Emissions shall be exhausted at Stack/Vent ID #B73.

(d) Eight (8) spray booths, four (4) dip tanks, one (1) skin tank, and three (3) patch areas as identified in the following table. Each surface coating station shall use application methods which comply with the Wood Furniture NESHAP (40 CFR 63, Subpart JJ). Emissions shall be exhausted at Stack/Vent ID # as shown in the following table:

<u>Station ID</u>	<u>Application Method</u>	<u>Maximum # of Operators</u>	<u>Stack/Vent ID #'s</u>
Dip Tank #1	dipping	1	B94
Dip Tank #2	dipping	1	B96
Skin Tank South	dipping	1	B80
B-66	dipping	1	B99
B-50	spraying	1	B85,B86,B87, B88
P-5	aerosol spray can	n/a	no stack
P-6	aerosol spray can	n/a	no stack
P-7	aerosol spray can	n/a	no stack
B-58	dipping	1	B42
B-34	spraying	1	B3
B-19	spraying	1	B29, B30
B-23	spraying	1	B9, B10
B-38	spraying	1	B13
B-16	spraying	1	B59
B-20	spraying	1	B28
B-28	spraying	1	B21,B22,B23,B24

(e) Twenty (20) spray booths and one (1) skin tank as identified in the following table. Each surface coating station shall use application methods which comply with the Wood Furniture NESHAP (40 CFR 63, Subpart JJ). Emissions shall be controlled by baffles, then exhausted at Stack/Vent ID # as shown in the following table:

<u>Station ID</u>	<u>Application Method</u>	<u>Maximum # of Operators</u>	<u>Stack/Vent ID #'s</u>
B-9A (Shade)	spraying	1	B35
B-30 (1)	spraying	1	B11, B12
B-30 (2)	spraying	1	B11, B12
B-4	spraying	1	B63, B66
B-8	spraying	1	B63, B64
Skin Tank-Main	dipping	1	B64
B-7	spraying	1	B69, B70, B71
B-9	spraying	1	B44, B45, B46
B-13	spraying	1	B51,B52,B53, B54
B-15	spraying	1	B60, B61, B62
B-35	spraying	1	B2
B-26	spraying	1	B16, B17
B-22	spraying	1	B6,B7,B8
B-24	spraying	1	B14, B15
P-1	spraying	1	B97
P-2	spraying	1	B93
B-2	spraying	1	B47
B-6	spraying	1	B68
B-56	spraying	1	B40
B-10	spraying	1	B43
B-11	spraying	1	B20, B27

(f) Nineteen (19) spray booths as identified in the following table. Each booth shall use application methods which comply with the Wood Furniture NESHAP (40 CFR 63, Subpart JJ). Emissions shall

SECTION D.4 FACILITY OPERATION CONDITIONS- Main Plant

Facility Description [326 IAC 2-7-5(15)]: Eight (8) spray booths, four (4) dip tanks, one (1) skin tank, and three (3) patch areas as identified in the following table. Each surface coating station shall use application methods which comply with the Wood Furniture NESHAP (40 CFR 63, Subpart JJ). Emissions shall be exhausted at Stack/Vent ID # as shown in the following table:

<u>Station ID</u>	<u>Application Method</u>	<u>Maximum #of Operators</u>	<u>Stack/Vent ID #'s</u>
Dip Tank #1	dipping	1	B94
Dip Tank #2	dipping	1	B96
Skin Tank South	dipping	1	B80
B-66	dipping	1	B99
B-50	spraying	1	B85,B86,B87, B88
P-5	aerosol spray can	n/a	no stack
P-6	aerosol spray can	n/a	no stack
P-7	aerosol spray can	n/a	no stack
B-58	dipping	1	B42
B-34	spraying	1	B3
B-19	spraying	1	B29, B30
B-23	spraying	1	B9, B10
B-38	spraying	1	B13
B-16	spraying	1	B59
B-20	spraying	1	B28
B-28	spraying	1	B21,B22,B23,B24

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

D.4.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c) (Process Operations), the allowable particulate matter (PM) emission rate from the surface coating operations 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.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 November 21, 1997.

(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

- (b) 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 Condition D.4.1 and D.4.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

D.4.7 Monitoring

Monthly inspections shall be performed of the emissions from the spray coating stacks (B3, B9, B10, B13, B21, B22, B23, B24, B28, B29, B30, B59, B85, B86, B87, B88) and any presence of overspray on the rooftops and the nearby ground. 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.

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.4.8 Record Keeping Requirements

- (a) To document compliance with Condition D.4.2, 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.4.2.
- (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.
 - (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) When the averaging compliance method is used, 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.4.5, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (c) To document compliance with Condition D.4.7, the Permittee shall maintain a log of monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.9 Reporting Requirements

- (a) An Initial Compliance Report to document compliance with Condition D.4.2, and the Certification form, shall be submitted within sixty (60) calendar days following the compliance date of November 21, 1997. The Initial compliance report must include data from the entire month that the compliance date falls.
- (b) A semi-annual Continuous Compliance Report to document compliance with Condition D.4.2, and the