

Ms. Cynthia Hauth
Indianapolis Woodworking, Inc.
9160 Ford Circle
Fishers, IN 46038

Re: **057-11832**
First Administrative Amendment to
F 057-10013-00052

Dear Ms. Hauth:

Indianapolis Woodworking, Inc. was issued a permit on April 14, 1999 for a custom woodworking and coating source. A letter requesting a change was received on January 31, 2000. Since this change does not involve any new emission units, does not impose any new rules or additions of applicable rules, pursuant to the provisions of 326 IAC 2-8-10, the permit is hereby administratively amended as follows:

The change requested was to eliminate the degreasing operation in Section D.3 since there are no degreasing activities in the production operations at this source. The application cited degreasing operations as an insignificant activity due to a parts washer that will be used to clean spray equipment. Since this parts washer will only be used to clean spray equipment, and not part of any degreasing operation, the degreasing operation rules are not applicable. The cleaning of the spray equipment is not subject to any specific 326 IAC Article 8 VOC rules. The VOC emissions from the cleaning solvents used are accounted for and the wood coating operation is subject to the requirements of 326 IAC 8-2-12 (Surface coating emission limitations: wood furniture and cabinet coating). Therefore, Conditions D.3.1 and D.3.2 relating to the insignificant activity, degreasing operations, have been removed. In addition, the reference in Condition A.3 that this source could be considered "portable" has also been removed. The changes are as follows with deleted language as ~~strikeouts~~ and new language **bolded**.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary ~~or portable~~ source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21): ~~List of all insignificant activities, include description from IDEM form GSD-10a, and a facility specific description.~~

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.
- (b) The following VOC and HAP storage containers: vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.
- (c) Equipment used exclusively for the following: filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.
- (d) Machining where an aqueous cutting coolant continuously floods the machining interface.

- ~~(e)~~ — Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (f e) Cleaners and solvents characterized as follows: having a vapor pressure equal to or less than 2 kiloPascals; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38EC (100EF) or; having a vapor pressure equal to or less than 0.7 kiloPascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- ~~(g-f)~~ Any operation using aqueous solutions containing less than 1 percent by weight of VOCs excluding HAPS.
- ~~(h-g)~~ Water based adhesives that are less than or equal to 5 percent by volume of VOCs excluding HAPS.
- ~~(i-h)~~ Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (j i) Paved and unpaved roads and parking lots with public access.
- (k-j) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (l k) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- ~~(m-l)~~ Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- ~~(n-m)~~ Grinding and machining operations controller 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 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- ~~(o-n)~~ Occasional open container of HAP-containing solvent, thinner, reducer, or wood finish. Repair products, xylene, toluene or methanol or other wood finishes.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)] Insignificant Activities

~~(a) — Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.~~

Grinding and machining operations controller 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 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

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

~~D.3.1 — Volatile Organic Compounds (VOC)~~

~~Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:~~

- ~~(a) — Equip the cleaner with a cover;~~
- ~~(b) — Equip the cleaner with a facility for draining cleaned parts;~~
- ~~(c) — Close the degreaser cover whenever parts are not being handled in the cleaner;~~
- ~~(d) — Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;~~
- ~~(e) — Provide a permanent, conspicuous label summarizing the operation requirements;~~
- ~~(f) — Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.~~

~~D.3.2 — Volatile Organic Compounds (VOC)~~

~~(a) — Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:~~

- ~~(1) — Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:~~
 - ~~(A) — The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));~~
 - ~~(B) — The solvent is agitated; or~~
 - ~~(C) — The solvent is heated.~~

- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.3.31 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from each facility shall not exceed allowable PM emission rate based on the following equation:

Interpolation and extrapolation of the data for the process weight rate of one hundred (100) pounds per hour up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirement

D.3.42 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test these facilities by this permit. However, 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 PM limit specified in Condition D.3.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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 Frank P. Castelli, c/o OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments FPC/MES

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

**FEDERALLY ENFORCEABLE
STATE OPERATING PERMIT
OFFICE OF AIR MANAGEMENT**

**Indianapolis Woodworking, Inc.
9160 Ford Circle
Fishers, Indiana 46038**

(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.: F 057-10013-00052	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: April 14, 1999
First Administrative Amendment: AAF 057-11832-00052	Pages Affected: 4, 6 and 34 - 36.
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

- D.2.6 Baghouse Inspections
- D.2.7 Broken Bag or Failure Detection

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

- D.2.8 Record Keeping Requirements

SECTION D.3 FACILITY OPERATION CONDITIONS - Insignificant Activities

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

- D.3.1 Particulate Matter (PM) [326 IAC 6-3]

Compliance Determination Requirement

- D.3.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

Certification Form

Emergency/Deviation Form

Semi-Annual Compliance Monitoring Report Form

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(l)]

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SECTION D.3 FACILITY OPERATION CONDITIONS

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D.3.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

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