



*Mitchell E. Daniels, Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

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Indianapolis, Indiana 46204  
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(800) 451-6027  
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TO: Interested Parties / Applicant  
DATE: February 28, 2006  
RE: Inwood Office Furniture Co., Inc. / 037-17564-00012  
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, 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 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) 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.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency  
401 M Street  
Washington, D.C. 20406

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.



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## PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Inwood Office Furniture Co., Inc.  
1108 East 15<sup>th</sup> Street  
Jasper, Indiana 47546**

(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.

**The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. 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. 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.**

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T037-17564-00012	
Issued by: Original Signed By:  Paul Dubenetzky, Assistant Commissioner Office of Air Quality	Issuance Date: February 28, 2006  Expiration Date: February 28, 2011

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## 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 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

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The Permittee owns and operates a stationary wood furniture manufacturing plant.

Responsible Official:	President
Source Address:	1108 East 15 <sup>th</sup> Street, Jasper, Indiana 47546
Mailing Address:	P.O. Box 646, Jasper, Indiana 47547-0646
General Source Phone Number:	(812) 482-6121
SIC Code:	2521
County Location:	Dubois
Source Location Status:	Nonattainment for PM2.5 Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD and Emission Offset Rules Major Source, Section 112 of the Clean Air Act Not in 1 of 28 Source Categories

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

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

- (a) First surface coating line operations (booths EU 01 through 012) consisting of the following:
  - (1) One (1) contact glue booth (EU 01) with a maximum throughput rate of 11.1 units per hour, controlled by dry filters and exhausting at stack A. This booth was installed prior to 1974.
  - (2) Three (3) stain booths (EU 02, EU 03 and EU04) with a maximum throughput rate of 3 units per hour each, controlled by dry filters and exhausting at stacks B, C and D. These booths were installed prior to 1974.
  - (3) One (1) wipe stain booth (EU 05) with a maximum throughput rate of 10 units per hour, controlled by dry filters and exhausting at stack E. This booth was installed prior to 1974.
  - (4) One (1) sealer booth (EU 06) with a maximum throughput rate of 10 units per hour, controlled by dry filters and exhausting at stack F. This booth was installed prior to 1974.
  - (5) One (1) lacquer booth (EU 07) with a maximum throughput rate of 10 units per hour, controlled by dry filters and exhausting at stack G. This booth was installed prior to 1974.
  - (6) One (1) lacquer booth (EU 08) with a maximum throughput rate of 8 units per hour, controlled by dry filters and exhausting at stack H. This booth was installed prior to 1974.
  - (7) One (1) wipe stain booth (EU 09) with a maximum throughput rate of 1.1 units per

hour, controlled by dry filters and exhausting at stack I. This booth was installed prior to 1974.

- (8) One (1) lacquer booth (EU 010) with a maximum throughput rate of 1.1 units per hour, controlled by dry filters and exhausting at stack J. This booth was installed prior to 1974.
- (9) One (1) black enamel booth (EU 011) with a maximum throughput rate of 11.1 units per hour, controlled by dry filters and exhausting at stack K. This booth was installed in 1998.
- (10) One (1) stain booth (EU 012) with a maximum throughput rate of 1.1 units per hour, controlled by dry filters and exhausting at stack L. This booth was installed prior to 1974.

Note: The term "unit(s)" in the facility description item (a) refers to desks and desktops.

(b) Second surface coating line operation consisting of the following:

- (1) One (1) SAP/NGR Booth (identified as 21/22) with a maximum throughput capacity of 30 units per hour, controlled by dry filters and exhausting at stacks 2A and 2B. This booth was installed in 2000.
- (2) One (1) Wash Coat Booth (identified as 23) with a maximum throughput capacity of 30 units per hour, controlled by dry filters and exhausting at stack 2C. This booth was installed in 2000.
- (3) One (1) Stain Booth (identified as 25) with a maximum throughput capacity of 30 units per hour, controlled by dry filters and exhausting at stack 2F. This booth was installed in 2000.
- (4) One (1) Sealer Booth (identified as 27) with a maximum throughput capacity of 30 units per hour, controlled by dry filters and exhausting at stack 2F. This booth was installed in 2000.
- (5) One (1) First Topcoat Booth with one (1) flash tunnel (identified as 29) with a maximum throughput capacity of 30 units per hour, controlled by dry filters and exhausting at stack 2H. The flash tunnel exhausts at stack 21. This booth was installed in 2000.
- (6) One (1) Second Topcoat Booth with one (1) flash tunnel (identified as 30) with a maximum rated capacity of 30 units per hour, controlled by dry filters and exhausting at stack 2J. The flash tunnel exhausts at stack 2K. This booth and flash tunnel were installed in 2000.

Note: The term "unit(s)" in the facility description item (b) refers to desks and desktops.

(c) One (1) Final Touch-up Sanding Booth (identified as 32) with a maximum throughput capacity of 7.50 tons of wood per hour and controlled by cartridge-filters.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Woodworking operations (identified as EU 014) with a maximum throughput rate of 2,750 pounds of wood per hour, controlled by a baghouse and exhausting at stack N. [326 IAC 2-7-1(21)(G)(xxix)] [326 IAC 6.5-1-2]

- (b) One (1) natural gas-fired boiler (identified as EU 013) with a maximum heat input capacity of 2.60 MMBtu per hour and exhausting at stack M. [326 IAC 6.5-1-2]
- (c) One (1) natural gas-fired air makeup unit utilized for general building ventilation (identified as 33) with a maximum heat input capacity of 2.10 MMBtu per hour, and exhausting externally. [326 IAC 6.5-1-2]
- (d) Seven (7) natural gas-fired air makeup units, two (2) integrated with the SAP/NGR Booth and one (1) integrated with each of the other five (5) surface coating booths located on the second surface coating line operations, each with a maximum heat input capacity of 1.50 MMBtu per hour and exhausting internally into the booth. [326 IAC 6.5-1-2]
- (e) Two (2) natural gas-fired drying ovens (identified as 26 and 31) used in conjunction with the second surface coating line operations and each with a maximum heat input capacity of 1.00 MMBtu per hour. The ovens 26 and 31 exhaust at stacks 2E and 2L, respectively and were installed in 2000. [326 IAC 6.5-1-2(a)]
- (f) One (1) natural gas-fired drying oven (identified as 28) used in conjunction with the second surface coating line operations and with a maximum heat input capacity of 4.0 MMBtu per hour. This oven exhausts at stacks 2G-1, 2G-2, and 2G-3, and was installed in 2000. [326 IAC 6.5-1-2(a)]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION B GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-7-1]

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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.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

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- (a) This permit, T037-17564-00012, is issued for a fixed term of five (5) years from the issuance date of this permit, 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 of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal 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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

### B.3 Term of Conditions [326 IAC 2-1.1-9.5]

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Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

### B.4 Enforceability [326 IAC 2-7-7]

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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 Severability [326 IAC 2-7-5(5)]

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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.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

### B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

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- (a) 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 "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, 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.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

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- (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 a responsible official 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. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

**B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]**

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- (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  
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-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 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]**

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- (a) If required by specific conditions 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) 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 is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

- (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.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe 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, and Southwest Regional Office 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 Number: 1-800-451-6027 (ask for Office of Air Quality,  
Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967

Southwest Regional Office

Telephone Number: (812) 380-2305  
Facsimile Number: (812) 380-2304

- (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

Indianapolis, Indiana 46204-2251

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 2-7-5(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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (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) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) 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 2-7 and any other applicable rules.
- (g) 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.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

**B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]**

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- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (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, 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. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

**B.13** Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T037-17564-00012 and issued pursuant to permitting programs approved into the state implementation plan have been either
  - (1) incorporated as originally stated,
  - (2) revised under 326 IAC 2-7-10.5, or
  - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

**B.14** Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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 2-7-3 and 326 IAC 2-7-4(a).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), 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  
Indianapolis, Indiana 46204-2251

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 "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit 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 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 2-7-9(a)(3)]
- (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 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(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 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

- (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 2-7-4. 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 "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) 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) 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 2-7 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 being needed to process the application.

**B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

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- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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  
Indianapolis, Indiana 46204-2251
- Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

**B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]**

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

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(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a 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 preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in 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  
Indianapolis, Indiana 46204-2251

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, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b), (c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

(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 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (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 "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]

The Permittee may trade emissions increases and decreases at 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 2-7-20(c).

- (d) **Alternative Operating Scenarios [326 IAC 2-7-20(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 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.21 Source Modification Requirement [326 IAC 2-7-10.5] [326 IAC 2-2-2]**

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- (a) A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.
- (b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2-2 and 326 IAC 2-3-2.

**B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]**

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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 Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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

Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (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) Except as provided in 326 IAC 2-7-19(e), 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 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

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

#### C.1 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 thirty percent (30%) 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.2 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.3 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

#### C.4 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.5 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.6 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  
Indianapolis, Indiana 46204-2251

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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 14-10-1, 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) **Demolition and renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **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 to use an Indiana Accredited Asbestos inspector is not federally enforceable.

### **Testing Requirements [326 IAC 2-7-6(1)]**

#### **C.7 Performance Testing [326 IAC 3-6]**

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- (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  
Indianapolis, Indiana 46204-2251

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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 Permittee 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.8 Compliance Requirements [326 IAC 2-1.1-11]**

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. 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 2-7-5(1)] [326 IAC 2-7-6(1)]**

#### **C.9 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within sixty (60) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within sixty (60) days, the Permittee may extend the compliance schedule related to the equipment for an additional sixty (60) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial sixty (60) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

#### **C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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Any monitoring or testing 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.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]**

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- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that

does not meet the above specifications provided the Permittee can demonstrate that an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

**C.12 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 prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures, submitted April 16, 1999.
- (b) 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.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]**

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

**C.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]**

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
  - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
  - (1) monitoring results;
  - (2) review of operation and maintenance procedures and records;
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
  - (1) monitoring data;

- (2) monitor performance data, if applicable; and
- (3) corrective actions taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

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- (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 response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

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- (a) Pursuant to 326 IAC 2-6-3(b)(3), starting in 2006 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
    - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
    - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The emission statement 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.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2]

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- (a) Records of all required monitoring data, reports and support information required by this permit 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 physically present or electronically accessible 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.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]

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- (a) The Permittee 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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (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  
Indianapolis, Indiana 46204-2251
- (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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

**Stratospheric Ozone Protection**

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

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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 2-7-5(15)]:

- (a) First surface coating line operations (booths EU 01 through 012) consisting of the following:
- (1) One (1) contact glue booth (EU 01) with a maximum throughput rate of 11.1 units per hour, controlled by dry filters and exhausting at stack A. This booth was installed prior to 1974.
  - (2) Three (3) stain booths (EU 02, EU 03 and EU04) with a maximum throughput rate of 3 units per hour each, controlled by dry filters and exhausting at stacks B, C and D. These booths were installed prior to 1974.
  - (3) One (1) wipe stain booth (EU 05) with a maximum throughput rate of 10 units per hour, controlled by dry filters and exhausting at stack E. This booth was installed prior to 1974.
  - (4) One (1) sealer booth (EU 06) with a maximum throughput rate of 10 units per hour, controlled by dry filters and exhausting at stack F. This booth was installed prior to 1974.
  - (5) One (1) lacquer booth (EU 07) with a maximum throughput rate of 10 units per hour, controlled by dry filters and exhausting at stack G. This booth was installed prior to 1974.
  - (6) One (1) lacquer booth (EU 08) with a maximum throughput rate of 8 units per hour, controlled by dry filters and exhausting at stack H. This booth was installed prior to 1974.
  - (7) One (1) wipe stain booth (EU 09) with a maximum throughput rate of 1.1 units per hour, controlled by dry filters and exhausting at stack I. This booth was installed prior to 1974.
  - (8) One (1) lacquer booth (EU 010) with a maximum throughput rate of 1.1 units per hour, controlled by dry filters and exhausting at stack J. This booth was installed prior to 1974.
  - (9) One (1) black enamel booth (EU 011) with a maximum throughput rate of 11.1 units per hour, controlled by dry filters and exhausting at stack K. This booth was installed in 1998.
  - (10) One (1) stain booth (EU 012) with a maximum throughput rate of 1.1 units per hour, controlled by dry filters and exhausting at stack L. This booth was installed prior to 1974.

Note: The term "unit(s)" in the facility description item (a) refers to desks and desktops.

- (b) Second surface coating line operation consisting of the following:
- (1) One (1) SAP/NGR Booth (identified as 21/22) with a maximum throughput capacity of 30 units per hour, controlled by dry filters and exhausting at stacks 2A and 2B. This booth was installed in 2000.
  - (2) One (1) Wash Coat Booth (identified as 23) with a maximum throughput capacity of 30 units per hour, controlled by dry filters and exhausting at stack 2C. This booth was installed in 2000.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

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

- (3) One (1) Stain Booth (identified as 25) with a maximum throughput capacity of 30 units per hour, controlled by dry filters and exhausting at stack 2F. This booth was installed in 2000.
- (4) One (1) Sealer Booth (identified as 27) with a maximum throughput capacity of 30 units per hour, controlled by dry filters and exhausting at stack 2F. This booth was installed in 2000.
- (5) One (1) First Topcoat Booth with one (1) flash tunnel (identified as 29) with a maximum throughput capacity of 30 units per hour, controlled by dry filters and exhausting at stack 2H. The flash tunnel exhausts at stack 21. This booth was installed in 2000.
- (6) One (1) Second Topcoat Booth with one (1) flash tunnel (identified as 30) with a maximum rated capacity of 30 units per hour, controlled by dry filters and exhausting at stack 2J. The flash tunnel exhausts at stack 2K. This booth and flash tunnel were installed in 2000.

Note: The term "unit(s)" in the facility description item (b) refers to desks and desktops.

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

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

#### D.1.1 PSD Minor Limit [326 IAC 2-2]

The use of VOC, including coatings, dilution solvents, and cleaning solvents shall be less than 249 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than 249 tons per twelve (12) consecutive month period.

Compliance with this limit ensures a PSD minor status for the source.

#### D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, one (1) black enamel booth (EU011) of first surface coating line and the second surface coating line operations, applying coating to wood furniture shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

**D.1.3 Particulate Matter (PM) [326 IAC 6.5-1-2]**

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Pursuant to 326 IAC 6.5-1-2 (formerly 326 IAC 6-1-2), the surface coating operations shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of three hundredths (0.03) grain per dry standard cubic feet.

**D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the surface coating operations and their control devices.

**Compliance Determination Requirements**

**D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]**

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Compliance with the VOC usage limitations contained in Condition D.1.1 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 data sheets. IDEM, OAQ procedures specified in 326 IAC 8-1-4., reserves the authority to determine compliance using Method 24 in conjunction with the analytical

**D.1.6 Particulate Control**

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Except as otherwise provided by statute, rule, or this permit, a dry particulate filter for PM control shall be in operation and control emissions at all times the associated surface coating operations are in operation.

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

**D.1.7 Monitoring**

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- (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. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

**D.1.8 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
  - (1) The amount of coating material and solvent less water used on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (2) The total VOC usage for each month; and
  - (3) The weight of VOCs emitted for each compliance period.

- (b) To document compliance with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.9 Reporting Requirements

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A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

### **National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]**

#### D.1.10 General Provisions Relating to NESHAP, Subpart JJ [326 IAC 20-1] [40 CFR 63, Subpart A]

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Pursuant to 40 CFR 63.800(d), the Permittee shall comply with the provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-14 for the surface coating operations as specified in Appendix A of 40 CFR 63, Subpart JJ in accordance with the schedule in 40 CFR 63, Subpart JJ.

#### D.1.11 NESHAP - Wood Furniture Manufacturing Operations [40 CFR 63, Subpart JJ] [326 IAC 20-14-1]

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Pursuant to 40 CFR 63, Subpart JJ, the Permittee shall comply with the provisions of 40 CFR 63.802(a), which are incorporated by reference as 326 IAC 20-14-1 for the wood furniture surface coating operations as specified as follows.

### **Subpart JJ—National Emission Standards for Wood Furniture Manufacturing Operations**

#### **§ 63.802 Emission limits.**

(a) Each owner or operator of an existing affected source subject to this subpart shall:

(1) Limit VHAP emissions from finishing operations by meeting the emission limitations for existing sources presented in Table 3 of this subpart, using any of the compliance methods in §63.804(a). To determine VHAP emissions from a finishing material containing formaldehyde or styrene, the owner or operator of the affected source shall use the methods presented in §63.803(l)(2) for determining styrene and formaldehyde usage.

(2) Limit VHAP emissions from contact adhesives by achieving a VHAP limit for contact adhesives based on the following criteria:

(i) For foam adhesives (contact adhesives used for upholstery operations) used in products that meet the upholstered seating flammability requirements of California Technical Bulletin 116, 117, or 133, the Business and Institutional Furniture Manufacturers Association's (BIFMA's) X5.7, UFAC flammability testing, or any similar requirements from local, State, or Federal fire regulatory agencies, the VHAP content of the adhesive shall not exceed 1.8 kg VHAP/kg solids (1.8 lb VHAP/lb solids), as applied; or

(ii) For all other contact adhesives (including foam adhesives used in products that do not meet the standards presented in paragraph (a)(2)(i) of this section, but excluding aerosol adhesives and excluding contact adhesives applied to nonporous substrates, the VHAP content of the adhesive shall not exceed 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied.

(3) Limit HAP emissions from strippable spray booth coatings by using coatings that contain no more than 0.8 kg VOC/kg solids (0.8 lb VOC/lb solids), as applied.

**§ 63.803 Work practice standards.**

(a) *Work practice implementation plan.* (1) Each owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan that defines environmentally desirable work practices for each wood furniture operation manufacturing operation and addresses each of the work practice standards presented in paragraphs (b) through (l) of this section. The plan shall be developed no more than 60 days after the compliance date.

(2) The written work practice implementation plan shall be available for inspection by the Administrator (or delegated State, local, or Tribal authority) upon request. If the Administrator (or delegated State, local, or Tribal authority) determines that the work practice implementation plan does not include sufficient mechanisms for ensuring that the work practice standards are being implemented, the Administrator (or delegated State, local, or Tribal authority) may require the affected source to modify the plan. Revisions or modifications to the plan do not require a revision of the source's Title V permit.

(3) The inspection and maintenance plan required by paragraph (c) of this section and the formulation assessment plan for finishing operations required by paragraph (l) of this section are also reviewable by the Administrator (or delegated State, local, or Tribal authority).

(b) *Operator training course.* Each owner or operator of an affected source shall train all new and existing personnel, including contract personnel, who are involved in finishing, gluing, cleaning, and washoff operations, use of manufacturing equipment, or implementation of the requirements of this subpart. All new personnel, those hired after the compliance date of the standard, shall be trained upon hiring. All existing personnel, those hired before the compliance date of the standard, shall be trained within six months of the compliance date of the standard. All personnel shall be given refresher training annually. The affected source shall maintain a copy of the training program with the work practice implementation plan. The training program shall include, at a minimum, the following:

(1) A list of all current personnel by name and job description that are required to be trained;

(2) An outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;

(3) Lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and

(4) A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.

(c) *Inspection and maintenance plan.* Each owner or operator of an affected source shall prepare and maintain with the work practice implementation plan a written leak inspection and maintenance plan that specifies:

(1) A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or organic HAP solvents;

(2) An inspection schedule;

(3) Methods for documenting the date and results of each inspection and any repairs that were made;

(4) The timeframe between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:

(i) A first attempt at repair (e.g., tightening of packing glands) shall be made no later than five calendar days after the leak is detected; and

(ii) Final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking

equipment is to be replaced by a new purchase, in which case repairs shall be completed within three months.

(d) *Cleaning and washoff solvent accounting system.* Each owner or operator of an affected source shall develop an organic HAP solvent accounting form to record:

(1) The quantity and type of organic HAP solvent used each month for washoff and cleaning, as defined in §63.801 of this subpart;

(2) The number of pieces washed off, and the reason for the washoff; and

(3) The quantity of spent organic HAP solvent generated from each washoff and cleaning operation each month, and whether it is recycled onsite or disposed offsite.

(e) *Chemical composition of cleaning and washoff solvents.* Each owner or operator of an affected source shall not use cleaning or washoff solvents that contain any of the pollutants listed in Table 4 to this subpart, in concentrations subject to MSDS reporting as required by OSHA.

(f) *Spray booth cleaning.* Each owner or operator of an affected source shall not use compounds containing more than 8.0 percent by weight of VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, or plastic filters unless the spray booth is being refurbished. If the spray booth is being refurbished, that is the spray booth coating or other protective material used to cover the booth is being replaced, the affected source shall use no more than 1.0 gallon of organic HAP solvent per booth to prepare the surface of the booth prior to applying the booth coating.

(g) *Storage requirements.* Each owner or operator of an affected source shall use normally closed containers for storing finishing, gluing, cleaning, and washoff materials.

(h) *Application equipment requirements.* Each owner or operator of an affected source shall use conventional air spray guns to apply finishing materials only under any of the following circumstances:

(1) To apply finishing materials that have a VOC content no greater than 1.0 lb VOC/lb solids, as applied;

(2) For touchup and repair under the following conditions:

(i) The touchup and repair occurs after completion of the finishing operation; or

(ii) The touchup and repair occurs after the application of stain and before the application of any other type of finishing material, and the materials used for touchup and repair are applied from a container that has a volume of no more than 2.0 gallons.

(3) When spray is automated, that is, the spray gun is aimed and triggered automatically, not manually;

(4) When emissions from the finishing application station are directed to a control device;

(5) The conventional air gun is used to apply finishing materials and the cumulative total usage of that finishing material is no more than 5.0 percent of the total gallons of finishing material used during that semiannual period; or

(6) The conventional air gun is used to apply stain on a part for which it is technically or economically infeasible to use any other spray application technology.

The affected source shall demonstrate technical or economic infeasibility by submitting to the Administrator a videotape, a technical report, or other documentation that supports the affected source's claim of technical or economic infeasibility. The following criteria shall be used, either independently or in combination, to support the affected source's claim of technical or economic infeasibility:

(i) The production speed is too high or the part shape is too complex for one operator to coat the part and

the application station is not large enough to accommodate an additional operator; or

(ii) The excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain.

(i) *Line cleaning.* Each owner or operator of an affected source shall pump or drain all organic HAP solvent used for line cleaning into a normally closed container.

(j) *Gun cleaning.* Each owner or operator of an affected source shall collect all organic HAP solvent used to clean spray guns into a normally closed container.

(k) *Washoff operations.* Each owner or operator of an affected source shall control emissions from washoff operations by:

(1) Using normally closed tanks for washoff; and

(2) Minimizing dripping by tilting or rotating the part to drain as much solvent as possible.

(l) *Formulation assessment plan for finishing operations.* Each owner or operator of an affected source shall prepare and maintain with the work practice implementation plan a formulation assessment plan that:

(1) Identifies VHAP from the list presented in Table 5 of this subpart that are being used in finishing operations by the affected source;

(2) Establishes a baseline level of usage by the affected source, for each VHAP identified in paragraph (l)(1) of this section. The baseline usage level shall be the highest annual usage from 1994, 1995, or 1996, for each VHAP identified in paragraph (l)(1) of this section. For formaldehyde, the baseline level of usage shall be based on the amount of free formaldehyde present in the finishing material when it is applied. For styrene, the baseline level of usage shall be an estimate of unreacted styrene, which shall be calculated by multiplying the amount of styrene monomer in the finishing material, when it is applied, by a factor of 0.16. Sources using a control device to reduce emissions may adjust their usage based on the overall control efficiency of the control system, which is determined using the equation in §63.805 (d) or (e).

(3) Tracks the annual usage of each VHAP identified in (l)(1) by the affected source that is present in amounts subject to MSDS reporting as required by OSHA.

(4) If, after November 1998, the annual usage of the VHAP identified in paragraph (l)(1) exceeds its baseline level, then the owner or operator of the affected source shall provide a written notification to the permitting authority that describes the amount of the increase and explains the reasons for exceedance of the baseline level. The following explanations would relieve the owner or operator from further action, unless the affected source is not in compliance with any State regulations or requirements for that VHAP:

(i) The exceedance is no more than 15.0 percent above the baseline level;

(ii) Usage of the VHAP is below the de minimis level presented in Table 5 of this subpart for that VHAP (sources using a control device to reduce emissions may adjust their usage based on the overall control efficiency of the control system, which is determined using the procedures in §63.805 (d) or (e);

(iii) The affected source is in compliance with its State's air toxic regulations or guidelines for the VHAP; or

(iv) The source of the pollutant is a finishing material with a VOC content of no more than 1.0 kg VOC/kg solids (1.0 lb VOC/lb solids), as applied.

(5) If none of the above explanations are the reason for the increase, the owner or operator shall confer with the permitting authority to discuss the reason for the increase and whether there are practical and reasonable technology-based solutions for reducing the usage. The evaluation of whether a technology is reasonable and practical shall be based on cost, quality, and marketability of the product, whether the technology is being used successfully by other wood furniture manufacturing operations, or other criteria mutually agreed upon by the permitting authority and owner or operator. If there are no practical and

reasonable solutions, the facility need take no further action. If there are solutions, the owner or operator shall develop a plan to reduce usage of the pollutant to the extent feasible. The plan shall address the approach to be used to reduce emissions, a timetable for implementing the plan, and a schedule for submitting notification of progress.

(6) If, after November 1998, an affected source uses a VHAP of potential concern listed in table 6 of this subpart for which a baseline level has not been previously established, then the baseline level shall be established as the *de minimis* level provided in that same table for that chemical. The affected source shall track the annual usage of each VHAP of potential concern identified in this paragraph that is present in amounts subject to MSDS reporting as required by OSHA. If usage of the VHAP of potential concern exceeds the *de minimis* level listed in table 6 of this subpart for that chemical, then the affected source shall provide an explanation to the permitting authority that documents the reason for the exceedance of the *de minimis* level. If the explanation is not one of those listed in paragraphs (l)(4)(i) through (l)(4)(iv) of this section, the affected source shall follow the procedures in paragraph (l)(5) of this section.

### § 63.804 Compliance procedures and monitoring requirements.

(a) The owner or operator of an existing affected source subject to §63.802(a)(1) shall comply with those provisions using any of the methods presented in §63.804 (a)(1) through (a)(4).

(1) Calculate the average VHAP content for all finishing materials used at the facility using Equation 1, and maintain a value of E no greater than 1.0;

$$E = (M_{c1} C_{c1} + M_{c2} C_{c2} + \dots + M_{cn} C_{cn} + S_1 W_1 + S_2 W_2 + \dots + S_n W_n) / (M_{c1} + M_{c2} + \dots + M_{cn}) \text{ Equation 1}$$

(2) Use compliant finishing materials according to the following criteria:

(i) Demonstrate that each stain, sealer, and topcoat has a VHAP content of no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight by maintaining certified product data sheets for each coating and thinner;

(ii) Demonstrate that each washcoat, basecoat, and enamel that is purchased pre-made, that is, it is not formulated onsite by thinning another finishing material, has a VHAP content of no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight by maintaining certified product data sheets for each coating and thinner; and

(iii) Demonstrate that each washcoat, basecoat, and enamel that is formulated at the affected source is formulated using a finishing material containing no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids) and a thinner containing no more than 3.0 percent VHAP by weight.

(4) Use any combination of an averaging approach, as described in paragraph (a)(1) of this section, compliant finishing materials, as described in paragraph (a)(2) of this section, and a control system, as described in paragraph (a)(3) of this section.

(b) The owner or operator of an affected source subject to §63.802(a)(2)(i) shall comply with the provisions by using compliant foam adhesives with a VHAP content no greater than 1.8 kg VHAP/kg solids (1.8 lb VHAP/lb solids), as applied.

(c) The owner or operator of an affected source subject to §63.802(a)(2)(ii) shall comply with those provisions by using either of the methods presented in §63.804 (c)(1) and (c)(2).

(1) Use compliant contact adhesives with a VHAP content no greater than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied; or

(g) *Continuous compliance demonstrations.* (1) Owners or operators of an affected source subject to the provisions of §63.802 (a)(1) or (b)(1) that comply through the procedures established in §63.804 (a)(1) or (d)(1) shall demonstrate continuous compliance by submitting the results of the averaging calculation (Equation 1) for each month within that semiannual period and submitting a compliance certification with the semiannual report required by §63.807(c).

(i) The compliance certification shall state that the value of (E), as calculated by Equation 1, is no greater than 1.0 for existing sources or 0.8 for new sources. An affected source is in violation of the standard if E is greater than 1.0 for existing sources or 0.8 for new sources for any month. A violation of the monthly average is a separate violation of the standard for each day of operation during the month, unless the affected source can demonstrate through records that the violation of the monthly average can be attributed to a particular day or days during the period.

(ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

(2) Owners or operators of an affected source subject to the provisions of §63.802 (a)(1) or (b)(1) that comply through the procedures established in §63.804 (a)(2) or (d)(2) shall demonstrate continuous compliance by using compliant coatings and thinners, maintaining records that demonstrate the coatings and thinners are compliant, and submitting a compliance certification with the semiannual report required by §63.807(c).

(i) The compliance certification shall state that compliant stains, washcoats, sealers, topcoats, basecoats, enamels, and thinners, as applicable, have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance. An affected source is in violation of the standard whenever a noncompliant coating, as demonstrated by records or by a sample of the coating, is used.

(ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

(5) Owners or operators of an affected source subject to the provisions of §63.802 (a)(2) (i) or (ii) or (b)(2) that comply through the procedures established in §63.804 (b), (c)(1), or (e)(1), shall submit a compliance certification with the semiannual report required by §63.807(c).

(i) The compliance certification shall state that compliant contact and/or foam adhesives have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant contact and/or foam adhesives were used. Each day a noncompliant contact or foam adhesive is used is a single violation of the standard.

(ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

(7) Owners or operators of an affected source subject to the provisions of §63.802 (a)(3) or (b)(3) shall submit a compliance certification with the semiannual report required by §63.807(c).

(i) The compliance certification shall state that compliant strippable spray booth coatings have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant materials were used. Each day a noncompliant strippable booth coating is used is a single violation of the standard.

(ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

(8) Owners or operators of an affected source subject to the work practice standards in §63.803 shall submit a compliance certification with the semiannual report required by §63.807(c).

(i) The compliance certification shall state that the work practice implementation plan is being followed, or should otherwise identify the provisions of the plan that have not been implemented and each day the provisions were not implemented. During any period of time that an owner or operator is required to implement the provisions of the plan, each failure to implement an obligation under the plan during any particular day is a violation.

(ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

**§ 63.806 Recordkeeping requirements.**

(a) The owner or operator of an affected source subject to this subpart shall fulfill all recordkeeping requirements of §63.10 of subpart A, according to the applicability criteria in §63.800(d) of this subpart.

(b) The owner or operator of an affected source subject to the emission limits in §63.802 of this subpart shall maintain records of the following:

(1) A certified product data sheet for each finishing material, thinner, contact adhesive, and strippable spray booth coating subject to the emission limits in §63.802; and

(2) The VHAP content, in kg VHAP/kg solids (lb VHAP/lb solids), as applied, of each finishing material and contact adhesive subject to the emission limits in §63.802; and

(3) The VOC content, in kg VOC/kg solids (lb VOC/lb solids), as applied, of each strippable booth coating subject to the emission limits in §63.802 (a)(3) or (b)(3).

(c) The owner or operator of an affected source following the compliance method in §63.804 (a)(1) or (d)(1) shall maintain copies of the averaging calculation for each month following the compliance date, as well as the data on the quantity of coatings and thinners used that is necessary to support the calculation of E in Equation 1.

(e) The owner or operator of an affected source subject to the work practice standards in §63.803 of this subpart shall maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including, but not limited to:

(1) Records demonstrating that the operator training program required by §63.803(b) is in place;

(2) Records collected in accordance with the inspection and maintenance plan required by §63.803(c);

(3) Records associated with the cleaning solvent accounting system required by §63.803(d);

(4) Records associated with the limitation on the use of conventional air spray guns showing total finishing material usage and the percentage of finishing materials applied with conventional air spray guns for each semiannual period as required by §63.803(h)(5).

(5) Records associated with the formulation assessment plan required by §63.803(l); and

(6) Copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.

(h) The owner or operator of an affected source subject to the emission limits in §63.802 and following the compliance provisions of §63.804(f) (1), (2), (3), (5), (7) and (8) and §63.804(g) (1), (2), (3), (5), (7), and (8) shall maintain records of the compliance certifications submitted in accordance with §63.807(c) for each semiannual period following the compliance date.

(i) The owner or operator of an affected source shall maintain records of all other information submitted with the compliance status report required by §63.9(h) and §63.807(b) and the semiannual reports required by §63.807(c).

(j) The owner or operator of an affected source shall maintain all records in accordance with the requirements of §63.10(b)(1).

**§ 63.807 Reporting requirements.**

(a) The owner or operator of an affected source subject to this subpart shall fulfill all reporting requirements of §63.7 through §63.10 of subpart A (General Provisions) according to the applicability criteria in §63.800(d) of this subpart.

(c) The owner or operator of an affected source demonstrating compliance in accordance with §63.804(g) (1), (2), (3), (5), (7), and (8) shall submit a report covering the previous 6 months of wood furniture manufacturing operations:

(1) The first report shall be submitted 30 calendar days after the end of the first 6-month period following the compliance date.

(2) Subsequent reports shall be submitted 30 calendar days after the end of each 6-month period following the first report.

(3) The semiannual reports shall include the information required by §63.804(g) (1), (2), (3), (5), (7), and (8), a statement of whether the affected source was in compliance or noncompliance, and, if the affected source was in noncompliance, the measures taken to bring the affected source into compliance.

(4) The frequency of the reports required by paragraph (c) of this section shall not be reduced from semiannually regardless of the history of the owner's or operator's compliance status.

(e) The owner or operator of an affected source required to provide a written notification under §63.803(1)(4) shall include in the notification one or more statements that explains the reasons for the usage increase. The notification shall be submitted no later than 30 calendar days after the end of the annual period in which the usage increase occurred.

**Table 3 to Subpart JJ of Part 63—Summary of Emission Limits**

Emission point	Existing source	New source
<b>Finishing Operations:</b>		
(a) Achieve a weighted average VHAP content across all coatings (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied.....	a 1.0	a 0.8
(b) Use compliant finishing materials (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied):		
_stains.....	a 1.0	a 1.0
_washcoats.....	a,b 1.0	a,b 0.8
_sealers.....	a 1.0	a 0.8
_topcoats.....	a 1.0	a 0.8
_basecoats.....	a,b 1.0	a,b 0.8
_enamels.....	a,b 1.0	a,b 0.8
_thinners (maximum percent VHAP allowable); or.....	10.0	10.0
(c) As an alternative, use control device; or.....	c 1.0	c 0.8
(d) Use any combination of (a), (b), and (c)	1.0	0.8
<b>Cleaning Operations:</b>		
Strippable spray booth material (maximum VOC content, kg VOC/kg solids [lb VOC/lb solids]).....	0.8	0.8
<b>Contact Adhesives:</b>		
(a) Use compliant contact adhesives (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied) based on following criteria:		
i. For aerosol adhesives, and for contact adhesives applied to nonporous substrates.....	d NA	d NA
ii. For foam adhesives used in products that meet flammability requirements....	1.8	0.2
iii. For all other contact adhesives (including foam adhesives used in	1.0	0.2

products that do not meet flammability requirements); or.....  
 (b) Use a control device..... e 1.0 e 0.2

- a The limits refer to the VHAP content of the coating, as applied.
- b Washcoats, basecoats, and enamels must comply with the limits presented in this table if they are purchased premade, that is, if they are not formulated onsite by thinning other finishing materials. If they are formulated onsite, they must be formulated using compliant finishing materials, i.e., those that meet the limits specified in this table, and thinners containing no more than 3.0 percent VHAP by weight.
- c The control device must operate at an efficiency that is equivalent to no greater than 1.0 kilogram (or 0.8 kilogram) of VHAP being emitted from the affected emission source per kilogram of solids used.
- d There is no limit on the VHAP content of these adhesives.
- e The control device must operate at an efficiency that is equivalent to no greater than 1.0 kilogram (or 0.2 kilogram) of VHAP being emitted from the affected emission source per kilogram of solids used.

**Table 4 to Subpart JJ of Part 63—Pollutants Excluded From Use in Cleaning and Washoff Solvents**

Chemical name	CAS No.
4-Aminobiphenyl.....	92671
Styrene oxide.....	96093
Diethyl sulfate.....	64675
N-Nitrosomorpholine.....	59892
Dimethyl formamide.....	68122
Hexamethylphosphoramide.....	680319
Acetamide.....	60355
4,4[prime]-Methylenedianiline.....	101779
o-Anisidine.....	90040
2,3,7,8-Tetrachlorodibenzo-p-dioxin.....	1746016
Beryllium salts.....	.....
Benzidine.....	92875
N-Nitroso-N-methylurea.....	684935
Bis (chloromethyl) ether.....	542881
Dimethyl carbamoyl chloride.....	79447
Chromium compounds (hexavalent).....	.....
1,2-Propylenimine (2-Methyl aziridine).....	75558
Arsenic and inorganic arsenic compounds.....	99999904
Hydrazine.....	302012
1,1-Dimethyl hydrazine.....	57147
Beryllium compounds.....	7440417
1,2-Dibromo-3-chloropropane.....	96128
N-Nitrosodimethylamine.....	62759
Cadmium compounds.....	.....
Benzo (a) pyrene.....	50328
Polychlorinated biphenyls (Aroclors).....	1336363
Heptachlor.....	76448
3,3[prime]-Dimethyl benzidine.....	119937
Nickel subsulfide.....	12035722
Acrylamide.....	79061
Hexachlorobenzene.....	118741
Chlordane.....	57749
1,3-Propane sultone.....	1120714
1,3-Butadiene.....	106990
Nickel refinery dust.....	.....
2-Acetylaminoflourine.....	53963
3,3[prime]-Dichlorobenzidine.....	53963
Lindane (hexachlorcyclohexane, gamma).....	58899

2,4-Toluene diamine.....	95807
Dichloroethyl ether (Bis(2-chloroethyl) ether).....	111444
1,2-Diphenylhydrazine.....	122667
Toxaphene (chlorinated camphene).....	8001352
2,4-Dinitrotoluene.....	121142
3,3[prime]-Dimethoxybenzidine.....	119904
Formaldehyde.....	50000
4,4[prime]-Methylene bis (2-chloroaniline).....	101144
Acrylonitrile.....	107131
Ethylene dibromide (1,2-Dibromoethane).....	106934
DDE (1,1-p-chlorophenyl 1-2 dichloroethylene).....	72559
Chlorobenzilate.....	510156
Dichlorvos.....	62737
Vinyl chloride.....	75014
Coke Oven Emissions.....	.....
Ethylene oxide.....	75218
Ethylene thiourea.....	96457
Vinyl bromide (bromoethene).....	593602
Selenium sulfide (mono and di).....	7488564
Chloroform.....	67663
Pentachlorophenol.....	87865
Ethyl carbamate (Urethane).....	51796
Ethylene dichloride (1,2-Dichloroethane).....	107062
Propylene dichloride (1,2-Dichloropropane).....	78875
Carbon tetrachloride.....	56235
Benzene.....	71432
Methyl hydrazine.....	60344
Ethyl acrylate.....	140885
Propylene oxide.....	75569
Aniline.....	62533
1,4-Dichlorobenzene(p).....	106467
2,4,6-Trichlorophenol.....	88062
Bis (2-ethylhexyl) phthalate (DEHP).....	117817
o-Toluidine.....	95534
Propoxur.....	114261
1,4-Dioxane (1,4-Diethyleneoxide).....	123911
Acetaldehyde.....	75070
Bromoform.....	75252
Captan.....	133062
Epichlorohydrin.....	106898
Methylene chloride (Dichloromethane).....	75092
Dibenz (ah) anthracene.....	53703
Chrysene.....	218019
Dimethyl aminoazobenzene.....	60117
Benzo (a) anthracene.....	56553
Benzo (b) fluoranthene.....	205992
Antimony trioxide.....	1309644
2-Nitropropane.....	79469
1,3-Dichloropropene.....	542756
7, 12-Dimethylbenz(a) anthracene.....	57976
Benz(c) acridine.....	225514
Indeno(1,2,3-cd)pyrene.....	193395
1,2:7,8-Dibenzopyrene.....	189559

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**Table 5 to Subpart JJ of Part 63—List of VHAP of Potential Concern Identified by Industry**

CAS No.	Chemical name	EPA de minimis, tons/yr
68122.....	Dimethyl formamide	1.0
50000.....	Formaldehyde	0.2
75092.....	Methylene chloride	4.0
79469.....	2-Nitropropane	1.0
78591.....	Isophorone	0.7
1000425.....	Styrene monomer	1.0
108952.....	Phenol	0.1
111422.....	Dimethanolamine	5.0
109864.....	2-Methoxyethanol	10.0
111159.....	2-Ethoxyethyl acetate	10.0

**Table 6 to Subpart JJ of Part 63—VHAP of Potential Concern**

CAS No.	Chemical name	EPA de minimis, tons/yr*
92671.....	4-Aminobiphenyl.....	1.0
96093.....	Styrene oxide.....	1.0
64675.....	Diethyl sulfate.....	1.0
59892.....	N-Nitrosomorpholine.....	1.0
68122.....	Dimethyl formamide.....	1.0
680319.....	Hexamethylphosphoramide.....	0.01
60355.....	Acetamide.....	1.0
101779.....	4,4[prime]-Methylenedianiline.....	1.0
90040.....	o-Anisidine.....	1.0
1746016.....	2,3,7,8-Tetrachlorodibenzo-p-dioxin.	0.00000006
92875.....	Benzidine.....	0.00003
684935.....	N-Nitroso-N-methylurea.....	0.00002
542881.....	Bis(chloromethyl) ether.....	0.00003
79447.....	Dimethyl carbamoyl chloride.....	0.002
75558.....	1,2-Propylenimine (2-Methyl aziridine).	0.0003
57147.....	1,1-Dimethyl hydrazine.....	0.0008
96128.....	1,2-Dibromo-3-chloropropane.....	0.001
62759.....	N-Nitrosodimethylamine.....	0.0001
50328.....	Benzo (a) pyrene.....	0.001
1336363.....	Polychlorinated biphenyls (Aroclors).	0.0009
76448.....	Heptachlor.....	0.002
119937.....	3,3[prime]-Dimethyl benzidine.....	0.001
79061.....	Acrylamide.....	0.002
118741.....	Hexachlorobenzene.....	0.004
57749.....	Chlordane.....	0.005
1120714.....	1,3-Propane sultone.....	0.003
106990.....	1,3-Butadiene.....	0.007
53963.....	2-Acetylaminoflourine.....	0.0005
91941.....	3,3[prime]-Dichlorobenzidine.....	0.02
58899.....	Lindane (hexachlorocyclohexane, gamma).	0.005
95807.....	2,4-Toluene diamine.....	0.002

111444.....	Dichloroethyl ether (Bis(2-chloroethyl)ether).	0.006
122667.....	1,2-Diphenylhydrazine.....	0.009
8001352.....	Toxaphene (chlorinated camphene).	0.006
121142.....	2,4-Dinitrotoluene.....	0.002
119904.....	3,3[prime]-Dimethoxybenzidine....	0.01
50000.....	Formaldehyde.....	0.2
101144.....	4,4[prime]-Methylene bis(2-chloroaniline).	0.02
107131.....	Acrylonitrile.....	0.03
106934.....	Ethylene dibromide(1,2-Dibromoethane).	0.01
72559.....	DDE (1,1-p-chlorophenyl 1-2 dichloroethylene).	0.01
510156.....	Chlorobenzilate.....	0.04
62737.....	Dichlorvos.....	0.02
75014.....	Vinyl chloride.....	0.02
75218.....	Ethylene oxide.....	0.09
96457.....	Ethylene thiourea.....	0.06
593602.....	Vinyl bromide (bromoethene).....	0.06
67663.....	Chloroform.....	0.09
87865.....	Pentachlorophenol.....	0.07
51796.....	Ethyl carbamate (Urethane).....	0.08
107062.....	Ethylene dichloride (1,2-Dichloroethane).	0.08
78875.....	Propylene dichloride (1,2-Dichloropropane).	0.1
56235.....	Carbon tetrachloride.....	0.1
71432.....	Benzene.....	0.2
140885.....	Ethyl acrylate.....	0.1
75569.....	Propylene oxide.....	0.5
62533.....	Aniline.....	0.1
106467.....	1,4-Dichlorobenzene(p).....	0.3
88062.....	2,4,6-Trichlorophenol.....	0.6
117817.....	Bis (2-ethylhexyl) phthalate (DEHP).	0.5
95534.....	o-Toluidine.....	0.4
114261.....	Propoxur.....	2.0
79016.....	Trichloroethylene.....	1.0
123911.....	1,4-Dioxane (1,4-Diethyleneoxide)	0.6
75070.....	Acetaldehyde.....	0.9
75252.....	Bromoform.....	2.0
133062.....	Captan.....	2.0
106898.....	Epichlorohydrin.....	2.0
75092.....	Methylene chloride (Dichloromethane).	4.0
127184.....	Tetrachloroethylene (Perchloroethylene).	4.0
53703.....	Dibenz (ah) anthracene.....	0.01
218019.....	Chrysene.....	0.01
60117.....	Dimethyl aminoazobenzene.....	1.0
56553.....	Benzo (a) anthracene.....	0.01
205992.....	Benzo (b) fluoranthene.....	0.01
79469.....	2-Nitropropane.....	1.0
542756.....	1,3-Dichloropropene.....	1.0
57976.....	7,12-Dimethylbenz (a) anthracene.	0.01
225514.....	Benz(c)acridine.....	0.01
193395.....	Indeno(1,2,3-cd)pyrene.....	0.01
189559.....	1,2:7,8-Dibenzopyrene.....	0.01
79345.....	1,1,2,2-Tetrachloroethane.....	0.03
91225.....	Quinoline.....	0.0006
75354.....	Vinylidene chloride (1,1-Dichloroethylene).	0.04

87683.....	Hexachlorobutadiene.....	0.09
82688.....	Pentachloronitrobenzene (Quintobenzene).	0.03
78591.....	Isophorone.....	0.7
79005.....	1,1,2-Trichloroethane.....	0.1
74873.....	Methyl chloride (Chloromethane)..	1.0
67721.....	Hexachloroethane.....	0.5
1582098.....	Trifluralin.....	0.9
1319773.....	Cresols/Cresylic acid (isomers and mixture).	1.0
108394.....	m-Cresol.....	1.0
75343.....	Ethylidene dichloride (1,1- Dichloroethane).	1.0
95487.....	o-Cresol.....	1.0
106445.....	p-Cresol.....	1.0
74884.....	Methyl iodide (Iodomethane).....	1.0
100425.....	Styrene.....	1.0
107051.....	Allyl chloride.....	1.0
334883.....	Diazomethane.....	1.0
95954.....	2,4,5-Trichlorophenol.....	1.0
133904.....	Chloramben.....	1.0
106887.....	1,2-Epoxybutane.....	1.0
108054.....	Vinyl acetate.....	1.0
126998.....	Chloroprene.....	1.0
123319.....	Hydroquinone.....	1.0
92933.....	4-Nitrobiphenyl.....	1.0
56382.....	Parathion.....	0.1
13463393.....	Nickel Carbonyl.....	0.1
60344.....	Methyl hydrazine.....	0.006
151564.....	Ethylene imine.....	0.0003
77781.....	Dimethyl sulfate.....	0.1
107302.....	Chloromethyl methyl ether.....	0.1
57578.....	beta-Propiolactone.....	0.1
100447.....	Benzyl chloride.....	0.04
98077.....	Benzotrichloride.....	0.0006
107028.....	Acrolein.....	0.04
584849.....	2,4-Toluene diisocyanate.....	0.1
75741.....	Tetramethyl lead.....	0.01
78002.....	Tetraethyl lead.....	0.01
12108133.....	Methylcyclopentadienyl manganese.	0.1
624839.....	Methyl isocyanate.....	0.1
77474.....	Hexachlorocyclopentadiene.....	0.1
62207765.....	Fluomine.....	0.1
10210681.....	Cobalt carbonyl.....	0.1
79118.....	Chloroacetic acid.....	0.1
534521.....	4,6-Dinitro-o-cresol, and salts..	0.1
101688.....	Methylene diphenyl diisocyanate..	0.1
108952.....	Phenol.....	0.1
62384.....	Mercury, (acetato-o) phenyl.....	0.01
98862.....	Acetophenone.....	1.0
108316.....	Maleic anhydride.....	1.0
532274.....	2-Chloroacetophenone.....	0.06
51285.....	2,4-Dinitrophenol.....	1.0
109864.....	2-Methoxy ethanol.....	10.0
98953.....	Nitrobenzene.....	1.0
74839.....	Methyl bromide (Bromomethane)....	10.0
75150.....	Carbon disulfide.....	1.0
121697.....	N,N-Dimethylaniline.....	1.0
106514.....	Quinone.....	5.0
123386.....	Propionaldehyde.....	5.0
120809.....	Catechol.....	5.0
85449.....	Phthalic anhydride.....	5.0
463581.....	Carbonyl sulfide.....	5.0
132649.....	Dibenzofurans.....	5.0

100027.....	4-Nitrophenol.....	5.0
540841.....	2,2,4-Trimethylpentane.....	5.0
111422.....	Diethanolamine.....	5.0
822060.....	Hexamethylene-1,6-diisocyanate...	5.0
	Glycol ethersa.....	5.0
	Polycyclic organic matterb.....	0.01

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\* These values are based on the de minimis levels provided in the proposed rulemaking pursuant to section 112(g) of the Act using a 70-year lifetime exposure duration for all VHAP. Default assumptions and the de minimis values based on inhalation reference doses (RfC) are not changed by this adjustment.

- a Except for ethylene glycol butyl ether, ethylene glycol ethyl ether (2-ethoxy ethanol), ethylene glycol hexyl ether, ethylene glycol methyl ether (2-methoxyethanol), ethylene glycol phenyl ether, ethylene glycol propyl ether, ethylene glycol mono-2-ethylhexyl ether, diethylene glycol butyl ether, diethylene glycol ethyl ether, diethylene glycol methyl ether, diethylene glycol hexyl ether, diethylene glycol phenyl ether, diethylene glycol propyl ether, triethylene glycol butyl ether, triethylene glycol ethyl ether, triethylene glycol methyl ether, triethylene glycol propyl ether, ethylene glycol butyl ether acetate, ethylene glycol ethyl ether acetate, and diethylene glycol ethyl ether acetate.
- b Except for benzo(b)fluoranthene, benzo(a)anthracene, benzo(a)pyrene, 7,12-dimethylbenz(a)anthracene, benz(c)acridine, chrysene, dibenz(ah)anthracene, 1,2:7,8-dibenzopyrene, indeno(1,2,3-cd)pyrene, but including dioxins and furans.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

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

- (c) One (1) Final Touch-up Sanding Booth (identified as 32) with a maximum throughput capacity of 7.50 tons of wood per hour and controlled by cartridge filters.

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

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

#### D.2.1 Particulate Matter (PM) [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(a)(formerly 326 IAC 6-1-2(a)), particulate matter (PM) emissions from the one (1) final touch-up sanding booth shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.

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

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

### Compliance Determination Requirements

#### D.2.3 Particulate Control

Pursuant to T037-6048-00012, issued December 21, 1998, and except as otherwise provided by statute, rule, or this permit, the cartridge filters for PM control shall be in operation and control emissions at all times the associated final touch-up sanding booth is in operation.

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

#### D.2.4 Visible Emissions Notations

- (a) Visible emission notations of the final touch-up sanding booth stack exhaust shall be performed once per day 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) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

#### D.2.5 Parametric Monitoring

The Permittee shall record the pressure drop across the cartridge filters used in conjunction with the final touch-up sanding booth, at least once per day when the final touch-up sanding booth is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 2.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the

above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

#### D.2.6 Broken or Failed Bag Detection

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- (a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed units and the associated process shall be shut down immediately until the failed unit has 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).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. 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).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

##### D.2.7 Record Keeping Requirements

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- (a) To document compliance with Condition D.2.4, the Permittee shall maintain daily records of visible emission notations of the final touch-up sanding booth stack exhaust.
- (b) To document compliance with Condition D.2.5, the Permittee shall maintain daily records of the pressure drop during normal operation when venting to the atmosphere.
- (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 2-7-5(15)]: Insignificant Activities

- (a) Woodworking operations (identified as EU 014) with a maximum throughput rate of 2,750 pounds of wood per hour, controlled by a baghouse and exhausting at stack N.  
[326 IAC 2-7-1(21)(G)(xxix)] [326 IAC 6-1-5-1-2]

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

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

#### D.3.1 Baghouse Limitations [326 IAC 2-7-1(21)(G)(xxix)]

Pursuant to T037-6048-00012, issued December 21, 1998, the woodworking operations controlled by a baghouse shall be an insignificant activity for Title V permitting purposes provided that the baghouse operations meet the following requirements:

- (a) The woodworking baghouse shall not exhaust to the atmosphere greater than one hundred twenty-five thousand (125,000) cubic feet of air per minute and shall not emit particulate matter with a diameter less than ten (10) microns in excess of three-thousandths (0.003) grain per dry standard cubic foot of outlet air.
- (b) The opacity from the baghouse shall not exceed ten percent (10%).
- (c) Visible emissions from the baghouse shall be observed daily, when venting to the atmosphere, using procedures in accordance with Method 22, and normal or abnormal emissions are recorded.
- (d) In the event abnormal emissions are observed for greater than six (6) minutes in duration, the baghouse shall be inspected, and corrective actions, such as replacing or reseating bags, shall be initiated when necessary.

#### D.3.2 Particulate Matter (PM) [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(a) (formerly 326 IAC 6-1-2(a)), the woodworking facilities shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of three hundredths (0.03) grain per dry standard cubic foot of outlet air.

#### D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

### Compliance Determination Requirements

#### D.3.4 Particulate Control [326 IAC 2-7-21(1)(G)(xxix)(DD)]

- (a) Pursuant to T037-6048-00012, issued December 21, 1998, and except as otherwise provided by statute, rule, or this permit, the baghouse for PM control shall be in operation and control emissions at all times the associated woodworking facilities are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

#### **D.3.5 Visible Emissions Notations**

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- (a) Visible emission notations of the woodworking facilities stack exhaust shall be performed once per day 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) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

#### **D.3.6 Baghouse Inspections [326 IAC 2-7-21(1)(G)(xxix)(FF)]**

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An inspection shall be performed each calendar quarter of all bags controlling the woodworking facilities when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

#### **D.3.7 Broken or Failed Bag Detection**

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- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has 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).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. 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).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows

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

#### **D.3.8 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.3.1(d) and D.3.6, the Permittee shall maintain records of the results of the inspections required under Conditions D.3.1(d) and D.3.6, and the dates the vents are redirected.
- (b) To document compliance with Conditions D.3.1(c) and D.3.5, the Permittee shall maintain records of daily visible emission notations of the baghouse exhaust when venting to the atmosphere.

- (c) The Permittee shall maintain records of corrective actions to document compliance with 326 IAC 2-7-21(1)(G)(xxix)(GG)(dd).
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.4

## FACILITY OPERATION CONDITIONS

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

- (b) One (1) natural gas-fired boiler (identified as EU 013) with a maximum heat input capacity of 2.60 MMBtu per hour and exhausting at stack M. [326 IAC 6.5-1-2]
- (c) One (1) natural gas-fired air makeup unit utilized for general building ventilation (identified as 33) with a maximum heat input capacity of 2.10 MMBtu per hour, and exhausting externally. [326 IAC 6.5-1-2]
- (d) Seven (7) natural gas-fired air makeup units, two (2) integrated with the SAP/NGR Booth and one (1) integrated with each of the other five (5) surface coating booths located on the second surface coating line operations, each with a maximum heat input capacity of 1.50 MMBtu per hour and exhausting internally into the booth. [326 IAC 6.5-1-2]
- (e) Two (2) natural gas-fired drying ovens (identified as 26 and 31) used in conjunction with the second surface coating line operations and each with a maximum heat input capacity of 1.00 MMBtu per hour. The ovens 26 and 31 exhaust at stacks 2E and 2L, respectively and were installed in 2000. [326 IAC 6.5-1-2(a)]
- (f) One (1) natural gas-fired drying oven (identified as 28) used in conjunction with the second surface coating line operations and with a maximum heat input capacity of 4.0 MMBtu per hour. This oven exhausts at stacks 2G-1, 2G-2, and 2G-3, and was installed in 2000. [326 IAC 6.5-1-2(a)]

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

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

#### D.4.1 Particulate [326 IAC 6.5-1-2]

- (a) Pursuant to 326 IAC 6.5-1-2(b)(3) (formerly 326 IAC 6-1-2(b)(3), particulate matter emissions from the 2.60 MMBtu per hour natural gas fired boiler shall not exceed one-hundredth (0.01) grains per dry standard cubic foot.
- (b) Pursuant to 326 IAC 6.5-1-2(a) ((formerly 326 IAC 6-1-2(a), particulate matter emissions from the eight (8) air makeup units and three (3) drying ovens (26, 31, and 28) shall not exceed three hundredth (0.03) grains per dry standard cubic foot.

**INDIANA DEPARTMENT OF ENVIRONMENTAL  
MANAGEMENT  
OFFICE OF AIR QUALITY**

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Inwood Office Furniture Co., Inc.  
Source Address: 1108 East 15<sup>th</sup> Street, Indiana 47546  
Mailing Address: P.O. Box 646, Jasper, Indiana 47547-0646  
Part 70 Permit No.: T037-17564-00012

**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:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-5674  
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Inwood Office Furniture Co., Inc.  
Source Address: 1108 East 15<sup>th</sup> Street, Indiana 47546  
Mailing Address: P.O. Box 646, Jasper, Indiana 47547-0646  
Part 70 Permit No.: T037-17564-00012

**This form consists of 2 pages**

**Page 1 of 2**

- This is an emergency as defined in 326 IAC 2-7-1(12)
- C The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
  - C The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

**Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.

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

**Part 70 Quarterly Report**

Source Name: Inwood Office Furniture Co., Inc.  
Source Address: 1108 East 15<sup>th</sup> Street, Indiana 47546  
Mailing Address: P.O. Box 646, Jasper, Indiana 47547-0646  
Part 70 Permit No.: T037-17564-00012  
Facility: Surface Coating Operations including First and Second Coating Lines  
Parameter: VOC Usage  
Limit: Less than 249 tons per twelve (12) consecutive month period with compliance determined at the end of each month. (Condition D.1.4)

YEAR:

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.  
Deviation has been reported on:

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

### PART 70 Semi-Annual Report

#### VOC and VHAP Usage - Wood Furniture NESHP

Source Name: Inwood Office Furniture Co., Inc.  
 Source Address: 1108 East 15<sup>th</sup> Street, Indiana 47546  
 Mailing Address: P.O. Box 646, Jasper, Indiana 47547-0646  
 Part 70 Permit No.: T037-17564-00012  
 Facility: Surface Coating Operations  
 Parameter: VOC and VHAPs - NESHP  
 Limit: (1) Finishing operations - 1.0 lb VHAP/lb Solids  
 (2) Thinners used for on-site formulation of washcoats, basecoats and enamels - 3% VHAP content by weight  
 (3) All other thinner mixtures - 10% VHAP content by weight  
 (4) Foam adhesives meeting the upholstered seating flammability requirements - 1.8 lb VHAP/lb Solids  
 (5) All other contact adhesives - 1.0 lb VHAP/lb Solids  
 (6) Strippable spray booth material - 0.8 pounds VOC per pound solids

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

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

No deviation occurred in this month.  
 Deviation/s occurred in this month.  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
 Title/Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

Attach a signed certification to complete this report

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

**PART 70 OPERATING PERMIT  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Inwood Office Furniture Co., Inc.  
Source Address: 1108 East 15<sup>th</sup> Street, Indiana 47546  
Mailing Address: P.O. Box 646, Jasper, Indiana 47547-0646  
Part 70 Permit No.: T037-17564-00012

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

<p>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. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does 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".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

# Indiana Department of Environmental Management Office of Air Quality

## Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

### Source Background and Description

Source Name:	Inwood Office Furniture Co., Inc.
Source Location:	1108 East 15 <sup>th</sup> Street, Jasper, Indiana 47546
County:	Dubois
SIC Code:	2521
Operation Permit No.:	037-6048-00012
Operation Permit Issuance Date:	December 21, 1998
Permit Renewal No.:	037-17564-00012
Permit Reviewer:	ERG/SD

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Renewal application from Inwood Office Furniture, Co., Inc. relating to the operation of a stationary wood furniture manufacturing plant.

### Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) First surface coating line operations (booths EU 01 through 012) consisting of the following:
  - (1) One (1) contact glue booth (EU 01) with a maximum throughput rate of 11.1 units per hour, controlled by dry filters and exhausting at stack A. This booth was installed prior to 1974.
  - (2) Three (3) stain booths (EU 02, EU 03 and EU04) with a maximum throughput rate of 3 units per hour each, controlled by dry filters and exhausting at stacks B, C and D. These booths were installed prior to 1974.
  - (3) One (1) wipe stain booth (EU 05) with a maximum throughput rate of 10 units per hour, controlled by dry filters and exhausting at stack E. This booth was installed prior to 1974.
  - (4) One (1) sealer booth (EU 06) with a maximum throughput rate of 10 units per hour, controlled by dry filters and exhausting at stack F. This booth was installed prior to 1974.
  - (5) One (1) lacquer booth (EU 07) with a maximum throughput rate of 10 units per hour, controlled by dry filters and exhausting at stack G. This booth was installed prior to 1974.
  - (6) One (1) lacquer booth (EU 08) with a maximum throughput rate of 8 units per hour, controlled by dry filters and exhausting at stack H. This booth was installed prior to 1974.
  - (7) One (1) wipe stain booth (EU 09) with a maximum throughput rate of 1.1 units per hour, controlled by dry filters and exhausting at stack I. This booth was installed prior to 1974.

- (8) One (1) lacquer booth (EU 010) with a maximum throughput rate of 1.1 units per hour, controlled by dry filters and exhausting at stack J. This booth was installed prior to 1974.
- (9) One (1) black enamel booth (EU 011) with a maximum throughput rate of 11.1 units per hour, controlled by dry filters and exhausting at stack K. This booth was installed in 1998.
- (10) One (1) stain booth (EU 012) with a maximum throughput rate of 1.1 units per hour, controlled by dry filters and exhausting at stack L. This booth was installed prior to 1974.

Note: The term "unit(s)" in the facility description item (a) refers to desks and desktops.

- (b) Second surface coating line operation consisting of the following:
  - (1) One (1) SAP/NGR Booth (identified as 21/22) with a maximum throughput capacity of 30 units per hour, controlled by dry filters and exhausting at stacks 2A and 2B. This booth was installed in 2000.
  - (2) One (1) Wash Coat Booth (identified as 23) with a maximum throughput capacity of 30 units per hour, controlled by dry filters and exhausting at stack 2C. This booth was installed in 2000.
  - (3) One (1) Stain Booth (identified as 25) with a maximum throughput capacity of 30 units per hour, controlled by dry filters and exhausting at stack 2F. This booth was installed in 2000.
  - (4) One (1) Sealer Booth (identified as 27) with a maximum throughput capacity of 30 units per hour, controlled by dry filters and exhausting at stack 2F. This booth was installed in 2000.
  - (5) One (1) First Topcoat Booth with one (1) flash tunnel (identified as 29) with a maximum throughput capacity of 30 units per hour, controlled by dry filters and exhausting at stack 2H. The flash tunnel exhausts at stack 21. This booth was installed in 2000.
  - (6) One (1) Second Topcoat Booth with one (1) flash tunnel (identified as 30) with a maximum rated capacity of 30 units per hour, controlled by dry filters and exhausting at stack 2J. The flash tunnel exhausts at stack 2K. This booth and flash tunnel were installed in 2000.

Note: The term "unit(s)" in the facility description item (b) refers to desks and desktops.

- (c) One (1) Final Touch-up Sanding Booth (identified as 32) with a maximum throughput capacity of 7.50 tons of wood per hour and controlled by cartridge-filters.

<b>Unpermitted Emission Units and Pollution Control Equipment</b>
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There are no unpermitted emission units operating at this source during this review process.

<b>Insignificant Activities</b>
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The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Woodworking operations (identified as EU 014) with a maximum throughput rate of 2,750 pounds of wood per hour, controlled by a baghouse and exhausting at stack N.  
[326 IAC 2-7-1(21)(G)(xxix)] [326 IAC 6.5-1-2]

- (b) One (1) natural gas-fired boiler (identified as EU 013) with a maximum heat input capacity of 2.60 MMBtu per hour and exhausting at stack M. [326 IAC 6.5-1-2]
- (c) One (1) natural gas-fired air makeup unit utilized for general building ventilation (identified as 33) with a maximum heat input capacity of 2.10 MMBtu per hour, and exhausting externally. [326 IAC 6.5-1-2]
- (d) Seven (7) natural gas-fired air makeup units, two (2) integrated with the SAP/NGR Booth and one (1) integrated with each of the other five (5) surface coating booths located on the second surface coating line operations, each with a maximum heat input capacity of 1.50 MMBtu per hour and exhausting internally into the booth. [326 IAC 6.5-1-2]
- (e) Two (2) natural gas-fired drying ovens (identified as 26 and 31) used in conjunction with the second surface coating line operations and each with a maximum heat input capacity of 1.00 MMBtu per hour. The ovens 26 and 31 exhaust at stacks 2E and 2L, respectively and were installed in 2000. [326 IAC 6.5-1-2(a)]
- (f) One (1) natural gas-fired drying oven (identified as 28) used in conjunction with the second surface coating line operations and with a maximum heat input capacity of 4.0 MMBtu per hour. This oven exhausts at stacks 2G-1, 2G-2, and 2G-3, and was installed in 2000. [326 IAC 6.5-1-2(a)]

#### Existing Approvals

The source has been operating under the existing Part 70 Permit No. 037-6048-00012, issued December 21, 1998 and the following approvals:

- (a) First Significant Permit Modification No. 037-10817-00012, issued June 29, 1999.
- (b) Second Significant Source Modification No. 037-12168-00012, issued September 28, 2000.
- (c) First Administrative Amendment No. 037-12407-00012, issued September 28, 2000.
- (d) Reopening No. 037-13196-00012, issued November 12, 2001.

All conditions from the previous Title V have been incorporated into this permit, except for the following, which have been either determined to be no longer applicable or have been revised:

Reopening of Title V Permit No.: T03713196-00012, issued November 12, 2001.

- (1) Condition D.1.5: The Permittee is not required to test this facility by this permit. However, IDEM may require testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing; and

Condition D.4.4: The Permittee is not required to test this facility by this permit. However, IDEM may require testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Reason not incorporated: Testing is not required for any of the woodworking facilities or the sanding booth because it is required by conditions in the permit to use a baghouse and cartridge filters to control PM and PM10 emissions. Visible emission notations, quarterly inspections, and bag failure detection requirements have been included consistent with the current compliance monitoring requirements for Title V woodworking

sources. These monitoring requirements are sufficient to ensure compliance with particulate matter emission limitations specified in the permit. Conditions D.1.5 and D.4.4 are, therefore, unnecessary.

- (2) Condition D.3.2: The Permittee is not required to test this facility by this permit. However, IDEM may require testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Reason not incorporated: Testing is not required for the natural gas-fired boiler with a maximum heat input capacity of 2.6 MMBtu per hour because the potential emissions from this unit were calculated using AP-42 emissions factors, which are considered to be reliable.

#### **Enforcement Issue**

There are no enforcement actions pending.

#### **Recommendation**

The staff recommends to the Commissioner that the Part 70 permit renewal 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 administratively complete Part 70 permit renewal application for the purposes of this review was received on February 24, 2003.

#### **Emission Calculations**

- (a) See Appendix A of this document for detailed emission calculations (pages 1 through 3).
- (b) Pursuant to SPM No. 037-10817-00012 issued June 29, 1999 and SSM No. 037-12168-00012 issued September 28, 2000, the VOC emissions from the existing surface coating operations are limited to less than 249 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Therefore, potential VOC emissions calculations for the surface coating facilities are not included in Appendix A.

#### **Potential to Emit of the Source**

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."

The source was issued a Part 70 Operating Permit on December 21, 1998. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of the original Part 70 operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Emission Unit	Potential To Emit (tons/year)						
	PM	PM10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
*Surface Coating Operations	8.47	8.47	0.00	Less than 249	0.00	0.00	Greater than 10 and 25 for single and combination of HAPs, respectively
**One (1) Wood Working	45.1	45.1	0.00	0.00	0.00	0.00	0.00
**One (1) Sanding Booth	45.1	45.1	0.00	0.00	0.00	0.00	0.00
Eleven (11) Natural Gas Combustion Units	0.51	0.51	0.04	0.37	5.59	6.66	Negligible
<b>Total PTE</b>	<b>98.9</b>	<b>98.9</b>	<b>0.04</b>	<b>Less than 250</b>	<b>5.59</b>	<b>6.66</b>	<b>Greater than 10 and 25 for single and combination of HAPs, respectively</b>

\*The potential to emit of VOC and particulate from the surface coatings are from SSM No. 037-12168-00012 issued September 28, 2000.

\* The potential to emit of PM and PM10 for the wood working and the sanding booth are based on the particulate emission limitation pursuant to 326 IAC 6.5-1-2.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) **Fugitive Emissions**  
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

**Actual Emissions**

The following table shows the actual emissions from the source. This information reflects the 2002 OAQ emission data. There was no data for 2003.

Pollutant	Actual Emissions (tons/year)
PM	1.00
PM10	1.00
SO <sub>2</sub>	NA
VOC	39.0
CO	NA
NO <sub>x</sub>	NA
HAP	NA

NA = no data available

### County Attainment Status

The source is located in Dubois County.

Pollutant	Status
PM10	Attainment
PM 2.5	Nonattainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Dubois County has been classified as nonattainment for PM<sub>2.5</sub> in 70 FR 943 dated January 5, 2005. Until the U.S. EPA adopts specific New Source Review rules for PM<sub>2.5</sub> emissions, it has directed states to regulate PM<sub>10</sub> emissions as surrogate for PM<sub>2.5</sub> emissions pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability - Entire Source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) emissions are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Dubois County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section.
- (c) Dubois County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section.

### Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

### Federal Rule Applicability

- (a) This source does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 for any regulated pollutant;
  - (1) with the potential to emit before controls equal to or greater than the major source threshold for a regulated pollutant,
  - (2) that is subject to an emission limitation or standard for that regulated pollutant, and
  - (3) uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

- (b) The 2.60 MMBtu per hour natural gas-fired boiler (identified as EU013) is not subject to the requirements of the New Source Performance Standard, 40 CFR 60, Subpart D – Standards of Performance for Fossil-Fuel-Fired Steam Generating Units for Which Construction is Commenced After August 17, 1971 (326 IAC 12) because this boiler has a maximum heat input capacity less than 250 MMBtu per hour.
- (c) The 2.60 MMBtu per hour natural gas-fired boiler (identified as EU013) is not subject to the requirements of the New Source Performance Standard, 40 CFR 60, Subpart Da - Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978 (326 IAC 12) because this boiler has a maximum heat input capacity less than 250 MMBtu per hour.
- (d) The 2.60 MMBtu per hour natural gas-fired boiler (identified as EU013) is not subject to the requirements of the New Source Performance Standard, 40 CFR 60, Subpart Db – Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12) because this boiler has a maximum heat input capacity less than 100 MMBtu per hour.
- (e) The 2.60 MMBtu per hour natural gas-fired boiler (identified as EU013) is not subject to the requirements of the New Source Performance Standard, 40 CFR 60, Subpart Dc Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12) because this boiler has a maximum heat input capacity less than 10 MMBtu per hour.

There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.

- (f) The wood furniture surface coating operations (first surface coating line operation and second surface coating line operation) are subject to the National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations, (40 CFR 63.800, Subpart JJ) because the source is a major source of HAPs and it is engaged in the manufacture of wood furniture or wood furniture components.

Pursuant to 40 CFR 63.800 and Part 70 Permit No.037-6048-00012, issued December 21, 1998, the Permittee shall continue to comply with the requirements of 40 CFR 63, Subpart JJ.

Pursuant to 40 CFR 63.804, the Permittee shall continue to comply with the requirements of 40 CFR 63, Subpart JJ using any of the compliance options listed in 40 CFR 63, Subpart JJ, with the exception of using an add-on control device. The Permittee wants to retain the flexibility to use all of the compliance options within the MACT. The MACT allows the source to switch between compliance options.

The existing affected source associated with the wood furniture surface coating operations is subject to the following portions of 40 CFR 63, Subpart JJ. Non-applicable portions of the NESHAP will not be included in the permit.

- (1) 40 CFR 63.800
- (2) 40 CFR 63.801
- (3) 40 CFR 63.802(a)(1)
- (4) 40 CFR 63.802(a)(2)
- (5) 40 CFR 63.802(a)(3)
- (6) 40 CFR 63.803
- (7) 40 CFR 63.804(a)(1),(2), and (4)
- (8) 40 CFR 63.804(b)
- (9) 40 CFR 63.804(c)(1)
- (10) 40 CFR 63.804(g)(1), (2), (5), (7), and (8)
- (11) 40 CFR 63.806(a), (b), (c), (e), (h), (i), and (j)
- (12) 40 CFR 63.807(a), (c), and (e)

(13) 40 CFR 63.808

The provisions of 40 CFR 63 Subpart A – General Provisions, which are incorporated as 326 IAC 20-14, apply to the wood furniture surface coating operations described in this section except when otherwise specified in 40 CFR 63, Subpart JJ.

- (g) The 2.60 MMBtu per hour natural gas-fired boiler (identified as EU 013) is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, (40 CFR 63, Subpart DDDDD) because this boiler is located at a major source of HAPs and is part of the affected source for the small gaseous fuel subcategory, as defined by 40 CFR 63.7575. Pursuant to 40 CR 63.7506(c), the affected boilers and process heaters listed in paragraphs (c)(1) through (4) of this section are not subject to the initial notification requirements in §63.9(b) and are not subject to any requirements in this subpart or in subpart A of this part (i.e., they are not subject to the emission limits, work practice standards, performance testing, monitoring, SSM plans, site-specific monitoring plans, recordkeeping and reporting requirements of this subpart, or any other requirements in subpart A of this part).
- (1) Existing small solid fuel boilers and process heaters.
  - (2) Existing small liquid fuel boilers and process heaters.
  - (3) Existing small gaseous fuel boilers and process heaters.
  - (4) New or reconstructed small gaseous fuel units.

<b>State Rule Applicability – Entire Source</b>
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326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This source was constructed prior to August 7, 1977 and is not in one of the 28 listed source categories. According to T037-6048-00012, issued December 21, 1998, at construction, the source was major for VOC under PSD but their actual emissions of VOC have never exceeded major source levels. On June 29, 1999, IDEM, OAQ issued the source a SPM No. 037-10817-000012 that limited the use of VOC to less than 249 tons per year; thereby, ensuring a minor source status under PSD. The source was modified in 2000 to add a second surface coating operation at the plant site and the potential to emit of VOC after this modification was limited by the PSD minor limit for VOC as follows:

The use of VOC, including coatings, dilution solvents, and cleaning solvents shall be less than 249 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than 249 tons per twelve (12) consecutive month period. Compliance with this limit ensures a minor source status under 326 IAC 2-2 (PSD).

The potential to emit of all other criteria pollutants are less than 250 tons per year.

326 IAC 2-3 (Emission Offset)

- (a) This source is located in Dubois county which is an attainment area for ozone under the 1-hour and 8-hour standard. Therefore, the provisions of 326 IAC 2-3 are not applicable to this source.
- (b) This source is located in Dubois county which is a nonattainment area for PM2.5. The potential to emit of particulate is less than 100 tons per year. Therefore, this source is a minor source under Emission Offset, 326 IAC 2-3.

326 IAC 2-4.1 (Hazardous Air Pollutants)

This source is not subject to the provisions of 326 IAC 2-4.1 because the surface coating operations are specifically regulated by 40 CFR Part 63, Subpart JJ (Wood Furniture NESHAP), which was promulgated on December 7, 1995.

326 IAC 5-1 (Opacity Limitations)

The source is located in Bainbridge Township of Dubois County. 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 thirty percent (30%) 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.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit under 326 IAC 2-7, Part 70 program. Pursuant to this rule and in accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2006 and every 3 years after. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 8-6 (Organic Solvent Emission Limitations)

Inwood Office Furniture is not subject to the requirements of 326 IAC 8-6 (Organic Solvent Emission Limitation) because it is located in Dubois County and is subject to the provisions of 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating).

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

This source is not subject to the requirements of 326 IAC 6-3-2 (Particulate Matter Emission Limitations for Manufacturing Processes) because it is located in a nonattainment area and is subject to the provisions of 326 IAC 6.5-1-2, which were previously listed as 326 IAC 6-8-2. Pursuant to 326 IAC 6-3-1©(3), the emission units located at this source are exempt from the requirements of 326 IAC 6-3-2 because 326 IAC 6-1 remains in effect under 40 CFR 52, Subpart P.

<b>State Rule Applicability - Surface Coating Operations</b>
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326 IAC 6.5-1-1 (Particulate Matter Limitations Except Lake County)

The first and second surface coating operations are subject to the requirements of 326 IAC 6.5-1 (formerly 326 IAC 6-1-2) because the source is located in Dubois County, has the potential to emit greater than 100 tons per year of particulate matter and is not specifically listed under 326 IAC 6.5-4 (formerly 326 IAC 6-1-9). Therefore, pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations Except Lake County), the surface coating operations shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of three hundredths (0.03) grain per dry standard cubic feet.

Particulate from the surface coating operations shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

- (a) Pursuant to T037-6048-00012 issued December 21, 1998, the one (1) black enamel booth (EU011) of first surface coating line and the second surface coating line operations are subject to the requirements of 326 IAC 8-2-12 because they were constructed after July 1, 1990 and have actual VOC emissions greater than 15 pounds per day before add-on controls. Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), with the exception of no more than ten (10) gallons of coating per day used for touch-up and

repair operations, the one (1) black enamel booth (EU011) of the first surface coating line and the second surface coating line operations, applying coating to wood furniture shall utilize one of the following application methods:

Airless Spray Application  
Air Assisted Airless Spray Application  
Electrostatic Spray Application  
Electrostatic Bell or Disc Application  
Heated Airless Spray Application  
Roller Coating Brush or Wipe Application  
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

- (b) Booths EU01 through EU010, and booth EU012 are not subject to the requirements of 326 IAC 8-2-12 because these booths were constructed prior to 1974.

326 IAC 8-11-1 (Wood Furniture Coating)

This source is not subject to 326 IAC 8-11 because this rule source applies only to sources located in Lake, Porter, Clark or Floyd Counties. This source is located in Dubois County.

<b>State Rule Applicability – Boiler EU013</b>
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326 IAC 6.5-1-1 (Particulate Matter Limitations Except Lake County)

The 2.60 MMBtu per hour natural gas-fired boiler (identified as EU 013) is not specifically listed in 326 IAC 6.5-4. Therefore, the 2.60 MMBtu per hour natural gas-fired boiler (EU 013) is subject to the requirements of 326 IAC 6.5-1-2(b)(3) (formerly 326 IAC 6-1-2(b)(3)), according to which the particulate matter emissions from the boiler shall not exceed one-hundredth (0.01) grain per dry standard cubic foot.

326 IAC 6.5-4 (Particulate Matter Limitations for Dubois County)

The 2.60 MMBtu per hour natural gas-fired boiler (identified as EU 013) is not subject to the requirements of 326 IAC 6.5-4 (formerly 326 IAC 6-1-9) because this source is not specifically listed in the rule.

326 IAC 6-2-4 (Particulate Matter for Sources of Indirect Heating)

The 2.60 MMBtu per hour natural gas-fired boiler (identified as EU 013) is not subject to the requirements of 326 IAC 6-2-4 (Particulate Matter for Sources of Indirect Heating) because 326 IAC 6-2-1(e) states that if any limitation established by 326 IAC 6-2 is inconsistent with the limitations contained in 326 IAC 6-1, then the limitations in 326 IAC 6-1 prevail. As of September 1, 2005, 326 IAC 6-1 was repealed and 326 IAC 6.5 was incorporated to address Particulate Matter Limitations Except Lake County. However, 326 IAC 6-1 remains in effect under 40 CFR 52, Subpart P.

<b>State Rule Applicability – Natural Gas-Fired Drying Ovens</b>
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326 IAC 6.5-4 (Particulate Matter Limitations for Dubois County)

The three (3) natural gas-fired drying ovens (identified as 26, 28, and 31) are not subject to the requirements of 326 IAC 6.5-4 (formerly 326 IAC 6-1-9) because these ovens are not specifically listed in the rule.

326 IAC 6.5-1 (Particulate Matter Limitations Except Lake County)

Since the three (3) natural gas-fired drying ovens (identified as 26, 28, and 31) are not specifically listed in 326 IAC 6.5-4, these ovens are subject to the requirements of 326 IAC 6.5-1-2(a)

(formerly 326 IAC 6-1-2(a)). The particulate matter emissions from the three (3) drying ovens shall not exceed three-hundredths (0.03) grain per dry standard cubic foot each.

**326 IAC 6-2-4 (Particulate Matter for Sources of Indirect Heating)**

The three (3) natural gas-fired drying ovens (identified as 26, 28, and 31) are not subject to the requirements of 326 IAC 6-2-4 (Particulate Matter for Sources of Indirect Heating) because 326 IAC 6-2-1(e) states that if any limitation established by 326 IAC 6-2 is inconsistent with the limitations contained in 326 IAC 6-1, then the limitations in 326 IAC 6-1 prevail. As of September 1, 2005, 326 IAC 6-1 was repealed and 326 IAC 6.5 was incorporated to address Particulate Matter Limitations Except Lake County. However, 326 IAC 6-1 remains in effect under 40 CFR 52, Subpart P.

**State Rule Applicability – Final Touch-up Sanding Booth**

**326 IAC 6.5-4 (Particulate Matter Limitations for Dubois County)**

The final touch-up sanding booth (identified as 32) is not subject to the requirements of 326 IAC 6.5-4 (Particulate Matter Limitations for Dubois County) because this unit is not specifically listed in the rule.

**326 IAC 6.5-1 (Particulate Matter Limitations Except Lake County)**

Since the final touch-up sanding booth (identified as 32) is not specifically listed in 326 IAC 6.5-4, it is subject to the requirements of 326 IAC 6.5-1-2(a) (Particulate Matter Limitations Except Lake County). The particulate matter emissions from the final touch-up sanding booth shall not exceed three-hundredths (0.03) grain per dry standard cubic foot.

**State Rule Applicability – Woodworking Operations (Insignificant Activity)**

**326 IAC 2-7-1(21)(G)(xxix) (Baghouse Limitations)**

Pursuant to T037-6048-00012 issued December 21, 1998, the woodworking operations controlled by a baghouse are classified as insignificant under 326 IAC 2-7-1(21)(G)(xxix) and shall meet the following requirements.

- (a) The woodworking baghouse shall not exhaust to the atmosphere greater than one hundred twenty-five thousand (125,000) cubic feet of air per minute and shall not emit particulate matter with a diameter less than ten (10) microns in excess of three-thousandths (0.003) grain per dry standard cubic foot of outlet air.
- (b) The opacity from the baghouse shall not exceed ten percent (10%).
- (c) Visible emissions from the baghouse shall be observed daily using procedures in accordance with Method 22 and normal or abnormal emissions are recorded.
- (d) In the event abnormal emissions are observed for greater than six (6) minutes in duration, the baghouse shall be inspected, and corrective actions, such as replacing or reseating bags, shall be initiated when necessary.

**326 IAC 6.5-4 (Particulate Matter Limitations for Dubois County)**

The woodworking operations are not subject to the requirements of 326 IAC 6.5-4 (Particulate Matter Limitations for Dubois County) because this facility is not specifically listed in the rule.

**326 IAC 6.5-1-2(a) (Particulate Matter Limitations Except Lake County)**

The woodworking operations are not specifically listed in 326 IAC 6.5-4 (Particulate Matter Limitations for Dubois County). Pursuant to 326 IAC 6.5-1-2(a) (formerly 326 IAC 6-1-2(a)), particulate emissions for sources that have potential to emit 100 tons or more; or have actual emissions of 10 tons or more of particulate matter per year, and that are not limited by sections 326 IAC 6.5-1-2(b), (e), (f) or (g), shall not exceed 0.03 grain per dry standard cubic foot (dscf). Therefore, the particulate emissions from woodworking operations shall not exceed 0.03 grain per dry standard cubic foot (dscf).

### Testing Requirements

- (a) The woodworking operations and final touch-up sanding booth do not have a testing requirement. The woodworking operations and the final touch-up sanding both are required by conditions in the permit to use a baghouse and cartridge filters to control PM and PM10 emissions. Visible emission notations, quarterly inspection, and bag failure requirements have been added consistent with current compliance monitoring requirements for Title V woodworking and non woodworking sources. These monitoring requirements should be sufficient to ensure compliance with the particulate matter emission limitations specified in the Permit.
- (b) The surface coating operations do not have a testing requirement for PM, PM10 or VOC. The surface coating operations at this source do not have a testing requirement for PM or PM10 because each of these emissions units account for a small portion of the total potential to emit for PM or PM10 from the source before controls. The Permittee is not required to perform compliance stack tests on the surface coating operations for VOC emissions because there are no VOC control devices in operation and records must be kept of all VOCs used at the source. The amount of VOC used at these facilities is assumed to be equal to the VOC emitted.
- (c) IDEM may require testing at any time to determine if the facilities are in compliance with the emissions limitations contained in 326 IAC 5-1, 326 IAC 6.5, 326 IAC 2-2 or 326 IAC 8-2-12.

### Compliance Requirements

Permits issued under 326 IAC 2-7 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 2-7-5. 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 in 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 woodworking operations have applicable compliance monitoring conditions as specified below:
  - (a) Visible emission notations of the woodworking operations stack exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall 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. If abnormal emissions are observed,

the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

- (b) An inspection shall be performed each calendar quarter of all bags controlling the woodworking facilities when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.
- (c) Broken or Failed Bag Detection
  - (1) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has 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).
  - (2) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. 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).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

These monitoring conditions are necessary because the baghouse must operate properly to ensure compliance with 326 IAC 2-7-1(21)(G)(xxix) and 326 IAC 6.5-1.

- 2. The final touch-up sanding booth has applicable compliance monitoring conditions as specified below:
  - (a) Visible emission notations of the final touch-up sanding booth stack exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall 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. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
  - (b) The Permittee shall record the pressure drop across the cartridge filters used in conjunction with the final touch-up sanding booth, at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the cartridge filters is outside the normal range

of 2.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

(c) Broken or Failed Bag Detection

- (1) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has 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).
- (2) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. 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).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

These monitoring conditions are necessary because the cartridge filters must operate properly to ensure compliance with 326 IAC 6.5-1.

3. In addition to compliance monitoring requirements pursuant to 40 CFR 63, Subpart JJ (as described under the Federal Rule Applicability section, Item (f)), the surface coating operations has applicable compliance monitoring conditions as specified below:
  - (a) Daily inspections shall be performed to verify that the water level of the water pans meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. In addition, weekly observations shall be made of the overspray from the surface coating booth stacks while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from 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. When a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure

to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

These monitoring conditions are necessary because the dry filters for the surface coating operations must operate properly to ensure compliance with 326 IAC 2-2 and 326 IAC 6.5-1.

<b>Conclusion</b>
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The operation of this stationary wood office furniture manufacturing plant shall be subject to the conditions of this Part 70 Permit Renewal 037-17564-00012.

**Indiana Department of Environmental Management  
Office of Air Quality**

Addendum to the  
Technical Support Document (TSD)  
for a Part 70 Operating Permit Renewal

**Source Background and Description**

Source Name:	Inwood Office Furniture Co.
Source Location:	1108 East 15 <sup>th</sup> Street, Jasper, Indiana 47546
County:	Dubois
SIC Code:	2521
Operation Permit No.:	037-6048-00012
Operation Permit Issuance Date:	December 21, 1998
Permit Renewal No.:	037-17564-00012
Permit Reviewer:	ERG/SD

On January 5, 2006 the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) had a notice published in The Herald, Jasper, Indiana, stating that Inwood Office Furniture Co., had applied for a Part 70 Operating Permit (Title V) Renewal to continue to operate a stationary wood furniture manufacturing plant. The notice also stated that IDEM, 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.

IDEM, OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table of Contents has been updated as necessary.

1. Condition B.11(b)(4) was revised to include the correct phone number for the Southwest Regional Office as shown:

**B.11 Emergency Provisions [326 IAC 2-7-16]**

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...

(b) ...

- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Southwest Regional Office 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 Number: 1-800-451-6027 (ask for Office of Air Quality,  
Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967

Southwest Regional Office  
Telephone Number: ~~(888) 672-8323 or (812) 436-2570~~ **(812) 380-2305**

Facsimile Number: (812) 436-2572 **(812) 380-2304**

...

2. Condition D.3.4(a) was revised to accurately reflect the type of control used at the woodworking facilities (identified as EU014) (i.e. baghouse instead of cartridge filters).

D.3.4 Particulate Control [326 IAC 2-7-21(1)(G)(xxix)(DD)]

- (a) Pursuant to T037-6048-00012, issued December 21, 1998, and except as otherwise provided by statute, rule, or this permit, the ~~cartridge filters~~ **baghouse** for PM control shall be in operation and control emissions at all times the associated ~~final touch-up sanding booth~~ **woodworking facilities** are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

**Appendix A: Emissions Calculations**  
**Emission Units under Section D.1**

**Company Name:** Inwood Office Furniture Co, Inc.  
**Address:** 1108 East 15th Street, Jasper, Indiana 47546  
**Title V Renewal:** 037-17564  
**Plant ID:** 037-00012  
**Reviewer:** ERG/SD  
**Date:** December 27, 2005

Unit Operations	Stack ID	Air Flow Rate Baghouse (acfm)	* 326 IAC 6.5-1-2(a) Limitation (gr/dscf)	Equivalent Particulate Limit	
				(lbs/hour)	(tons/year)
Wood Working Shop	WW 1	40,000	0.03	10.3	45.1
Final Touch-Up Sanding Booth	SS-1	40,000	0.03	10.3	45.1

\* Formerly 326 IAC 6-1-2(a)

**METHODOLOGY**

Equivalent Particulate Limit (lbs/hour) = Air Flow Rate (acfm) \* Grains/dscf \* 60 minutes/hour \* 1 lb/7000 grains

Equivalent Particulate Limit (tons/year) = Air Flow Rate (acfm) \* Grains/dscf \* 60 minutes/hour \* 1 lb/7000 grains \* 8760 hours/year \* 1 ton/2000 lbs

**Appendix A: Emission Calculations  
Emission Units under Section D.3  
(1 Boiler and 8 Air Make-Up Units)**

**Company Name:** Inwood Office Furniture Co, Inc.  
**Address:** 1108 East 15th Street, Jasper, Indiana 47546  
**Title V Renewal:** 037-17564  
**Plant ID:** 037-00012  
**Reviewer:** ERG/SD  
**Date:** December 27, 2005

**Heat Input Capacity**  
(MMBtu/hour)

**Potential Throughput**  
(MMSCF/year)

15.2 (9 Units Total)

131

<b>Emission Factor (lb/MMSCF)</b>	<b>* PM</b> 7.6	<b>* PM10</b> 7.6	<b>SO<sub>2</sub></b> 0.6	<b>** NO<sub>x</sub></b> 100	<b>VOC</b> 5.5	<b>CO</b> 84
<b>Potential To Emit (tons/year)</b>	0.50	0.50	0.04	6.53	0.36	5.48

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

\*\* Emission factor for NOx (Uncontrolled) = 100 lb/MMSCF.

Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1 and 1.4-2, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July, 1998).

All emission factors are based on normal firing.

**METHODOLOGY**

Potential Throughput (MMSCF/year) = Heat Input Capacity (MMBtu/hour) \* 8760 hours/year \* 1 MMSCF/1020 MMBtu

Potential To Emit (tons/year) = Potential Throughput (MMSCF/year) \* Emission Factor (lb/MMSCF) \* 1 ton/2000 lbs

See next page for HAPs emissions calculations.

**Appendix A: Emission Calculations**  
**Emission Units under Section D.3**  
**(1 Boiler and 8 Air Make-Up Units)**

**Company Name:** Inwood Office Furniture Co, Inc.  
**Address:** 1108 East 15th Street, Jasper, Indiana 47546  
**Title V Renewal:** 037-17564  
**Plant ID:** 037-00012  
**Reviewer:** ERG/SD  
**Date:** December 27, 2005

**HAPs - Organics**

	<b>Benzene</b>	<b>Dichlorobenzene</b>	<b>Formaldehyde</b>	<b>Hexane</b>	<b>Toluene</b>
<b>Emission Factor (lb/MMSCF)</b>	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
<b>Potential To Emit (tons/year)</b>	1.37E-04	7.83E-05	4.90E-03	1.17E-01	2.22E-04

**HAPs - Metals**

	<b>Lead</b>	<b>Cadmium</b>	<b>Chromium</b>	<b>Manganese</b>	<b>Nickel</b>
<b>Emission Factor (lb/MMSCF)</b>	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
<b>Potential To Emit (tons/year)</b>	3.26E-05	7.18E-05	9.14E-05	2.48E-05	1.37E-04

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors provided above are from AP-42, Chapter 1.4, Table 1.4-3 and 1.4-4 (July, 1998).

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations  
Surface Coating Operations**

**Company Name:** Inwood Office Furniture Co, Inc.  
**Address:** 1108 East 15th Street, Jasper, Indiana 47546  
**Title V Renewal:** 037-17564  
**Plant ID:** 037-00012  
**Reviewer:** ERG/SD  
**Date:** December 27, 2005

Process I.D.	Material Used	Density (lbs/gal)	Weight % Volatiles (H <sub>2</sub> O+Organics)	Weight % Water	Volume % Water	Volume % Non-volatiles (Solids)	Coating Ratio	Lbs VOC per Gallon as Applied	Lbs Solids per Gallon as Applied	Max. Usage (gal/unit)	Max.Throughput (units/hour)	Unlimited PTE of VOC (tons/year)	Uncontrolled PTE of PM/PM10 (tons/year)	Method	Controlled PTE of PM/PM10 (tons/year)	
21/SAP	Crown Cherry Durostain	6.95	96.05%	0	0	1.36	100%	6.68	0.27	0.308	30	270	6.11	(1)	1.22	
22/NGR	Crown Cherry Durostain	6.95	96.05%	0	0	1.36	100%	6.68	0.27	0.308	30	270	6.11	(1)	1.22	
23/wash coat	Crown Cherry Durostain	6.95	96.05%	0	0	1.36	100%	6.68	0.27	0.308	30	270	6.11	(1)	1.22	
24/filler	#1 Walnut Wipe Stain	6.73	86.50%	0	0	7.7	61.54%	6.46	0.56	0.124	30	105	0.00	(2)	0.00	
	Reducer	7.47	100.00%	0	0	0	38.46%									
25/stain	Crown Cherry Durostain	6.95	96.05%	0	0	1.36	100%	6.68	0.27	0.308	30	270	6.11	(1)	1.22	
27/sealer	H.S. Catalyst Sealer	7.5	76.81%	0	0	16.63	98.20%	5.80	1.71	0.145	30	110	17.90	(1)	3.58	
	Retarder	7.86	100.00%	0	0	0	1.80%									
29/topcoat 1	#1 Walnut Wipe Stain	6.73	86.50%	0	0	7.7	61.54%	6.46	0.56	0.124	30	105	0.00	(2)	0.00	
	Reducer	7.47	100.00%	0	0	0	38.46%									
30/topcoat-2	#1 Walnut Wipe Stain	6.73	86.50%	0	0	7.7	61.54%	6.46	0.56	0.124	30	105	0.00	(2)	0.00	
	Reducer	7.47	100.00%	0	0	0	38.46%									
		Method #1	Method #2									<b>Totals</b>	<b>1507</b>	<b>42.3</b>		<b>8.47</b>
	Transfer Efficiency	45%	100%													
	Collection Efficiency	90%	NA													
	Control Efficiency	90%	NA													

Process I.D.	Material Used	Weight Percent HAPs						PTE of HAPs in tons per year						
		EG monobutyl ether	Xylene	MIBK	Formaldehyde	Methyl Ethyl Ketone	Toluene	EG monobutyl ether	Xylene	MIBK	Formaldehyde	Methyl Ethyl Ketone	Toluene	
21/SAP	Crown Cherry Durostain					18.4%	40.9%					50	111	
22/NGR	Crown Cherry Durostain					18.4%	40.9%					50	111	
23/wash coat	Crown Cherry Durostain					18.4%	40.9%					50	111	
24/filler	#1 Walnut Wipe Stain	10.6%	17.3%					11.1	18.2					
	Reducer													
25/stain	Crown Cherry Durostain					18.4%	40.9%					50	111	
27/sealer	H.S. Catalyst Sealer		20.3%	25.4%	0.24%				22.4	28.1	0.27			
	Retarder													
29/topcoat 1	#1 Walnut Wipe Stain	10.6%	17.3%					11.1	18.2					
	Reducer													
30/topcoat-2	#1 Walnut Wipe Stain	10.6%	17.3%					11.1	18.2					
	Reducer													
<b>Total Single HAPs (tons/year)</b>								<b>33.4</b>	<b>77.0</b>	<b>28.1</b>	<b>0.27</b>	<b>198</b>	<b>442</b>	
<b>Total Combined HAPs (tons/year)</b>								<b>780</b>						

Assume all PM emissions are equal to PM10.  
 The surface coating calculations are from SSM permit no.: 037-12168-00012 issued September 28, 2000.

**METHODOLOGY**  
 PTE of VOC (tons/year) = Pounds VOC per Gallon Coating \* Max. Usage (gal/unit) \* Max. Throughput (units/hour) \* 8760 hours/year \* 1 ton/2000 lbs  
 PTE of PM/PM10 (tons/year) = Pounds Solids per Gallon Coating \* Max.Usage (gal/unit) \* Max. Throughput (units/hour) \* (1-Transfer Efficiency %) \* 8760 hours/year \* 1 ton/2000 lbs  
 Controlled PTE of PM/PM10 (tons/year) = PTE of PM/PM10 (tons/year) \* [(1- Collection Efficiency %) + (1- Control Efficiency %)]