



*Mitchell E. Daniels, Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
(800) 451-6027  
www.IN.gov/idem

TO: Interested Parties / Applicant  
DATE: April 13, 2006  
RE: Child Craft Industries, Inc / 061-17576-00013  
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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Indianapolis, Indiana 46204-2251  
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## PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Child Craft Industries, Inc.  
1010 Keller Drive  
New Salisbury, Indiana 47161**

(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.: T061-17576-00013	
Original signed by Nisha Sizemore for:  Paul Dubenetzky, Assistant Commissioner Permits Branch Office of Air Quality	Issuance Date: April 13, 2006  Expiration Date: April 13, 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 non-upholstered wood furniture manufacturing plant.

Responsible Official:	President/CEO
Source Address:	1010 Keller Drive, New Salisbury, Indiana 47161
Mailing Address:	P.O. Box 335, New Salisbury, Indiana 47161
General Source Phone Number:	(812) 206-2200
SIC Code:	2511
County Location:	Harrison
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(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) Surface coating facilities for coating wood furniture, with a combined maximum production capacity of thirty (30) finished pieces of children's furniture per hour, using HVLP or airless application methods, with dry filter for control, consisting of the following:
  - (1) One (1) surface coating line consisting of five (5) spray booths, identified as EU-1 through EU-5, constructed in 1973, and exhausting to stacks S/V-1 through S/V-10, respectively.
  - (2) One (1) surface coating line consisting of two (2) spray booths, identified as EU-6 and EU-7, constructed in 1973, and exhausting to stacks S/V-11 through S/V-14, respectively.
  - (3) One (1) spray booth identified as EU-8, constructed in 1996, and exhausting to stack S/V-15.
  - (4) Seven (7) spray booths used for patching, identified as EU-9 through EU-15, constructed in 1973, and exhausting to stacks S/V-18, S/V-22, S/V-23, S/V-24, S/V-25, S/V-26, and S/V-27, respectively.
- (b) Two (2) woodworking operations, identified as EU-19 and EU-20, constructed in 1973 and modified in 2004, with a total maximum throughput of 16,680 pounds of wood per hour, with two (2) baghouses for particulate control (BH-1 and BH-2), and exhausting to stacks S/V-20 and S/V-21, respectively.
- (c) One (1) Keeler 450 HP wood and coal-fired watertube boiler, identified as EU-18, constructed in 1976, with a maximum heat input capacity of 15.1 MMBtu per hour, with a Zurn Ash Arrestor multi-cyclone for particulate control, and exhausting to stack S/V-19.

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) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].
- (b) The following equipment related to manufacturing activities not resulting in the release of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment. [326 IAC 6-3-2]
- (c) Grinding and machining operations controlled with fabric filters, with a design grain loading of less than or equal to three one-hundredths (0.03) grains per actual cubic foot and a gas flow rate less than or equal to four thousand (4,000) actual cubic feet per minute, consisting of five (5) sanding tables, with particulate emissions controlled by a 2,900 acfm Torrit bag filter (BH-3), and exhausting inside the building. [326 IAC 6-3-2]

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, T061-17576-00013, 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)]

- (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)]

- (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 condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) 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]

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- (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, 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
  - (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]

- (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 T061-17576-00013 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)]**

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- (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]**

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- (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)]**

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- (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]

(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]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

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]

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]

- (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 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

**C.2 Opacity [326 IAC 5-1]**

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

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

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

**C.6 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.7 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.8 Performance Testing [326 IAC 3-6]**

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

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

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
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.9 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.10 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 ninety (90) 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 ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) 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 ninety (90) 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.11 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.

**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]**

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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 on December 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]**

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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]**

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- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit(s) (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]**

- (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]**

- (a) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year 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]**

- (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) If there is a reasonable possibility that a “project” (as defined in 326 IAC 2-2-1 (qq)) at an existing emissions unit, other than projects at a Clean Unit, which is not part of a “major modification” (as defined in 326 IAC 2-2-1 (ee)) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1 (rr)) the Permittee shall comply with following:
  - (1) Prior to commencing the construction of the “project” (as defined in 326 IAC 2-2-1 (qq)) at an existing emissions unit, document and maintain the following records:
    - (A) A description of the project.
    - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
    - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
      - (i) Baseline actual emissions;
      - (ii) Projected actual emissions;
      - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii); and
      - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
  - (2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
  - (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]

- (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) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
  - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx), for that regulated NSR pollutant, and
  - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
  - (1) The name, address, and telephone number of the major stationary source.
  - (2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.
  - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3).
  - (4) Any other information that the Permittee deems fit to include in this report,

Reports required in this part shall be submitted to:

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

- (h) 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)]:

- (c) One (1) Keeler 450 HP wood and coal-fired watertube boiler, identified as EU-18, constructed in 1976, with a maximum heat input capacity of 15.1 MMBtu per hour, with a Zurn Ash Arrestor multi-cyclone for particulate control, and exhausting to stack S/V-19.

(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 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

- (a) The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the 15.1 MMBtu/hr wood and coal-fired boiler (EU-18) as designated by 40 CFR 63.7490(a), except when otherwise specified in 40 CFR 63 Subpart DDDDD. The Permittee must comply with these requirements on and after September 13, 2007.
- (b) Since the applicable requirements associated with the compliance options for the affected source for the large solid fuel subcategory are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition, except as otherwise provided in this condition. The permit shield applies to Condition D.1.13, National Emissions Standards for Industrial, Commercial, and Institutional Boilers and Process Heaters - Notification Requirements.

#### D.1.2 National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters [40 CFR Part 63, Subpart DDDDD]

- (a) The 15.1 MMBtu/hr wood and coal-fired boiler (EU-18) is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, (40 CFR 63, Subpart DDDDD), as of September 13, 2004. Pursuant to this rule, the Permittee must comply with 40 CFR 63, Subpart DDDDD on and after September 13, 2007.
- (b) The following emissions units comprise the affected source for the large solid fuel subcategory: the 15.1 MMBtu/hr wood and coal-fired boiler (EU-18).
- (c) The definitions of 40 CFR 63, Subpart DDDDD at 40 CFR 63.7575 are applicable to the affected source.
- (d) Since the applicable requirements associated with the compliance options for the affected source for the large solid fuel subcategory are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition, except as otherwise provided in this condition. The permit shield applies to Condition D.1.13, National Emissions Standards for Industrial, Commercial, and Institutional Boilers and Process Heaters - Notification Requirements.

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

Pursuant to 326 IAC 6-2-3(e) (Particulate Emission Limitations for Sources of Indirect Heating) the PM emissions from the 15.1 MMBtu/hr wood and coal-fired boiler (EU-18) shall be limited to 0.6 pounds PM per MMBtu heat input.

**D.1.4 Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 7-1.1-1]**

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Pursuant to 326 IAC 7-1.1 (SO<sub>2</sub> Emissions Limitations), the SO<sub>2</sub> emissions from the 15.1 MMBtu/hr wood and coal-fired boiler (EU-18) shall not exceed six (6.0) pounds per million Btu heat input while combusting coal. Compliance shall be demonstrated on a monthly average.

**D.1.5 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 this facility and its control device.

**Compliance Determination Requirements**

**D.1.6 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 2-7-5(3)(A)] [326 IAC 2-7-6]**

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Pursuant to 326 IAC 7-2, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed six (6.0) pounds per MMBtu. Compliance shall be determined utilizing one of the following options:

- (a) Providing vendor analysis of coal delivered, if accompanied by a certification from the fuel supplier, as described under 40 CFR 60.48c(f)(3). The certification shall include:
  - (1) The name of the coal supplier; and
  - (2) The location of the coal when the sample was collected for analysis to determine the properties of the coal, specifically including whether the coal was sampled as delivered to the affected facility or whether the coal was collected from coal in storage at the mine, at a coal preparation plant, at a coal supplier's facility, or at another location. The certification shall include the name of the coal mine (and coal seam), coal storage facility, or coal preparation plant (where the sample was collected); and
  - (3) The results of the analysis of the coal from which the shipment came (or of the shipment itself) including the sulfur content, moisture content, ash content, and heat content; and
  - (4) The methods used to determine the properties of the coal; or
- (b) Sampling and analyzing the coal by using one of the following procedures:
  - (1) Minimum Coal Sampling Requirements and Analysis Methods:
    - (A) The coal sample acquisition point shall be at a location where representative samples of the total coal flow to be combusted by the facility or facilities may be obtained. A single as-bunkered or as-burned sampling station may be used to represent the coal to be combusted by multiple facilities using the same stockpile feed system;
    - (B) Coal shall be sampled at least one (1) time per day;
    - (C) Minimum sample size shall be five hundred (500) grams;
    - (D) Samples shall be composited and analyzed at the end of each calendar quarter;
    - (E) Preparation of the coal sample, heat content analysis, and sulfur content analysis shall be determined pursuant to 326 IAC 3-7-2(c), (d), (e); or
  - (2) Sample and analyze the coal pursuant to 326 IAC 3-7-3; or
- (c) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the boiler, using 40 CFR 60, Appendix A, Method 6 in accordance with the

procedures in 326 IAC 3-6, which is conducted with such frequency as to generate the amount of information required by (a) or (b) above. [326 IAC 7-2-1(b)]

A determination of noncompliance pursuant to any of the methods specified in (a), (b), or (c) above shall not be refuted by evidence of compliance pursuant to the other method.

#### D.1.7 Particulate Control

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Pursuant to 326 IAC 6-2-3(e), and in order to comply with Condition D.1.3, the Zurn Ash Arrestor multi-cyclone for particulate control shall be in operation and control emissions from the 15.1 MMBtu/hr wood and coal-fired boiler (EU-18) at all times that this boiler is burning coal.

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

#### D.1.8 Visible Emissions Notations

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- (a) Visible emission notations of the boiler (EU-18) stack exhaust (stack S/V-19) shall be performed once per day during normal daylight operations. 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 at the boiler exhaust stack (stack S/V-19), 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.1.9 Cyclone Failure

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In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). 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 Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### D.1.10 Record Keeping Requirements

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- (a) To document compliance with Condition D.1.3 and D.1.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the PM and SO<sub>2</sub> emission limits established in Condition D.1.3 and D.1.4.
  - (1) Calendar dates covered in the compliance determination period; and;
  - (2) Actual coal usage since last compliance determination period; and;
  - (3) Sulfur content, heat content, and ash content; and;
  - (4) Sulfur dioxide emission rates; and;

- (5) Vendor analysis of coal and coal supplier certification.
- (b) To document compliance with Condition D.1.8, the Permittee shall maintain records of visible emission notations of the boiler stack S/V-19 exhaust while combusting wood or coal.
- (c) To document compliance with Condition D.1.9, the Permittee shall maintain records of the inspections required under Condition D.1.9.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.12 Reporting Requirements

Pursuant to 326 IAC 7-2-1(c)(3), the Permittee shall provide reports of calendar month average sulfur content, heat content, fuel consumption and sulfur dioxide emissions rate in pounds per million Btu. These reports shall be submitted to IDEM, OAQ upon request by IDEM. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### D.1.13 National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters - Notification Requirements [40 CFR 63, Subpart DDDDD]

- (a) Pursuant to 40 CFR 63.7545, the Permittee shall submit the notifications in 40 CFR 63.7(b) and (c), 63.8(e), (f)(4), and (f)(6), and 63.9(b) through (h) that apply to the affected source for the large solid fuel subcategory and chosen compliance methods by the dates specified. These notifications include, but are not limited to, the following:
  - (1) An Initial Notification containing the information specified in 40 CFR 63.9(b)(2) not later than March 12, 2005.
  - (2) If required to conduct a performance test, a notification of intent to conduct a performance test at least 60 days before the performance test is scheduled to begin as required by 40 CFR 63.7(b)(1) and 40 CFR 63.7545(d).
  - (3) If required to conduct an initial compliance demonstration as specified in 40 CFR 63.7530(a), a Notification of Compliance Status containing the information required by 40 CFR 63.9(h)(2)(ii) in accordance with 40 CFR 62.7545(e).
    - (A) For each initial compliance demonstration, the Permittee shall submit the Notification of Compliance Status, including all performance test results and fuel analyses, before the close of business on the 60th day following the completion of the performance test and/or other initial compliance demonstrations according to 40 CFR 63.10(d)(2).
    - (B) The Notification of Compliance Status shall contain the items in 40 CFR 63.7545(e)(1) through (9), as applicable.
  - (4) If required to use a continuous monitoring system (CMS), notification of a performance evaluation, if required, as specified in 40 CFR 63.9(g), by the date of submission of the notification of intent to conduct a performance test.
- (b) The notifications required by paragraph (a) shall be submitted to:

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

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

D.1.14 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

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The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Part 70 permit for the affected source for the large solid fuel subcategory.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart DDDDD, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than nine months prior to September 13, 2007, as specified in 40 CFR 63.7495(b).
- (c) The significant permit modification application shall be submitted to:

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

## SECTION D.2

## FACILITY OPERATION CONDITIONS

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

- (a) Surface coating facilities for coating wood furniture, with a combined maximum production capacity of thirty finished pieces of children's furniture per hour, using HVLP or airless application methods, with dry filter for control, consisting of the following:
- (1) One (1) surface coating line consisting of five (5) spray booths, identified as EU-1 through EU-5, constructed in 1973, and exhausting to stacks S/V-1 through S/V-10, respectively.
  - (2) One (1) surface coating line consisting of two (2) spray booths, identified as EU-6 and EU-7, constructed in 1973, and exhausting to stacks S/V-11 through S/V-14, respectively.
  - (3) One (1) spray booth identified as EU-8, constructed in 1996, and exhausting to stack S/V-15.
  - (4) Seven (7) spray booths used for patching, identified as EU-9 through EU-15, constructed in 1973, and exhausting to stacks S/V-18, S/V-22, S/V-23, S/V-24, S/V-25, S/V-26, and S/V-27, respectively.

(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 General Provisions Relating to HAPs [326 IAC 20-14] [40 CFR 63, Subpart A]

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

#### D.2.2 Wood Furniture Manufacturing Operations NESHAP [40 CFR 63, Subpart JJ] [326 IAC 20-14-1]

- (a) The wood furniture manufacturing operations (EU-1 through EU-15) are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart JJ, incorporated by reference as 326 IAC 20-14-1, with a compliance date of December 7, 1998.
- (b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:
- (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
    - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids, as applied; or
    - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or
    - (C) Use any combination of (A) and (B).

- (2) Limit VHAP emissions from contact adhesives as follows:
  - (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pound VHAP per pound solids;
  - (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids;
- (3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids, as applied.

D.2.3 Work Practice Standards for Wood Furniture Manufacturing Operations [40 CFR 63, Subpart JJ]

The owner or operator of an affected source subject to this subpart shall maintain a written work practice implementation plan, as required by 40 CFR 63.803(a). The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

- (a) Operator training course.
- (b) Leak inspection and maintenance plan.
- (c) Cleaning and washoff solvent accounting system.
- (d) Chemical composition of cleaning and washoff solvents.
- (e) Spray booth cleaning.
- (f) Storage requirements.
- (g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
- (h) Line cleaning.
- (i) Gun cleaning.
- (j) Washoff operations.
- (k) Formulation assessment plan for finishing operations.

D.2.4 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating facilities shall be controlled by a dry particulate filter and the Permittee shall operate the control devices in accordance with manufacturer's specifications.

**D.2.5 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]**

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Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to the wood furniture by spray booth EU-8 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.2.6 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 these facilities and their control devices.

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

**D.2.7 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. Section C - Response to Excursions or Exceedances shall be followed whenever a condition exists which should result in a response step. 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. If a noticeable change in overspray emission, or evidence of overspray emission is observed at any stack exhaust, 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.

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

**D.2.8 Record Keeping Requirements**

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- (a) Pursuant to 40 CFR 63.806 and in order to document compliance with 40 CFR 63.802 and Condition D.2.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.2.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
  - (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating. [40 CFR 63.806(b)(1)]
  - (2) The VHAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used. [40 CFR 63.806(b)(2)]

- (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable spray booth coating used. [40 CFR 63.806(b)(3)]
  - (4) The VHAP content in weight percent of each thinner used. [40 CFR 63.806(c) and (d)].
  - (5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average. [40 CFR 63.806(c) and (d)].
- (b) To document compliance with 40 CFR 63.803 and Condition D.2.3, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
  - (c) To document compliance with Conditions D.2.7 and D.2.8, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.
  - (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.2.9 Reporting Requirements

Pursuant to 40 CFR 63.807, a semi-annual Continuous Compliance Report to document compliance with 40 CFR 63.802 and Condition D.2.2, and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported.

The six (6) month periods shall cover the following months:

- (a) January 1 through June 30;
- (b) July 1 through December 31.

The report shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
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

## SECTION D.3

## FACILITY OPERATION CONDITIONS

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

- (b) Two (2) woodworking operations, identified as EU-19 and EU-20, constructed in 1973 and modified in 2004, with a total maximum throughput of 16,680 pounds of wood per hour, with two (2) baghouses for particulate control (BH-1 and BH-2), and exhausting to stacks S/V-20 and S/V-21, respectively.

(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 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from:

- (a) The baghouse controlling emissions from woodworking facility EU-19 shall not exceed 11.2 pounds per hour when operating at a process weight of 8,953 pounds per hour.
- (b) The baghouse controlling emissions from woodworking facility EU-20 shall not exceed 10.1 pounds per hour when operating at a process weight of 7,727 pounds per hour.

The pounds per hour limitations were calculated with the following equation:

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

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

#### D.3.2 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 these facilities and their control devices.

### Compliance Determination Requirements

#### D.3.3 Particulate Control [40 CFR 64] [326 IAC 2-7-6(6)]

- (a) Pursuant to T061-6065-00013, issued on December 21, 1998 and 326 IAC 6-3-2, and in order to comply with Condition D.3.1, the baghouses for particulate control shall be in operation and control emissions from the woodworking operations (EU-19 and EU-20) at all times that the woodworking operations 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.3.4 Visible Emissions Notations [40 CFR 64]

- (a) Daily visible emission notations of the woodworking operations stack exhausts (S/V-20 and S/V-21) shall be performed during normal daylight operations when exhausting to the

atmosphere. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed at the woodworking operations stack exhausts (S/V-20 and S/V-21), 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.3.5 Baghouse Inspections [40 CFR 64]**

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An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation 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. All defective bags shall be replaced.

#### **D.3.6 Broken or Failed Bag Detection [40 CFR 64]**

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- (a) For a single compartment baghouse controlling emissions from a process operated continuously, failed units and the associated process shall be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (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.3.7 Record Keeping Requirements**

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- (a) To document compliance with Condition D.3.4, the Permittee shall maintain records of daily visible emission notations of the woodworking operations stack exhaust.
- (b) To document compliance with Condition D.3.5, the Permittee shall maintain records of the results of the inspections required under Condition D.3.5 and the dates the vents are redirected.
- (c) 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) The following equipment related to manufacturing activities not resulting in the release of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment. [326 IAC 6-3-2]
- (c) Grinding and machining operations controlled with fabric filters, with a design grain loading of less than or equal to three one-hundredths (0.03) grains per actual cubic foot and a gas flow rate less than or equal to four thousand (4,000) actual cubic feet per minute, consisting of five (5) sanding tables, with particulate emissions controlled by a 2,900 acfm Torrit bag filter (BH-3), and exhausting inside the building. [326 IAC 6-3-2]

(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.4.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the insignificant brazing, cutting, soldering and welding activities and the insignificant sanding tables shall not exceed E as shown in the following equation:

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

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

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

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

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Child Craft Industries, Inc.  
Source Address: 1010 Keller Drive, New Salisbury, Indiana 47161  
Mailing Address: P.O. Box 335, New Salisbury, Indiana 47161  
Part 70 Permit No.: T061-17576-00013

**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: Child Craft Industries, Inc.  
Source Address: 1010 Keller Drive, New Salisbury, Indiana 47161  
Mailing Address: P.O. Box 335, New Salisbury, Indiana 47161  
Part 70 Permit No.: T061-17576-00013

**This form consists of 2 pages**

**Page 1 of 2**

- |  |
|--|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)  |
| <input checked="" type="checkbox"/> 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                    |
| <input checked="" type="checkbox"/> 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 MANAGEMENT  
 COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
 Semi-Annual Report**

VOC and VHAP usage - Wood Furniture NESHAP

Source Name: Child Craft Industries, Inc.  
 Source Address: 1010 Keller Drive, New Salisbury, Indiana 47161  
 Mailing Address: P.O. Box 335, New Salisbury, Indiana 47161  
 Part 70 Permit No.: T061-17576-00013  
 Facility: All Surface Coating Facilities  
 Parameter: VOC and VHAPs - NESHAP  
 Limit: (1) Finishing operations - 1.0 lb VHAP/lb Solids  
 (2) Thinners used for on-site formulation of washcoats, basecoats and enamels - 3% VHAP content by weight  
 (3) All other thinner mixtures - 10% VHAP content by weight  
 (4) Foam adhesives meeting the upholstered seating flammability requirements - 1.8 lb VHAP/lb Solids  
 (5) All other contact adhesives - 1.0 lb VHAP/lb Solids  
 (6) Strippable spray booth material - 0.8 pounds VOC per pound solids

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

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

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: Child Craft Industries, Inc.  
Source Address: 1010 Keller Drive, New Salisbury, Indiana 47161  
Mailing Address: P.O. Box 335, New Salisbury, Indiana 47161  
Part 70 Permit No.: T061-17576-00013

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**

**Addendum to the Technical Support Document  
for a Part 70 (Title V) Operating Permit Renewal**

**Source Background and Description**

Source Name: Child Craft Industries, Inc.  
Source Location: 1010 Keller Drive, New Salisbury, Indiana 47161  
County: Harrison  
SIC Code: 2511  
Operation Permit No.: T061-17576-00013  
Permit Reviewer: ERG/ST

On March 9, 2005, the Office of Air Quality (OAQ) had a notice published in the Corydon Democrat, Corydon, Indiana, stating that Child Craft Industries, Inc. had applied for a Part 70 (Title V) Operating Permit Renewal to operate a stationary non-upholstered wood furniture manufacturing plant with control. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On March 15, 2005, Child Craft Industries, Inc. submitted comments on the proposed Part 70 Operating Permit. The summary of the comments is as follows:

**Comment 1:**

The phone number for the Child Craft Industries, Inc. facility has changed to 812-206-2200 and the mailing address has changed to P.O. Box 335, New Salisbury, Indiana 47161.

**Response to Comment 1:**

The mailing address and phone number have been updated throughout the permit as shown below. No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice.

**A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]**

---

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

Responsible Official:	President/CEO
Source Address:	1010 Keller Drive, New Salisbury, Indiana 47161
Mailing Address:	<del>1010 Keller Drive</del> <b>P.O. Box 335</b> , New Salisbury, Indiana 47161
General Source Phone Number:	(812) <del>738-2222</del> <b>206-2200</b>
SIC Code:	2511

...

## PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Child Craft Industries, Inc.  
Source Address: 1010 Keller Drive, New Salisbury, Indiana 47161  
Mailing Address: ~~4010 Keller Drive~~ **P.O. Box 335**, New Salisbury, Indiana 47161  
Part 70 Permit No.: T061-17576-00013

...

## PART 70 OPERATING PERMIT EMERGENCY OCCURRENCE REPORT

Source Name: Child Craft Industries, Inc.  
Source Address: 1010 Keller Drive, New Salisbury, Indiana 47161  
Mailing Address: ~~4010 Keller Drive~~ **P.O. Box 335**, New Salisbury, Indiana 47161  
Part 70 Permit No.: T061-17576-00013

...

## PART 70 OPERATING PERMIT Semi-Annual Report VOC and VHAP usage - Wood Furniture NESHP

Source Name: Child Craft Industries, Inc.  
Source Address: 1010 Keller Drive, New Salisbury, Indiana 47161  
Mailing Address: ~~4010 Keller Drive~~ **P.O. Box 335**, New Salisbury, Indiana 47161  
Part 70 Permit No.: T061-17576-00013

...

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

Source Name: Child Craft Industries, Inc.  
Source Address: 1010 Keller Drive, New Salisbury, Indiana 47161  
Mailing Address: ~~4010 Keller Drive~~ **P.O. Box 335**, New Salisbury, Indiana 47161  
Part 70 Permit No.: T061-17576-00013

Upon further review, 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 modified, if applicable, to reflect these changes.

1. IDEM's mailing address has been corrected throughout the permit:

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

2. The County Attainment Status section in the Technical Support Document is changed to document a Notice published by U.S.EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 regarding PM2.5 attainment status for Indiana Counties. Washington County is determined

to be “Attainment or Unclassifiable for PM2.5.” U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.

### County Attainment Status

The source is located in Harrison County.

Pollutant	Status
PM10	Attainment
<b>PM2.5</b>	<b>Attainment or Unclassifiable</b>
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) **Harrison County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability for the source section.**
- (ab) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Harrison County has been designated as maintenance attainment for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. **See the State Rule Applicability for the source section.**
- (bc) Harrison County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. **See the State Rule Applicability for the source section.**

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

- 3. The equipment descriptions in Sections A.3 and D.4 of the permit have been changed to more accurately describe the insignificant welding activities at this source. Sections A.3 and D.4 of the permit have been changed as follows:

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

---

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

- (a) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].

- (b) ~~Structural steel and bridge fabrication activities: using 80 tons of less or welding consumables. [326 IAC 6-3-2]~~ **The following equipment related to manufacturing activities not resulting in the release of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment. [326 IAC 6-3-2]**
- (c) Grinding and machining operations controlled with fabric filters, with a design grain loading of less than or equal to three one-hundredths (0.03) grains per actual cubic foot and a gas flow rate less than or equal to four thousand (4,000) actual cubic feet per minute, consisting of five (5) sanding tables, with particulate emissions controlled by a 2,900 acfm Torrit bag filter (BH-3), and exhausting inside the building. [326 IAC 6-3-2]
- ...

#### SECTION D.4

#### FACILITY OPERATION CONDITIONS

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

##### Insignificant Activities:

- (b) ~~Structural steel and bridge fabrication activities: using 80 tons of less or welding consumables. [326 IAC 6-3-2]~~ **The following equipment related to manufacturing activities not resulting in the release of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment. [326 IAC 6-3-2]**
- (c) Grinding and machining operations controlled with fabric filters, with a design grain loading of less than or equal to three one-hundredths (0.03) grains per actual cubic foot and a gas flow rate less than or equal to four thousand (4,000) actual cubic feet per minute, consisting of five (5) sanding tables, with particulate emissions controlled by a 2,900 acfm Torrit bag filter (BH-3), and exhausting inside the building. [326 IAC 6-3-2]

(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.4.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the insignificant ~~structural steel and bridge fabrication~~ **brazing, cutting, soldering and welding** activities and the insignificant sanding tables shall not exceed E as shown in the following equation:

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

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

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

4. IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request, records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. Therefore, IDEM has deleted paragraph (b) of Section B – Preventive Maintenance, and has amended the Section B – Emergency Provisions condition as follows:

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]

---

...

- ~~(b)~~ The Permittee shall implement the PMPs, including any required record keeping as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- ~~(e)~~**(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 does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- ~~(d)~~**(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]

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...

- (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

...

- (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.**

...

5. For clarification purposes, Condition B.20 has been revised as follow:

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

---

(a) ...

- (3) The changes do not result in emissions which exceed the ~~emissions allowable under~~ **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, P. O. Box 6045  
Indianapolis, Indiana ~~46206-6045~~ **46204-2251**

and  
...

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

...

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade **emissions** increases and decreases ~~in emissions in~~ 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).

6. The 326 IAC 6-3 revisions that became effective on June 12, 2002 were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP; therefore, the requirements of the previous version of 326 IAC 6-3-2 are no longer applicable to this source. Condition C.1 has been revised to remove (a) which contained these requirements, and Condition D.2.4 which contained these requirements has been removed and the remaining conditions re-numbered accordingly.

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour ~~[40 CFR 52 Subpart P]~~ [326 IAC 6-3-2]

~~(a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.~~

~~(b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.~~

...

~~D.2.4 Particulate Matter (PM) [40 CFR 52 Subpart P]~~

~~Pursuant to 40 CFR 52 Subpart P, the PM from surface coating facilities EU 1 through EU 15 shall each not exceed the pound per hour emission rate established as E in the following formula:~~

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

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

7. IDEM has deleted Condition C.6 - Operation of Equipment because the requirements in this condition are already included in Conditions D.1.7, D.2.4, D.2.5, and D.3.3. Conditions in Section C have been re-numbered and the Table of Contents updated accordingly.

~~C.6 Operation of Equipment [326 IAC 2-7-6(6)]~~

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

8. IDEM has reconsidered the requirement to develop and follow a Compliance Response Plan. The Permittee will still be required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. Replacing the requirement to develop and follow a Compliance Response Plan with a requirement to take reasonable response steps will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated. The Section D conditions that refer to the Compliance Response Plan have been revised to reflect the new condition title. The following changes have been made to the Condition C.14 (formerly C.15):

**C.1415 Compliance Response Plan – Preparation, Implementation, Records, and Reports Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]**

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- ~~(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:~~
- ~~(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.~~
  - ~~(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (c) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.~~
- ~~(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:~~
- ~~(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or~~
  - ~~(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.~~
  - ~~(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.~~
  - ~~(4) Failure to take reasonable response steps shall be considered a deviation from the permit.~~
- ~~(c) The Permittee is not required to take any further response steps for any of the following reasons:~~

- ~~(1) — A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.~~
- ~~(2) — The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.~~
- ~~(3) — An automatic measurement was taken when the process was not operating.~~
- ~~(4) — The process has already returned or is returning to operating within “normal” parameters and no response steps are required.~~
- ~~(d) — When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B Deviations from Permit Requirements and Conditions.~~
- ~~(e) — The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.~~
- ~~(f) — Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.~~
- (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.**

#### D.1.8 Visible Emissions Notations

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...

- (e) **If abnormal emissions are observed at the boiler exhaust stack (stack S/V-19), the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances.** ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances**, shall be considered a deviation from this permit.

#### D.1.409 Cyclone Failure

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In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances** shall be considered a deviation from this permit.

#### D.2.87 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. ~~The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step.~~ **Section C - Response to Excursions or Exceedances shall be followed whenever a condition exists which should result in a response step.** Failure to take response steps in accordance with Section C - ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~ **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. ~~The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step.~~ **If a noticeable change in overspray emission, or evidence of overspray emission is observed at any stack**

**exhaust, 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 - ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances**, shall be considered a deviation from this permit.

#### D.3.4 Visible Emissions Notations [40 CFR 64]

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- ...
- (e) **If abnormal emissions are observed at the woodworking operations stack exhausts (S/V-20 and S/V-21), the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances.** ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.~~ Failure to take response steps in accordance with Section C - ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances**, shall be considered a deviation from this permit.

9. IDEM has determined that once per day monitoring of visible emissions is generally sufficient to ensure proper operation of the control device. IDEM has also determined that monitoring these parameters once per day is sufficient to satisfy the requirements of the Part 70 rules at 326 IAC 2-7-5 and 326 IAC 2-7-6. Condition D.1.8 has been revised as follows:

#### D.1.8 Visible Emissions Notations

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- (a) Visible emission notations of the boiler (EU-18) stack exhaust (stack S/V-19) shall be performed once per ~~shift~~ **day** during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

...

10. Paragraph (a) of the Broken or Failed Baghouse condition has been deleted. For multi-compartment baghouses, the permit will not specify what actions the Permittee needs to take in response to a broken bag. However, a requirement has been added to Condition D.3.3 requiring the Permittee to notify IDEM if a broken bag is detected and the control device will not be repaired for more than ten (10) days. This notification allows IDEM to take any appropriate actions if the emission unit will continue to operate for a long period of time while the control device is not operating in optimum condition.

Paragraph (b) of the Broken or Failed Baghouse condition has been revised for those processes that operate in batch mode. The condition required an emission unit to be shut down immediately in case of baghouse failure. However, IDEM is aware there can be safety issues with shutting down a process in the middle of a batch. IDEM also realizes that in some situations, shutting down an emissions unit mid-process can cause equipment damage. Therefore, since it is not always possible to shut down a process with material remaining in the equipment, IDEM has revised the condition to state that in the case of baghouse failure, the feed to the process must be shut off immediately, and the process shall be shut down as soon as practicable. The following changes have been made to Section D.3:

#### D.3.3 Particulate Control [40 CFR 64] **[326 IAC 2-7-6(6)]**

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- (a) Pursuant to T061-6065-00013, issued on December 21, 1998 and 326 IAC 6-3-2, and in order to comply with Condition D.3.1, the baghouses for particulate control shall be in operation and control emissions from the woodworking operations (EU-19 and EU-20) at all times that the woodworking operations 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.**

...

#### D.3.6 Broken or Failed Bag Detection [40 CFR 64]

~~In the event that bag failure has been observed:~~

- ~~(a) For multi-compartment units, the affected baghouse compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 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.~~
- (a) For a single compartment baghouses controlling emissions from a process operated continuously, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will shall be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**
- (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.**

11. IDEM has determined that it is the Permittee's responsibility to include routine control device inspection requirements in the applicable preventive maintenance plan. Since the Permittee is in the best position to determine the appropriate frequency of control device inspections and the details regarding which components of the control device should be inspected, the conditions requiring control device inspections have been removed from the permit. In addition, the requirement to keep records of the inspections has been removed.

~~D.1.9 Cyclone Inspections~~

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~~An inspection shall be performed each calendar quarter of all cyclones controlling the boiler. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. The inspections required under this condition shall not be performed in consecutive months.~~

~~D.1.11 Record Keeping Requirements~~

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~~...~~

~~(d) To document compliance with Condition D.1.5, the Permittee shall maintain records of any additional inspections and preventive measures that are performed as prescribed in the Preventive Maintenance Plan.~~

~~D.2.8 Monitoring~~

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~~...~~

~~(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

~~D.2.9 Record Keeping Requirements~~

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~~...~~

~~(c) To document compliance with Conditions D.2.7 and D.2.8, the Permittee shall maintain a log of weekly overspray observations, **and** daily and monthly inspections. ~~and these additional inspections prescribed by the Preventive Maintenance Plan.~~~~

~~D.3.7 Record Keeping Requirements~~

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~~...~~

~~(c) To document compliance with Condition D.3.2, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.~~

**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:	Child Craft Industries, Inc.
Source Location:	1010 Keller Drive, New Salisbury, Indiana 47161
County:	Harrison
SIC Code:	2511
Operation Permit No.:	061-6065-00013
Operation Permit Issuance Date:	December 21, 1998
Permit Renewal No.:	061-17576-00013
Permit Reviewer:	ERG/ST

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

**History**

Keller Manufacturing Industries, Inc. has been operating a furniture manufacturing facility at this site in New Salisbury, Indiana, since 1973. On March 7, 2003, Keller Manufacturing Industries applied for a renewal of their Title V permit. In October 2004, the Keller Manufacturing Industries, Inc. facilities in New Salisbury were purchased by Child Craft Industries, Inc.

**Permitted Emission Units and Pollution Control Equipment**

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

- (a) Surface coating facilities for coating wood furniture, with a combined maximum production capacity of thirty (30) finished pieces of children's furniture per hour, using HVLP or airless application methods, with dry filter for control, consisting of the following:
  - (1) One (1) surface coating line consisting of five (5) spray booths, identified as EU-1 through EU-5, constructed in 1973, and exhausting to stacks S/V-1 through S/V-10, respectively.
  - (2) One (1) surface coating line consisting of two (2) spray booths, identified as EU-6 and EU-7, constructed in 1973, and exhausting to stacks S/V-11 through S/V-14, respectively.
  - (3) One (1) spray booth identified as EU-8, constructed in 1996, and exhausting to stack S/V-15.
  - (4) Seven (7) spray booths used for patching, identified as EU-9 through EU-15, constructed in 1973, and exhausting to stacks S/V-18, S/V-22, S/V-23, S/V-24, S/V-25, S/V-26, and S/V-27, respectively.
- (b) Two (2) woodworking operations, identified as EU-19 and EU-20, constructed in 1973 and modified in 2004, with a total maximum throughput of 16,680 pounds of wood per hour, with two (2) baghouses for particulate control (BH-1 and BH-2), and exhausting to stacks S/V-20 and S/V-21, respectively.

- (c) One (1) Keeler 450 HP wood and coal-fired watertube boiler\*, identified as EU-18, constructed in 1976, with a maximum heat input capacity of 15.1 MMBtu per hour, with a Zurn Ash Arrestor multi-cyclone for particulate control, and exhausting to stack S/V-19.

\*Note: The wood-fired boiler at this source is rated at 450 (boiler) horsepower. The proper conversion factor from AP-42 was used to convert boiler horsepower to MMBtu/hr (see AP-42, Appendix A, Page A-13). The result of this conversion was an actual heat input capacity rating of 15.1 MMBtu/hr and not 35.8 MMBtu/hr, as was listed in operating permit T061-6065-00013.

### **Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted emission units operating at this source during this review process.

### **Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].
- (b) Structural steel and bridge fabrication activities using 80 tons or less of welding consumables. [326 IAC 6-3-2]
- (c) Grinding and machining operations controlled with fabric filters, with a design grain loading of less than or equal to three one-hundredths (0.03) grains per actual cubic foot and a gas flow rate less than or equal to four thousand (4,000) actual cubic feet per minute, consisting of five (5) sanding tables, with particulate emissions controlled by a 2,900 acfm Torrit bag filter (BH-3), and exhausting inside the building. [326 IAC 6-3-2]
- (d) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour.
- (e) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, and having a storage capacity less than or equal to 10,500 gallons.
- (f) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (g) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (h) Closed loop heating and cooling systems.
- (i) Noncontact, forced and induced, draft cooling tower system not regulated under a NESHAP.
- (j) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (k) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (l) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (m) Stationary fire pumps.

- (n) Other activities not previously identified, consisting of two (2) stripping tanks, identified as Skin Tanks, using acetone as solvent, and exhausting to stacks S/V-16 and S/V-17.

### Existing Approvals

The source has been operating under Operating Permit T061-6065-00013, issued on December 21, 1998, and the following approvals:

- (a) Reopening 061-13310-00013, issued on January 3, 2002; and
- (b) Administrative Amendment 061-19931-0013, issued on January 28, 2005.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous permits are superseded by this permit.

The following terms and conditions from previous approvals have been revised in this Part 70 permit:

- (a) Condition D.3.8 (Reporting Requirement) from T061-6065-00013, issued on December 21, 1998, required quarterly reporting for the wood/coal boiler (EU-18) to document compliance with 326 IAC 7-1.1.

Revised condition: "The Permittee shall provide reports of calendar month average sulfur content, heat content, fuel consumption and sulfur dioxide emissions rate in pounds per million Btu. These reports shall be submitted to IDEM, OAQ upon request by IDEM."

Reason Revised: This source has a total coal fired heat input capacity of less than 100 MMBtu per hour. Pursuant to 326 IAC 7-2-1(c)(3), the Permittee "is only required to submit reports of calendar month average sulfur content, heat content, fuel consumption and sulfur dioxide emissions rate in pounds per million Btu upon request."

- (b) Sections A.1 and D.3 from T061-6065-00013 incorrectly list the wood/coal boiler as a 35.8 MMBtu per hour boiler. The boiler's maximum heat input capacity is 15.1 MMBtu per hour, based on the horsepower rating of the boiler. The particulate emission limit under 326 IAC 6-2 remains unchanged at 0.6 lbs particulate per MMBtu heat capacity.
- (c) Condition 4 of Administrative Amendment 061-19931-00013, issued on January 28, 2004, incorrectly required triennial emission reporting for this source. The PTE for VOC for the entire source is greater than 250 tons per year. Pursuant to 326 IAC 2-6-3(a)(I)(E), this source must report emissions annually.

### 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 March 7, 2003. Additional information was received on January 12, 2005 and February 7, 2005.

There was no notice of completeness letter mailed to the Permittee.

### Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 3) from the boiler and woodworking. Calculations for PTE of VOC and HAP from the surface coating facilities are not required for determining applicability of federal and state rules, as the source claims to be a major source for VOC and HAP.

### 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.

Process/emission unit	Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Surface Coating Booths (EU-1 through EU-4, EU-6 through EU-17, S-1)	(a)	(a)	--	Greater than 250	--	--	Greater than 10 for a single HAP, greater than 25 for a combination of HAPs.
Woodworking Operations (EU-19, EU-20)	93	93	--	--	--	--	--
Wood/Coal Boiler (EU-18)	39.6	34.1	268	1.1	39.6	32.3	3.93
Insignificant Activities	11.3	11.3	--	--	--	--	--
<b>Total PTE</b>	<b>144</b>	<b>138</b>	<b>268</b>	<b>Greater than 250</b>	<b>39.6</b>	<b>32.3</b>	<b>Greater than 10 for a single HAP, greater than 25 for a combination of HAPs.</b>

“--“ Emissions are negligible (less than 0.1 tons per year).

(a) Particulate emissions from the surface coating operations are limited by 326 IAC 6-3.

PTE for PM10, SO<sub>2</sub>, VOC, CO, NO<sub>x</sub> and HAPs for wood/coal boiler represents worst case emissions using either fuel.

PTE for PM for wood/coal boiler represents allowable emissions under 326 IAC 6-2-3(e).

PTE for woodworking operations represents allowable emissions under 326 IAC 6-3-2.

PTE for surface coating operations is from TSD for T061-6065-00013, issued on December 21, 1998.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM10, SO<sub>2</sub> and VOC are 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 and since there are no applicable New Source Performance Standards

that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.

### Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2001 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	Not reported
PM10	13
SO <sub>2</sub>	0
VOC	51
CO	8
NO <sub>x</sub>	1
HAP	Not reported

### County Attainment Status

The source is located in Harrison County.

Pollutant	Status
PM-10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) 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. Harrison County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions NO<sub>x</sub> were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Harrison 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.

### 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) The woodworking operations (EU-19 and EU-20) at this source are subject to the requirements of 40 CFR 64 Compliance Assurance Monitoring (CAM). In order for this rule to apply, a pollutant-specific-emissions-unit at a source that requires a Part 70 or Part 71 permit must meet three criteria for a given pollutant: 1) the unit is subject to an applicable emission limitation or standard for the applicable regulated air pollutant, 2) the unit uses a control device to achieve compliance with any such emission limitation or standard, and 3) the unit has the uncontrolled potential to emit, of the applicable regulated air pollutant, equal or greater than 100 percent of the amount required for a source to be classified as a major source. The woodworking operations (EU-19 and EU-20) are subject to an emission standard for particulate emissions, use a control device to comply with that emission limitation and have an uncontrolled PTE for particulate emissions greater than 100 percent of the amount required for a source to be classified as a major source. The Permittee has submitted a CAM plan as part of the Part 70 permit renewal application. Monitoring of the pollutant-specific emission unit will be conducted pursuant to 40 CFR 64.

The CAM plan for the woodworking operations is as follows:

- (1) Daily visible emission notations of the woodworking operations stack exhausts (S/V-20 through S/V-21) shall be performed 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. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (2) An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation 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.
- (3) All defective bags shall be replaced. In the event that bag failure has been observed, A) for multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. If operations continue after bag failure is observed and it will be 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, B) for single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is

determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

- (b) The requirements of the New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units, 326 IAC 12, (40 CFR 60.40c, Subpart Dc) is not included in this permit for the 15.1 MMBtu/hr wood/coal fired boiler (EU-18). The 15.1 MMBtu/hr wood/coal fired boiler was constructed prior to June 9, 1989.
- (c) The wood furniture coating operations at this source are subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 20-14, (40 CFR Part 63, Subpart JJ), because Keller Manufacturing Company, Inc. manufactures wood furniture and is a major source of HAPs.

Pursuant to 40 CFR 63.800, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:

- (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
  - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids, as applied; or
  - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or
  - (C) Use any combination of (A) and (B).
- (2) Limit VHAP emissions from contact adhesives as follows:
  - (A) Use compliant contact adhesives as follows:
    - (i) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pound VHAP per pound solids;
    - (ii) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids;
- (3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.
- (4) Pursuant to 40 CFR 63.803, the Permittee of an affected source subject to this subpart shall maintain a written work practice implementation plan. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:
  - (A) Operator training course.
  - (B) Leak inspection and maintenance plan.

- (C) Cleaning and washoff solvent accounting system.
- (D) Chemical composition of cleaning and washoff solvents.
- (E) Spray booth cleaning.
- (F) Storage requirements.
- (G) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
- (H) Line cleaning.
- (I) Gun cleaning.
- (J) Washoff operations.
- (K) Formulation assessment plan for finishing operations.

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart JJ.

- (d) The 15.1 MMBtu/hr wood/coal fired boiler (EU-18) is subject to the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD. The 15.1 MMBtu/hr wood/coal fired boiler (EU-18) comprises one existing affected source for the large solid fuel subcategory, as defined by 40 CFR 63.7506(b), because it meets the criteria in the definition in 40 CFR 63.7575 for the large solid fuel subcategory. The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the 15.1 MMBtu/hr wood/coal fired boiler (EU-18) after September 13, 2004, except when otherwise specified in 40 CFR 63 Subpart DDDDD.

This rule has a future compliance date; therefore, the specific details of the rule and how the Permittee will demonstrate compliance for the 15.1 MMBtu/hr wood/coal fired boiler (EU-18) for the large solid fuel subcategory are not provided in the permit. The Permittee shall submit an application for a significant permit modification nine months prior to September 13, 2007 that will specify the option or options for the emission limitations and standards and methods for determining compliance chosen by the Permittee. At that time, IDEM, OAQ will include the specific details of the rule and how the Permittee will demonstrate compliance. In addition, pursuant to 40 CFR 63, Subpart DDDDD, the Permittee shall submit:

- (1) An Initial Notification containing the information specified in 40 CFR 63.9(b)(2) not later than 120 days after September 13, 2004, as required by 40 CFR 63.7545(b).
- (2) If required to conduct a performance test, a notification of intent to conduct a performance test at least 60 days before the performance test is scheduled to begin as required by 40 CFR 63.7(b)(1) and 40 CFR 63.7545(d).
- (3) If required to conduct an initial compliance demonstration as specified in 40 CFR 63.7530(a), a Notification of Compliance Status containing the information required by 40 CFR 63.9(h)(2)(ii) in accordance with 40 CFR 63.7545(e).
  - (A) For each initial compliance demonstration, the Permittee shall submit the Notification of Compliance Status, including all performance test results and fuel analyses, before the close of business on the 60th day following the completion of the performance test and/or other initial compliance demonstrations according to 40 CFR 63.10(d)(2).
  - (B) The Notification of Compliance Status shall contain the items in 40 CFR 63.7545(e)(1) through (9), as applicable.
- (4) If required to use a continuous monitoring system (CMS), notification of a performance evaluation, if required, as specified in 40 CFR 63.9(g), by the date of submission of the notification of intent to conduct a performance test.

- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR 63, Subpart ZZZZ, are not included in this permit for the insignificant internal combustion engines at this source. The insignificant internal combustion engines at this source are existing stationary RICE with a site-rating of less than 500 brake horsepower. Pursuant to 40 CFR 63.6590(a), there are no applicable requirements from 40 CFR 63, Subpart ZZZZ and 40 CFR 63, Subpart A for existing stationary RICE with a site-rating of less than 500 brake horsepower.

### **State Rule Applicability – Entire Source**

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

This source is not in 1 of the 28 source categories and there are no applicable New Source Performance Standards that were in effect on August 7, 1980, therefore, fugitive emissions are not counted towards applicability of PSD.

The surface coating facilities (EU-1 through EU-4 and EU-6 through EU-17), woodworking operations (EU-19 and EU-20) were constructed in 1973 and the Keeler wood-fired boiler was constructed in 1976. Upon the promulgation of PSD rules, the source was a PSD major source for PM, PM10, VOC and SO<sub>2</sub>.

In 1996, the source added surface coating booth S-1. This modification did not trigger PSD review because the increase in PTE for PM/PM10 and VOC due to this modification was less than the PSD significant levels. At the time of construction, the booth was required to control particulate emissions with a dry filter.

Upon issuance of the initial Title V permit T061-6065-00013 on December 21, 1998 the potential to emit for VOC and SO<sub>2</sub>, after limits and controls, were greater than 250 tons per year; therefore the source was a PSD major source.

In 2004, the woodworking operations were modified and the existing baghouses were replaced with two new (2) baghouses having an air flow rate of 61,000 acfm and an outlet grain loading of 0.005 gr/cubic foot. This modification did not trigger PSD review because the PTE for PM and PM10 decreased as a result of this change.

The source is a major source under PSD.

#### **326 IAC 2-4.1 (Hazardous Air Pollutants)**

The surface coating facilities (EU-1 through EU-15) are not subject to the requirements of 326 IAC 2-4.1 because these facilities were constructed prior to July 27, 1997. Also, the surface coating facilities at this source are not subject to the requirements of 326 IAC 2-4.1 because pursuant to 326 IAC 2-4.1(b)(2), facilities subject to the requirements of 40 CFR Part 63, Subpart JJ are exempt from the requirements of 326 IAC 2-4.1.

This source has not added any major sources of HAPs after July 27, 1997.

#### **326 IAC 2-6 (Emission Reporting)**

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). The source also has potential to emit greater than or equal to 250 tons per year of VOC. Therefore, an emission statement covering the previous calendar year must be submitted by July 1 annually. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

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

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

326 IAC 6-4 (Fugitive Dust)

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).

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

The source is not subject to the requirements of 326 IAC 6-5 because it does not contain any facilities with the potential to emit 25 tons per year of fugitive particulate matter.

326 IAC 8-6 (Organic Solvent Emission Limitations)

The source is not subject to the requirements of 326 IAC 8-6 because it was constructed prior to October 7, 1974 and is not located in Lake or Marion counties.

**State Rule Applicability - Surface Coating Facilities**

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

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

Pursuant to T061-6065-00013, issued on December 21, 1998 and 40 CFR 52 Subpart P, the particulate emissions from the surface coating operations (EU-1 through EU-15) shall be limited by the following:

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

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

Under the rule revision, particulate emissions 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 8-1-6 (Volatile Organic Compounds Limitations - BACT)

- (a) The surface coating facilities (EU-1 through EU-7 and EU-9 through EU-15) are not subject to the requirements of 326 IAC 8-1-6 (Volatile Organic Compounds Limitations - BACT) because they were constructed prior to January 1, 1980.
- (b) Surface coating facility EU-8 is not subject to the requirements of 326 IAC 8-1-6 (Volatile Organic Compounds Limitations - BACT) even though it was constructed after January 1, 1980 because it is subject to the requirements of 326 IAC 8-2-12.

326 IAC 8-2-12 (Volatile Organic Compounds (VOC))

- (a) The surface coating facilities (EU-1 through EU-7 and EU-9 through EU-15) are not subject to the requirements of 326 IAC 8-2-12 because they were constructed prior to July 1, 1990 and are located in Harrison County.

- (b) The spray booth EU-8 is subject to the requirements of 326 IAC 8-2-12 because it was constructed after July 1, 1990, has actual VOC emissions greater than 15 pounds per day and applies surface coatings to wood furniture.

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to the wood furniture in spray booth EU-8 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.

Spray booths EU-1 through EU-15 use HVLP or airless application methods.

### State Rule Applicability - Woodworking Facilities

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from:

- (a) the baghouse controlling emissions from woodworking facility EU-19 shall not exceed 11.2 pounds per hour when operating at a process weight of 8,953 pounds per hour.
- (b) the baghouse controlling emissions from woodworking facility EU-20 shall not exceed 10.1 pounds per hour when operating at a process weight of 7,727 pounds per hour.

The pound per hour limitations were calculated using the following equation:

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

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

The baghouses controlling emissions from the woodworking equipment shall be in operation at all times the woodworking facilities are in operation.

### State Rule Applicability - Keeler 15.1 MMBtu/hr Wood and Coal Fired Boiler

326 IAC 6-2-3 (Particulate Matter- Sources of Indirect Heating)

The Keeler 15.1 MMBtu/hr wood/coal fired boiler (EU-18) is subject to the requirements of 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating) because it is a source of indirect heating and it was constructed prior to September 21, 1983. Pursuant to this rule, the particulate matter (PM) emissions from the boiler shall not exceed the pound per million Btu limit calculated using the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}} = \frac{50 \times .67 \times 50}{76.5 \times 15.1^{0.75} \times 1^{0.25}} = 2.86\text{lbs PM/MMBtu}$$

Where:

C = 50 u/m<sup>3</sup>

Pt = pounds of particulate matter emitted per million Btu heat input (lb/MMBtu)

Q = total source maximum operating capacity rating (Q = 15.1 MMBtu/hr)

N = number of stacks (N = 1)

a = plume rise factor (a = 0.67)

h = stack height in feet (h = 50)

However, pursuant to 326 IAC 6-2-3(e), particulate emissions from any facility used for indirect heating and which began operation after June 8, 1972 shall in no case exceed 0.6 pounds per MMBtu heat input. The potential to emit PM from the boiler before controls is 2.6 pounds per MMBtu when burning coal and 0.32 pounds per MMBtu when burning wood. The potential to emit PM from the boiler after controls is 0.31 pounds per MMBtu when burning coal and 0.04 pounds per MMBtu when burning wood. Therefore, the Zurn Ash Arrestor multi-cyclone shall be in operation at all times that coal is being burned in order to comply with the requirements of 326 IAC 6-2-3.

#### 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The Keeler 15.1 MMBtu/hr wood/coal fired boiler (EU-18) is subject to the requirements of 326 IAC 7-1.1 because it has the potential to emit greater than 25 tons per year of SO<sub>2</sub> when combusting coal. Pursuant to 326 IAC 7-1.1-2(a)(1) sulfur dioxide emissions from facility EU-18 shall be limited to six and zero tenths (6.0) pounds per million Btu (MMBtu), when combusting coal. The potential to emit SO<sub>2</sub> when burning coal of 4.35 percent average sulfur content at maximum rated heat input capacity is less than the allowable SO<sub>2</sub> emission rate of 6.0 pounds per million Btu (equivalent to 90.3 pounds SO<sub>2</sub> per hour), the facility is in compliance with 326 IAC 7-1.1 if the average sulfur content of the coal burned is less than 4.35 percent sulfur.

#### State Rule Applicability – Insignificant Activities

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the insignificant structural steel and bridge fabrication activities and the insignificant sanding tables shall not exceed E as shown in the following equation:

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

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

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

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

#### Testing Requirements

- (a) The woodworking operations at this source (EU-19 and EU-20) do not have a testing requirement. The woodworking operations are required by Conditions in the Permit to use baghouses 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 sources. These monitoring requirements should be sufficient to ensure compliance with the particulate matter emission limitations specified in the Permit.
- (b) The wood/coal fired boiler at this source (EU-18) does not have a testing requirement for PM, PM10 or SO<sub>2</sub>. The wood/coal fired boiler does not have a testing requirement for PM or PM10 because this emission unit accounts for a small portion of the total potential to emit for PM or PM10 from the source before controls. The wood/coal fired boiler is required by Conditions in the Permit to use a multi-cyclone to control PM and PM10 emissions. Visible emission notations, quarterly inspection, and cyclone failure requirements are included in the permit. These monitoring requirements should be

sufficient to ensure compliance with the particulate matter emission limitations specified in the Permit. The wood/coal fired boiler does not have a testing requirement for SO<sub>2</sub> because this permit contains conditions requiring that the Permittee demonstrate compliance with the sulfur dioxide emission limitations using the sulfur content of the coal burned.

- (c) The surface coating operations (EU-1 through EU-15) 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 accounts 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 facilities 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 surface coating operations are subject to the requirements of 40 CFR Part 63, Subpart JJ but are not required to test under this regulation.
- (d) 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 6-3-2, 326 IAC 2-7 (Part 70) and 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 (EU-19 and EU-20) have applicable compliance monitoring conditions as specified below:
  - (a) Daily visible emission notations of the woodworking operations stack exhaust shall be performed 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. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

- (b) An inspection shall be performed each calendar quarter of all bags controlling the woodworking operations. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.
- (c) In the event that bag failure has been observed:
  - (1) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit. If operations continue after bag failure is observed and it will be 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.
  - (2) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the baghouses for the woodworking operations must operate properly to ensure compliance with 326 IAC 5-1, 326 IAC 6-3-2 and 326 IAC 2-7 (Part 70).

- 2. The wood/coal boiler (EU-18) has applicable compliance monitoring conditions as specified below:
  - (a) Visible emission notations of the wood/coal boiler stack exhaust (stack 19) shall be performed once per shift 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. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation,

Implementation, Records, and Reports, shall be considered a deviation from this permit.

- (b) An inspection shall be performed each calendar quarter of the multi-cyclone controlling the wood/coal boiler. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter.
- (c) In the event that cyclone failure has been observed, the failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the multi-cyclone for the wood/coal boiler must operate properly to ensure compliance with 326 IAC 5-1, 326 IAC 6-3-2 and 326 IAC 2-7 (Part 70).

- 3. The surface coating operations (EU-1 through EU-15) have applicable compliance monitoring conditions as specified below:
  - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, 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. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
  - (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for the surface coating operations must operate properly to ensure compliance with 326 IAC 5-1, 326 IAC 6-3-2, 40 CFR 52 Subpart P, and 326 IAC 2-7 (Part 70).

## Conclusion

The operation of this stationary non-upholstered wood furniture manufacturing plant shall be subject to the conditions of this Part 70 permit T061-17576-00013.

**Appendix A: Emission Calculations  
Combustion Emissions - Coal-Fired Boiler (EU-18)**

**Company Name: Child Craft Industries, Inc.  
Address: 1010 Keller Drive, New Salisbury, Indiana 47161  
Title V: T061-17576-00013  
Reviewer: ERG/ST  
Date: February 4, 2004**

Horsepower (boiler)	Max. Potential Throughput of Coal (tons/year)	Heat Input Capacity (MMBtu/hr)	S = Weight % Sulfur
450	5,170	15.1	2.96

Pollutant Emission Factors							
PM <sup>a</sup>	PM10 <sup>a</sup>	SO <sub>2</sub> <sup>a</sup>	NO <sub>x</sub> <sup>a</sup>	CO <sup>a</sup>	VOC <sup>a</sup> (NMOC)	HAP <sup>b</sup> (metals)	HAP <sup>b</sup> (other)
66.0	13.2	104	11.0	5.00	0.05	0.0062	1.36
(lbs/ton)	(lbs/ton)	38(S) (lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/ton)	(lbs/MMBtu)	(lbs/ton)

	Potential To Emit (tons/yr)							
	PM	PM10	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOC (NMOC)	HAP (metals)	HAP (other)
PTE Before Controls (tons/yr)	171	34.1	268	28.4	12.9	0.13	0.41	3.52
PTE After Controls (tons/yr)	20.5	4.09	268	28.4	12.9	0.13	0.41	3.52

1 lb of bituminous coal has a Btu rating of 12,750 Btu.

The conversion factor used to convert horsepower (boiler) to Btu/hour is taken from AP-42, Appendix A, Page A-13. Horsepower (boiler) x 3.3446 x 10<sup>-4</sup> = Btu/hr.

<sup>a</sup> Emission factors are from AP-42, Chapter 1.1 - Bituminous and Subbituminous Coal Combustion, Tables 1.1-3, 1.1-4, 1.1-19. Spreader Stoker, Bituminous (SCC 1-01-002-04, 1-02-002-04, 1-03-002-09) (AP-42, 9/98).

<sup>b</sup> Emission Factors are from AP-42, Chapter 1.1 - Bituminous and Subbituminous Coal Combustion, Tables 1.1-13, 1.1-14, 1.1-15, 1.1-17. (SCC 1-01-002-04, 1-02-002-04, 1-03-002-09) (AP-42, 9/98).

HAPs (metal) include arsenic, chromium, lead, manganese, mercury and nickel in trace amounts.

HAPs (other) include hydrogen chloride and hydrogen fluoride in significant amounts and acetaldehyde, acrolien, benzene, benzyl chloride, formaldehyde, isophrone, methyl chloride, propionaldehyde, toluene in trace amounts.

The coal fired boiler (EU-18) is controlled by a cyclone with 88% collection/control efficiency.

**Methodology**

Heat Input Capacity (MMBtu/hr) = Horsepower x 33,446 x 1/1,000,000 (MMBtu/Btu)

Max. Potential Throughput (tons coal/year) = Horsepower x 33,446 (Btu/hr/Hp) x 8760 (hr/year) x (1 lb coal/12,750 Btu) x 1/2000 (ton/lbs)

PTE for PM / PM10 / SO<sub>2</sub> / NO<sub>x</sub> / CO / VOC / HAP (other) (tons/yr) = Max. Potential Throughput (tons/yr) x Emission Factor (lb/ton) x 1/2000 (ton/lbs)

PTE for HAP (metals) (tons/yr) = Heat Input Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8760 (hr/yr) x 1/2000 (ton/lbs)

**Appendix A: Emission Calculations  
Combustion Emissions - Wood-Fired Boiler (EU-18)**

**Company Name:** Child Craft Industries, Inc.  
**Address:** 1010 Keller Drive, New Salisbury, Indiana 47161  
**Title V:** T061-17576-00013  
**Reviewer:** ERG/ST  
**Date:** February 4, 2004

<b>Horsepower (boiler)</b>
450

<b>Heat Input Capacity (MMBtu/hr)</b>
15.1

	Pollutant							
	PM *	PM10 *	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOC	HAP (metals)	HAP (other)
Emission Factor (lbs/MMBtu)	0.32	0.29	0.025	0.49	0.60	0.017	0.002	0.037
PTE Before Controls (tons/yr)	20.9	18.9	1.65	32.3	39.6	1.1	0.12	2.41
PTE After Controls** (tons/yr)	2.51	2.27	1.65	32.3	39.6	1.1	0.12	2.41

Dry wood has a heat value of 8,000 Btu / lb.

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

The conversion factor used to convert horsepower (boiler) to Btu/hour is taken from AP-42, Appendix A, Page A-13. Horsepower (boiler) x 3.3446 x 10<sup>4</sup> = Btu/hr.

\*\* The control efficiency of the cyclone controlling particulate emissions from the 15.1 MMBtu/hr boiler is 88% according to manufacturer's specifications.

Emission factors are from AP-42, Chapter 1.6 - Wood Residue Combustion in Boilers, (dry wood) Tables 1.6-1, 1.6-2, 1.6-3 and 1.6-4 (9/03).

HAP from the wood-fired boilers include acetaldehyde, acrolien, arsenic, benzene, chlorine, chromium, formaldehyde, hydrogen chloride, lead, manganese, nickel and styrene.

**Methodology**

PTE (tons/yr) = Heat Input Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8760 (hr/yr) x (1/2000) (tons/lb).

PTE After Controls for PM/PM10 (tons/yr) = Heat Input Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8760 (hr/yr) x (1/2000) (tons/lb) x (1 - Control Efficiency%).

**Appendix A: Emission Calculations**  
**Particulate Emissions - Woodworking Operations**

**Company Name: Child Craft Industries, Inc.**  
**Address: 1010 Keller Drive, New Salisbury, Indiana 47161**  
**Title V: T061-17576-00013**  
**Reviewer: ERG/ST**  
**Date: February 4, 2004**

Emissions Unit ID	Control Device ID	Process Weight Rate (lbs/hr)	Air Flow Rate (acfm)	Outlet Grain Loading (gr/acf)	Control Efficiency (%)	PTE for PM/PM10 Before Controls (tons/yr)	PTE for PM/PM10 After Controls (tons/yr)	PTE for PM/PM10 Before Controls (lbs/hr)	PTE for PM/PM10 After Controls (lbs/hr)	326 IAC 6-3-2 Maximum Allowable Emissions (lb/hr)	Maximum Allowable Emissions (tons/yr)
EU-19	BH-1	8,953	61,000	0.005	99.0%	1,145	11.5	261	2.61	11.2	49.0
EU-20	BH-2	7,727	61,000	0.005	99.0%	1,145	11.5	261	2.61	10.1	44.4
Sanding Tables	BH-3	1,000	2,900	0.03	99.0%	327	3.3	75	0.75	2.6	11.3
<b>PTE TOTAL</b>						<b>2,617</b>	<b>26.2</b>				

Assume all PM emissions are equal to PM10

**Methodology**

PTE PM/PM10 After Controls (tons/yr) = Flow Rate (acfm) x Outlet Grain Loading (gr/ascf) x 60 (min/hr) x 8760 (hr/yr) x 1/7000 (lb/gr) x 1/2000 (ton/lbs)

PTE PM/PM10 Uncontrolled (tons/yr) = Flow Rate (acfm) x Outlet Grain Loading (gr/ascf) x 60 (min/hr) x 8760 (hr/yr) x 1/7000 (lb/gr) x 1/2000 (ton/lbs) x 1/(1-Control Eff. (%))

Maximum Allowable Emissions (lbs/hr) = 4.1 x (Process Weight Rate (lbs/hr)/2000 (lbs/ton))<sup>0.67</sup>

Maximum Allowable Emissions (tons/yr) = 4.1 x (Process Weight Rate (lbs/hr)/2000 (lbs/ton))<sup>0.67</sup> x 8760 (hrs/yr) x 1/2000 (ton/lbs)

The baghouses must be in operation at all times that the woodworking machinery is in operation in order to ensure compliance with 326 IAC 6-3-2.