



File

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

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November 22, 1999

Mr. Jeff Cochren
JOFCO, Inc.
P.O. Box 71
Jasper, Indiana 47547-0071

Re: 037-11521
Second 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 three (3) spray booths was received on November 3, 1999. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows:

Page 7 of 63:

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 2

- (1) Twelve (12) surface coaters exhausting to stacks SC-1 through SC-20, 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;
 - (b)(e) one (1) spray booth identified as SB-11, constructed in 1991; and
 - (c)(d) one (1) dip tank, constructed in 1988.

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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-20, 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;~~
- (b)(e) one (1) spray booth identified as SB-11, constructed in 1991; and
- (c)(d) one (1) dip tank, constructed in 1988.

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D.4.5 Volatile Organic Compound (VOC)

- (a) Pursuant to Registration Letter, issued on March 1, 1988, volatile organic compound emissions shall be limited to 24 tons per twelve consecutive month period, for the ~~spray booths identified as SB8 through SB10 and one dip tank.~~
- (b) Any change or modification which may increase the potential (VOC) emissions to 25 tons per year or more from ~~spray booths, identified as SB8 through SB10 and one dip tank,~~ must be approved by the Office of Air Management (OAM) before such change may occur.

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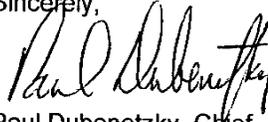
Part 70 Quarterly Report

Source Name: JOFCO, Inc. Plant 2
Source Address: Plant 2: 305 East 12th Street, Jasper, Indiana 47547
Mailing Address: Plant 2: PO Box 71, Jasper, Indiana 47547
Part 70 Permit No.: T037-5984-00107
Facility: Plant 2: ~~Spray Booths SB-8 through SB-10 and one dip tank~~
Parameter: VOC usage
Limit: 24 tons per 12 consecutive month period

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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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 037-11060-00107, issued on August 16, 1999

Second Administrative Amendment: 037-11521	revised pages: 7, 8, 42, 44, 59
Issued by: <i>Paul Dubenetzky</i> Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: November 22, 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) Fourteen (14) surface coating booths, identified as SB-1 through SB-14, with dry filters for particulate control, exhausting to stacks SC-1 through SC-30.
- (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-20, 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) one (1) spray booth identified as SB-11, constructed in 1991; and
 - (c) one (1) dip tank, constructed in 1988.
- (2) One (1) woodworking operation, identified as W-1, with a maximum capacity of 3,000 pounds per hour, with two (20) baghouses for particulate control, exhausting to stacks DC-1 and DC-2.
 - (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.

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 also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

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).

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-20, 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) one (1) spray booth identified as SB-11, constructed in 1991; and
- (c) 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).

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) pound 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.4.5 Volatile Organic Compound (VOC)

- (a) Pursuant to Registration Letter, issued on March 1, 1988, volatile organic compound emissions shall be limited to 24 tons per twelve consecutive month period, for the one dip tank.
- (b) Any change or modification which may increase the potential (VOC) emissions to 25 tons per year or more from one dip tank, must be approved by the Office of Air Management (OAM) before such change may occur.

D.4.6 Volatile Organic Compound (VOC)

Any change or modification which may increase potential emission from SB-1 through SB-7 shall require prior approval from the OAM to determine applicability requirements of 326 IAC 8, before such change may occur.

D.4.7 Volatile Organic Compound (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (BACT) the surface coating operation shall reduce VOC emissions using best available control technology. Compliance with BACT shall be satisfied through compliance with 326 IAC 8-2-12 and 40 CFR 63, Subpart JJ.

Pursuant to 326 IAC 8-1-6, the seven (7) surface coating booths identified as SB-1 through SB-7

- (a) 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.

- (b) 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

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

Part 70 Quarterly Report

Source Name: JOFCO, Inc. Plant 2
Source Address: Plant 2: 305 East 12th Street, Jasper, Indiana 47547
Mailing Address: Plant 2: PO Box 71, Jasper, Indiana 47547
Part 70 Permit No.: T037-5984-00107
Facility: Plant 2: one dip tank
Parameter: VOC usage
Limit: 24 tons per 12 consecutive month period

YEAR: _____

Month and Year	VOC usage (tons/ month)
Month 1	
Month 2	
Month 3	

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

