Mr. Kenneth Garland
Creative Wood Products, Inc.
Post Office Box 112
712 North Bowen Avenue
Bremen, Indiana 46506

RE: 099-12728
Third Administrative Amendment to
Part 70 099-7526-00047

Dear Mr. Garland:

Creative Wood Products, Inc., was issued a permit on September 24, 1998 for a kitchen cabinetry coating operation. A letter requesting to add five (5) new surface coating booths was received on August 7, 2000. Pursuant to the provisions of 326 IAC 2-711, the permit is hereby administratively amended as follows (strike-out and bold are used to show the changes):

~~(1) Two (2) surface coating booths, identified as STANDARD - 1A/B, having a maximum throughput of 18.5 units per hour, application method is HVLP, using dry filters as control, and exhausting to stacks S1.~~

~~(2) Two (2) surface coating booths, identified as STANDARD - 2A/B, having a maximum throughput of 18.5 units per hour, application method is air assisted, using dry filters as control, and exhausting to stacks S2.~~

~~(3) Two (2) surface coating booths, identified as ULTRA - 3A/B each having a maximum throughput of 6.5 units per hour, application method is HVLP, using dry filters as control, and exhausting to stacks S1, and S3.~~

~~(4)~~**(1)** One (1) surface coating booth, identified as booth four (4), making repairs with one (1) HVLP spray gun and exhausting to stack S4.

~~(5) Two (2) surface coating booths, identified as STANDARD 6-A, having a maximum throughput of 18.5 units per hour, and ULTRA 6-B, having a maximum throughput of 6.5 units per hour, application method is air assisted, using dry filters as control, and exhausting to stack S6.~~

~~(6)~~**(2)** Two (2) surface coating booths, identified as booths 1 and 2, having a maximum throughput of 3 units per hour, application method is air assisted, and exhausting to a stack.

(3) One (1) surface coating booth, identified as PB2, having a maximum throughput of 3 units per day, application method is hvlp, using dry filters as control, and exhausting to stack S2.

(4) One (1) surface coating booth, identified as PB3, having a maximum throughput of 3 units per day, application method is hvlp, using dry filters as control, and exhausting to stack S3.

(5) One (1) surface coating booth, identified as PB4, having a maximum throughput of 3 units per day, application method is hvlp, using dry filters as control, and exhausting to stack SNEW4.

(6) One (1) surface coating booth, identified as PB5, having a maximum throughput of 3 units per day, application method is hvlp, using dry filters as control, and exhausting to stack S5.

(7) One (1) surface coating booth, identified as PB6, having a maximum throughput of 3 units per day, application method is hvlp, using dry filters as control, and exhausting to stack S6.

D.1.9 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, daily observations shall be made of the overspray from the surface coating booth stack (~~S1,~~ S2, S3, S4, **SNEW4, S5,** S6 and stack) 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.

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. Pursuant to Contract No. A305-0-00-36, IDEM, OAM has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Mike Pring, ERG, P.O. Box 2010, Morrisville, North Carolina 27560, or call (919) 468-7840 to speak directly to Mr. Pring. Questions may also be directed to Duane Van Laningham at IDEM, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
ERG/MP

cc: File - Marshall County
U.S. EPA, Region V
Marshall County Health Department
Air Compliance Section Inspector - Paul Karkiewicz
Compliance Data Section - Jerry Curless
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

Creative Wood Products
712 North Bowen Avenue
Bremen, Indiana 46506-0112

(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.: T099-7526-00047	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date: September 24, 1998

First Administrative Amendment 099-10375, issued on March 17, 2000.

Second Administrative Amendment 099-12649, issued on **[fill in when issued]**

Third Administrative Amendment: A 099-12728	Pages Affected: 2,25, 27
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	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 stationary wood preserving operation for furnished vans parts.

Responsible Official:	Kenneth L. Miller
Source Address:	712 North Bowen Avenue, Bremen, Indiana
Mailing Address:	P.O. Box 112, Bremen, Indiana 46506-0112
SIC Code:	3714
County Location:	Marshall
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5 (15)]

(1) One (1) surface coating booth, identified as booth four (4), making repairs with one (1) HVLP spray gun and exhausting to stack S4.

(2) Two (2) surface coating booths, identified as booths 1 and 2, having a maximum throughput of 3 units per hour, application method is air assisted, and exhausting to a stack.

(3) One (1) surface coating booth, identified as PB2, having a maximum throughput of 3 units per day, application method is HVLP, using dry filters as control, and exhausting to stack S2.

(4) One (1) surface coating booth, identified as PB3, having a maximum throughput of 3 units per day, application method is HVLP, using dry filters as control, and exhausting to stack S3.

(5) One (1) surface coating booth, identified as PB4, having a maximum throughput of 3 units per day, application method is HVLP, using dry filters as control, and exhausting to stack SNEW4.

(6) One (1) surface coating booth, identified as PB5, having a maximum throughput of 3 units per day, application method is HVLP, using dry filters as control, and exhausting to stack S5.

(7) One (1) surface coating booth, identified as PB6, having a maximum throughput of 3 units per day, application method is HVLP, using dry filters as control, and exhausting to stack S6.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(20)] [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):

SECTION D.1 FACILITY OPERATION CONDITIONS

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

(1) One (1) surface coating booth, identified as booth four (4), making repairs with one (1) HVLP spray gun and exhausting to stack S4.

(2) Two (2) surface coating booths, identified as booths 1 and 2, having a maximum throughput of 3 units per hour, application method is air assisted, and exhausting to a stack.

(3) One (1) surface coating booth, identified as PB2, having a maximum throughput of 3 units per day, application method is HVLP, using dry filters as control, and exhausting to stack S2.

(4) One (1) surface coating booth, identified as PB3, having a maximum throughput of 3 units per day, application method is HVLP, using dry filters as control, and exhausting to stack S3.

(5) One (1) surface coating booth, identified as PB4, having a maximum throughput of 3 units per day, application method is HVLP, using dry filters as control, and exhausting to stack SNEW4.

(6) One (1) surface coating booth, identified as PB5, having a maximum throughput of 3 units per day, application method is HVLP, using dry filters as control, and exhausting to stack S5.

(7) One (1) surface coating booth, identified as PB6, having a maximum throughput of 3 units per day, application method is HVLP, using dry filters as control, and exhausting to stack S6.

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

(a) 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

(b) 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.1.2 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

326 IAC 6-3-2 (Process Operations)
The particulate matter (PM) overspray from this paint booths described above, shall be limited by the following:

D.1.5 Work Practice Standards [40 CFR 63.803]

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 63.803:

(a) Operator training course.
(b) Leak inspection and maintenance plan.
(c) Cleaning and washoff solvent accounting system.
(d) Chemical composition of cleaning and washoff solvents.
(e) Spray booth cleaning.
(f) Storage requirements.
(g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
(h) Line cleaning.
(i) Gun cleaning.
(j) Washoff operations.
(k) Formulation assessment plan for finishing operations.

Compliance Determination Requirements

D.1.6 Testing Requirements [326 IAC 2-7-6(1)]

(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.1.4 shall be determined by performance tests conducted in accordance with Section C-Performance Testing. This does not preclude testing requirements on the facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

D.1.7 HAP Content

Pursuant to 40 CFR 63, Subpart JJ, an Initial Compliance Report must be submitted within sixty (60) calendar days following the compliance date specified in Condition D.1.4 and a Continuous Compliance Demonstration Report must be submitted within thirty (30) days following every six (6) month period, thereafter.

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

D.1.8 Compliance monitoring

When the surface coating booths are in operation the filters and baffles shall be operating at all times.

D.1.9 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, daily observations shall be made of the overspray from the surface coating booth stack (S2, S3, S4, SNEW4, S5, S6 and stack) 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) Weekly 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.