

March 6, 2003

Mr. Randy Keefer  
Jasper Plastics  
a Division of Kimball International, Inc.  
Jasper, IN 47549

Re: **037-16032**  
First Significant Permit Modification to  
**Part 70 No.: T 037-6952-00085**

Dear Mr. Keefer:

Jasper Plastics a Division of Kimball International, Inc. was issued a permit on March 28, 2002 for molded plastic parts manufacturing operation. A letter requesting changes to this permit was received on August 30, 2002. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of adding wood surface coating to their existing plastic parts surface coating booths.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification 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 Scott Fulton, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Scott Fulton or extension (3-5691), or dial (317) 233-5691.

Sincerely,  
Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments  
SDF

cc: File - Dubois County  
U.S. EPA, Region V  
Dubois County Health Department  
Southwest Regional Office  
Air Compliance Section Inspector - Gene Kelso  
Compliance Data Section - Karen Nowak  
Administrative and Development  
Technical Support and Modeling - Michele Boner

# **PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY**

**Jasper Plastics a Division of Kimball International  
1220 Power Drive  
Jasper, IN 47549**

(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.: T037-6952-00085	Date Issued: March 28, 2002
First Significant Permit Modification No.: 037-16032-00085	Affected Pages: 3, 4, 25, 26, 27, and 28, with 3a, 4a, 28a, 34a, and 34b added.
Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky Branch Chief, Office of Air Quality	March 6, 2003

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

- C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]
- C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

- C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
- C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
- C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

**Stratospheric Ozone Protection**

- C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

**D.1 FACILITY OPERATION CONDITIONS - Surface Coating Operation**

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

- D.1.1 Operating Requirements When Coating Wood Furniture [326 IAC 8-2-12]
- D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]
- D.1.3 Single and Combined Hazardous Air Pollutant (HAP) Limits [63.800]
- D.1.4 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]
- D.1.5 Particulate Matter (PM) [326 IAC 6-1-2]
- D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements**

- D.1.7 Volatile Organic Compounds (VOC)
- D.1.8 VOC Emissions
  - D.1.9 Compliance Determination, Single and Combined HAP Limits

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

- D.1.10 Particulate Matter (PM)
  - D.1.11 Monitoring
    - D.1.12 Compliance Monitoring, Single and Combined HAP Limits

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

- D.1.13 Record Keeping Requirements
- D.1.14 Record Keeping, Single and Combined HAP Limits
- D.1.15 Reporting Requirements
- D.1.16 Reporting Requirements, Single and Combined HAP limits

**D.2 FACILITY OPERATION CONDITIONS - Insignificant Activities**

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

D.2.1 Particulate Matter (PM) [326 IAC 6-1-2]

Jasper Plastics  
Jasper, Indiana  
Permit Reviewer: Amy Cook

Significant Permit Modification 037-16032-00085  
Modified by: SDF

Page 3a of 36  
OP No. T037-6952-00085

**Certification**

**Emergency Occurrence Report**

**Quarterly Report** Twenty six (26) Spray Booths (SB1 - SB26)

**Quarterly Report** (Two (2) Spray Booths (I&K and 30)

**Quarterly Report** (Single HAP Limit)

**Quarterly Report** (Combined HAP Limit)

**Quarterly Deviation and Compliance Monitoring Report**

## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.4 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)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary source which manufactures molded plastic parts for the furniture industry.

Responsible Official:	Randy Keefer, General Manager
Source Address:	1220 Power Drive, Jasper, IN 47549
Mailing Address:	1600 Royal Ave, Jasper, IN 47549
General Source Phone Number:	(812) 634-3443
SIC Code:	2519, 3089
County Location:	Dubois
Source Location 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)]

This stationary source consists of the following emission units and pollution control devices:

- (a) Sixteen (16) spray booths, identified as Nos. 1-16, constructed in 1984, using HVLP guns to coat molded plastic or wood furniture parts, using water pans and/or dry filters as control, and exhausting to stacks identified as Nos. 1-16.
- (b) Sanding operation consisting of three (3) sanders and a planer, using two (2) dust collectors (Donaldson/Day, 1985; Torit/Day, 1995). Each dust collector has a maximum unit capacity of 282.33 pounds per hour.
- (c) Ten (10) spray booths, identified as Nos. 17-26, constructed in 1990, using HVLP guns to coat molded plastic or wood furniture parts, using water pans and/or dry filters as control, and exhausting to stacks identified as Nos. 17-26.

- (d) Two (2) spray booths, identified as I&K and booth 30, constructed in 1994, using HVLP guns to coat molded plastic or wood furniture parts, using water pans and/or dry filters as control, and exhausting to stacks identified as Nos. 30-31.

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):

Jasper Plastics  
Jasper, Indiana  
Permit Reviewer: Amy Cook

Significant Permit Modification 037-16032-00085  
Modified by: SDF

Page 4a of 36  
OP No. T037-6952-00085

- (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 less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

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

- (a) Sixteen (16) spray booths, identified as Nos. 1-16, constructed in 1984, using HVLP guns to coat molded plastic or wood furniture parts, using water pans and/or dry filters as control, and exhausting to stacks identified as Nos. 1-16.
- (b) Ten (10) spray booths, identified as Nos. 17-26, constructed in 1990, using HVLP guns to coat molded plastic or wood furniture parts, using water pans and/or dry filters as control, and exhausting to stacks identified as Nos. 17-26.
- (c) Two (2) spray booths, identified as I&K and booth 30, constructed in 1994, using HVLP guns to coat molded plastic or wood furniture parts, using water pans and/or dry filters as control, and exhausting to stacks identified as Nos. 30-31.

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

#### D.1.1 Operating Requirements When Coating Wood Furniture [326 IAC 8-2-12]

When coating wood furnishings or furniture, the owner or operator shall apply all coating materials using one (1) of the following systems:

- (a) airless spray application,
- (b) air-assisted airless spray application,
- (c) electrostatic spray application,
- (d) electrostatic bell or disc application,
- (e) heated airless spray application,
- (f) roll coating,
- (g) brush or wipe application,
- (h) dip-and-drain application, or

- (i) high volume low pressure (HVLP) spray application.

High volume low pressure (HVLP) spray application is an accepted alternative method of application for air assisted airless spray application.

For the purposes of this condition, HVLP means spray technology used to apply coating to a 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 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The owner or operator shall, during all periods when not coating wood furniture or wood furnishings:

- (a) comply with the adjusted air and fluid pressures listed below:

<u>Coating</u>	<u>Atomizing Pressure</u>	<u>Fluid Pressure</u>
topcoat	40 psi	15 psi
barrier coat	30 psi	40 psi
washcoat	35 psi	3 psi
sealer	30 psi	10 psi
mold release toner	32 psi	40 psi
glaze	28 psi	5 psi

Jasper Plastics  
Jasper, Indiana  
Permit Reviewer: Amy Cook

Significant Permit Modification 037-16032-00085  
Modified by: SDF

Page 26 of 36  
OP No. T037-6952-00085

(These pressures may vary slightly depending on viscosity of surface coating material); and

- (b) limit the total amount of volatile organic compound (VOC) from each of the 2 spray booths (I&K and 30) to 24.9 tons per 12 consecutive month period with compliance determined at the end of each month. This condition will make the 326 IAC 8-1-6 rule not applicable.

D.1.3 Single and Combined Hazardous Air Pollutant (HAP) Limits [63.800]

The owner or operator shall limit the wood furniture coating and solvent single and combined HAP potential to emit to less than 10 and 25 tons per consecutive 12 month period, respectively, with compliance being demonstrated at the end of each month.

D.1.4 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- (a) This source shall use less than two hundred fifty (250) tons of VOC, including coating, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than two hundred fifty (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) The following conditions are no longer applicable because the source has requested a less than two hundred fifty (250) ton per year synthetic limit in order to avoid PSD. Therefore, Jasper Plastics is considered minor for PSD.

- (1) Pursuant to CP (19) 1863, issued on August 23, 1990, the 10 spray booths (SB17 - SB26) plus the 16 spray booths (SB1 - SB16) shall use less than 246 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than 246 tons per 12

consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

- (2) Pursuant to CP 037-3992, issued on January 3, 1995, Operating Condition 4(a), the total amount of volatile organic compound (VOC) delivered to each of the 2 spray booths (I&K and 30) shall not 39.6 tons per year. This condition will make the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21 not applicable.

**D.1.5 Particulate Matter (PM) [326 IAC 6-1-2]**

---

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Particulate Limitations) the particulate matter (PM) from the spray booths (SB1 - SB26; SB30; I&K) shall be limited to 0.03 grains per dry standard cubic foot.

**D.1.6 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 any control devices.

**Compliance Determination Requirements**

**D.1.7 Volatile Organic Compounds (VOC)**

---

Compliance with the VOC content and usage limitations contained in Conditions D.1.2 and D.1.4 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.

Jasper Plastics  
Jasper, Indiana  
Permit Reviewer: Amy Cook

Significant Permit Modification 037-16032-00085  
Modified by: SDF

Page 27 of 36  
OP No. T037-6952-00085

**D.1.8 VOC Emissions**

---

Compliance with Condition D.1.2 and D.1.4 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

**D.1.9 Compliance Determination, Single and Combined HAP Limits**

---

To determine compliance with the limits of Condition D.1.3, the owner or operator shall, on a monthly basis:

- (a) draft a list of each wood surface coating and solvent used that contains hazardous air pollutants (HAP), including for each coating and solvent, a list of the individual HAPs,
- (b) determine the individual HAP emissions for each wood surface coating and solvent used during the affected month,
- (c) determine the sum total individual HAP emissions from the wood surface coatings and solvents used during the affected month;
- (d) determine the combined HAP emissions from the wood surface coatings and solvents used during the affected month;
- (e) determine the sum total individual HAP emissions from the wood surface coatings and solvents used during the 11 months preceding the most recent affected month;

- (f) determine the sum total combined HAP emissions from the wood surface coatings and solvents used during the 11 months preceding the most recent affected month;
- (g) determine the consecutive 12 month total for each individual HAP by summing the values determined in Parts (c) and (e) of this Condition;
- (h) determine from the totals in Part (g) of this Condition, the highest consecutive 12 month total individual HAP emissions; and
- (i) determine the consecutive 12 month total combined HAP emissions by summing the values in Parts (d) and (f) of this Condition.

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

#### D.1.10 Particulate Matter (PM)

---

In order to comply with D.1.5 the water pans and dry filters for PM control shall be in operation and control emissions from the spray booths at all times the spray booths (SB1 - SB26; SB30; I&K) are in operation.

#### D.1.11 Monitoring

---

The dry filters and water pans have applicable compliance monitoring conditions as specified below:

- (a) For the Dry Filters: 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 booths stacks (1SB; 7SB - 10SB; 13SB; 26SB; I&K) 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 Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) For the Water Pans: Daily inspections shall be performed to verify that the water level of the water pans meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. In addition, weekly observations shall be made of the overspray from the surface coating booths stacks (2SB - 6SB; 11SB - 12SB; 14SB - 25SB; 30SB) 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 Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

- (c) Monthly inspections shall be performed of the surface 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 Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.12 Compliance Monitoring, Single and Combined HAP Limits

- To demonstrate compliance with the requirements of Condition D.1.3, the owner or operator shall record the information required and values determined in Condition D.1.9.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.1.13 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.2 and D.1.4, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.2 and D.1.4.
  - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (2) The total VOC usage for each month; and
  - (3) The weight of VOCs emitted for each compliance period.

Jasper Plastics  
Jasper, Indiana  
Permit Reviewer: Amy Cook

Significant Permit Modification 037-16032-00085  
Modified by: SDF

Page 28a of 36  
OP No. T037-6952-00085

- (b) To document compliance with Condition D.1.5 and D.1.11, the Permittee shall maintain a log of weekly overspray observations, weekly observations of the water level in the pans, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.14 Record Keeping, Single and Combined HAP Limits

To demonstrate compliance with the requirements of Condition D.1.3, the owner or operator shall keep and maintain:

- (a) records of the information and specific values required in Condition D.1.12; and
- (b) copies of the emission calculations performed each month including the methods used, a list of all parameters used to determine the emissions, material safety data sheets (MSDS) for

all materials stored and handled, and all supporting documentation used to verify the amount of each material, including as applicable, purchase and shipping orders, and invoices.

All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.15 Reporting Requirements

---

A quarterly summary of the information to document compliance with Condition D.1.2 and D.1.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

D.1.16 Reporting Requirements, Single and Combined HAP Limits

---

To document compliance with the requirements of Condition D.1.3, the owner or operator shall submit a quarterly summary of the information required in Condition D.1.14. Said summary shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Jasper Plastics  
Jasper, Indiana  
Permit Reviewer: Amy Cook

Significant Permit Modification 037-16032-00085  
Modified by: SDF

Page 34a of 36  
OP No. T037-6952-00085

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

**Part 70 Quarterly Report**

Source Name: Jasper Plastics a division of Kimball International, Inc.  
Source Address: 1220 Power Drive, Jasper, IN 47549  
Mailing Address: 1220 Power Drive, Jasper, IN 47549

Part 70 Permit No.: T037-6952-00085  
 Facilities: Twenty-eight (28) Spray Booths (SB1 - SB26; I&K and 30)  
 Parameter: Worst Case Single HAP  
 Limit: Less than 10 tons per consecutive 12 month period

YEAR: \_\_\_\_\_

Month	Worst Case Single HAP Emissions for the Consecutive 12 Month Period (Tons)
1	
2	
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.

Jasper Plastics  
 Jasper, Indiana  
 Permit Reviewer: Amy Cook

Significant Permit Modification 037-16032-00085  
 Modified by: SDF

Page 34b of 36  
 OP No. T037-6952-00085

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

**Part 70 Quarterly Report**

Source Name: Jasper Plastics a division of Kimball International, Inc.  
 Source Address: 1220 Power Drive, Jasper, IN 47549

Mailing Address: 1220 Power Drive, Jasper, IN 47549  
 Part 70 Permit No.: T037-6952-00085  
 Facilities: Twenty-eight (28) Spray Booths (SB1 - SB26; I&K and 30)  
 Parameter: Combined HAPs  
 Limit: Less than 25 tons per consecutive 12 month period

YEAR: \_\_\_\_\_

Month	(a) Combined HAP Emissions This Month (Tons)	(b) Combined HAP Emissions From the Previous 11 Months (Tons)	(a) + (b) Combined HAP Emissions for the Consecutive 12 Month Period (Tons)
1			
2			
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

## Addendum to the Technical Support Document for a Significant Permit Modification to an Existing Part 70 Permit

Source Name:	Jasper Plastics a Division of Kimball International, Inc.
Source Location:	1220 Power Drive, Jasper, Indiana 47549
County:	Dubois
SIC Code:	2521
Part 70 Permit No.:	037-6952-00085
Date Issued:	March 28, 2002
Significant Permit Modification No.:	037-16032-00085
Permit Reviewer:	SDF

On January 20, 2003, the Office of Air Quality (OAQ) had a notice published in the Herald, located in Jasper, Indiana, stating that Jasper Plastics had applied for a Significant Permit Modification to their existing Part 70 permit. The notice also stated that OAQ proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

The Office of Air Quality (OAQ) has decided to make the following changes.

### 1. Change 1:

High Volume Low Pressure (HVLP) spray application is not one of the application methods listed in 326 IAC 8-2-12. However, after completing some research regarding HVLP and 326 IAC 8-2-12, it is determined that the Office of Air Quality (OAQ) has established a policy that approves HVLP application as an acceptable application method for the purposes of 326 IAC 8-2-12.

Thus, HVLP shall be added to Condition D.1.1 as follows as an acceptable application method.

#### D.1.1 Operating Requirements When Coating Wood Furniture [326 IAC 8-2-12]

When coating wood furnishings or furniture, the owner or operator shall apply all coating materials using one (1) of the following systems:

- (a) airless spray application,
- (b) air-assisted airless spray application,
- (c) electrostatic spray application,
- (d) electrostatic bell or disc application,
- (e) heated airless spray application,
- (f) roll coating,
- (g) brush or wipe application, ~~or~~
- (h) dip-and-drain application, ~~or~~
- (i) **high volume low pressure (HVLP) spray application.**

**High volume low pressure (HVLP) spray application is an accepted alternative method of application for air assisted airless spray application.**

**For the purposes of this condition, HVLP means spray technology used to apply coating to a 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.**

Jasper Plastics  
Jasper, Indiana  
Permit Reviewer: SDF

Page 2 of 2  
037-16032-00085

**2. Change 2:**

Condition D.1.2 was not affected as a result of the current request. Thus, the language included in the affected pages is the same as proposed in the existing permit.

While the Office of Air Quality (OAQ) typically only addresses the requests made by the source under the most recent application, the OAQ can correct previous permit errors if discovered, requested, or commented on.

After review of Condition D.1.2, it is determined that the words "shall be limited" should be removed from Part (b). Therefore, Condition D.1.2 shall be revised as follows.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

---

The owner or operator shall, during all periods when not coating wood furniture or wood furnishings:

.....

- (b) limit the total amount of volatile organic compound (VOC) from each of the 2 spray booths (I&K and 30) ~~shall be limited to 24.9 tons per 12 consecutive month period~~ **with compliance determined at the end of each month** ~~which is equivalent to less than twenty-five (25) tons of VOC per year.~~ This condition will make the 326 IAC 8-1-6 rule not applicable.

## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Significant Permit Modification to an Part 70 Permit

#### Source Background and Description

Source Name:	Jasper Plastics a Division of Kimball International, Inc.
Source Location:	1220 Power Drive, Jasper, Indiana 47549
County:	Dubois
SIC Code:	2521
Part 70 Permit No.:	037-6952-00085
Date Issued:	March 28, 2002
Significant Permit Modification No.:	037-16032-00085
Permit Reviewer:	SDF

The Office of Air Quality (OAQ) has reviewed a Significant Permit Modification application from Jasper Plastics relating to the operation of their existing molded plastic parts manufacturing operation.

#### Request

On August 30, 2002, Jasper Plastics submitted a request to add wood furniture coating to their existing plastic parts coating booths.

No new equipment will be added and there will be no modifications to the existing equipment. In addition, there will be no increase in the affected spray booth UPTE because the worst case coating scenario is the existing worst case plastics coating scenario that was used to determine the UPTE for the existing Part 70 permit. Therefore, no Part 70 source modification is required.

Adding wood furniture coating to the existing booths triggers 40 CFR 63, Subpart JJ, "National Emission Standards for Wood Furniture Manufacturing Operations". Pursuant to 63.800(b), a source that complies with the limits and criteria specified in paragraphs (b)(1), (b)(2), or (b)(3) of this section is considered an area source for the purposes of this subpart and is not subject to provisions of the rule. Jasper Plastics cannot meet the requirements of 63.800(b)(1), (b)(2), or (b)(3).

63.800(b) also states that nothing in paragraph 63.800(b) is intended to preclude a source from limiting its potential to emit through other appropriate mechanisms. This means if Jasper Plastics limits the hazardous air pollutant (HAP) emissions from the wood furniture manufacturing facilities to less than the major source levels of 10 and 25 tons per year through conventional methods, the source will be considered an area source for the purposes of Subpart JJ, exempting the source from the requirements of Subpart JJ.

Jasper Plastics has proposed single and combined HAP limits of 10 and 25 tons per year, respectively. Thus, while the source is subject to 40 CFR 63, Subpart JJ, none of the requirements will apply.

Since Jasper Plastics is taking a limit to avoid the requirements of 40 CFR 63, Subpart JJ, the proposed changes cannot be incorporated into the existing Part 70 permit via a minor permit modification because pursuant to 326 IAC 2-7-12(b)(1)(D), the minor permit modification procedures cannot be used if a source is seeking to establish a condition to avoid an applicable requirement to which the source would otherwise be

subject.

In addition, the proposed changes do not consist of :

- (a) correction of typographical errors,
- (b) name, address, telephone, or other similar administrative changes,
- (c) an increase in the frequency of monitoring or reporting,
- (d) a change in ownership or operational control that does not require any other changes to the existing permit,
- (e) incorporation of preconstruction permit requirements issued under 326 IAC 2-7-10.5,
- (f) incorporation of a general permit issued under 326 IAC 2-7-13,
- (g) monitoring, maintenance, or recordkeeping requirements (the proposed change includes new limits) that are not environmentally significant, or
- (h) revisions to descriptive information where the revisions will not trigger any new applicable requirements.

The proposed changes do not qualify for an administrative amendment under 326 IAC 2-7-11.

Therefore, the proposed changes shall be incorporated into the permit via a significant permit modification pursuant to 326 IAC 2-7-12(d)(1) which states permit modifications that do not qualify as a minor permit modification or an administrative amendment, shall be approved via a significant permit modification.

### **Existing Approvals**

The source has been operating under Part 70 permit 037-6952-00085, issued on March 28, 2002.

### **Recommendation**

The staff recommends to the Commissioner that the Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application.

### **Emission Calculations**

The proposed changes consist of adding wood furniture coating to the existing coating booths. There will be no new equipment nor any changes to the existing equipment and the worst case coating scenario is the existing worst case plastics coating scenario that was used to determine the UPTE for the existing Part 70 permit.

Thus, there will no changes in UPTE due to the proposed changes.

### **Potential To Emit**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA."

This table reflects the PTE before controls due to the proposed changes based on the above estimated emissions calculations. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	-
PM-10	-
SO <sub>2</sub>	-
VOC	-
CO	-
NO <sub>x</sub>	-

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAPs	Potential To Emit (tons/year)
Worst Case Single HAP	-
Combined HAPs	-

Since no new equipment will be added, no modifications will be made to the existing equipment, and there will be no increases in UPTE due to the proposed changes, no source modification is required.

Since the proposed changes do not qualify for an administrative amendment or minor permit modification under 326 IAC 2-7-11 and 2-7-12(b), respectively, the proposed changes shall be incorporated into the permit via a significant permit modification pursuant to 326 IAC 2-7-12(d)(1) which states permit modifications that do not qualify as a minor permit modification or an administrative amendment shall be approved via a significant permit modification.

### County Attainment Status

The source is located in Dubois County.

Pollutant	Status
PM <sub>10</sub>	attainment or unclassifiable
SO <sub>2</sub>	attainment or unclassifiable
NO <sub>2</sub>	attainment or unclassifiable
Ozone	attainment or unclassifiable
CO	attainment or unclassifiable
Lead	attainment or unclassifiable

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Dubois County has been designated as attainment or unclassifiable for ozone. Therefore, the VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration, 326 IAC 2-2 and 40 CFR 52.21.
- (b) Dubois County has also been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

**Existing Source Status**

Existing Source Emissions (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited), as obtained from the Technical Support Document (TSD) of Part 70 permit 037-6952-00085, issued on March 28, 2002:

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Worst Case Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Source	>100, <250	>100, <250	<100	<100	<250	<100	<10	<25
PSD Major Levels	250	250	250	250	250	250	-	-
Part 70 Major Levels	-	100	100	100	100	100	10	10/25

- (a) The existing source is not a major PSD stationary source because the source criteria pollutant emissions, after the source VOC limit of 249 tons per year, are less than the major source level of 250 tons per year.
- (b) Even though the single and combined hazardous air pollutant (HAP) emissions are less than the respective levels of 10 and 25 tons per year, the existing source is a Title V major stationary source because the PM, PM10, and VOC emissions exceed the applicable level of 100 tons/yr.

**Emissions Due to the Proposed Changes**

Emissions due to the proposed changes based on emissions after controls and 8760 hours of operation per year at rated capacity:

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Worst Case Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Proposed Changes	-	-	-	-	-	-	-	-
PSD Major Levels	250	250	250	250	250	250	-	-

There will be no increases in emissions due to the proposed changes. Therefore, the proposed change is not considered a major PSD modification under 40 CFR 52.21 and 326 IAC 2-2.

**Source Emissions After the Proposed Changes**

Emissions after the proposed changes based on emissions after controls and 8760 hours of operation per year at rated capacity:

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Worst Case Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Source	>100, <250	>100, <250	<100	<100	<250	<100	<10	<25
PSD Major Levels	250	250	250	250	250	250	-	-
Part 70 Major Levels	-	100	100	100	100	100	10	10/25

- (a) The source after the proposed changes is still not a major PSD stationary source because the source criteria pollutant emissions, after the source VOC limit of 249 tons per year, are still less than the major source level of 250 tons per year.
- (b) The source after the proposed change is still a Title V major stationary because the PM, PM10, and VOC emissions still exceed the applicable level of 100 tons per year.

**Federal Rule Applicability**

**(a) New Source Performance Standards (NSPS)**

There are no NSPS (326 IAC 12, 40 CFR 60) that apply or become applicable to the source as a result of the proposed changes.

**(b) National Emission Standards for Hazardous Air Pollutants (NESHAP):**

**(1) 40 CFR Part 63, Subpart T:**

40 CFR Part 63, Subpart T still does not apply to the three (3) stripper tanks because the tanks still use acetone which is not a halogenated solvent.

**(2) 40 CFR Part 63, Subpart JJ:**

Pursuant to 40 CFR Part 63.800(a) the affected source to which Subpart JJ applies is each facility that is engaged, either in part or in whole, in the manufacture of wood furniture or wood furniture components that is located at a plant site that is a Part 70 major source.

The source is a Part 70 major source and after implementation of the proposed changes, will be involved in wood furniture manufacturing. Therefore, the source is subject to 40 CFR 63, Subpart JJ.

Pursuant to 63.800(b), a source that complies with the limits and criteria specified in paragraphs (b)(1), (b)(2), or (b)(3), is considered an area source for the purposes of this subpart and are not subject to provisions of the rule. Jasper Plastics cannot meet the requirements of 63.800(b)(1), (b)(2), or (b)(3).

63.800(b) also states that nothing in paragraph 63.800(b) is intended to preclude a source from limiting its potential to emit through other appropriate mechanisms. This means if Jasper Plastics limits the hazardous air pollutant (HAP) emissions from the wood furniture manufacturing facilities

to less than the major source levels of 10 and 25 tons per year through conventional methods, the source will be considered an area source for the purposes of Subpart JJ, exempting the source from the requirements of Subpart JJ.

Jasper Plastics has proposed single and combined HAP limits of 10 and 25 tons per year, respectively. Thus, while the source is subject to 40 CFR 63, Subpart JJ, none of the requirements will apply.

#### **State Rule Applicability - Entire Source**

**(1) 326 IAC 1-6-3 (Preventive Maintenance Plan):**

The source is still required to have a Preventive Maintenance Plan (PMP) for all emission units and control devices of the source.

**(2) 326 IAC 2-2 (Prevention of Significant Deterioration):**

There will be no increases in emissions due to the proposed changes. Therefore, the proposed change is not considered a major PSD modification under 40 CFR 52.21 and 326 IAC 2-2.

**(3) 326 IAC 2-4.1 (HAPs Major Sources):**

326 IAC 2-4.1 does not apply because the single and combined HAP emissions will be limited to less than the applicable levels of 10 and 25 tons per year, respectively.

**(4) 326 IAC 2-6 (Emission Reporting):**

This source is still subject to 326 IAC 2-6 (Emission Reporting), because the VOC potential to emit is still greater than the applicable level of one hundred (100) tons per year.

**(5) 326 IAC 5-1 (Opacity Limitations):**

The source is still subject to the requirements of 326 IAC 5.

**(6) 326 IAC 6-4 (Fugitive Dust Emissions):**

The 326 IAC 6-4 fugitive dust requirements still apply.

**(7) 326 IAC 6-5-1 (Fugitive Particulate Matter Emission Limitations):**

The 326 IAC 6-5 fugitive requirements still do not apply because the source fugitive emissions will still be less than the applicable level of 25 tons per year.

#### **State Rule Applicability - Individual Facilities**

**(1) 326 IAC 6-1-2 (Nonattainment Area Particulate Limitations):**

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Particulate Limitations) the following particulate matter (PM) limits shall still be applicable:

The particulate matter (PM) from the spray booths (SB1 - SB26; SB30; I&K) shall be limited to 0.03 grains per dry standard cubic foot.

The water pans and/or dry filters shall be in operation at all times the spray booths are in operation, in order to comply with this limit.

**(2) 326 IAC 8-2-10 (Flat Wood Panel Manufacturing Operations):**

The requirements of 326 IAC 8-2-10 do not apply to the proposed wood coating operation because the wood coated is wood furniture, not wood paneling as described in 326 IAC 8-2-10(a)(1), (2), and (3).

**(3) 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating Requirements):**

Pursuant to 326 IAC 8-2-12(a), this rule applies to surface coated wood furnishings which include cabinets, tables, beds, chairs, sofas, art objects, and any other coated furnishings made of solid wood, wood composition, or simulated wood material.

Jasper Plastics will, after the proposed changes, coat wood furnishings. Thus, the requirements of 326 IAC 8-2-12 apply when the booths are coating wood furnishings.

Pursuant to 326 IAC 8-2-12(b), the owner or operator shall apply all coating materials using one (1) of the following application systems:

- (a) airless spray application,
- (b) air-assisted airless spray application,
- (c) electrostatic spray application,
- (d) electrostatic bell or disc application,
- (e) heated airless spray application,
- (f) roll coating,
- (g) brush or wipe application, or
- (h) dip-and-drain application.

**(4) 326 IAC 8-11 (Wood Furniture Coatings):**

The requirements of 326 IAC 8-11 do not apply to the proposed wood furniture coating operation because the source is not located in any of the applicable counties (Lake, Porter, Clark, and Floyd).

**(5) 326 IAC 8-1-6:**

The requirements of 326 IAC 8-1-6 do not apply when applying wood furniture coatings because 326 IAC 8-2-12 applies during these periods.

326 IAC 8-1-6 does apply when applying all other coatings. Since the proposed change does not increase the surface coating booth UPTE, no changes to the existing 326 IAC 8-1-6 BACT requirements are required.

Therefore, the owner or operator shall be required to meet the existing 326 IAC 8-1-6 BACT requirements when not coating wood furniture.

**Changes to the Permit**

The following lists the changes to the existing permit that are necessary to incorporate the proposed modification. All language removed from the permit is struck-out and all added information is indicated in bold type.

**1. Unit Description of Condition A.2:**

The unit description of Condition A.2 shall be modified as follows to include wood furniture coating.

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

7-5(15)]

---

This stationary source consists of the following emission units and pollution control devices:

- (a) Sixteen (16) spray booths, identified as Nos. 1-16, constructed in 1984, using HVLP guns to coat molded plastic **or wood furniture** parts, using water pans and/or dry filters as control, and exhausting to stacks identified as Nos. 1-16.
- (b) Sanding operation consisting of three (3) sanders and a planer, using two (2) dust collectors (Donaldson/Day, 1985; Torit/Day, 1995). Each dust collector has a maximum unit capacity of 282.33 pounds per hour.
- (c) Ten (10) spray booths, identified as Nos. 17-26, constructed in 1990, using HVLP guns to coat molded plastic **or wood furniture** parts, using water pans and/or dry filters as control, and exhausting to stacks identified as Nos. 17-26.
- (d) Two (2) spray booths, identified as I&K and booth 30, constructed in 1994, using HVLP guns to coat molded plastic **or wood furniture** parts, using water pans and/or dry filters as control, and exhausting to stacks identified as Nos. 30-31.

## 2. Unit Description of Section D.1:

The unit description of Section D.1 shall be modified as follows to include wood furniture coating.

### **SECTION D.1 FACILITY OPERATION CONDITIONS**

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

- (a) Sixteen (16) spray booths, identified as Nos. 1-16, constructed in 1984, using HVLP guns to coat molded plastic **or wood furniture** parts, using water pans and/or dry filters as control, and exhausting to stacks identified as Nos. 1-16.
- (b) Ten (10) spray booths, identified as Nos. 17-26, constructed in 1990, using HVLP guns to coat molded plastic **or wood furniture** parts, using water pans and/or dry filters as control, and exhausting to stacks identified as Nos. 17-26.
- (c) Two (2) spray booths, identified as I&K and booth 30, constructed in 1994, using HVLP guns to coat molded plastic **or wood furniture** parts, using water pans and/or dry filters as control, and exhausting to stacks identified as Nos. 30-31.

## 3. New Condition D.1.1:

A new Condition D.1.1 shall be added as follows to specify the 326 IAC 8-2-12 requirements.

### **D.1.1 Operating Requirements When Coating Wood Furniture [326 IAC 8-2-12]**

**When coating wood furnishings or furniture, the owner or operator shall apply all coating materials using one (1) of the following systems:**

- (a) airless spray application,
- (b) air-assisted airless spray application,
- (c) electrostatic spray application,
- (d) electrostatic bell or disc application,
- (e) heated airless spray application,
- (f) roll coating,
- (g) brush or wipe application, or
- (h) dip-and-drain application.

4. Existing Condition D.1.1:

Existing Condition D.1.1 (now Condition D.1.2) shall be revised as follows to make the requirements applicable when the coating booths are not coating wood furnishings or furniture.

D.1.42 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

---

~~(1) Pursuant to CP (19) 1863, issued on August 23, 1990, Operating Condition 8, and CP (19) 1663, issued on April 8, 1988, Operating Condition 4, that pursuant to 326 IAC 8-1-6, Best Available Control Technology has been determined to be air atomization with lowered fluid and air pressures to increase transfer efficiency. The owner or operator shall, during all periods when not coating wood furniture or wood furnishings:~~

~~(a) comply with the adjusted air and fluid pressures shall be representative of the pressures listed below:~~

<u>Coating</u>	<u>Atomizing Pressure</u>	<u>Fluid Pressure</u>
topcoat	40 psi	15 psi
barrier coat	30 psi	40 psi
washcoat	35 psi	3 psi
sealer	30 psi	10 psi
mold release toner	32 psi	40 psi
glaze	28 psi	5 psi

~~(These pressures may vary slightly depending on viscosity of surface coating material); and~~

~~(2b) Pursuant to CP 037-3992, issued on January 3, 1995, Operating Condition 4(b), limit the total amount of volatile organic compound (VOC) from each of the 2 spray booths (I&K and 30) shall be limited to 24.9 tons per 12 consecutive month period which is equivalent to less than twenty-five (25) tons of VOC per year. This condition will make the 326 IAC 8-1-6 rule not applicable.~~

5. New Condition D.1.3:

A new Condition D.1.3 shall be added to include the new HAP limits established to reduce the emissions to less than the levels that trigger 40 CFR 63, Subpart JJ requirement applicability.

D.1.3 Single and Combined Hazardous Air Pollutant (HAP) Limits [63.800]

---

**The owner or operator shall limit the wood furniture coating and solvent single and combined HAP potential to emit to less than 10 and 25 tons per consecutive 12 month period, respectively, with compliance being demonstrated at the end of each month.**

**6. Existing Condition D.1.4:**

Existing Condition D.1.4 (now Condition D.1.6) shall be revised as follows to make sure that the preventive maintenance plan is, as applicable, updated to include wood furniture coating.

D.1.46 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 any control devices.

~~The source has submitted a Preventive Maintenance Plan (PMP) on October 16, 1996. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).~~

**7. Existing Condition D.1.5:**

Existing Condition D.1.5 (now Condition D.1.7) shall be revised as follows to insert the correct condition references.

D.1.57 Volatile Organic Compounds (VOC)

---

Compliance with the VOC content and usage limitations contained in Conditions D.1.42 and D.1.24 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.

**8. Existing Condition D.1.6:**

Existing Condition D.1.6 (now Condition D.1.8) shall be revised as follows to insert the correct condition references.

D.1.68 VOC Emissions

---

Compliance with Condition D.1.42 and D.1.24 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

**9. New Condition D.1.9:**

A new condition D.1.9 shall be added to include the determination requirements for the new HAP limits.

**D.1.9 Compliance Determination, Single and Combined HAP Limits**

---

**To determine compliance with the limits of Condition D.1.3, the owner or operator shall, on a monthly basis:**

- (a) draft a list of each wood surface coating and solvent used that contains hazardous air pollutants (HAP), including for each coating and solvent, a list of the individual HAPs,**
- (b) determine the individual HAP emissions for each wood surface coating and solvent used during the affected month,**
- (c) determine the sum total individual HAP emissions from the wood surface coatings and solvents used during the affected month;**

- (d) determine the combined HAP emissions from the wood surface coatings and solvents used during the affected month;
- (e) determine the sum total individual HAP emissions from the wood surface coatings and solvents used during the 11 months preceding the most recent affected month;
- (f) determine the sum total combined HAP emissions from the wood surface coatings and solvents used during the 11 months preceding the most recent affected month;
- (g) determine the consecutive 12 month total for each individual HAP by summing the values determined in Parts (c) and (e) of this Condition;
- (h) determine from the totals in Part (g) of this Condition, the highest consecutive 12 month total individual HAP emissions; and
- (i) determine the consecutive 12 month total combined HAP emissions by summing the values in Parts (d) and (f) of this Condition.

**10. Existing Condition D.1.7:**

Existing Condition D.1.7 (now Condition D.1.10) shall be revised as follows to insert the correct condition references.

**D.1.710** Particulate Matter (PM)

---

In order to comply with D.1.35 the water pans and dry filters for PM control shall be in operation and control emissions from the spray booths at all times the spray booths (SB1 - SB26; SB30; I&K) are in operation.

**11. New Condition D.1.12:**

A new condition D.1.12 shall be added to include the determination requirements for the new HAP limits.

**D.1.12** Compliance Monitoring, Single and Combined HAP Limits

---

**To demonstrate compliance with the requirements of Condition D.1.3, the owner or operator shall record the information required and values determined in Condition D.1.9.**

**12. Existing Condition D.1.9:**

Existing Condition D.1.9 ( now Condition D.1.13) shall be revised as follows to insert the correct condition references and remove requirements that are not necessary.

**D.1.913** Record Keeping Requirements

---

- (a) To document compliance with Conditions D.1.42 and D.1.24, the Permittee shall maintain records in accordance with (1) through (43) below. Records maintained for (1) through (43) shall

be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.42 and D.1.24.

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (2) ~~A log of the dates of use;~~
  - (3) The total VOC usage for each month; and
  - (3) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.35 and D.1.811, the Permittee shall maintain a log of weekly overspray observations, weekly observations of the water level in the pans, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**13. New Condition D.1.14:**

A new Condition D.1.14 shall be added as follows to include the record keeping requirements Associated with the single and combined HAP limits.

**D.1.14 Record Keeping, Single and Combined HAP Limits**

---

**To demonstrate compliance with the requirements of Condition D.1.3, the owner or operator shall keep and maintain:**

- (a) records of the information and specific values required in Condition D.1.12; and**
- (b) copies of the emission calculations performed each month including the methods used, a list of all parameters used to determine the emissions, material safety data sheets (MSDS) for all materials stored and handled, and all supporting documentation used to verify the amount of each material, including as applicable, purchase and shipping orders, and invoices.**

**14. Existing Condition D.1.10:**

Existing Condition D.1.10 ( now Condition D.1.15) shall be revised as follows to insert the correct condition references.

**D.1.105 Reporting Requirements**

---

A quarterly summary of the information to document compliance with Condition D.1.42 and D.1.24 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**15. New Condition D.1.16:**

A new Condition D.1.16 shall be added as follows to include the new reporting requirements associated with the single and combined HAP limits.

**D.1.16 Reporting Requirements, Single and Combined HAP limits**

- **To document compliance with the requirements of Condition D.1.3, the owner or operator shall submit a quarterly summary of the information required in Condition D.1.14. Said summary shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).**

**16. Quarterly Report for the Single HAP Emission Limit:**

A quarterly report shall be added to allow documentation of the single HAP limit.

**17. Quarterly Report for the Combined HAP Emission Limit:**

A quarterly report shall be added to allow documentation of the combined HAP limit.

**18. Section D.1 Condition Numbering:**

The conditions of Section D.1 shall be renumbered as a result of the conditions that have been removed.

**19. Table of Contents:**

The Table of Contents shall be modified to reflect the conditions that have been added.

**Conclusion**

The owner or operator shall construct and operate the proposed booths according to the applicable requirements of the existing source Part 70 permit and Significant Permit Modification 037-16032-00085, and as applicable, all other approvals issued after the Part 70 permit.