

June 5, 2004

Ms. Stacey Christley
Operations Coordinator
Corsi Cabinet Company, Inc.
6111 Churchman Bypass
Indianapolis, IN 46203-6195

Certified Mail - 7000 0600 0023 5188 5278

Re: Change in Air Permit Status from FESOP
Operation Permit No.: F097-7880-00302, to
Permit By Rule Status: 097-14592-00302

Dear Ms. Christley:

A letter from Corsi Cabinets Company, Inc. (Corsi) requesting a change in the permit status from a Federally Enforceable Operating Permit (FESOP) to a Permit-By-Rule was received on May 11, 2004 by Indianapolis Office of Environmental Services (OES).

Corsi Cabinet Company, Inc., an owner and operator of a stationary wood furniture and cabinets manufacturing plant (SIC Code 2434), located at 6111 Churchman Bypass, Indianapolis, IN 46203, has been operating under a FESOP numbered F097-7880-00302, issued on July 28, 1997. The source operates seven (7) paint booths, identified as PB₁, PB₂, PB₃, PB₄, PB₅, PB₆, and PB₇ using air assisted airless spray guns, sprays, HVLP and other previously approved application systems. All seven paint booths utilize dry filters as particulate control, except for PB₆, which utilizes a water wall as particulate control. The booths exhaust to stack vents 1, 2, 3, 4, 5, 6, and 7, respectively.

Furthermore, the particulate emissions from wood working facilities, brazing equipment, cutting torches, soldering equipment, welding equipment, trimmers, and sanding, produce insignificant emitting activities. Reduction of particulate emissions is further accomplished with control devices such as dust collectors equipped with bag filters and cyclones at every paint booth.

Based on data and information submitted to OES and provisions of 326 IAC 2-10 (Permit-By-Rule), Corsi states that it has operated in compliance with provisions of 326 IAC 2-10 for a period of over one (1) year and will continue to comply with its provisions. Therefore, OES has determined that Corsi satisfies the criteria to operate under the Permit-By-Rule provisions.

Pursuant to 326 IAC 2-10 (Permit by Rule), this source shall comply with the following conditions:

- (a) The source's total actual emissions for every 12-month period shall be limited to less than 20% of any threshold for the following:
 - (1) A major source of regulated air pollutants.
 - (2) A major source of hazardous air pollutants, as defined in Section 112 of the Clean Air Act. [326 IAC 2-10-3(1)]
- (b) The source shall not rely on air pollution control equipment to comply with the above-mentioned limitations. [326 IAC 2-10-3(2)]

- (c) Not later than thirty (30) days after receipt of written request by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), U.S. Environmental Protection Agency (EPA), or Indianapolis Office of Environmental Services (OES), the owner or operator shall demonstrate that the source is in compliance with the above-mentioned conditions. [326 IAC 2-10-4]
- (d) Compliance demonstration shall be based on actual emissions for the previous 12 months and may include, but is not limited to, fuel or material usage or production records. No other demonstration of compliance shall be required. [326 IAC 2-10-4]

The conditions described above limit Corsi to particulate matter (PM-10) and volatile organic compounds (VOC) below 20 tons per year; combined hazardous air pollutants (HAPs) to below 5 tons per year, and single HAPs to 2 tons per year.

Moreover, the source is hereby notified that this Permit by Rule approval does not relieve the source of the responsibility to comply with the provisions of any applicable federal, state, or local requirements, such as New source Performance Standards (NSPS), 40 CFR Part 60, or National Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 61. [326 IAC 2-10-5]

Any change or modification which will alter operations in such a way that the source will no longer comply with 326 IAC 2-10 (Permit by Rule), must obtain the appropriate approval from the Indiana Department of Environmental Management, Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES) under 326 IAC 2-1.1, 326 IAC 2-2, 326 IAC 2-3, 326 IAC 2-7, 326 IAC 2-8, or 326 IAC 2-9 before such change may occur. This source may at any time apply for a state operating permit under 326 IAC 2-6.1, a Part 70 permit under 326 IAC 2-7, a FESOP under 326 IAC 2-8, or an operating agreement under 326 IAC 2-9, as applicable. [326 IAC 2-10-1(b)]

Any violation of 326 IAC 2-10 (Permit by Rule) may result in administrative or judicial enforcement proceedings under IC 13-30-3 and penalties under IC 13-30-4.

If you have any questions on this matter, please contact Carmen Bugay of my staff, via e-mail at cbugay@indygov.org or by phone at (317) 327-2512.

Sincerely,

original signed by,

John B. Chavez
Administrator

JBC/cmb

cc: IDEM - Mindy Hahn
OES, Compliance - Matt Mosier
OES, Permits - Carmen Bugay
Files