

May 8, 2001

Mr. Dan Granger
CANA, Inc.
29240 Phillips Street
Elkhart, Indiana 46514

Re: 039-13793
Minor Source Modification to:
Part 70 permit No: 039-6494-00005

Dear Mr. Granger:

CANA, Inc., was issued a Part 70 permit 039-6494-00005 on February 26, 1999 for a wood cabinet operation. An application to modify the source was received on January 18, 2001. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

- (b) One (1) topcoat booth (TB-10) with airless spray guns exhausting to stack S-10.
- (c) One (1) sealer booth (SB-11) with airless spray guns exhausting to stack S-11.

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(l), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

The proposed operating conditions applicable to these emission units are attached to this Source Modification approval. These proposed operating conditions shall be incorporated into the Part 70 operating permit as a significant permit modification in accordance with 326 IAC 2-7-12.

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, OAQ 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, OAQ, 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,

Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

ERG/MP

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

**PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR QUALITY**

**CANA, Inc.
29240 Philips Street
Elkhart, Indiana 46514**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units 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.

Operating Permit No.: T039-6494-00005	
Original issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: February 26, 1999

First Administrative Amendment 039-12514, issued on September 19, 2000

Second Administrative Amendment 039-12311, issued on June 30, 2000

First Minor Source Modification No. 039-13793-00005	Page Affected: 6, 31, 31a, 32, 34, 37, 45, 46
Original signed by Paul Dubenetzky Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: May 8, 2001

- (b) One (1) topcoat booth (TB-10) with a capacity to coat 478 square feet of wood cabinetry an hour using airless spray guns, controlled by dry filters, and exhausting to stack S-10.
- (c) One (1) sealer booth (SB-11) with a capacity to coat 683 square feet of wood cabinetry an hour using airless spray guns, controlled by dry filters, and exhausting to stack S-11.
- (d) Woodworking operations with a baghouse to control particulate matter emissions.

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) 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 of less than or equal to 4000 actual cubic feet per minute, including the following: buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

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).

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description:

- (a) Ten (10) spray booths all identified as EU1 consisting of the following:
- (1) One (1) stain machine with airless spray guns, exhausting to Stack ID #S-1.
 - (2) One (1) sealer machine with airless spray guns, exhausting to Stack ID #S-2.
 - (3) One (1) topcoat machine with airless spray guns, exhausting to Stack ID #S-3.
 - (4) Two (2) stain booth with HVLP spray guns. Particulate matter emissions shall be controlled by dry filters, then exhausting to Stack ID #S-4.
 - (5) One (1) sealer booth with airless spray guns. Particulate matter emissions shall be controlled by dry filters, then exhausting to Stack ID #S-5.
 - (6) One (1) topcoat booth with airless spray guns. Particulate matter emissions shall be controlled by dry filters, then exhausting to Stack ID #S-6.
 - (7) One (1) stain booth with HVLP spray guns. Particulate matter emissions shall be controlled by dry filters, then exhausting to Stack ID #S-7.
 - (8) One (1) sealer booth with airless spray guns. Particulate matter emissions shall be controlled by dry filters, then exhausting to Stack ID #S-8.
 - (9) One (1) topcoat booth with airless spray guns. Particulate matter emissions shall be controlled by dry filters, then exhausting to Stack ID #S-9.
- (b) One (1) topcoat booth (TB-10) with a capacity to coat 478 square feet of wood cabinetry an hour using airless spray guns, controlled by dry filters, and exhausting to stack S-10.
- (c) One (1) sealer booth (SB-11) with a capacity to coat 683 square feet of wood cabinetry an hour using airless spray guns, controlled by dry filters, and exhausting to stack S-11.

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

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

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 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- (a) This entire source shall be limited to less than 250 tons of VOC, per twelve (12) consecutive month period. This emission limit is required to limit the potential to emit of VOC to less than 250 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

- (b) VOC input shall include coatings, dilution solvents, and cleaning solvents, minus any VOC solvent shipped out.

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

Pursuant to 326 IAC 6-3-2 the PM from each of the ten (10) paint booths (EU1), the topcoat booth (TB-10) and the sealant booth (SB-11) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation 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:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

or

Interpolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.4 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 IAC20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart JJ.

D.1.5 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) 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).

- (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 VOC and PM limits specified in Condition D.1.2, D.1.3, and D.1.5 shall be determined by a performance test conducted in accordance with

D.1.9 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limit contained in Condition D.1.2 and D.1.5 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.10 VOC Emissions

Compliance with Condition D.1.2 and D.1.5 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent month.

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

D.1.11 Particulate Matter (PM)

The dry filters for PM control shall be in place at all times when the ten (10) paint booths (EU1), the topcoat booth (TB-10), and the sealant booth (SB-11) are in operation.

D.1.12 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 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 is observed. If no overspray emission is usually observed, evidence of any overspray emission will be considered a noticeable change. 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.

D.2 FACILITY OPERATION CONDITIONS - Woodworking Operations

Facility Description:

- (d) Woodworking operations with a baghouse to control particulate matter emissions.

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

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

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

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:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility 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.2.1 shall be determined by a performance test conducted in accordance with Section C Performance Testing.

D.2.4 Particulate Matter (PM)

The baghouses and the Torit filter system must be operating at all times when the woodworking process is in operation.

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

D.2.5 Visible Emissions Notations

- (a) Daily visible emission notations of the woodworking baghouse stacks exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

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

Part 70 Quarterly Report

Source Name: CANA, Inc.
Source Address: 29240 Philips Street, Elkhart, Indiana 46514
Mailing Address: 29240 Philips Street, Elkhart, Indiana 46514
Part 70 Permit No.: T 039-6494-00005
Facility: ten (10) paint booths (EUI), topcoat booth (TB-10), and sealant booth (SB-11)
Parameter: VOC
Limit: Less than 250 tons per 12 consecutive months

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

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

Attach a signed certification to complete this report.

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

Part 70 Operating Permit Semi-Annual Report VOC and VHAP usage - Wood Furniture NESHAP

Source Name: CANA, Inc.
 Source Address: 29240 Philips Street, Elkhart, Indiana 46514
 Mailing Address: 29240 Philips Street, Elkhart, Indiana 46514
 Part 70 Permit No.: T 039-6494-00005
 Facility: ten (10) paint booths (EUI), topcoat booth (TB-10), and sealant booth (SB-11)
 Parameter: VOC and VHAPs - NESHAP
 Limit: (1) Finishing operations - 1.0 lb VHAP/lb Solids
 (2) Thinners used for on-site formulation of washcoats, basecoats and enamels
 -3% VHAP content by weight
 (3) All other thinner mixtures - 10% VHAP content by weight
 (4) Foam adhesives meeting the upholstered seating flammability requirements
 - 1.8 lb VHAP/lb Solids
 (5) All other contact adhesives - 1.0 lb VHAP/lb Solids
 (6) Strippable spray booth material - 0.8 pounds VOC per pound solids

YEAR: _____

Month	Finishing Operations (1lb VHAP/lb Solid)	Thinners (3% by weight)	All Other Thinner Mixtures (10% by weight)	Foam Adhesives (upholstered) (1.8 lb VHAP/lb solid)	Contact Adhesives (1.0 lb VHAP/lb Solid)	Strippable Spray Booth Material (0.8 lb VOC/ lb Solid)
1						
2						
3						
4						
5						
6						

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

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

Attach a signed certification to complete this report.