



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

June 17, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Jasper Seating Co., Inc. - PLT #2 / 117-17422-00011

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot 9/16/03



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June 17, 2004

Mr. Michael Elliott
Jasper Seating Co., Inc. - PLT #2
8084 West County Road 25 South
French Lick, Indiana 47432

Re: 117-17422-00011
First Significant Permit Revision to:
FESOP 117-13919-00011

Dear Mr. Elliott:

Jasper Seating Co., Inc. - PLT #2, was issued a FESOP on December 27, 2001 for a wood furniture manufacturing plant. A letter requesting changes to this permit was received on June 16, 2003. Pursuant to the provisions of 326 IAC 2-8-11.1, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the following:

- (a) Addition of one (1) 0.88 MMBtu/hr natural gas-fired boiler
- (b) Addition of two (2) 1.3 MMBtu/hr natural gas-fired air make-up units.
- (c) Addition of one (1) woodworking operation (EU14) with a baghouse for control.
- (d) Replacement of the existing baghouse for woodworking operation EU13.

The following construction conditions are applicable to the proposed project:

- 1. The data and information supplied with the application shall be considered part of this permit revision 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. Pursuant to IC 13-15-5-3, this approval to construct becomes effective upon its issuance.
- 4. Pursuant to 326 IAC 2-1.1-9 (Revocation), 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.



Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please find attached a copy of the revised permit.

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 Yu-Lien Chu, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7871 to speak directly to Ms. Chu. 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, 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/YC

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



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**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
OFFICE OF AIR QUALITY**

**Jasper Seating Co., Inc. - PLT #2
8084 W. County Road 25 S.
French Lick, Indiana 47432**

(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 2-8 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.: F117-13919-00011	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: December 27, 2001 Expiration Date: December 27, 2006

First Significant Permit Revision No.: 117-17422-00011	Affected Pages: 5, 6, 24 through 30, 32 through 34
Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:June 17, 2004



TABLE OF CONTENTS

SECTION A	SOURCE SUMMARY	5
A.1	General Information [326 IAC 2-8-3(b)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3	Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(l)]	
A.4	FESOP Applicability [326 IAC 2-8-2]	
A.5	Prior Permit Conditions	
SECTION B	GENERAL CONDITIONS	7
B.1	Permit No Defense [IC 13]	
B.2	Definitions [326 IAC 2-8-1]	
B.3	Permit Term [326 IAC 2-8-4(2)]	
B.4	Enforceability [326 IAC 2-8-6]	
B.5	Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3 (h)]	
B.6	Severability [326 IAC 2-8-4(4)]	
B.7	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.8	Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]	
B.9	Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.10	Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]	
B.11	Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]	
B.12	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.13	Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]	
B.14	Emergency Provisions [326 IAC 2-8-12]	
B.15	Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]	
B.16	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C) [326 IAC 2-8-7(a)][326 IAC 2-8-8]	
B.17	Permit Renewal [326 IAC 2-8-3(h)]	
B.18	Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]	
B.19	Operational Flexibility [326 IAC 2-8-15]	
B.20	Permit Revision Requirement [326 IAC 2-8-11.1]	
B.21	Inspection and Entry [326 IAC 2-8-5(a)(2)] [I13-14-2-2]	
B.22	Transfer of Ownership or Operation [326 IAC 2-8-10]	
B.23	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]	
SECTION C	SOURCE OPERATION CONDITIONS	16
	Emission Limitations and Standards [326 IAC 2-8-4(1)]	
C.1	Overall Source Limit [326 IAC 2-8]	
C.2	Opacity [326 IAC 5-1]	
C.3	Open Burning [326 IAC 4-1][IC 13-17-9]	
C.4	Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]	
C.5	Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]	
C.6	Operation of Equipment [326 IAC 2-8-5(a)(4)]	
C.7	Stack Height [326 IAC 1-7]	
C.8	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
	Testing Requirements [326 IAC 2-8-4(3)]	
C.9	Performance Testing [326 IAC 3-6]	
	Compliance Requirements [326 IAC 2-1.1-11]	
C.10	Compliance Requirements [326 IAC 2-1.1-11]	
	Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]	
C.11	Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]	
C.12	Maintenance of Emission Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]	
C.13	Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]	

TABLE OF CONTENTS (Continued)

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

- C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.16 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]
- C.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]
- C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

- C.19 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]
- C.20 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

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

SECTION D.1 FACILITY OPERATION CONDITIONS 24

Emission Limitations and Standards [326 IAC 2-8-4(1)]

- D.1.1 Particulate Matter (PM) [40 CFR 52, Subpart P]
- D.1.2 Volatile Organic Compounds (VOC) Limit [326 IAC 2-8-4] [326 IAC 8-6]
- D.1.3 Hazardous Air Pollutants (HAP) Limit [326 IAC 2-8-4]
- D.1.4 PM and PM10 Limits [326 IAC 2-8-4] [326 IAC 2-2] [40 CFR 52.21]
- D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

- D.1.6 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2] [326 IAC 8-1-4]
- D.1.7 Particulate Matter (PM) and PM10

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

- D.1.8 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

- D.1.9 Record Keeping Requirements
- D.1.10 Reporting Requirements

SECTION D.2 FACILITY OPERATION CONDITIONS 27

Emission Limitations and Standards [326 IAC 2-8-4(1)]

- D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]
- D.2.2 PM and PM10 Limits [326 IAC 2-8-4][326 IAC 2-2]
- D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

- D.2.4 Particulate Matter (PM) and PM10 Control

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

- D.2.5 Visible Emissions Notations
- D.2.6 Baghouse Inspections
- D.2.7 Broken or Failed Bag Detection

TABLE OF CONTENTS (Continued)

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)][326 IAC 2-8-16]
D.2.8 Record Keeping Requirements

SECTION D.3 FACILITY OPERATION CONDITIONS 30

Emission Limitations and Standards [326 IAC 2-8-4(1)]
D.3.1 Particulate Emissions [326 IAC 6-2-4]

Certification Form 31
Quarterly Report Form 32 through 34
Quarterly Deviation and Compliance Monitoring Report Form 35

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.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 2-8-3(b)]

The Permittee owns and operates a plant which manufactures wood desks and custom made wood furniture.

Authorized individual:	President
Source Address:	8084 West County Road 25 South, French Lick, Indiana 47432
Mailing Address:	8084 West County Road 25 South, French Lick, Indiana 47432
General Source Phone Number:	(812) 936-9977
SIC Code:	2521
County Location:	Orange
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source Under PSD Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) Twelve (12) spray coating booths, constructed in 1978, identified as EU1, EU2, EU3, EU4, EU5, EU6, EU7, EU8, EU9, EU10, EU11 and EU12. Each booth is equipped with a variable number of air assisted airless spray guns for wood furniture coating with dry filters for overspray control of particulates, exhausting through various stacks.
- (b) One (1) woodworking operation, identified as EU13 and constructed in 1978, with a maximum throughput rate of 1,000 pounds of wood per hour, controlled by a baghouse which has a maximum flow rate of 48,000 scfm and a maximum outlet grain loading of 0.01 grain/dscf, and exhausting to stack EU13.
- (c) One (1) woodworking operation, identified as EU14 and constructed in 2003, with a maximum throughput rate of 2,000 pounds of wood per hour, controlled by a baghouse which has a maximum flow rate of 48,000 scfm and a maximum outlet grain loading of 0.01 grain/dscf, and exhausting to stack EU14.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(l)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(2) and 326 IAC 2-7-1(21)(g)(xxx):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.
 - (1) Two (2) 1.0 million British thermal units per hour natural gas fired oven.
 - (2) One (1) 1.5 million British thermal units per hour natural gas fired furnace.
 - (3) Two (2) 0.2 million British thermal unit per hour natural gas fired air make-up unit.

- (4) Twenty-four (24) 90,000 British thermal units per hour natural gas space heater.
 - (5) One (1) natural gas fired boiler, constructed in 2003, with a maximum heat input capacity of 0.88 MMBtu/hr.
 - (6) Two (2) air make-up units, constructed in 2003, using natural gas as fuel, each with a maximum heat input capacity of 1.3 MMBtu/hr.
- (b) Other emission units, not regulated by a NESHAP, with PM₁₀, NO_x, and SO₂ emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any combination of HAPs:

Two (2) veneering operations.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions

- (a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]

- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AR-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAQ, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (c) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit [326 IAC 2-8-4(5)(C)]. The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be

considered timely if received by IDEM, OAQ, on or before the date it is due.

- (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) **Right to Operate After Application for Renewal [326 IAC 2-8-9]**
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control

The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Maintenance of Emission Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no often less than once an hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a temperature, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days from the date of issuance of this permit.

The ERP does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.16 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.17 Compliance Response Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared immediately upon issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such

additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

- (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.19 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

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

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) Twelve (12) spray coating booths, constructed in 1978, identified as EU1, EU2, EU3, EU4, EU5, EU6, EU7, EU8, EU9, EU10, EU11 and EU12. Each booth is equipped with a variable number of air assisted airless spray guns for wood furniture coating with dry filters for overspray control of particulates, exhausting through various stacks.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

D.1.1 Particulate Matter (PM) [40 CFR 52, Subpart P]

Pursuant 40 CFR 52, Subpart P, the PM from the twelve (12) spray coating 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:

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

D.1.2 Volatile Organic Compounds (VOC) Limit [326 IAC 2-8-4] [326 IAC 8-6]

Pursuant to 326 IAC 2-8-4 and 326 IAC 8-6, the amount of VOCs delivered to the applicators plus the amount of VOCs used for clean-up shall not exceed 95 tons per 12 consecutive month period with compliance determined at the end of each month. This limitation renders the requirements of 326 IAC 2-7 (Part 70) not applicable.

D.1.3 Hazardous Air Pollutants (HAP) Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, the amount of any single HAP delivered to the applicators plus the amount used for clean-up shall not exceed 9 tons per 12 consecutive month period with compliance determined at the end of each month and the amount of any combination of HAPs delivered to the applicators plus the amount used for clean-up shall not exceed 23 tons per 12 consecutive month period with compliance determined at the end of each month. These limitations render the requirements of 326 IAC 2-7 (Part 70) not applicable.

D.1.4 PM and PM10 Limits [326 IAC 2-8-4] [326 IAC 2-2]

(a) In order to make the requirements of 326 IAC 2-2 (PSD) not applicable, the total PM emissions from the existing twelve (12) spray coating booths (EU01 through EU12) shall not exceed 2.28 pounds per hour. This is equivalent to 10.0 tons per year of PM emissions.

(a) Pursuant to 326 IAC 2-8-4 (FESOP) and in order to make the requirements of 326 IAC 2-2 (PSD) not applicable, the total PM10 emissions from the existing twelve (12) spray coating booths (EU01 through EU12) shall not exceed 2.28 pounds per hour. This is equivalent to 10.0 tons per year of PM10 emissions.

Combined with the PM and PM10 emissions from the woodworking operations and the insignificant activities, the PM and PM10 emissions from the entire source are each limited to less than 100 tons/yr. Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit) and 326 IAC 2-2 (PSD) are not applicable.

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(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.

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC and HAP usage limitations contained in Conditions D.1.2 and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAP data sheets. 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.1.7 Particulate Matter (PM) and PM10

Pursuant to CP-59-01-90-0048, issued on March 4, 1986 and in order to comply with Conditions D.1.1 and D.1.4, the dry filters for PM and PM10 control shall be in proper placement and operation at all times when the twelve (12) paint booths (EU1, EU2, EU3, EU4, EU5, EU6, EU7, EU8, EU9, EU10, EU11, and EU12) are in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.8 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 Response Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.2 and D.1.3, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits established in Conditions D.1.2 and D.1.3.
 - (1) The amount and VOC and HAP 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. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) The cleanup solvent usage for each month;
 - (3) The total VOC and HAP usage for each month; and

- (4) The weight of VOCs and HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.8, the Permittee shall maintain a log of weekly overspray observations, 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.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.2 and D.1.3 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (b) One (1) woodworking operation, identified as EU13 and constructed in 1978, with a maximum throughput rate of 1,000 pounds of wood per hour, controlled by a baghouse which has a maximum flow rate of 48,000 scfm and a maximum outlet grain loading of 0.01 grain/dscf, and exhausting to stack EU13.
- (c) One (1) woodworking operation, identified as EU14 and constructed in 2003, with a maximum throughput rate of 2,000 pounds of wood per hour, controlled by a baghouse which has a maximum flow rate of 48,000 scfm and a maximum outlet grain loading of 0.01 grain/dscf, and exhausting to stack EU14.

(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 2-8-4(1)]

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

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the woodworking operation EU13 shall not exceed 2.6 pounds per hour when operating at a process weight rate of 1000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

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

- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the wood working operation EU14 shall not exceed 4.1 lb/shr when operating at a process weight rate of 2,000 pounds per hour. This emission limit was calculated using the equation in D.2.1(a).

D.2.2 PM and PM10 Limits [326 IAC 2-8-4][326 IAC 2-2]

- (a) In order to make the requirements of 326 IAC 2-2 (PSD) not applicable, the PM emissions from each of the woodworking operations (EU13 and EU14) shall not exceed 4.11 lbs/hr. This is equivalent to 18.0 tons/yr of PM emission from each woodworking operation.
- (b) Pursuant to 326 IAC 2-8-4 (FESOP) and in order to make the requirements of 326 IAC 2-2 (PSD) not applicable, the PM10 emissions from each of the woodworking operations (EU13 and EU14) shall not exceed 4.11 lbs/hr. This is equivalent to 18.0 tons/yr of PM10 emission from each woodworking operation.

Combined with the PM and PM10 emissions from the spray booths and the insignificant units, the PM and PM10 emissions from the entire source are each limited to less than 100 tons per year. Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit) and 326 IAC 2-2 (PSD) are not applicable.

D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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.2.4 Particulate Matter (PM) and PM10 Control

In order to comply with Conditions D.2.1 and D.2.2, the baghouses for PM and PM10 control shall be in operation and control emissions from the woodworking operations at all times that the woodworking operations are in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.5 Visible Emissions Notations

- (a) Daily visible emission notations of the woodworking stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. 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.2.6 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operations when venting to the atmosphere. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.2.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. 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 single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been

repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhausts.
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.
 - (5) One (1) natural gas fired boiler, constructed in 2003, with a maximum heat input capacity of 0.88 MMBtu/hr.

(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 2-8-4(1)]

D.3.1 Particulate Emissions [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (a) (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from the 0.88 MMBtu/hr boiler shall be limited to 0.6 pounds per MMBtu heat input.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Jasper Seating Co., Inc. - PLT #2
Source Address: 8084 West County Road 25 South, French Lick, Indiana 47432
Mailing Address: 8084 West County Road 25 South, French Lick, Indiana 47432
FESOP No.: F117-13919-00011

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify) _____
- Report (specify) _____
- Notification (specify) _____
- Affidavit (specify) _____
- Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

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

FESOP Quarterly Report

Source Name: Jasper Seating Co., Inc. - PLT #2
Source Address: 8084 West County Road 25 South, French Lick, Indiana 47432
Mailing Address: 8084 West County Road 25 South, French Lick, Indiana 47432
FESOP No.: F117-13919-00011
Facility: Twelve (12) spray coating booths, identified as EU1, EU2, EU3, EU4, EU5, EU6, EU7, EU8, EU9, EU10, EU11, EU12
Parameter: VOCs delivered to applicators and used for cleanup
Limit: 95 tons VOCs per 12 consecutive month period with compliance determined at the end of each month.

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

FESOP Quarterly Report

Source Name: Jasper Seating Co., Inc. - PLT #2
Source Address: 8084 West County Road 25 South, French Lick, Indiana 47432
Mailing Address: 8084 West County Road 25 South, French Lick, Indiana 47432
FESOP No.: F117-13919-00011
Facility: Twelve (12) spray coating booths, identified as EU1, EU2, EU3, EU4, EU5, EU6, EU7, EU8, EU9, EU10, EU11, EU12
Parameter: HAPs delivered to applicators and used for cleanup
Limit: 9 tons per 12 consecutive month period of any single HAP with compliance determined at the end of each month.

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

FESOP Quarterly Report

Source Name: Jasper Seating Co., Inc. - PLT #2
Source Address: 8084 West County Road 25 South, French Lick, Indiana 47432
Mailing Address: 8084 West County Road 25 South, French Lick, Indiana 47432
FESOP No.: F117-13919-00011
Facility: Twelve (12) spray coating booths, identified as EU1, EU2, EU3, EU4, EU5, EU6, EU7, EU8, EU9, EU10, EU11, EU12
Parameter: HAPs delivered to applicators and used for cleanup
Limit: 23 tons per 12 consecutive month period of any combination of HAPs with compliance determined at the end of each month.

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**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Jasper Seating Co., Inc. - PLT #2
Source Address: 8084 West County Road 25 South, French Lick, Indiana 47432
Mailing Address: 8084 West County Road 25 South, French Lick, Indiana 47432
FESOP No.: F117-13919-00011

Months: _____ to _____ Year: _____

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

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 Revision to a Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name:	Jasper Seating Co., Inc. - PLT #2
Source Location:	8084 West County Road 25 South, French Lick, Indiana 47432
County:	Orange
SIC Code:	2521
Operation Permit No.:	F117-13919-00011
Operation Permit Issuance Date:	December 27, 2001
Permit Revision No.:	117-17422-00011
Permit Reviewer:	ERG/YC

On September 23, 2003, the Office of Air Quality (OAQ) had a notice published in the Paoli News-Republican, Paoli, Indiana, stating that Jasper Seating Co., Inc. - PLT #2 had applied for a Significant Permit Revision to a Federally Enforceable State Operating Permit (FESOP) for adding three (3) natural gas-fired combustion units, replacing one (1) baghouse, and adding one (1) woodworking operation with a new baghouse for control. The notice also stated that OAQ proposed to issue a permit for this operation 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.

On October 22, 2003, Jasper Seating Company, Inc. [referred to as the source] and Mr. Alec Kalla [referred to as the commenter or Mr. Kalla] submitted comments on the proposed Significant Permit Revision. Additional information from the source was submitted on November 24, 2003 and March 24, 2004. The summary of the comments is below.

In April 2004 a draft of this Addendum to the Technical Support Document was sent to Mr. Kalla at his request. He concluded that his comments were not adequately addressed and requested a public hearing. On April 20, 2004, the Office of Air Quality (OAQ) had a notice published in the Paoli News-Republican, Paoli, Indiana, stating that a public hearing would be held on April 28, 2004, at 6:00 PM at the French Lick Community Center, 8560 West Main Street, French Lick, Indiana 47432. The notice informed interested parties that all interested parties are invited to be present or to be represented at this meeting.

The hearing was convened at 6:27 PM on April 28, 2004 at the French Lick Community Center, French Lick, Indiana. Mr. Mack E. Sims, a senior environmental engineer at IDEM, acted as the hearing officer. Ms. Kathy Moore, a permitting section chief of IDEM, OAQ, and Mr. Gene Kelso, the compliance inspector of this source, were also present. The general public who provided comment was Mr. Alec Kalla. A transcript was made of the hearing.

The following is a compilation of comments and responses. The written comments are presented first followed by the comments given at the public hearing. It should be noted that after hearing Mr. Kalla elaborate on his written comments at the public hearing, the summary of the original comments and

responses have been revised to better reflect Mr. Kalla's original comments. Therefore, these have been changed since Mr. Kalla received the draft of the Addendum to the Technical Support Document in April 2004.

If the permit language has been changed, it is indicated by bold text for new language and a strike through for any deleted language. The Table of Contents was updated as needed.

Comment 1:

The source stated that the enforcement issue listed under the Technical Support Document (TSD) relating to the replacement of the existing baghouse is incorrect. In the TSD for this permit revision, it was stated that the replacement of the existing baghouse caused the potential to emit (PTE) of PM10 from the entire source to increase to greater than 100 tons/yr. The source stated that the PTE of the existing spray coating booths were incorrectly listed as 84 tons/yr in the TSD for FESOP #117-13919-00011, issued on December 27, 2001.

The source stated that the PTE of PM10 from the coating operations is less than 10 tons/yr because these operations are controlled by dry filters. Combined with the PM10 emissions from the woodworking operations and the insignificant activities at this source, the PTE of PM10 from the entire source is still less than 100 tons/yr after the replacement of the existing baghouse.

Response to Comment 1:

IDEM, OAQ agrees that the replacement of the existing baghouse did not result in an increase of the PTE of PM10 from the entire source to greater than 100 tons/yr. There were no specific PM10 emission limits established for the existing coating booths in FESOP #117-13919-00011, issued on December 27, 2001. According to a memo dated November 3, 2003 from the IDEM inspector for this facility (Mr. Gene Kelso), IDEM has determined that no enforcement action will proceed regarding this issue because the replacement of the baghouse does not violate any permit conditions.

However, no changes have been made to the TSD because the OAQ prefers that the TSD reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Comment 2:

In a letter from the source received on March 24, 2004, the official name of this source has been changed to "Jasper Seating Co., Inc. - PLT #2".

Response to Comment 2:

The source name has been revised to "Jasper Seating Co., Inc. - PLT #2" through the entire permit.

Comment 3:

The commenter requested that the potential to emit formaldehyde be evaluated for the proposed boiler, the proposed air make-up units, and the composite woods. Below are the exact words of Mr. Kalla's comment:

"Page 27 of the FESOP describes the woodworking done in unit EU13 as '...cutting preformed composite board panels...' Composite board is not a specific term to me, but indicates that material comprised of wood particles glued and pressed together to form a sheet is to be cut. This, to me, includes particle board. I understand that glues used in some such materials can and will emit formaldehyde in the presence of moisture or humidity. Nowhere in the Significant Revision is the HAP formaldehyde listed as an emission, not even for the natural gas fired heaters and boiler, though formaldehyde is listed as an HAP with a listed PTE on page 2 of 2 TSD App A of OP: 117-13919.

I question the lack and the cause of this lack, of these 3 PTE entries, i.e., for the outgassing from the composite board and the PM and PM10 produced from it, from the combustion of natural gas in the new boiler and in the two new make up air heaters. Should the argument be raised that the quantity is trivial, I counter that on the Page 2 just cited, quantities as small as 1.009E-05 ton per year are listed (1.009 x 10 to the negative 5th power, as I was told by an IDEM agent over the phone).

How much formaldehyde is now and how much, should this revision be granted, will be released in total from this source, i.e., Jasper Seating Company, Inc. in Orange County, IN, hereafter, the source?

Response to Comment 3:

Because Jasper Seating does not manufacture particle board, the emissions of formaldehyde are not typically estimated from this type of facility. The vast majority of formaldehyde emissions from this product would occur at the manufacture. The emissions of formaldehyde from particle board are assumed to be trivial. The commenter is correct that the Appendix of the Technical Support Document for FESOP #117-13919-00011, issued December 27, 2001, included a pollutant at a very low level (1.009 x 10 to the negative 5th power) for the existing natural gas combustion units. The reason for this is that the emission factors for these pollutants are well established and they are contained in our standard spreadsheets for natural gas combustion. The total capacity of the combustion devices is very small for this source, but this standard spreadsheet was made to be used for a wide size range of units. The emissions of these pollutants may be more significant for larger units. The use of this spreadsheet should not be interpreted to mean that these quantities are considered significant.

However, when posed the question, the source was able to provide a reference on this issue. According to "Volatile Organic Compounds Emission from Particleboard Veneered with Decorative Paper Foil" (2002) by R. Wiglusz, G. Nickel, B. Igielska and E. Sitko, the highest formaldehyde emission rate from particle board is 0.12 mg/m². It is important to note that this value was determined after the first day of the test, when one would expect the emissions to be the highest. Although this was not the first day after manufacture, it closely simulates it because the samples were well wrapped to avoid off-gassing prior to the beginning of the test. Therefore, using this value is an overestimate of the emissions of formaldehyde from particle board because the particle board would have aged to some extent before being brought to Jasper Seating.

According to a letter from the source received on March 24, 2004, the current maximum particle board process rate at this source is 93.0 m²/hr. Therefore, the potential to emit formaldehyde for the particle board is calculated as below:

$$0.12 \text{ mg/m}^2 \times 93.0 \text{ m}^2/\text{hr} \times 2.2 \times 10^6 \text{ lbs/mg} \times 8760 \text{ hr/yr} = 0.22 \text{ lbs/yr.}$$

The source could increase production by 3 fold as a result of this revision, therefore the emissions of formaldehyde from particle board could increase to 0.66 lbs/yr (0.22 lbs/yr x3), an increase of 0.44 lbs/yr. Again, this is assuming the worst case emission rate and that the source

operates around the clock every day of the year.

For the emissions of formaldehyde from the natural gas combustion, AP-42, Table 1.4-3, states that the formaldehyde emission factor for natural gas combustion is 0.075 lbs/MMCF. The potential to emit formaldehyde from the additional 0.8 MMBtu/hr boiler and two (2) 1.3 MMBtu/hr air make-up units is:

$$(0.8 + 1.3 \times 2) \text{ MMBtu/hr} \times 1 \text{ MMCF}/1,000 \text{ MMBtu} \times 0.075 \text{ lbs/MMCF} \times 8760 \text{ hrs/yr} = 2.23 \text{ lbs/yr}$$

Therefore, the potential to emit formaldehyde from the proposed natural gas combustion units and the particleboard is 2.23 lbs/yr + 0.44 lbs/yr = 2.67 lbs/yr. This equivalent to 0.001 tons/yr of formaldehyde emissions, which is emitted in a form of gas, and is considered negligible for air permitting purposes.

Comment 4:

The commenter stated that the description for the hot oil press is vague and requested a detailed description for this process, including what materials are utilized and how much VOC and HAP are emitted from this process.

Response to Comment 4:

The hot oil press is used for veneering woods at the plant. The heated oil is enclosed in coils in two beds. Because the hot oil is enclosed, emissions of VOC are not expected from the oil. A sheet of core wood is put on the bottom bed. Glue is spread on the core wood, veneer placed on top of the glue, and the top bed comes down over the veneer to heat the glue so that the veneer sticks.

According to a letter from the source received on March 24, 2004, the source has two (2) existing veneering operations. The potential to emit from these two operations is less than 15 lbs/day (2.73 tons/yr) for VOC, less than 1.0 ton/yr for a single HAP, and less than 2.5 tons/yr for total HAPs (see the table below). Therefore, these veneering operations are considered insignificant activities, pursuant to 326 IAC 2-7-1(21).

Material	Max. Usage (lbs/hr)	Weight % VOC	Weight % a Single HAP	Weight % Total HAPs	PTE of VOC (tons/yr)	PTE of a Single HAP (tons/yr)	PTE of total HAPs (tons/yr)
Glue (CR-583)	46.6	0.676%	0.374%	0.676%	1.38	0.76	1.38

Note: PTE of VOC and HAP (tons/yr) = Max. Usage (lbs/hr) x VOC/HAP content (%) x 8760 hr/yr x 1 ton/2000 lbs

The source also stated that these two (2) veneering operations were not listed in FESOP #117-13919-00011, issued on December 27, 2001, and requested to include these operations in this permit. Since there are no specifically applicable requirements for these veneering operations. Condition A.3 has been revised as follows to reflect these units:

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(2) and 326 IAC 2-7-1(21)(g)(xxx):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.

...

- (b) Other emission units, not regulated by a NESHAP, with PM₁₀, NO_x, and SO₂ emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any combination of HAPs:**

Two (2) veneering operations.

Comment 5:

The commenter stated that the changes in the existing spray booths should be described in detail and should include the following information:

- (a) Will this change increase the capacity of the booths?
- (b) What material is being sprayed?
- (c) What pollutants are emitted from these spraying booths? The commenter specifically requested that the following information be provided:
 - (1) The CAS numbers for the pollutants.
 - (2) The name of the material contained in the pollutants, including all the solvent used.
 - (3) The quantity of the VOC and HAPs emitted.

The commenter stated up to 118 tons per 12 month period of VOC and HAPs were listed in the TSD for FESOP # 117-13919-000111, issued on December 27, 2001. The commenter questioned why this 118 tons of emissions were not accounted for in this revision.

The exact wording of this commenter's comment is as follows:

"This same page discusses changing spray coating booths. The statement supporting the claim that this is an insignificant activity carefully does not mention whether these modifications will increase the booths' capacity to handle a larger quantity of the same type of products and/or units? What is being sprayed? What is emitted from this spraying? This information is not supplied. Only PM and PM₁₀ are listed in PTE charts. The FESOP lists up to 118 tons per 12 month period of VOCs and HAPs permitted to be imported into the source. These 118 tons are not accounted for. What are they? What are their CAS numbers? What becomes of these compounds? Are any, and if so how many/much, is released from the source and in what manner? Solvents and HAPs such as are utilized in industrial painting and wood finishing are associated with incidence of cancer and other health problems. Benzene, toluene and MEK are examples of such compounds. Specific data is available through CDC, NJH, and OSHA. Time constraints prevent me from including copies of monographs at this time."

Response to Comment 5:

As stated in the technical support document for this revision, the purpose of replacing the booth enclosures with existing spray coating booths EU3 and EU6 is for dust control purposes and this change will not allow the source to coat larger units or different types of products. Therefore, this change will not increase the capacity of the existing spray booths. The type of material being sprayed is paint and it is being applied to particle board and medium density fiberboard (MDF) wood.

The 118 tons/yr of VOC referred to in the TSD of FESOP #117-13919-00011, issued on December 27, 2001, is the unrestricted potential to emit VOC for the spray booths, which means the amount of VOC that could be emitted when using the worst case scenario of coating and operating the booths 24 hrs/day and 365 days/yr. However, according to Conditions D.1.2 and D.1.3 in FESOP #117-13919-00011, issued on December 27, 2001, the Permittee shall comply with the following requirements:

- (a) The total VOC input to the spray booths shall be limited to less than 95 tons/yr.
- (b) A single HAP input to the spray booths shall be limited to less than 9.0 tons/yr.
- (c) The total HAP input to the spray booths shall be limited to less than 23 tons/yr.

Therefore, even if the source could physically emit 118 tons per year or even 3 times this amount after the revision, they are not allowed to. They are limited by the conditions above to the same amount of HAP and VOC before and after the revision.

Condition D.1.9(a) in FESOP #117-13919-00011, issued on December 27, 2001, requires this source to keep records of the monthly coating and solvent usages, the VOC and HAP content for each material used, and the total VOC and HAP inputs to the spray coating operations for each month. Condition D.1.10 in FESOP #117-13919-00011, issued on December 27, 2001, requires this source to submit quarterly reports to IDEM, OAQ to demonstrate compliance with the total VOC and HAP usage limits listed above.

The source currently uses a computer system to keep all the MSDS for each solvent and coating used, to record total coating and solvent usages, and to compute the actual VOC and HAPs usages for the spray booths in order to demonstrate compliance with the above limits. In a letter from the source received on March 24, 2004, the actual VOC usage and the HAP usages in 2002 and 2003 for the spray booths were provided and are listed in the table below:

Pollutant	CAS Number	Actual Emissions in 2002 (tons/yr)	Actual Emissions in 2003 (tons/yr)
VOC	NA	52.2	46.0
Total HAP	NA	0.31	2.59
Methanol	67-56-1	0.10	0.50
Formaldehyde	50-00-0	0.08	0.12
Xylene	1330-20-7	0.05	0.57
Toluene	108-88-3	0.05	0.86
Ethylbenzene	100-41-4	0.01	0.004
MEK	78-93-3	0.01	0.52
MIBK	108-10-1	0.00	0.01

Diethanalamine	111-42-2	0.0005	0.0006
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Note that the computer tracking system at this source does not record the HAPs which have concentrations lower than 0.1%.

Since the actual VOC and HAP usages from these spray booths are less than the limits above, this source is currently in compliance with the VOC and HAP usage limits in this FESOP.

Comment 6:

The commenter stated this permit revision will allow the source to triple the woodworking activities. The commenter questioned if the increase in woodworking activities would result in an increase in spray coating operations. The commenter requested to include the VOC and HAP emission increase information in this permit revision, including the type of material used, the amount and CAS numbers of the pollutants, and the actual emissions from the source. The commenter's specific language follows:

"Regarding VOCs and HAPs: this revision entails tripling the capacity for woodworking at the source. I must assume this means a tripling of all activities at the plant. How, then, can the VOCs and HAPs PTE not increase significantly? Section D.1.2 claims 326 IAC 2-7 (Part 70) doesn't apply because VOCs delivered to applicators and used for cleanup will not exceed 95 tons per 12 month period. It is impossible for me to believe that a tripling of the woodworking capacity would not result in a significant increase in spray coating activity. I believe this is an inaccurate figure. Section D.1.6 of the revision specifically mentions VOCs and HAPs. Therefore, this revision must concern activities that involve these compounds, yet there are no PTE listed by specific compounds. Which compounds are involved in activities at the source? What are their CAS number? I request an accounting of what these are and how much is to be released and in what manner from the source."

Response to Comment 6:

The source stated that they do not currently plan to increase production. The changes in woodworking operations are to improve the current woodworking operations flow. However, the source could increase production. As stated in response to comment 5, the source is not allowed to emit greater than 95 tons/yr of VOC, 9 tons/yr of a single HAP, and 23 tons/yr of total HAP under this FESOP, regardless of what they can physically do. The source is required to submit quarterly reports to demonstrate compliance with these limits. The actual HAP emission information from the spray booths in 2002 and 2003 can be found in the response to comment 5.

Comment 7:

The commenter requested that permission for outside burning or any type of inadequate or non-stoichiometric burning of waste or materials from this source be denied to prevent pollution of the air, ground, and water.

Response to Comment 7:

Only the combustion units which use natural gas as fuel were permitted in this FESOP. The source is also required to comply with the Open Burning requirements in Condition C.3 and the Incineration requirement in Condition C.4. In general, open burning is prohibited except as specifically outlined in these requirements.

Comment 8:

The commenter stated that "Page 10 of 21, Section D.1 of the revision describes the facility. The description includes spray guns for wood furniture coating with dry filters for overspray control of particulates. Are any VOCs and HAPs involved in this process? If so, why are they not cited, listed, and their PTE listed? I request that these be listed and explained, that all VOCs and HAPs be listed and accounted for in order to determine how much might be released from the source and in what manner."

Response to Comment 8:

The description in Section D.1 is meant to be a physical description of the equipment and to provide the reason for any control equipment. The control equipment is mentioned because it is part of the physical makeup of the equipment. There are VOCs and HAPs that are emitted from spray booths. The potential to emit of VOC and HAP was provided in the Technical Support Document and emissions of VOC and HAP (both potential and actual) are discussed in response to comments 5 and 6.

Comment 9:

The commenter stated that Condition D.1.4 limits PM emissions from the spray coating booths only, and not from the entire source. The commenter requested clarification of the law and determination of the legitimacy of the claim that 326 IAC 2-2 (PSD) is not applicable. The commenter asked if there are any other rules or laws applicable to PM emissions at this source.

Response to Comment 9:

Condition C.1 in FESOP #117-13919-00011, issued on December 27, 2001 limits the emissions from the entire source to less than the Part 70 major source thresholds. The conditions in Section D.1 apply specifically to the spray booths at this source, and the conditions in Section D.2 apply specifically to the woodworking operations at this source. Any emissions from the source greater than these limits are considered violations.

Pursuant to Condition D.1.4(a), the total PM emissions from the spray coating booths are limited to less than 10 ton/yr. Pursuant to Condition D.2.2(a), the PM emissions from each of the woodworking operations EU13 and EU14 are limited to less than 18 tons/yr. Combined with the PM emissions from the insignificant activities, the PM emissions from the entire source will be limited to less than 250 tons/yr. The Prevention of Significant Deterioration (PSD) does not apply to sources that are not major sources. For the purposes of PSD, a major source is a source with emissions of any regulated pollutant greater than 250 tons/yr. In this FESOP all pollutants, except PM, are limited to less than 100 tons per year and PM is limited to less than 250 tons per year. Therefore, the source is a minor source and the requirements of 326 IAC 2-2 (PSD) are not applicable.

The PM emissions from the existing spray booths are also subject to the requirements in 40 CFR 52, Subpart P (see Condition D.1.1).

Comment 10:

The commenter stated that "Section D.1. and D.2 treat the matter of inspections of the source by source employees to determine compliance. I request the outside verification be required, and that the specifications of the inspection process be made effective. There is no guarantee that the employee's training would occur when the source was in compliance with its permit. Further, visual confirmation of compliance is not a certain means of determining the same. Further, no specifications of environmental conditions during compliance monitoring are listed. Two suggestions of the inadequacy of the specifications follow. A strong wind could lessen the visual

impact of dust in the exhaust from the bag house. A heavy rain or grass cutting operation might remove indications of PM deposits.”

Response to Comment 10:

IDEM, OAQ believes that regular inspections performed by the source are sufficient to ensure that the control devices are in normal operation. The source is required to maintain a log of these inspection results for five (5) years and to keep them on site for three (3) years. In addition, the source is required to submit annual compliance certification and an IDEM assigned inspector verifies the compliance status of the source periodically.

Condition D.2.5 - Visible Emissions Notations specifies that the visible emissions notations shall be performed during normal daylight operations. Therefore, if the environmental conditions are abnormal, the source is not required to perform such monitoring.

Comment 11:

The commenter stated this revision permit allows the source to triple the source's capacity. The commenter requested the following information associated with this revision:

- (a) What type of activity will be increased?
- (b) Does the source spray particle board?
- (c) What type of finishing solutions are used?
- (d) What are the actual VOC and HAP emissions from this source?
- (e) Will the actual VOC and HAP emissions be tripled after installing the new woodworking operation EU-14?

Response to Comment 11:

The source stated that modifications to the existing woodworking operations are for improving the existing work flow and will not affect the potential to emit of the existing spray booths. The source stated that they do not plan to increase their production after this revision. Therefore, the actual emissions from this source will not change significantly after this revision. However, the source is limited to VOC and HAP emissions of less than 95 tons/yr for VOC, 9 tons/yr for a single HAP, and 23 tons/yr for total HAPs. Therefore, if operations increase they can not increase to the point that these limits are exceeded.

Particle board is one of the materials processed at this source. The source uses more than 100 types of coatings and solvents currently. The actual emissions from the spray booths at this source in 2002 and 2003 are listed in the response to comment 5.

Comment 12:

The commenter asked what the proposed air make-up units are used for and why the source needs to install these units. The commenter also asked if any VOC or HAP is released with any of the air that is sent back into the atmosphere.

Response to Comment 12:

In a letter from the source received on November 24, 2003, the source stated that the additional air make-up units are needed because spray booth EU3 was modified to keep dirt or dust out of the booth during the spray coating operation. This requires pulling a lot of air out of the booth and out of the building. To keep the building pressurized correctly and comfortable, warm make-up air is added back in the building through the new air make-up units.

Since the VOC and HAP usage limits in the FESOP apply to the total VOC and HAP input to the spray coating booths, the emissions in the exchanged air have been accounted for. Therefore, the increase in the air exchanged in the spray booths will not affect the total VOC and HAP usage recorded for the spray booths.

Comment 13:

The commenter stated: "I have been informed that the source has, apparently, committed a violation by constructing something which requires a permit without obtaining that permit. The wording of the revision fails to cause me to believe this was an oversight that should be corrected simply by applying for a permit after the fact."

Response to Comment 13:

In general, violations discovered during the permit review process will be forwarded to the Office of Enforcement (OE). The OE staff will review this manner and take proper action. This source replaced a baghouse without getting an air approval. Since this change did not increase potential emissions from the woodworking operation (see the response to comment 1), IDEM has determined that no enforcement action is needed for this issue.

Comment 14:

The commenter stated that: "regarding the first paragraph on page 5 of 21 of the revision, this seems to be a statement that IDEM has no jurisdiction on this manner. I argue that IDEM is charged with protecting air and water quality and has jurisdiction by the IC sections cited on page one."

Response to Comment 14:

IDEM assumes that the commenter is referring to the paragraph regarding fugitive emissions not being included when determining the applicability of PSD. This paragraph in no way makes a statement about IDEM's jurisdiction. This paragraph simply states that in determining applicability of PSD that fugitive emissions do not need to be taken into account. This is a provision of the PSD rules and is meant to be a clarification. In the case of Jasper Seating, this provision does not have any effect because it has little to no fugitive emissions.

Public Hearing Comments

Comment PH1A:

Mr. Kalla, commenting on a previous draft copy of this Addendum to the Technical Support Document, stated that he believed that his written comments submitted in October 2003 during the public notice period were modified. He questioned whether a law was violated because of this and whether there was any criminal intent. Mr. Kalla had specific concerns about his comment number 9. This led Mr. Kalla to ask several questions regarding the contractors that IDEM uses to support them in permit preparation, asking why was the decision made to send the work outside IDEM and outside Indiana; who made the decision and why. Mr Kalla also asked whether there were associations between the contractor and the source. Mr. Kalla stated that he did not believe that the comments he submitted had been addressed.

Response to comment PH1A:

There was no intention to modify comments received on the public notice draft permit to change their meaning. IDEM, OAQ and their contractors make a good faith effort to accurately summarize all comments received. Any incorrect summaries are not intentional and would be due to misunderstanding of the original comment. To address this concern, IDEM has reviewed all comments that Mr. Kalla provided in his letter submitted in October 2003 and resummarized them using much of Mr. Kalla's original language. Every attempt has been made to address each specific comment.

Regarding IDEM's use of contractors in the preparation of permits, and as stated by IDEM in the public hearing, IDEM has been using contractors for years because of the large volume of permits received. IDEM in-house staff can not possibly prepare all of the permits within the time frame necessary. The contracts between IDEM and the contractors address the issue of conflict of interest. The contractors cannot prepare permits for companies that they have prior relationships with. IDEM takes the issue of conflict of interest very seriously and feels confident that there was no conflicts of interest effecting the work on this permit.

Comment PH1:

Mr. Kalla had the following questions about the production rate of this source:

- (a) Has an increase in production already occurred?
- (b) Is production above 1,000 lbs/hr currently?

He stated that it is misleading for the source to state that they do not plan to increase production.

Response to Comment PH1:

The proposed new emission units have not been constructed yet. The source cannot construct or operate the new propose emission units of this revision before issuance of this revision. The current actual woodworking throughput rate is less than 1,000 lbs/hr. After this revision, the potential throughput rate for all the woodworking operations will be 3,000 lbs/hr. As stated in the response to comment 6, the source stated that they do not plan to increase actual production currently and the additional woodworking operations are used to improve the current woodworking operation flow. However the source may increase production as long as emissions do not exceed the limits presented in the permit. These limits were also discussed in response to comments 5, 6, 8 and 11.

Comment PH2:

Mr. Kalla had the following questions/comments about the response to comment 3, regarding the formaldehyde emissions:

- (a) Is 93 m²/hr the full woodworking capacity after this revision?
- (b) The response of 2.45 lbs/yr formaldehyde emissions is in contradiction with the formaldehyde emissions listed in the response to comment 5.
- (c) How much formaldehyde is emitted from the entire source, including the spray booths and all other units?

Response to Comment PH2:

93 m²/hr is the maximum throughput rate provided by the source for the current woodworking operations. After this revision, the maximum throughput rate for all the woodworking operations will increase from 1,000 lbs/hr to 3,000 lbs/hr. Assuming the maximum surface area of the processed wood will increase proportionally, the potential to emit formaldehyde from the wood working operations after this revision will be 0.22 lbs/yr x 3 = 0.66 lbs/yr.

The formaldehyde emissions in the response to comment 3 only represents the potential to emit formaldehyde from the proposed new natural gas combustion units and the processed wood boards. The formaldehyde emissions listed in the response to comment 5 are the actual emissions from the coatings in 2002 and 2003. These emissions are from different units and do not contradict with each other.

The potential to emit formaldehyde of the existing woodwork operation is 0.22 lbs/yr. The potential to emit formaldehyde from the existing natural gas combustion units, which have a total maximum heat input rate of 6.06 MMBtu/hr, is calculated below using the emission factor in AP-42, Table 1.4-3:

$$6.06 \text{ MMBtu/hr} \times 1 \text{ MMCF/1,000 MMBtu} \times 0.075 \text{ lbs/MMCF} \times 8760 \text{ hrs/yr} = 3.98 \text{ lbs/yr}$$

According to the response to comment 5, the actual formaldehyde emissions from the paint booths are 0.12 tons/yr (=240 lbs/yr) in 2003.

Therefore, the actual formaldehyde emissions from existing source, including the existing woodworking operation, natural gas combustion units, and the spray booths are estimated to be 0.22 lbs/yr + 3.98 lbs/yr + 240 lbs/yr = 244.2 lbs/yr (=0.12 tons/yr)

After this revision, the source will add three natural gas combustion units and one woodworking operation with a baghouse. According to the response to comment 3, the potential to emit formaldehyde will be increased by 2.23 lbs/yr + 0.44 lbs/yr x 2 = 2.67 lbs/yr from the new emission units. However, the actual formaldehyde emissions from the paint usage could not be estimated here due to the lack of future paint usage information. However, in order to maintain the FESOP status, the formaldehyde emissions from the entire source after this revision must not exceed 10 tons/yr.

Comment PH3:

Mr. Kalla asked the following additional questions about the formaldehyde emissions from the woodworking operations:

- (a) How much formaldehyde is emitted from the sawdust and other dusts formed at this source?
- (b) What are the temperatures and conditions under which the figures cited were derived and those at the source?
- (c) What are the emissions from the materials other than the particle board, including from MDF?

Mr. Kalla stated that the increase of surface area of particle board, if it were converted to dust at approximately PM10 size, is at least ten to the fifth power increase and that the amount of formaldehyde emissions from this source would probably increase to levels of concern.

Response to Comment PH3:

No information is available to estimate the formaldehyde emissions from saw dust and other dust formed at this source. The formaldehyde emission factor for particle boards used in the response to comment 3 is based on the laboratory results for a whole piece of particle board. Therefore, it is questionable that the emission factor can be used for sawdust generated from cutting particle boards. However, as an estimate of emissions we have calculated the emissions using Mr. Kalla's estimate of the increase in emissions due to off-gassing from sawdust and his estimate of the amount of sawdust generated.:

$$0.93 \text{ m}^2/\text{hr} \times 3 \text{ (increase in production)} \times 0.12 \text{ mg}/\text{m}^2 \times 100,000 \text{ (due to increase in surface area)} \\ \times 2.2 \times 10^6 \times 8760 \text{ hr/year} = 645 \text{ lb/year}$$

This calculation assumes that all the wood is ground into sawdust. The emissions of formaldehyde are still very low. Although this method of calculating emissions from saw dust is used in the above equation, there are no data known that can be used to estimate the emissions of sawdust.

The environment conditions for the experiment to derive the formaldehyde emission factor can be found in the table 1 of the reference listed in the response to comment 3. The temperature listed in table 1 of this reference is 23 degree C. The temperature and environment conditions for this source is the ambient air condition, which varies from different season.

No information is available to estimate the formaldehyde emissions from the MDF boards at this source. However, the formaldehyde emissions from the woodworking operations are not discussed in AP-42. IDEM considers the emissions of formaldehyde from particle board and MDF negligible.

Comment PH4:

Mr. Kalla stated that the actual emissions listed in the response to comment 5 only includes the formaldehyde emissions from the spray booths. He asked how much total formaldehyde is released from the entire source.

Response to Comment PH4:

According to the response to comment PH2, the actual formaldehyde emissions from this source are estimated to be 244.2 lbs/yr in 2003. After this revision, the potential to emit formaldehyde will be increased by 2.67 lbs/yr due to the new natural gas combustion units and new woodworking operation. The future formaldehyde emissions from painting can not be estimated due to lack of future coating information. However, the source is required to continue to limit the formaldehyde

emissions from the entire source to less than 10 tons/yr.

Comment PH5A:

Mr. Kalla stated that he does not believe that all the HAPs and VOCs have been listed. He stated: "I think that the amounts are cited as being no more than 2.5 tons per year, 2.73 tons per year, respectively, and these are referred to as 'insignificant'. Yet amounts of HAPs from spray booths are listed, HAPs as low as 0.01 tons per year."

Response to Comment PH5A:

One definition of an "insignificant activity" is that the emissions must be less than 1 ton per year for a single HAP and 2.5 tons per year for a combination of HAPs. If an activity emits less than these values it can be considered an insignificant activity. The spray booth is not considered an insignificant activity, therefore emissions are calculated for this equipment. It is IDEM's position that all the significant emissions of HAPs and VOC have been determined. The insignificant activities have been taken into account in the development of the HAP limit. The spray booths are limited to less than 9 tons per year of a single HAP and less than 23 tons per year for a combination of HAPs. These limits are lower than the required 10 tons per year of a single HAP and 25 tons per year of a combination of HAPs to make sure the insignificant activities are considered and that the source never goes over 10 and 25.

If the commenter is specifically commenting on the response to comment 4, note that the PTE of the glue used in the veneering is given in the table in that response.

Comment PH5:

Mr. Kalla stated if only one percent of particle board were made into sawdust of PM10, the formaldehyde emissions might increase significantly. He asked what and how much will be released from the source.

Response to Comment PH5:

See response to comment PH3.

Comment PH6:

Mr. Kalla stated that he does not believe that a company which has increased its production capacity three hundred percent will not make use of this increase. The source indicated the changes in spray booths will not allow the coating of larger or different types of units; Mr. Kalla inquired "What about more units?". Mr. Kalla stated that he believes that the source's newspaper ad seeking an employee contradicts the source's statement regarding no increase in production.

Response to Comment PH6:

As documented in the Technical Support Document for this revision, the replacement of the booth enclosures for existing spray coating booths EU3 and EU6 is being done for dust control purposes and will not allow the source to coat larger units or different types of products. These changes will not increase the potential to emit from the existing spray booths. However, the source is allowed to increase the actual production of these booths as long as the total VOC usage and HAP usage is limited to less than the FESOP applicability thresholds. Therefore, pursuant to FESOP #117-13919-00011, issued on December 27, 2001, the VOC usage for the spray booth is limited to less than 95 tons/yr and the total HAP usage is limited to less than 9.0 tons/yr for a single HAP and

less than 23 tons/yr for a combination of HAP. These limits keep the source under the FESOP applicability thresholds.

Comment PH7:

Mr. Kalla stated that he understood that the source said that the MSDSs and records of all HAPs and VOCs used by the source are computerized. Mr Kalla believes that this should allow easy, quick, and inexpensive printing of a list of the pollutants, but the source has not provided this list. Mr. Kalla wishes to incorporate by reference every listing of element and compound listed in the most recent edition of the CRS Handbook of Physics & Chemistry, and asked the source to list the amount of each, together with that element or compound CAS that it might emit per year.

Response to Comment PH7:

IDEM reviews the emissions of regulated pollutants and does not consider every chemical in the CRS handbook. The source has provided actual emissions of the eight HAPs that are emitted most often and at the highest levels. They are provided in the table in the response to comment 5. The lowest emitting HAP reported in either year is about 1 lb per year (0.0005 tons per year in 2002 and 0.0006 tons per year in 2003.) There are several HAPs that could be emitted from coatings and this list could be very long. However, the list would not provide additional value because the other HAPs would have been emitted in quantities less than 1 lb per year. IDEM considers this a significant detail. Also, the source must keep these records and provide reports four times per year.

Comment PH8:

Mr. Kalla requested that outside or non-stoichiometric burning not be permitted. He stated that the languages in Conditions C.3 and C.4 cause him to believe that the source is allowed to attempt open burning of materials in the future. Mr. Kalla stated that "Source's response, including reference to conditions C.3 and C4 text, which refer to permits which would allow such burning, causes me to believe it will attempt open burning."

Response to Comment PH8:

The permit conditions in C.3 and C.4 are standard conditions; they were not included in the permit because the source has requested to burn anything outside. Condition C.3 - Open Burning states that the Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. As stated during the public hearing, no business or organization is allowed to open burn in Indiana, except certain emergency situations, such as storm damages. However, the emergency burning is only applicable for clean woods, not for processed woods.

Condition C.4 - Incineration is for regulating incinerators. An incinerator is defined as an engineered device with an afterburner and the exhaust stream has to pass the associated afterburner. As stated by the inspector, Mr. Gene Kelso, Jasper Seating does not have such device at this location.

Comment PH9:

Mr. Kalla stated that the response to comment 8 indicated that "the input of VOC and HAP could be emitted in gas form or particulate form. The response to comment 8 seems to be for the spray booths only and does not include the emissions from adsorbed particles."

Response to Comment PH9:

The response to comment 8 states that the HAPs might be emitted as particulate matter. However, VOCs are always in gas form since they are volatile. The particulate emissions from the spray booths are controlled by dry filters, which provide more than 80% of control efficiency. The FESOP limits for this source limit the VOC and HAP input to the spray booths, instead of the VOC and HAP emissions from the spray booths. Therefore, the VOC and HAP emissions, including both gas and particle forms, are efficiently limited to less than the FESOP limits.

Note that the response to comment 8 has been revised since Mr. Kalla made this comment. Upon further review, it was determined that the original response to comment 8 did not address Mr Kalla's specific question.

Comment PH10:

Mr. Kalla stated that the response to comment 9 indicates that up to 206 tons/yr of PM could result from insignificant woodworking activities. This would be significantly more PM10 than that which is produced from the source's significant activities.

Response to Comment PH10:

The response to comment 9 states that the PM emissions from the entire source are limited to less than 250 tons/yr, therefore, this source is a PSD minor source. The potential to emit PM/PM10 from the woodworking activities at this source after this revision will be 36 tons/yr, and the limited emissions from the spray booths is 10 tons per year for a total of 46 tons per year. The emissions from the insignificant activities will add some to that total, but in no case will the total for the entire source be greater than 250 tons per year . The response to comment 9 did not mean to imply that the insignificant activities emitted the difference between 250 tons per year and 46 tons per year.

Comment PH11:

Mr. Kalla questioned how "abnormal environmental conditions" are defined in the response to comment 10 for the visible emission notation requirement. He believes that the abnormal environmental conditions only postpone the monitoring, but do not remove such monitoring requirements.

Response to Comment PH11:

Condition D.2.5 - Visible Emission Notations specifies that the visible emissions notations shall be performed during normal daylight operations. Therefore, if abnormal conditions occur, the source is not required to perform such monitoring. There is no specific definition for abnormal environmental conditions are those that would obscure a visible emissions observation. The abnormal condition could be a raining day or windy day.

Comment PH12:

Mr. Kalla stated the response to comment 11 only addressed the emissions from spray booths, not from the entire source. He asked what is being exhausted from the source, from the baghouse, from the source's windows, ventilators, buildings, and land.

Response to Comment PH12:

The information for the VOC and HAP emissions from the entire source could be found in the response to comments PH2 and PH4. There is no information available to estimate the actual PM/PM10 emissions from the baghouses. However, based on the baghouse design parameters and assuming this source operate 8,760 hrs/yr, the maximum PM/PM10 emissions from each baghouse are 18 tons/yr.

The PM/PM10 emissions from this source are controlled by filters or baghouses. Therefore, the emissions from the source's windows and ventilators are mainly VOC and HAPs. Since HAP emissions from other units are insignificant, the VOC and HAP emissions for the coatings should represent more than 99% of the emissions from the entire source. The source keeps records of the VOC and HAP input to the spray booths. Therefore, the input VOC and HAP information should cover all the possible VOC and HAP emissions from the paint booth stacks, windows, ventilators, and etc.

Comment PH13:

Mr. Kalla stated that the response to comment number 12 was not adequate. He asked if the source stated that no HAP and VOC will leave the source except through the spray booth exhausts. Is anything emitted from the oven mentioned in the revision? To where? What is it? And how much of it?

Response to Comment PH13:

The VOC and HAP contained in the coatings could be emitted from the spray booth stacks, ovens, and in general ventilation to the atmosphere. However, the source keep records of the VOC and HAP input to the spray booths, and not of the VOC and HAP emitted from the spray booths. Therefore, this record should cover all the possible VOC and HAP emissions emitted from all the emission points, including stacks, ovens, and general ventilation.

Upon further review, IDEM, OAQ has made the following corrections to Condition D.1.4:

D.1.4 PM and PM10 Limits [326 IAC 2-8-4] [326 IAC 2-2]

-
- (a) In order to make the requirements of 326 IAC 2-2 (PSD) not applicable, the total PM emissions ~~form~~ **from** the existing twelve (12) spray coating booths (EU01 through EU12) shall not exceed 2.28 pounds per hour. This is equivalent to 10.0 tons per year of PM emissions.

 - (a) Pursuant to 326 IAC 2-8-4 (FESOP) and in order to make the requirements of 326 IAC 2-2 (PSD) not applicable, the total PM10 emissions ~~form~~ **from** the existing twelve (12) spray coating booths (EU01 through EU12) shall not exceed 2.28 pounds per hour. This is equivalent to 10.0 tons per year of PM10 emissions.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Significant Permit Revision to a Federally Enforceable State Operating Permit

Source Background and Description

Source Name:	Jasper Seating Company, Inc.
Source Location:	8084 West County Road 25 South, French Lick, Indiana 47432
County:	Orange
SIC Code:	2521
Operation Permit No.:	F117-13919-00011
Operation Permit Issuance Date:	December 27, 2001
Permit Revision No.:	117-17422-00011
Permit Reviewer:	ERG/YC

The Office of Air Quality (OAQ) has reviewed a revision application from Jasper Seating Company, Inc., relating to the operation of a wood furniture manufacturing plant.

History

Jasper Seating Company, Inc. is an existing wood furniture manufacturing plant and their FESOP (F117-13919-00011) was issued on December 27, 2001. On June 16, 2003, Jasper Seating Company, Inc. submitted an application to the OAQ requesting the following modifications:

- (a) Addition of a 0.88 MMBtu/hr natural gas fired boiler. This boiler will be used to heat the oil for the hot pressing process. Currently, the oil is heated by electric heaters.
- (b) Removal of the existing booth enclosure for spray coating booth EU6 and replacing it with the existing 3-sided booth enclosure for spray coating booth EU3.
- (c) Addition of a new 4-sided downdraft booth enclosure for the existing spray coating booth EU3.
- (d) Addition of two (2) new natural gas fired air make-up units, each with a maximum heat input capacity of 1.3 MMBtu/hr.

The replacement of the booth enclosures for existing spray coating booths EU3 and EU6 is being done for dust control purposes and will not allow the source to coat larger units or different types of products. Therefore, this replacement is not a modification to the existing booths EU3 and EU6. The new boiler and air-make up units are considered insignificant activities, pursuant to 326 IAC 2-7-1(21)(G) and the total potential to emit from these units is less than the exemption thresholds in 326 IAC 2-1.1-3 (e)(1). However, the installation of a new boiler will trigger a new applicable requirement (326 IAC 6-2-4).

On August 4, 2003, the Permittee also requested the following changes:

- (a) Replacement of the existing 40,000 cfm baghouse, which was used to control the existing woodworking operation EU13. The new baghouse has a maximum flow rate of 48,000 cfm and a maximum outlet grain loading of 0.01 gr/dscf. This replacement occurred in March 2002.
- (b) Addition of woodworking operation EU14 with a 48,000 cfm baghouse. The maximum throughput rate for the proposed woodworking operation is 2,000 lbs/hr. The proposed baghouse has a maximum flow rate of 48,000 cfm and a maximum outlet grain loading of 0.01 gr/dscf.

Currently, the PM and PM10 emissions from the entire source were limited to less than 99.2 tons/yr, according to the Technical Support Document (TSD) for FESOP 117-13919-00011, issued on December 27, 2001. The replacement of the existing baghouse with greater air flow rate and the installation of the new woodworking operation EU14 will result in an increase in the potential to emit PM/PM10 from the entire source. In order to maintain the FESOP status, the PM10 emission limits in the permit will be adjusted such that the potential to emit PM10 from the entire source will remain less than 100 tons/yr.

These two (2) woodworking operations will not meet the insignificant activity definition in 326 IAC 2-7-1(21)(xxx) after this modification. Therefore, these two (2) units will be listed as significant emission units in the revised permit.

Existing Approvals

The source was issued a FESOP F117-13919-00011 on December 27, 2001. There are no other air approval issued to this source since the issuance of FESOP 117-13919-00011.

Enforcement Issue

- (a) IDEM is aware that the replacement of the 48,000 scfm baghouse for the existing woodworking operation EU13 was not done in compliance with Condition D.2.2(a) in FESOP 117-13919-00011, issued on December 27, 2001. This condition stated that the exhausts from the baghouse for the woodworking operation EU13 shall not exceed 40,000 scfm. The replacement of this baghouse with a higher air flow rate resulted in an increase in the potential to emit PM10 from woodworking operation EU13 from 15 tons/yr to 18 tons/yr. This change also made the potential to emit PM10 from the entire source greater than 100 tons/yr. Therefore, the source should have applied for a permit revision before this replacement occurred.
- (b) IDEM is reviewing this matter and has taken appropriate action. The compliance schedule in this proposed permit will satisfy the requirements of the above stated requirement.

Recommendation

The staff recommends to the Commissioner that the Significant Permit Revision 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 and additional information submitted by the applicant.

An application for the purposes of this review was received on June 16, 2003. Additional information was received on August 4, 2003 and August 18, 2003.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 5).

Potential To Emit of the Revision

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. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	*Potential To Emit (tons/year)
PM	3604
PM-10	3604
SO ₂	0.01
VOC	0.08
CO	1.28
NO _x	1.53

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

HAP's	Potential To Emit (tons/year)
TOTAL	Negligible

* Note: This includes the potential to emit from woodworking operations (EU13 and EU14), the new boiler, and the new air make-up units.

Justification for Revision

This revision is being performed as a significant permit revision because: (1) the potential to emit of PM and PM10 is each greater than 25 tons per year pursuant to 326 IAC 2-8-11.1(f)(1), (2) this modification triggers a new applicable requirement (326 IAC 6-2-4) pursuant to 326 IAC 2-8-11.1(g)(1); and (3) this modification requires an adjustment to the emissions cap limitations pursuant to 326 IAC 2-8-11.1(g)(2).

Potential to Emit after Revision

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units. The control equipment is considered federally enforceable only after issuance of this Permit Revision.

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
*Existing 12 Spray Coating Booths	Less than 84.0 10.0	Less than 84.0 10.0	-	Less than 95.0	-	-	Less than 9 for a single HAP and less than 23 for total HAPs
*Existing Woodworking Operation EU13	Less than 45.0 18.0	Less than 45.0 18.0	-	-	-	-	-
New Woodworking Operation EU14	Less than 18.0	Less than 18.0	-	-	-	-	-

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
New Boiler (insignificant)	0.03	0.03	Negligible	0.02	0.32	0.39	Negligible
New Air Make-up Units (insignificant)	0.09	0.09	Negligible	0.06	0.96	1.14	Negligible
Other Existing Insignificant Units	0.20	0.20	0.02	0.15	2.23	2.65	Negligible
Total PTE of the Entire Source after Revision	Less than 99.2 46.3	Less than 99.2 46.3	0.03	Less than 95.2	3.45	1.48	Less than 10 for a single HAP and less than 25 for any combination of HAPs
Title V Major Source Thresholds	NA	100	100	100	100	100	10 for a single HAP and 25 for any combination of HAPs

*Note: The potential to emit of the existing units is from the Technical Support Document (TSD) for F117-13919-0001, issued on December 27, 2001.

The existing source is a FESOP source because the potential to emit each criteria pollutant is limited to less than the Title V major source thresholds. After adding the new emission units and adjusting the existing limits, the source will maintain their FESOP operation status.

County Attainment Status

The source is located in Orange County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (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. Orange County has been designated as attainment or unclassifiable for ozone.
- (b) Orange County has 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.
- (c) Fugitive Emissions
 Since this type of operation is not in one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in

effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD applicability.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this revision.
- (b) The 0.88 MMBtu/hr boiler has a maximum heat input capacity less than 10 MMBtu/hr. Therefore, the New Source Performance Standards for Small Industrial - Commercial - Institutional Steam generating Units (40 CFR 60.40c - 60.48c, Subpart Dc) are not applicable to this boiler.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63) applicable to this revision.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This source was constructed in 1978 and is not in 1 of 28 source categories defined in 326 IAC 2-2-1(p)(1). The potential to emit PM and PM10 before control from the entire source is greater than 250 tons/yr. The source has accepted FESOP limits to limit the PM10 emissions from the entire source to less than 100 tons/yr by the use of baghouses and dry filters.

Pursuant to 326 IAC 2-2, the source shall also comply with the following:

- (a) The total PM emissions from the existing twelve (12) spray coating booths (EU01 through EU12) shall not exceed 2.28 pounds per hour. This is equivalent to 10.0 tons per year of PM emissions. The use of dry filters for overspray control ensures compliance with this limit.
- (b) The PM emissions from each of the woodworking operations (EU13 and EU14) shall not exceed 4.11 lbs/hr. This is equivalent to 18.0 tons/yr of PM emission from each woodworking operation. The use of baghouses for particulate control ensures compliance with this limit.

Combined with the PM emissions from the insignificant units, the PM emissions from the entire source are limited to less than 250 tons/yr. Therefore, the requirements of 326 IAC 2-2 are not applicable.

326 IAC 2-4.1 (New Sources of Hazardous Air Pollutants)

This revision does not have any HAP emissions. In addition, the source has accepted FESOP limits to limit the potential to emit HAP from the entire source to less than the HAP major source thresholds. Therefore, the requirements of 326 IAC 2-4.1 are not applicable.

326 IAC 2-8-4 (FESOP)

The potential to emit VOC, PM10, and HAPs before control from this source is greater than the Title V major source thresholds. Pursuant to 326 IAC 2-8-4, the source shall comply with the following:

- (a) Pursuant to F117-13919-00011, issued on December 27, 2001, the amount of VOCs delivered to the applicators plus the amount of VOCs used for clean-up shall not exceed 95 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) Pursuant to F117-13919-00011, issued on December 27, 2001, the amount of any single HAP delivered to the applicators plus the amount used for clean-up shall not exceed 9

tons per twelve (12) consecutive month period with compliance determined at the end of each month.

- (c) Pursuant to F117-13919-00011, issued on December 27, 2001, the amount of any combination of HAPs delivered to the applicators plus the amount used for clean-up shall not exceed 23 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (d) The total PM10 emissions from the existing twelve (12) spray coating booths (EU01 through EU12) shall not exceed 2.28 pounds per hour. This is equivalent to 10.0 tons per year of PM10 emissions. The use of dry filters for overspray control ensures compliance with this limit.
- (e) The PM10 emissions from each of the woodworking operations (EU13 and EU14) shall not exceed 4.11 lbs/hr. This is equivalent to 18.0 tons/yr of PM10 emission from each woodworking operation. The use of baghouses for particulate control ensures compliance with this limit.

Combined with the emissions from the rest of the source, the VOC and PM10 emissions from the entire source are limited to less than 100 tons/yr, and the HAPs emissions from the entire source are limited to less than 10 tons/yr for a single HAP and less than 25 tons/yr for any combination of HAPs. Therefore, the requirements of 326 IAC 2-7 (Part 70) are not applicable.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This source commenced operation after October 7, 1974 and before January 1, 1980. The potential VOC emissions from this source are greater than 100 tons/yr. Therefore, this source is subject to the requirements of 326 IAC 8-6 and the VOC emissions from the entire source shall be limited to less than 100 tons/yr. This source has accepted FESOP requirements to limit the VOC usage from the entire source to less than 100 tons/yr. Therefore, this source is in compliance with 326 IAC 8-6.

326 IAC 2-6 (Emission Reporting)

This source is located in Orange County and the potential to emit all criteria pollutants are limited to less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Spray Coating Booths (EU1 through EU12)

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

This source is located in Orange County and the spray booths at this source were constructed before July 1, 1990. Therefore, the requirements of 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating) are not applicable to these booths, pursuant to 326 IAC 8-1-2(a)(4).

326 IAC 6-3-2 (Process Operations)

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued, these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirement from the previous version of 326 IAC 6-3 (Process Operations), which has been approved into the SIP, remains an applicable requirement until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

Pursuant to 40 CFR 52, Subpart P, the particulate matter (PM) from each of the spray coating booths (EU1 through EU12) shall be limited by the following:

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:

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

Under the rule revision, particulate from these spray coating booths (EU1 through EU12) shall be controlled by dry filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications. Currently, these spray booths are controlled by dry filters. Therefore, spray coating booths EU1 through EU12 will comply with the revised rule also.

State Rule Applicability - Woodworking Operations (EU13 and EU14)

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

- (a) Particulate emissions from the woodworking operation EU13 shall be limited to less than 2.6 lbs/hr when the process weight rate is 1,000 lbs/hr.

The pounds per hour limitation was calculated with the following equation:

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:

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

- (b) Particulate emissions from the woodworking operation EU14 shall be limited to less than 4.1 lbs/hr when the process weight rate is 2,000 lbs/hr. This emission limit was calculated using the equation above.

According to the emission calculations (see Appendix A), the potential to emit PM from each woodworking operation is less than the limit above. Therefore, woodworking operations EU13 and EU14 are in compliance with 326 IAC 6-3-2.

State Rule Applicability - 0.88 MMBtu/hr Boiler (Insignificant)

326 IAC 6-2-4 (PM Emissions for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-4(a), indirect heating facilities constructed after September 12, 1983, shall be limited by the following equation:

$$P_t = \frac{1.09}{Q^{0.26}}$$

Where P_t = emission rate limit (lbs/MMBtu)
 Q = total source heat input capacity (MMBtu/hr)

The maximum heat input rate of the new boiler is 0.88 MMBtu/hr and there are no other existing boilers at this source. 326 IAC 6-2-4(a) states that if Q is less than 10 MMBtu/hr, Pt shall not exceed 0.6 lbs/MMBtu. Therefore, the PM emission limit for the proposed boiler is 0.6 lbs/MMBtu.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The spray coating booths (EU1 through EU12) have applicable compliance monitoring conditions as specified below:
 - (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 spray coating booth stacks while one or more of the booths are in operation.
 - (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed.
 - (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters must function properly to ensure compliance with 40 CFR 52, Subpart P, 326 IAC 2-8-4(FESOP), and 326 IAC 2-2 (PSD).

2. The woodworking operations (EU13 and EU14) have applicable compliance monitoring conditions as specified below:
 - (a) Visible emissions notations of the exhaust from the woodworking operations shall be performed once per day during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would

normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

- (b) An inspection shall be performed each calendar quarter of all bags controlling the woodworking operations. A baghouse inspection shall not be performed in consecutive months. In the event that bag failure has been observed:
- (1) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit.
 - (2) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit.

These monitoring conditions are necessary because baghouses associated with the woodworking operations (EU13 and EU14) must operate properly to ensure compliance with 326 IAC 6-3-2 (Manufacturing Processes), 326 IAC 2-8-4(FESOP), and 326 IAC 2-2 (PSD).

Proposed Changes

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a plant which manufactures wood desks and custom made wood furniture.

Authorized individual:	Mike Elliott, President
Source Address:	8084 West County Road 25 South, French Lick, Indiana 47432
Mailing Address:	8084 West County Road 25 South, French Lick, Indiana 47432
General Source Phone Number:	(812) 936-9977
SIC Code:	2521
County Source Location Status:	Orange
Source Location County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source Under PSD Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) Twelve (12) spray coating booths, **constructed in 1978**, identified as EU1, EU2, EU3, EU4, EU5, EU6, EU7, EU8, EU9, EU10, EU11 and EU12. Each booth is equipped with a variable number of air assisted airless spray guns for wood furniture coating with dry filters for overspray control of particulates, exhausting through various stacks.
- (b) **One (1) woodworking operation, identified as EU13 and constructed in 1978, with a maximum throughput rate of 1,000 pounds of wood per hour, controlled by a**

baghouse which has a maximum flow rate of 48,000 scfm and a maximum outlet grain loading of 0.01 grain/dscf, and exhausting to stack EU13.

- (c) **One (1) woodworking operation, identified as EU14 and constructed in 2003, with a maximum throughput rate of 2,000 pounds of wood per hour, controlled by a baghouse which has a maximum flow rate of 48,000 scfm and a maximum outlet grain loading of 0.01 grain/dscf, and exhausting to stack EU14.**

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(2) and 326 IAC 2-7-1(21)(g)(xxx):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.

(5) **One (1) natural gas fired boiler, constructed in 2003, with a maximum heat input capacity of 0.88 MMBtu/hr.**

(6) **Two (2) air make-up units, constructed in 2003, using natural gas as fuel, each with a maximum heat input capacity of 1.3 MMBtu/hr.**

~~(b) Woodworking equipment controlled by a baghouse that does not exhaust to the atmosphere greater than forty thousand (40,000) cubic feet per minute and does not emit particulate matter with a diameter less than ten (10) microns in excess of one-hundredth (0.01) grain per dry standard cubic feet of outlet air.~~

~~(1) One (1) woodworking unit, identified as EU13. The woodworking consists of cutting preformed composite board panels for use in assembling wood desks, at a maximum capacity of 1000 pounds per hour, exhausting through stack ID # V16 and controlled by a baghouse system and closed loop cyclone.~~

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) Twelve (12) spray coating booths, **constructed in 1978**, identified as EU1, EU2, EU3, EU4, EU5, EU6, EU7, EU8, EU9, EU10, EU11 and EU12. Each booth is equipped with a variable number of air assisted airless spray guns for wood furniture coating with dry filters for overspray control of particulates, exhausting through various stacks.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2] [40 CFR 52, Subpart P]

Pursuant 326 IAC 6-3-2 **40 CFR 52, Subpart P**, the PM from the twelve (12) spray coating 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:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.2 Volatile Organic Compounds (VOC) Limit [326 IAC 2-8-4] [326 IAC 8-6]

Pursuant to 326 IAC 2-8-4 and **326 IAC 8-6**, the amount of VOCs delivered to the applicators plus the amount of VOCs used for clean-up shall not exceed 95 tons per 12 consecutive month

period **with compliance determined at the end of each month**. This limitation renders the requirements of 326 IAC 2-7 (Part 70) not applicable.

D.1.3 Hazardous Air Pollutants (HAP) Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, the amount of any single HAP delivered to the applicators plus the amount used for clean-up shall not exceed 9 tons per 12 consecutive month period **with compliance determined at the end of each month** and the amount of any combination of HAPs delivered to the applicators plus the amount used for clean-up shall not exceed 23 tons per 12 consecutive month period **with compliance determined at the end of each month**. These limitations render the requirements of 326 IAC 2-7 (Part 70) not applicable.

D.1.4 PM and PM10 Limits [326 IAC 2-8-4] [326 IAC 2-2] [CFR 52.21]

~~Pursuant to 326 IAC 2-8-4, the particulate emissions from the spray coating booths shall be controlled by the use of the dry filters. This limit, in conjunction with the VOC limit in Condition D.1.2, is necessary to ensure that the potential to emit PM10 from the whole source emissions do not exceed 100 tons per year. Therefore, the requirements of 326 IAC 2-2, 40 CFR 52.21, and 326 IAC 2-7 (Part 70) do not apply.~~

- (a) **In order to make the requirements of 326 IAC 2-2 (PSD) not applicable, the total PM emissions from the existing twelve (12) spray coating booths (EU01 through EU12) shall not exceed 2.28 pounds per hour. This is equivalent to 10.0 tons per year of PM emissions.**
- (b) **Pursuant to 326 IAC 2-8-4 (FESOP) and in order to make the requirements of 326 IAC 2-2 (PSD) not applicable, the total PM10 emissions from the existing twelve (12) spray coating booths (EU01 through EU12) shall not exceed 2.28 pounds per hour. This is equivalent to 10.0 tons per year of PM10 emissions.**

Combined with the PM and PM10 emissions from the woodworking operations and the insignificant activities, the PM and PM10 emissions from the entire source are each limited to less than 100 tons/yr. Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit) and 326 IAC 2-2 (PSD) are not applicable.

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2] [326 IAC 8-1-4]

~~Compliance with the VOC content and HAP usage limitations contained in Conditions D.1.2 and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAP data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4 using formulation data supplied by the coating manufacturer.~~

~~**D.1.7 VOC Emissions**~~

~~Compliance with Condition D.1.2 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.1.87 Particulate Matter (PM) and PM10

Pursuant to CP-59-01-90-0048, issued on March 4, 1986 and in order to comply with **Conditions D.1.1 and D.1.4**, the dry filters for **PM and PM10** control shall be in proper placement and operation at all times when the twelve (12) paint booths (EU1, EU2, EU3, EU4, EU5, EU6, EU7, EU8, EU9, EU10, EU11, and EU12) are in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.98 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.109 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.2 and D.1.3, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Conditions D.1.2 and D.1.3.
- (1) The amount and VOC and HAP 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. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) The cleanup solvent usage for each month;
 - (3) The total VOC and HAP usage for each month; and
 - (4) The weight of VOCs and HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.98, the Permittee shall maintain a log of weekly overspray observations, 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.1.110 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions ~~D.1.1~~, D.1.2 and D.1.3 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)] ~~Insignificant Activities~~

- (b) One (1) woodworking operation, identified as EU13 and constructed in 1978, with a maximum throughput rate of 1,000 pounds of wood per hour, controlled by a baghouse which has a maximum flow rate of 48,000 scfm and a maximum outlet grain loading of 0.01 grain/dscf, and exhausting to stack EU13.
- (c) One (1) woodworking operation, identified as EU14 and constructed in 2003, with a maximum throughput rate of 2,000 pounds of wood per hour, controlled by a baghouse which has a maximum flow rate of 48,000 scfm and a maximum outlet grain loading of 0.01 grain/dscf, and exhausting to stack EU14.
- (1) One (1) woodworking unit, identified as EU13. The woodworking consists of cutting preformed composite board panels for use in assembling wood desks, at a maximum capacity of 1000 pounds per hour, exhausting through stack ID # V16 and controlled by a baghouse system and closed loop cyclone.

(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 2-8-4(1)]

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

- (a) Pursuant to 326 IAC 6-3-2 (~~Particulate Emission Limitations for Manufacturing Processes~~Process Operations), the allowable PM particulate emissions rate from the woodworking facilitiesoperation EU13 shall not exceed 2.6 pounds per hour when operating at a process weight rate of 1000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

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

- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the wood working operation EU14 shall not exceed 4.1 lb/shr when operating at a process weight rate of 2,000 pounds per hour. This emission limit was calculated using the equation in D.2.1(a).

D.2.2 PM and PM10 Limits [326 IAC 2-8-4][326 IAC 2-2]

- (a) In order to make the requirements of 326 IAC 2-2 (PSD) not applicable, the PM emissions from each of the woodworking operations (EU13 and EU14) shall not exceed 4.11 lbs/hr. This is equivalent to 18.0 tons/yr of PM emission from each woodworking operation.
- (b) Pursuant to 326 IAC 2-8-4 (FESOP) and in order to make the requirements of 326 IAC 2-2 (PSD) not applicable, the PM10 emissions from each of the woodworking operations (EU13 and EU14) shall not exceed 4.11 lbs/hr. This is equivalent to 18.0 tons/yr of PM10 emission from each woodworking operation.

Combined with the PM and PM10 emissions from the spray booths and the insignificant units, the PM and PM10 emissions from the entire source are each limited to less than 100

tons per year. Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit) and 326 IAC 2-2 (PSD) are not applicable.

D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

~~D.2.2 Baghouse Limitations [326 IAC 2-8-1] [326 IAC 2-7-1(21)(G)(xxx)]~~

~~The woodworking operations controlled by a baghouse shall be an insignificant activity for FESOP permitting purposes provided that the baghouse operations meet the requirements of 326 IAC 2-7-1(21)(G)(xxx), including the following:~~

- ~~(a) Each woodworking baghouse shall not exhaust to the atmosphere greater than forty thousand (40,000) cubic feet of air per minute and shall not emit particulate matter with a diameter less than ten (10) microns in excess of one-hundredth (0.01) grain per dry standard cubic foot of outlet air.~~
- ~~(b) The opacity from each baghouse shall not exceed ten percent (10%).~~
- ~~(c) Visible emissions from the baghouse shall be observed daily when exhausting to the atmosphere using procedures in accordance with Method 22 and normal or abnormal emissions are recorded. In the event abnormal emissions are observed for greater than six (6) minutes in duration, the following shall occur:~~
 - ~~(1) The baghouse shall be inspected.~~
 - ~~(2) Corrective actions, such as replacing or reseating bags, are initiated, when necessary.~~

~~Compliance with these conditions will also ensure that the emissions of PM and PM10 will not exceed 15 tons per year from woodworking and the emissions from the entire source will not exceed 100 tons per year. Therefore, the requirements of 326 IAC 2-2, 40 CFR 52.21, and 326 IAC 2-7 (Part 70) do not apply.~~

Compliance Determination Requirements

D.2.34 Particulate Matter (PM) and PM 10 Control [326 IAC 2-7-21(1)(G)(xxx)(DD)]

In order to comply with **Conditions D.2.1 and D.2.2**, the baghouses and closed loop cyclone for **PM and PM10** control shall be in operation and control emissions from the woodworking **unitoperations** at all times that the woodworking **unitoperations** **isare** in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.5 Visible Emissions Notations

- (a) Daily visible emission notations of the woodworking stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.**
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.**
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.**

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. 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.2.6 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operations when venting to the atmosphere. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.2.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. 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 single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhausts.
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.**
 - (5) One (1) natural gas fired boiler, constructed in 2003, with a maximum heat input capacity of 0.88 MMBtu/hr.**

(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 2-8-4(1)]

D.3.1 Particulate Emissions [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (a) (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from the 0.88 MMBtu/hr boiler shall be limited to 0.6 pounds per MMBtu heat input.

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

FESOP Quarterly Report

Source Name: Jasper Seating Company, Inc.
Source Address: 8084 West County Road 25 South, French Lick, Indiana 47432
Mailing Address: 8084 West County Road 25 South, French Lick, Indiana 47432
FESOP No.: F117-13919-00011
Facility: Twelve (12) spray coating booths, identified as EU1, EU2, EU3, EU4, EU5, EU6, EU7, EU8, EU9, EU10, EU11, EU12
Parameter: VOCs delivered to applicators and used for cleanup
Limit: 95 tons VOCs per 12 consecutive month period **with compliance determined at the end of each month.**

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**

FESOP Quarterly Report

Source Name: Jasper Seating Company, Inc.
 Source Address: 8084 West County Road 25 South, French Lick, Indiana 47432
 Mailing Address: 8084 West County Road 25 South, French Lick, Indiana 47432
 FESOP No.: F117-13919-00011
 Facility: Twelve (12) spray coating booths, identified as EU1, EU2, EU3, EU4, EU5, EU6, EU7, EU8, EU9, EU10, EU11, EU12
 Parameter: HAPs delivered to applicators and used for cleanup
 Limit: 9 tons per 12 consecutive month period of any single HAP **with compliance determined at the end of each month.**

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**

FESOP Quarterly Report

Source Name: Jasper Seating Company, Inc.
Source Address: 8084 West County Road 25 South, French Lick, Indiana 47432
Mailing Address: 8084 West County Road 25 South, French Lick, Indiana 47432
FESOP No.: F117-13919-00011
Facility: Twelve (12) spray coating booths, identified as EU1, EU2, EU3, EU4, EU5, EU6, EU7, EU8, EU9, EU10, EU11, EU12
Parameter: HAPs delivered to applicators and used for cleanup
Limit: 23 tons per 12 consecutive month period of any combination of HAPs **with compliance determined at the end of each month.**

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.

Conclusion

This permit revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 117-17422-00011.

**Appendix A: Emission Calculations
PM/PM10 Emissions
From Woodworking Operation EU13**

Company Name: Jasper Seating Company, Inc.
Address: 8084 West County Rd. 25 South, French Lick, IN 47432
SPR: 117-17422-00011
Reviewer: ERG/YC
Date: August 18, 2003

Process Description:

PM Control Equipment: Baghouse
Grain Loading: 0.01 grains/dscf
Air Flow Rate: 48,000 dcfm
Control Efficiency: 99.0%

1. Potential to Emit After Control:

Assume All the PM emissions are equal to PM10 emissions.

Hourly PM/PM10 Emissions = $0.01 \text{ (gr/dscf)} \times 48000 \text{ (dcf/min)} \times 60 \text{ (min/hr)} \times 1/7000 \text{ (lb/gr)} =$ **4.11 lbs/hr**
Annual PM/PM10 emissions = $4.11 \text{ lbs/hr} \times 8760 \text{ hr/yr} \times 1/2000 \text{ (ton/lb)} =$ **18.02 tons/yr**

2. Potential to Emit Before Control:

PTE of PM/PM10 Before Control = $18.02 \text{ tons/yr} / (1-99\%) =$ **1802 tons/yr**

**Appendix A: Emission Calculations
PM/PM10 Emissions
From Woodworking Operation EU14**

Company Name: Jasper Seating Company, Inc.
Address: 8084 West County Rd. 25 South, French Lick, IN 47432
SPR: 117-17422-00011
Reviewer: ERG/YC
Date: August 18, 2003

Process Description:

PM Control Equipment: Baghouse
Grain Loading: 0.01 grains/dscf
Air Flow Rate: 48,000 dcfm
Control Efficiency: 99.0%

1. Potential to Emit After Control:

Assume All the PM emissions are equal to PM10 emissions.

Hourly PM/PM10 Emissions = $0.01 \text{ (gr/dscf)} \times 48000 \text{ (dcf/min)} \times 60 \text{ (min/hr)} \times 1/7000 \text{ (lb/gr)} =$ **4.11 lbs/hr**
Annual PM/PM10 emissions = $4.11 \text{ lbs/hr} \times 8760 \text{ hr/yr} \times 1/2000 \text{ (ton/lb)} =$ **18.02 tons/yr**

2. Potential to Emit Before Control:

PTE of PM/PM10 Before Control = $18.02 \text{ tons/yr} / (1-99\%) =$ **1802 tons/yr**

**Appendix A: Emission Calculations
Natural Gas Combustion
(MMBtu/hr < 100)
From 0.88 MMBtu/hr Boiler**

**Company Name: Jasper Seating Company, Inc.
Address: 8084 West County Rd. 25 South, French Lick, IN 47432
SPR: 117-17422-00011
Reviewer: ERG/YC
Date: August 18, 2003**

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

0.88

7.7

	Pollutant					
Emission Factor in lb/MMCF	PM*	PM10*	SO ₂	**NO _x	VOC	CO
	7.6	7.6	0.6	100	5.5	84.0
Potential to Emit in tons/yr	0.03	0.03	2.3E-03	0.39	0.02	0.32

*PM and PM10 emission factors are condensable and filterable PM10 combined.

**Emission Factors for NO_x: Uncontrolled = 100, Low NO_x Burner = 50, Low NO_x Burners/Flue gas recirculation = 32

Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (AP-42 Supplement D 3/98)

Methodology

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Potential to Emit (tons/yr) = Potential Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Appendix A: Emission Calculations
Natural Gas Combustion
(MMBtu/hr < 100)
From Two (2) 1.3 MMBtu/hr Air Make-Up Units**

**Company Name: Jasper Seating Company, Inc.
Address: 8084 West County Rd. 25 South, French Lick, IN 47432
SPR: 117-17422-00011
Reviewer: ERG/YC
Date: August 18, 2003**

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

2.6

22.8

	Pollutant					
Emission Factor in lb/MMCF	PM*	PM10*	SO ₂	**NO _x	VOC	CO
	7.6	7.6	0.6	100	5.5	84.0
Potential to Emit in tons/yr	0.09	0.09	6.8E-03	1.14	0.06	0.96

*PM and PM10 emission factors are condensable and filterable PM10 combined.

**Emission Factors for NO_x: Uncontrolled = 100, Low NO_x Burner = 50, Low NO_x Burners/Flue gas recirculation = 32

Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (AP-42 Supplement D 3/98)

Methodology

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Potential to Emit (tons/yr) = Potential Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Appendix A: Emission Calculations
Natural Gas Combustion
(MMBtu/hr < 100)
From the Existing Insignificant Combustion Units**

**Company Name: Jasper Seating Company, Inc.
Address: 8084 West County Rd. 25 South, French Lick, IN 47432
SPR: 117-17422-00011
Reviewer: ERG/YC
Date: August 18, 2003**

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

6.06

53.1

	Pollutant					
Emission Factor in lb/MMCF	PM*	PM10*	SO ₂	**NO _x	VOC	CO
	7.6	7.6	0.6	100	5.5	84.0
Potential to Emit in tons/yr	0.20	0.20	0.02	2.65	0.15	2.23

*PM and PM10 emission factors are condensable and filterable PM10 combined.

**Emission Factors for NO_x: Uncontrolled = 100, Low NO_x Burner = 50, Low NO_x Burners/Flue gas recirculation = 32

Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (AP-42 Supplement D 3/98)

Methodology

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Potential to Emit (tons/yr) = Potential Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Appendix B: Emission Calculations
VOC and HAP Emissions
From the Two (2) Veneering Operations**

Company Name: Jasper Seating Company, Inc.

Address: 8084 West County Rd. 25 South, French Lick, IN 47432

SPR: 117-17422-00011

Reviewer: ERG/YC

Date: March 30, 2004

Material	Max. Usage (lbs/hr)	Weight % VOC	*Weight % a Single HAP	Weight % Total HAPs	PTE of VOC (tons/yr)	PTE of a Single HAP (tons/yr)	PTE of total HAPs (tons/yr)
Glue (CR-583)	46.6	0.676%	0.374%	0.676%	1.38	0.76	1.38
Total					1.38	0.76	1.38

* This material contains 0.374% of methanol, 0.3% of Formaldehyde, and 0.002% of Diethanolamine.

METHODOLOGY

PTE of VOC and HAP (tons/yr) = Max. Usage (lbs/hr) x VOC/HAP content (%) x 8760 hr/yr x 1 ton/2000 lbs

**Appendix A: Emission Calculations
Natural Gas Combustion
(MMBtu/hr < 100)
From the Existing Insignificant Combustion Units**

**Company Name: Jasper Seating Company, Inc.
Address: 8084 West County Rd. 25 South, French Lick, IN 47432
SPR: 117-17422-00011
Reviewer: ERG/YC
Date: August 18, 2003**

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

6.06

53.1

	Pollutant					
Emission Factor in lb/MMCF	PM*	PM10*	SO ₂	**NO _x	VOC	CO
	7.6	7.6	0.6	100	5.5	84.0
Potential to Emit in tons/yr	0.20	0.20	0.02	2.65	0.15	2.23

*PM and PM10 emission factors are condensable and filterable PM10 combined.

**Emission Factors for NO_x: Uncontrolled = 100, Low NO_x Burner = 50, Low NO_x Burners/Flue gas recirculation = 32

Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (AP-42 Supplement D 3/98)

Methodology

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Potential to Emit (tons/yr) = Potential Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton