

Mr. Ray Yoder
R and R Custom Woodworking, Inc.
71596 CR 100
Nappanee, Indiana 46550

Re: **039-12228-00402**
Notice-only change to
MSOP 039-11782-00402

Dear Mr. Yoder:

R and R Custom Woodworking, Inc. was issued a permit on April 27, 2000 for a stationary wood furniture manufacturing source. A letter notifying the Office of Air Management of an error in Condition D.1.7(a) and the replacement of high volume low pressure (HVLP) spray guns with air assisted airless spray guns was received on May 4, 2000. Pursuant to the provisions of 326 IAC 2-6.1-6 the permit is hereby revised as follows:

1. There is no water level device at the three (3) spray booths; therefore, the following reference to water pans in Condition D.1.7 of the permit has been removed:

D.1.7 Record Keeping Requirements

- (a) To document compliance with Condition D.1.6, the Permittee shall maintain a log of weekly overspray observations, ~~weekly observations of the water level in the pans~~, daily and monthly inspections of **Booths 1, 2 and 3**, and those additional inspections prescribed by the Preventive Maintenance Plan.
2. The source will be replacing the existing high volume low pressure (HVLP) spray guns with air assisted airless spray guns. Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), assisted airless spray guns are an acceptable replacement for HVLP spray guns. This change will not change rule applicability, capacity or potential to emit from the three (3) spray booths. No changes to the permit are necessary.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this letter 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 Paula M. Miano, 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

R and R Custom Woodworking, Inc.
Nappanee, Indiana
Permit Reviewer: PMMMES

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Office of Air Management

Attachments
PMM/MES

cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector - Dave Wingstrom
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michelle Boner

**NEW SOURCE CONSTRUCTION PERMIT
and MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR MANAGEMENT**

**R and R Custom Woodworking, Inc.
71596 CR 100
Nappanee, Indiana 46550**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, (, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 039-11782-00402	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: April 27, 2000

First Notice Only Change No.: 039-12228-00402	Pages Affected: 18
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

Compliance Determination Requirements [326 IAC 2-1.1-11]

D.1.4 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.5 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when Booths 1, 2 and 3 are in operation.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.6 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 SV1, SV2 and SV3 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. 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 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.7 Record Keeping Requirements

- (a) To document compliance with Condition D.1.6, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections of Booths 1, 2 and 3, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.