



*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: March 10, 2006

RE: Hartson-Kennedy Cabinet Top Company / 039-17698-00318

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

### **Notice of Decision: Approval – Effective Immediately**

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

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204.

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

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

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

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

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

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



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## PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Hartson-Kennedy Cabinet Top Company, Inc.  
28322 County Road 20 West  
Elkhart, Indiana 46517**

(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.: T 039-17698-00318	
Issued by: Original signed by Paul Dubenetzky, Assistant Commissioner Office of Air Quality	Issuance Date: March 10, 2006  Expiration Date: March 10, 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 counter top manufacturing and coating source.

Responsible Official:	General Manager
Source Address:	28322 County Road 20 West, Elkhart, IN 46517
Mailing Address:	28322 County Road 20 West, Elkhart, IN 46517
General Source Phone Number:	(574) 293-2504
SIC Code:	2434
County Location:	Elkhart
Source Location Status:	Attainment for 1-Hour Ozone Standard Basic Nonattainment for 8-Hour Ozone Standard Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules and Major Source under Emission Offset Rules; Major Source, Section 112 of the Clean Air Act

### 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) One (1) ultra form spray booth, identified as EU-1, equipped with a drying tunnel, HVLP spray applicators and dry filters for overspray control, exhausting through Stacks 1 and 2 for the spray booth and Stack 3 for the drying tunnel, installed in 1992, capacity: 1,660 linear feet of wood cabinet tops per hour.
- (b) One (1) E-top spray booth, identified as EU-2, equipped with a drying tunnel, HVLP spray applicators and dry filters for overspray control, exhausting through Stack 4 for the spray booth and Stack 5 for the drying tunnel, installed in 1992, capacity: 830 linear feet of wood cabinet tops per hour.
- (c) One (1) dura-form/diamond top spray booth, identified as EU-3, equipped with a drying tunnel, HVLP spray applicators and dry filters for overspray control, exhausting through Stack 6 for the spray booth and Stack 7 for the drying tunnel, installed in 1992, capacity: 550 linear feet of wood cabinet tops per hour.
- (d) One (1) woodworking operation, identified as EU-4, equipped with a cyclone connected in series with a baghouse for particulate control, exhausting inside the building, installed in 1992, capacity: 17,160 pounds of wood per hour.

### 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 does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

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

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]**

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)]**

- (a) This permit, T 039-17698-00318, 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]**

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]**

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)]**

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)]**

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)]**

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U.S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]**

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

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

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 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 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

Northern Regional Office: 574-245-4870, Facsimile Number: 574-245-4877

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 T 039-17698-00318 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 combined permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

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

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

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

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

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

- (1) That this permit contains a material mistake.
- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12] [40 CFR 72]

- (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) Pursuant to 326 IAC 2-7-11(b) and 326 IAC 2-7-12(a), administrative Part 70 permit amendments and permit modifications for purposes of the acid rain portion of a Part 70 permit shall be governed by regulations promulgated under Title IV of the Clean Air Act. [40 CFR 72]
- (c) 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).

- (d) 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)]
- (e) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

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

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

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

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
  - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
  - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
  
and  
  
United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590  
  
in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
  - (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document, all such changes and emission trades that are subject to 326 IAC 2-7-20(b), (c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

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

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
- (1) A brief description of the change within the source;
  - (2) The date on which the change will occur;
  - (3) Any change in emissions; and
  - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.21 Source Modification Requirement [326 IAC 2-7-10.5] [326 IAC 2-3-2]**

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

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

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

- (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.

**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).

**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. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

**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]

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### Compliance Requirements [326 IAC 2-1.1-11]

#### C.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 March 30, 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 (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) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2007 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
  - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
  - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

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

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-3]

- (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 2-3-1(II)) 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 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
  - (1) Before beginning actual construction of the “project” (as defined in 326 IAC 2-3-1(II)) 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 2-3-1(mm) (2)(A)(3); 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 2-3]

- (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 2-3-1 (II)) 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 2-3-1 (qq), 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 a 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 2-3-2(c)(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)]: Surface Coating Operations (EU-1, EU-2 & EU-3)

- (a) One (1) ultra form spray booth, identified as EU-1, equipped with a drying tunnel, HVLP spray applicators and dry filters for overspray control, exhausting through Stacks 1 and 2 for the spray booth and Stack 3 for the drying tunnel, installed in 1992, capacity: 1,660 linear feet of wood cabinet tops per hour.
- (b) One (1) E-top spray booth, identified as EU-2, equipped with a drying tunnel, HVLP spray applicators and dry filters for overspray control, exhausting through Stack 4 for the spray booth and Stack 5 for the drying tunnel, installed in 1992, capacity: 830 linear feet of wood cabinet tops per hour.
- (c) One (1) dura-form/diamond top spray booth, identified as EU-3, equipped with a drying tunnel, HVLP spray applicators and dry filters for overspray control, exhausting through Stack 6 for the spray booth and Stack 7 for the drying tunnel, installed in 1992, capacity: 550 linear feet of wood cabinet tops per hour.

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

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods in surface coating booths (EU-1, EU-2 and EU-3):

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

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

#### D.1.2 PSD Minor Limit [326 IAC 2-2]

Pursuant to T 039-10001-00318, issued on February 5, 1999, the usage of VOC, including coatings, dilution solvents, and cleaning solvents, in the three (3) spray booths, identified as EU-1, EU-2 and EU-3) shall be limited to less than a total of 249 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC from the entire source to less than two hundred and fifty (250) tons per year. Compliance with this limit makes the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

#### D.1.3 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), the dry filters for particulate control shall be in operation in accordance

with manufacturer's specifications and control emissions from the three (3) spray booths, identified as EU-1, EU-2 and EU-3, at all times when the three (3) spray booths are in operation.

D.1.4 General Provisions Relating to NESHAP (Subpart JJ) [326 IAC 20-1] [40 CFR Part 63, Subpart A]

Pursuant to 40 CFR 63.800, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1 for the three (3) spray booths, identified as EU-1, EU-2, and EU-3, as specified in Appendix A of 40 CFR Part 63, Subpart JJ in accordance with schedule in 40 CFR 63 Subpart JJ.

D.1.5 Wood Furniture NESHAP [40 CFR 63.800, Subpart JJ] [326 IAC 20-14]

Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:

- (a) Limit the volatile hazardous air pollutants (VHAP) emissions from finishing operations as follows:
  - (1) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or
  - (2) 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
  - (3) Use a combination of (1) and (2).
- (b) Limit VHAP emissions contact adhesives as follows:
  - (1) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pounds VHAP per pound solids.
  - (2) 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.
- (c) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

D.1.6 Work Practice Standards [40 CFR 63.803]

The Permittee 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.

**D.1.7 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 any control devices.

**Compliance Determination Requirements**

**D.1.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]**

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

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

**D.1.9 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 spray booth stacks 1, 2, 4, and 6 while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

**Record Keeping and Reporting Requirements [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.1.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.2. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

- (1) The VOC content of each coating material and solvent used.
  - (2) The amount of coating material and solvent less water used on monthly basis.  
  
Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (3) The total VOC usage for each month; and
  - (4) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Conditions D.1.7 and D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**D.1.11 Record Keeping Requirements [40 CFR 63, Subpart JJ]**

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- (a) To document compliance with Condition D.1.5, 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 content and usage limits established in Condition D.1.5.
- (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
  - (2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
  - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.
  - (4) The VHAP content in weight percent of each thinner used.
  - (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.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**D.1.12 Reporting Requirements**

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- (a) A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting form located at the end of this permit, or its equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) A semi-annual Continuous Compliance Report to document compliance with Condition D.1.5 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:

- (1) January 1 through June 30.
  - (2) July 1 through December 31.
- (c) The reports required in (a) and (b) of this condition shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, 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

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]: Woodworking (EU-4)

- (d) One (1) woodworking operation, identified as EU-4, equipped with a cyclone connected in series with a baghouse for particulate control, exhausting inside the building, installed in 1992, capacity: 17,160 pounds of wood per hour.

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

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

#### D.2.1 Particulate [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 woodworking facilities shall not exceed 17.3 pounds per hour when operating at a process weight rate of 8.58 tons per hour.

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

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

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

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

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

### Compliance Determination Requirements

#### D.2.3 Particulate Control

- (a) Pursuant to T 039-10001-00318, issued on February 5, 1999, and in order to comply with Condition D.2.1, the cyclone and baghouse for particulate control shall both be in operation and control emissions from the woodworking operation at all times that the woodworking operation is 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 Assurance Monitoring Requirements

#### D.2.4 Visible Emissions Notations

- (a) Visible emission notations of the woodworking operation, identified as EU-4, exhaust shall be performed once per day during normal daylight operations when exhausting directly to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

#### D.2.5 Baghouse Inspections

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 (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

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

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material woodworking operation. 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.

#### D.2.7 Cyclone Inspections

An inspection shall be performed each calendar quarter of all cyclones controlling the woodworking operation when venting to the atmosphere. A cyclone inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors.

#### D.2.8 Cyclone Failure Detection

- (a) For a cyclone controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a cyclone 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 woodworking operations. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

**D.2.9 Record Keeping Requirements**

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- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of visible emission notations of the woodworking exhaust once per day when exhausting directly to the atmosphere.
- (b) To document compliance with Conditions D.2.5 and D.2.7 the Permittee shall maintain records of the results of the inspections required under Conditions D.2.5 and D.2.7 and the dates the vents are redirected.
- (c) To document compliance with Condition D.2.2, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Hartson-Kennedy Cabinet Top Company, Inc.  
Source Address: 28322 County Road 20 West, Elkhart, Indiana 46517  
Mailing Address: 28322 County Road 20 West, Elkhart, Indiana 46517  
Part 70 Permit No.: T 039-17698-00318

**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: Hartson-Kennedy Cabinet Top Company, Inc.  
Source Address: 28322 County Road 20 West, Elkhart, Indiana 46517  
Mailing Address: 28322 County Road 20 West, Elkhart, Indiana 46517  
Part 70 Permit No.: T 039-17698-00318

**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) <ul style="list-style-type: none"><li>C The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and</li><li>C The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.</li></ul> |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

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

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

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

**Page 2 of 2**

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

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

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

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

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

A certification is not required for this report.

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

**Part 70 Quarterly Report**

Source Name: Hartson-Kennedy Cabinet Top Company, Inc.  
Source Address: 28322 County Road 20 West, Elkhart, Indiana 46517  
Mailing Address: 28322 County Road 20 West, Elkhart, Indiana 46517  
Part 70 Permit No.: T 039-17698-00318  
Facilities: Surface Coating Booths (EU-1, EU-2 and EU-3)  
Parameter: Total VOC Usage  
Limit: 249 tons per twelve (12) consecutive month period, total, with compliance demonstrated at the end of each month.

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

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

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

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

Attach a signed certification to complete this report.

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

**Part 70 Semi-Annual Report for Subpart JJ**

Source Name: Hartson-Kennedy Cabinet Top Company, Inc.  
 Source Address: 28322 County Road 20 West, Elkhart, Indiana 46517  
 Mailing Address: 28322 County Road 20 West, Elkhart, Indiana 46517  
 Part 70 Permit No.: T 039-17698-00318  
 Facilities: Spray Booths (EU-1, EU-2 and EU-3)  
 Parameters: VOC and VHAPs  
 Limits: (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 (lb VHAP/lb solid)	Thinners Used for On-site Formulation (% by weight)	All Other Thinner Mixtures (% by weight)	Foam Adhesives (upholstered) (lb VHAP/lb solid)	Contact Adhesives (lb VHAP/lb solid)	Strippable Spray Booth Material (lb VHAP/lb solid)

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

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

Attach a signed certification to complete this report.

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

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

Source Name: Hartson-Kennedy Cabinet Top Company, Inc.  
Source Address: 28322 County Road 20 West, Elkhart, Indiana 46517  
Mailing Address: 28322 County Road 20 West, Elkhart, Indiana 46517  
Part 70 Permit No.: T 039-17698-00318

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

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

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

Form Completed By: \_\_\_\_\_

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

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

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

Attach a signed certification to complete this report.

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

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

**Source Background and Description**

<b>Source Name:</b>	<b>Hartson-Kennedy Cabinet Top Company, Inc.</b>
<b>Source Location:</b>	<b>28322 County Road 20 West, Elkhart, Indiana 46517</b>
<b>County:</b>	<b>Elkhart</b>
<b>SIC Code:</b>	<b>2434</b>
<b>Operation Permit No.:</b>	<b>T 039-10001-00318</b>
<b>Operation Permit Issuance Date:</b>	<b>February 5, 1999</b>
<b>Permit Renewal No.:</b>	<b>T 039-17698-00318</b>
<b>Permit Reviewer:</b>	<b>Frank P. Castelli</b>

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Renewal application from Hartson-Kennedy Cabinet Top Company, Inc. relating to the operation of a counter top manufacturing and coating source.

**Permitted Emission Units and Pollution Control Equipment**

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

- (a) One (1) ultra form spray booth, identified as EU-1, equipped with a drying tunnel, HVLP spray applicators and dry filters for overspray control, exhausting through Stacks 1 and 2 for the spray booth and Stack 3 for the drying tunnel, installed in 1992, capacity: 1,660 linear feet of wood cabinet tops per hour.
- (b) One (1) E-top spray booth, identified as EU-2, equipped with a drying tunnel, HVLP spray applicators and dry filters for overspray control, exhausting through Stack 4 for the spray booth and Stack 5 for the drying tunnel, installed in 1992, capacity: 830 linear feet of wood cabinet tops per hour.
- (c) One (1) dura-form/diamond top spray booth, identified as EU-3, equipped with a drying tunnel, HVLP spray applicators and dry filters for overspray control, exhausting through Stack 6 for the spray booth and Stack 7 for the drying tunnel, installed in 1992, capacity: 550 linear feet of wood cabinet tops per hour.
- (d) One (1) woodworking operation, identified as EU-4, equipped with a cyclone connected in series with a baghouse for particulate control, exhausting inside the building, installed in 1992, capacity: 17,160 pounds of wood per hour.

**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) Infrared cure equipment.
- (b) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

## Existing Approvals

The source has been operating under the previous Part 70 Operating Permit T 039-10001-00318, issued on February 5, 1999 and the following amendments and modifications:

- (a) AAT 039-10878-00318, issued on May 5, 1999 and
- (b) Reopening 039-13240-00318, issued on December 14, 2001.

The following terms and conditions from previous approvals have been revised or added in this Part 70 Operating Permit:

- (a) 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 Condition B.12 (Preventive Maintenance Plan) and has amended Condition B.13 (Emergency Provisions).
- (b) Indiana was required to incorporate credible evidence provisions into state rules consistent with the SIP call published by U.S. EPA in 1997 (62 FR 8314). Indiana has incorporated the credible evidence provision in 326 IAC 1-1-6. This rule is effective March 16, 2005; therefore, a new condition, entitled, Credible Evidence, reflecting this rule will be incorporated into Section B of the permit.
- (c) 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 (Condition C.15) 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.
- (d) All references to the condition entitled, Compliance Monitoring Plan - Failure to Take Response Steps have been revised to reflect the new condition title, Response to Excursions or Exceedances.
- (e) Paragraph (a) of Condition D.2.7 (Broken or Failed Baghouse) 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.2.4 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 this 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 condition from previous approvals has been determined no longer applicable; therefore, was not incorporated into this proposed Part 70 Operating Permit:

Since the requirements of Condition C.6 (Operation of Equipment) have been incorporated in the D Sections, Condition C.6 has been removed from the permit.

### Enforcement Issue

There are no enforcement actions pending.

### Recommendation

The staff recommends to the Commissioner that the Part 70 permit 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 June 25, 2003. Additional information was received on March 18, 2004.

### Emission Calculations

See Appendix A, pages 1 - 3, of this document for detailed emission calculations.

### 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 February 5, 1999. 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 <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Surface Coating (EU 1, EU-2 & EU-3)	26.8	26.8	-	249	-	-	104
Woodworking (EU-4)	0.867	0.867	-	-	-	-	-
Insignificant Activities	2.00	2.00	-	0.500	-	-	0.500
Total Emissions	29.7	29.7	-	Less than 250	-	-	105

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC and PM<sub>10</sub> is equal to or greater than one hundred (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 and Emission Offset applicability.

**Actual Emissions**

The following table shows the actual emissions from the source. This information reflects the 2001 OAQ criteria pollutants and 1999 OAQ HAPs emission data.

<b>Pollutant</b>	<b>Actual Emissions (tons/year)</b>
PM	-
PM <sub>10</sub>	-
SO <sub>2</sub>	-
VOC	61
CO	-
NO <sub>x</sub>	-
Toluene	10.4
Hexane	5.5
Methanol	0.28
MEK	3.9

**County Attainment Status**

The source is located in Elkhart County.

<b>Pollutant</b>	<b>Status</b>
PM <sub>2.5</sub>	Attainment
PM <sub>10</sub>	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
1-HourOzone	Attainment

Pollutant	Status
8-HourOzone	Basic Nonattainment
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 the ozone standards. Elkhart County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements of 326 IAC 2-3, Emission Offset. See the State Rule Applicability - Entire Source section of this document.
- (b) Elkhart County has been classified as unclassifiable or attainment for PM<sub>2.5</sub>. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM<sub>2.5</sub> emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM<sub>2.5</sub> emissions, it has directed states to regulate PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions. See the State Rule Applicability - Entire Source section of this document.
- (c) Elkhart County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section of this document.

### Part 70 Permit Conditions

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

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

### Federal Rule Applicability

- (a) This source does involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 that has the potential to emit before controls equal to or greater than the major source threshold for VOC, and is subject to an emission limitation or standard for VOC. However, neither the ultra form spray booth, identified as EU-1, the E-top spray booth, identified as EU-2, nor the dura-form/diamond top spray booth, identified as EU-3, use a control device as defined in 40 CFR Part 64.1 to comply with that emission limitation or standard. Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not included in the permit for the three (3) spray booths, identified as EU-1, EU-2 and EU-3.

- (b) This source does involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 that has the potential to emit before controls equal to or greater than the major source threshold for PM<sub>10</sub>, that is subject to an emission limitation or standard for PM, where PM is the surrogate for PM<sub>10</sub>. The woodworking operation, identified as EU-4, uses a control device (a cyclone connected in series with a baghouse) as defined in 40 CFR Part 64.1 to comply with that emission limitation or standard (326 IAC 6-3-2). Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are included in the permit for woodworking operation, identified as EU-4.

The following compliance assurance monitoring conditions are applicable to the wood-working operation, identified as EU-4, with a cyclone connected in series with a baghouse as control units. The woodworking operation with a cyclone connected in series with a baghouse is not a large pollutant-specific emission unit because the potential to emit PM<sub>10</sub> after controls of 0.867 tons per year is less than the major source level of one hundred (100) tons per year.

- (1) Parameters to Monitor

Visible Emissions Notations

- (2) Inspection and Maintenance Activities

Cyclone/Baghouse Inspections

- (c) Each of the three (3) spray booths, identified as EU-1, EU-2 and EU-3, has the potential to emit before controls that is less than the major source threshold for PM<sub>10</sub>, where PM is the surrogate for PM<sub>10</sub>. Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not included in the permit for the three (3) spray booths, identified as EU-1, EU-2 and EU-3.
- (d) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (e) The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the surface coating facilities described in this section except when otherwise specified in 40 CFR 63 Subpart JJ.
- (f) The ultra form spray booth, identified as EU-1, the E-top spray booth, identified as EU-2, and the dura-form/diamond top spray booth, identified as EU-3, are all subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 20-14 and 40 CFR 63.800 Subpart JJ.

The three (3) spray booths, identified as EU-1, EU-2 and EU-3, are subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 20-14 and 40 CFR 63.800 Subpart JJ because these facilities are engaged in the manufacturing of wood furniture components located at a major source of HAPs.

The three (3) spray booths, identified as EU-1, EU-2 and EU-3, are subject to the following portions of Subpart JJ. Nonapplicable portions of the NESHAP will not be included in the permit.

- (1) 40 CFR 63.800 (a), (d), (e), (f) and (g)
- (2) 40 CFR 63.801

- (3) 40 CFR 63.802 (a)(2), (a)(3), (b)(2) and (b)(3)
  - (4) 40 CFR 63.803
  - (5) 40 CFR 63.804 (b), (c)(1) and (e)(1)
  - (6) 40 CFR 63.805(a)
  - (7) 40 CFR 63.806(a), (b), (e), (i) and (j)
  - (8) 40 CFR 63.807(a) and (e)
  - (9) 40 CFR 63.808
- (g) The requirements of National Emission Standards for Hazardous Air Pollutants, 326 IAC 20, (40 CFR 63.4680 - 63.4781, Subpart QQQQ) Wood Building Products Surface Coating are not included in this permit because the source does not coat doors, windows, exterior siding, interior wall paneling, flooring and/or trim.
- (h) The requirements of National Emission Standards for Hazardous Air Pollutants, 326 IAC 20, (40 CFR 63.2230 - 2292, Subpart DDDD) Plywood and Composite Wood Products are not included in this permit because the source does not manufacture plywood or composite wood products.
- (i) There are no other National Emission Standards for Hazardous Air Pollutants included in the permit for this source.

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

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

The potential to emit all criteria pollutants except VOC is less than two hundred fifty (250) tons per year. Therefore, this source, constructed in 1992, is a minor PSD source pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) which did not require PSD review.

##### **326 IAC 2-3 (Emission Offset)**

Pursuant to T 039-10001-00318 issued on February 5, 1999, the use of VOC, including coatings, dilution solvents, and cleaning solvents, in the three (3) surface coating booths, identified as EU-1, EU-2 and EU-3, will be limited to less than a total of 249 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC, from the entire source, to less than two hundred and fifty (250) tons per twelve (12) consecutive month period. The source emits negligible NO<sub>x</sub> emissions. Therefore, this source is a major Emission Offset source pursuant to 326 IAC 2-3 that did not require Emission Offset review.

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

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit pursuant to 326 IAC 2-7, Part 70. In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted by July 1. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

#### 326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), 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.

#### **State Rule Applicability – Individual Facilities**

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

Pursuant to 326 IAC 6-3-2(d), the dry filters for particulate control shall be operation in accordance with manufacturer's specifications and control emissions from the three (3) spray booths, identified as EU-1, EU-2 and EU-3, at all times when these three (3) spray booths are in operation.

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

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the woodworking operation, EU-4, shall not exceed 17.3 pounds per hour when operating at a process weight rate of 17,160 pounds per hour (8.58 tons per hour).

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 cyclone and baghouse shall be in operation at all times the woodworking operation, EU-4, is in operation, in order to comply with this limit.

##### 326 IAC 8-2-12 (Surface coating emission limitations: wood furniture and cabinet coating)

This source is subject to the requirements of 326 IAC 8-2-12 since contact adhesives are being applied to solid wood, wood composition or simulate wood in the production of wood cabinet tops. Pursuant to 326 IAC 8-2-12, the HVLP spray applicators which were installed in all three (3) spray booths prior to January 1, 1999 comply with this rule.

#### **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:

The three (3) spray booths, identified as EU-1, EU-2 and EU-3, have applicable compliance monitoring conditions as specified below:

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the spray booth stacks 1, 2, 4, and 6 while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

The woodworking operation, identified as EU-4, has applicable compliance monitoring conditions as specified below:

- (a) Visible emission notations of the woodworking operation, identified as EU-4, exhaust shall be performed once per day during normal daylight operations when exhausting directly to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (b) An inspection shall be performed each calendar quarter of all bags controlling the wood-working 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.

- (c) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (d) 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 woodworking operation. 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).
- (e) 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.
- (f) An inspection shall be performed each calendar quarter of all cyclones controlling the woodworking operation when venting to the atmosphere. A cyclone inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors.
- (g) For a cyclone controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (h) For a cyclone 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 woodworking operations. 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 baghouse and cyclone for the woodworking operation must operate properly to ensure compliance with 326 IAC 5-1, 326 IAC 6-3 and 326 IAC 2-7 (Part 70).

## **Conclusion**

The operation of this counter top manufacturing and coating source shall be subject to the conditions of this Part 70 Operating Permit T 039-17698-00318.

## Indiana Department of Environmental Management Office of Air Quality

Addendum to the  
Technical Support Document for a Part 70 Operating Permit

**Source Name:** Hartson-Kennedy Cabinet Top Company, Inc.  
**Source Location:** 28322 County Road 20 West, Elkhart, Indiana 46517  
**County:** Elkhart  
**SIC Code:** 2434  
**Operation Permit No.:** T 039-17698-00318  
**Permit Reviewer:** Frank P. Castelli

On December 1, 2005, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Hartson-Kennedy Cabinet Top Company, Inc. had applied for a Part 70 Operating Permit to operate a counter top manufacturing and coating source. The notice also stated that OAQ proposed to issue a Part 70 Operating Permit for this operation and provided information on how the public could review the proposed Part 70 Operating 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 Part 70 Operating Permit should be issued as proposed.

On December 21, 2005, Wendy M. Krause, CHMM, of Cornerstone Environmental, on behalf of Hartson-Kennedy Cabinet Top Company, Inc. submitted comments on the proposed Part 70 Operating Permit Renewal. The comments are as follows: The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded**.

### Comment 1:

We request Condition D.1.6 be removed from the permit. This section requires daily inspections of the baffles and weekly and monthly overspray observations. Inspections are completed as part of a preventive maintenance plan. IDEM has recently concluded that "...the requirement to inspect control devices does not need to be included in specific permit conditions. IDEM intends to allow the Permittee the discretion to determine the frequency of control device inspections necessary to ensure continual proper operation of the control device, and to include such requirements in the preventive maintenance plant (PMP).

### Response 1:

IDEM has determined that surface coating operators still need to check the placement of dry filters and baffles for overspray particulate control once per day. Unlike inspecting other types of particulate control devices, such as baghouses and cyclones, the checking of the placement of the dry filters does not necessitate shutting down the entire surface coating operation. The weekly and monthly overspray inspections are also still required for all surface coating operations that emit overspray particulate matter since it is not necessary for the operations to cease in order to perform these inspections. Therefore, Condition D.1.6 (now D.1.9) has not been deleted from the permit.

### Comment 2:

We request that Condition D.1.7(b), the record keeping condition applicable to Condition D.1.6, be removed per above.

### Response 2:

See Response 1. No changes were made to Condition D.1.7 (now D.1.10) based on the comment, however the internal citations have been revised as follows:

**D.1.710 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.2. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.
- (1) The VOC content of each coating material and solvent used.
- (2) The amount of coating material and solvent less water used on monthly basis.
- Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (3) The total VOC usage for each month; and
- (4) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Conditions D.1.47 and D.1.69, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**Comment 3:**

We also request that Condition D.1.10 be modified. Currently, the condition includes all of the language in 40 CFR Part 63, Subpart JJ. We request that this be removed from the permit. In its place, we request the summary of the applicable requirements as stated in Condition D.1.4 of the existing Title V permit T 039-10001-00318 be included in the new Permit.

**Response 3:**

Reference to Subpart A in Condition D.1.9 is now Condition D.1.4. Condition D.1.10 has been deleted as requested and replaced with the summary of the requirements of 40 CFR Part 63 Subpart JJ in Conditions D.1.5 and D.1.6. All conditions have been re-numbered accordingly. In addition, the Subpart JJ record keeping requirements have been added to the permit as Condition D.1.11 and the reporting Condition D.1.8 (now D.1.12) has been revised to include paragraphs (b) and (c) to reference the reports required by the NESHAP Subpart JJ.

**D.1.94 General Provisions Relating to NESHAP (Subpart JJ) [326 IAC 20-1] [40 CFR Part 63, Subpart A]**

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Pursuant to 40 CFR 63.800, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1 for the three (3) spray booths, identified as EU-1, EU-2, and EU-3, as specified in Appendix A of 40 CFR Part 63, Subpart JJ in accordance with schedule in 40 CFR 63 Subpart JJ.

**D.1.5 Wood Furniture NESHAP [40 CFR 63.800, Subpart JJ] [326 IAC 20-14]**

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**Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:**

- (a) **Limit the volatile hazardous air pollutants (VHAP) emissions from finishing operations as follows:**

- (1) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or
  - (2) Use compliant finishing materials in which all stains, washcoats, sealers, top-coats, 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
  - (3) Use a combination of (1) and (2).
- (b) Limit VHAP emissions contact adhesives as follows:
- (1) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pounds VHAP per pound solids.
  - (2) 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.
- (c) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

**D.1.6 Work Practice Standards [40 CFR 63.803]**

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The Permittee 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.

**D.1.11 Record Keeping Requirements [40 CFR 63, Subpart JJ] [326 IAC 20-14]**

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- (a) **To document compliance with Condition D.1.5, 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 content and usage limits established in Condition D.1.5.**
- (1) **Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.**
  - (2) **The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.**
  - (3) **The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.**
  - (4) **The VHAP content in weight percent of each thinner used.**
  - (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.**
- (b) **To document compliance with Condition D.1.6, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.**
- (c) **All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

**D.1.812 Reporting Requirements**

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- (a) **A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting form located at the end of this permit, or its equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**
- (b) **A semi-annual Continuous Compliance Report to document compliance with Condition D.1.5 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:**
- (1) **January 1 through June 30.**
  - (2) **July 1 through December 31.**
- (c) **The reports required in (a) and (b) of this condition shall be submitted to:**

**Indiana Department of Environmental Management  
Compliance Data Section, 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**

~~D.1.10 National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations Requirements [40 CFR Part 63, Subpart JJ] [326 IAC 20-14]~~

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Pursuant to CFR Part 63, Subpart JJ, the Permittee shall comply with the provisions of 40 CFR Part 63,800, which are incorporated by reference as 326 IAC 20-14 for the three (3) spray booths, identified as EU-1, EU-2 and EU-3, as specified as follows:

**§ 63.800 – Applicability**

~~(a) The affected source to which this subpart applies is each facility that is engaged, either in part or in whole, in the manufacture of wood furniture or wood furniture components and that is located at a plant site that is a major source as defined in 40 CFR part 63, subpart A, §63.2. The owner or operator of a source that meets the definition for an incidental wood furniture manufacturer shall maintain purchase or usage records demonstrating that the source meets the definition in §63.801 of this subpart, but the source shall not be subject to any other provisions of this subpart.~~

~~(d) Owners or operators of affected sources shall also comply with the requirements of subpart A of this part (General Provisions), according to the applicability of subpart A to such sources, as identified in Table 1 of this subpart.~~

~~(e) The compliance date for existing affected sources that emit less than 50 tons per year of HAP in 1996 is December 7, 1998. The compliance date for existing affected sources that emit 50 tons or more of hazardous air pollutants in 1996 is November 21, 1997. The owner or operator of an existing area source that increases its emissions of (or its potential to emit) HAP such that the source becomes a major source that is subject to this subpart shall comply with this subpart one year after becoming a major source.~~

~~(f) New affected sources must comply with the provisions of this standard immediately upon startup or by December 7, 1995, whichever is later. New area sources that become major sources shall comply with the provisions of this standard immediately upon becoming a major source.~~

~~(g) Reconstructed affected sources are subject to the requirements for new affected sources. The costs associated with the purchase and installation of air pollution control equipment (e.g., incinerators, carbon adsorbers, etc.) are not considered in determining whether the facility has been reconstructed, unless the control equipment is required as part of the process (e.g., product recovery). Additionally, the costs of retrofitting and replacement of equipment that is installed specifically to comply with this subpart are not considered reconstruction costs. For example, an affected source may convert to waterborne coatings to meet the requirements of this subpart. At most facilities, this conversion will require the replacement of existing storage tanks, mix equipment, and transfer lines. The cost of replacing the equipment is not considered in determining whether the facility has been reconstructed~~

### § 63.801—Definitions

~~(a) All terms used in this subpart that are not defined below have the meaning given to them in the CAA and in subpart A (General Provisions) of this part.~~

~~Adhesive means any chemical substance that is applied for the purpose of bonding two surfaces together other than by mechanical means. Under this subpart, adhesives shall not be considered coatings or finishing materials. Products used on humans and animals, adhesive tape, contact paper, or any other product with an adhesive incorporated onto or in an inert substrate shall not be considered adhesives under this subpart.~~

~~Administrator means the Administrator of the United States Environmental Protection Agency or his or her authorized representative.~~

~~Aerosol adhesive means an adhesive that is dispensed from a pressurized container as a suspension of fine solid or liquid particles in gas.~~

~~Affected source means a wood furniture manufacturing facility that is engaged, either in part or in whole, in the manufacture of wood furniture or wood furniture components and that is located at a plant site that is a major source as defined in 40 CFR part 63.2, excluding sources that meet the criteria established in §63.800(a), (b) and (c) of this subpart.~~

~~Alternative method means any method of sampling and analyzing for an air pollutant that is not a reference or equivalent method but has been demonstrated to the Administrator's satisfaction to, in specific cases, produce results adequate for a determination of compliance.~~

~~As applied means the HAP and solids content of the coating or contact adhesive that is actually used for coating or gluing the substrate. It includes the contribution of materials used for in-house dilution of the coating or contact adhesive.~~

~~Basecoat means a coat of colored material, usually opaque, that is applied before graining inks, glazing coats, or other opaque finishing materials, and is usually topcoated for protection.~~

~~Baseline conditions means the conditions that exist prior to an affected source implementing controls, such as a control system.~~

~~Building enclosure means a building housing a process that meets the requirements of a temporary total enclosure. The EPA Method 204E is used to identify all emission points from the building enclosure and to determine which emission points must be tested. For additional information see *Guidelines for Determining Capture Efficiency*, January 1994, Docket No. A-93-10, Item No. IV-B-1.~~

~~Capture device means a hood, enclosed room, floor sweep, or other means of collecting solvent emissions or other pollutants into a duct so that the pollutant can be directed to a pollution control device such as an incinerator or carbon adsorber.~~

~~Capture efficiency means the fraction of all organic vapors generated by a process that are directed to a control device.~~

~~Certified product data sheet (CPDS) means documentation furnished by coating or adhesive suppliers or an outside laboratory that provides:~~

~~(1) The VHAP content of a finishing material, contact adhesive, or solvent, by percent weight, measured using the EPA Method 311 (as promulgated in this subpart), or an equivalent or alternative method (or formulation data if the coating meets the criteria specified in §63.805(a));~~

(2) The solids content of a finishing material or contact adhesive by percent weight, determined using data from the EPA Method 24, or an alternative or equivalent method (or formulation data if the coating meets the criteria specified in §63.805 (a)); and

(3) The density, measured by EPA Method 24 or an alternative or equivalent method. Therefore, the reportable VHAP content shall represent the maximum aggregate emissions potential of the finishing material, adhesive, or solvent in concentrations greater than or equal to 1.0 percent by weight or 0.1 percent for VHAP that are carcinogens, as defined by the Occupational Safety and Health Administration Hazard Communication Standard (29 CFR part 1910), as formulated. Only VHAP present in concentrations greater than or equal to 1.0 percent by weight, or 0.1 percent for VHAP that are carcinogens, must be reported on the CPDS. The purpose of the CPDS is to assist the affected source in demonstrating compliance with the emission limitations presented in §63.802.

Note: Because the optimum analytical conditions under EPA Method 311 vary by coating, the coating or adhesive supplier may also choose to include on the CPDS the optimum analytical conditions for analysis of the coating, adhesive, or solvent using EPA Method 311. Such information may include, but not be limited to, separation column, oven temperature, carrier gas, injection port temperature, extraction solvent, and internal standard.)

*Cleaning operations* means operations in which organic HAP solvent is used to remove coating materials or adhesives from equipment used in wood furniture manufacturing operations.

*Coating* means a protective, decorative, or functional film applied in a thin layer to a surface. Such materials include, but are not limited to, paints, topcoats, varnishes, sealers, stains, washcoats, basecoats, enamels, inks, and temporary protective coatings. Aerosol spray paints used for touch-up and repair are not considered coatings under this subpart.

*Coating application station* means the part of a coating operation where the coating is applied, e.g., a spray booth.

*Coating operation* means those activities in which a coating is applied to a substrate and is subsequently air-dried, cured in an oven, or cured by radiation.

*Coating solids (or solids)* means the part of the coating which remains after the coating is dried or cured; solids content is determined using data from the EPA Method 24, or an equivalent or alternative method.

*Compliant coating/contact adhesive* means a finishing material, contact adhesive, or strippable booth coating that meets the emission limits specified in Table 3 of this subpart.

*Contact adhesive* means an adhesive that is applied to two substrates, dried, and mated under only enough pressure to result in good contact. The bond is immediate and sufficiently strong to hold pieces together without further clamping, pressure, or airing.

*Continuous coater* means a finishing system that continuously applies finishing materials onto furniture parts moving along a conveyor. Finishing materials that are not transferred to the part are recycled to a reservoir. Several types of application methods can be used with a continuous coater including spraying, curtain coating, roll coating, dip coating, and flow coating.

*Continuous compliance* means that the affected source is meeting the emission limitations and other requirements of the rule at all times and is fulfilling all monitoring and recordkeeping provisions of the rule in order to demonstrate compliance.

*Control device* means any equipment that reduces the quantity of a pollutant that is emitted to the air. The device may destroy or secure the pollutant for subsequent recovery. Includes, but is not limited to, incinerators, carbon adsorbers, and condensers.

~~*Control device efficiency* means the ratio of the pollutant released by a control device and the pollutant introduced to the control device.~~

~~*Control system* means the combination of capture and control devices used to reduce emissions to the atmosphere.~~

~~*Conventional air spray* means a spray coating method in which the coating is atomized by mixing it with compressed air and applied at an air pressure greater than 10 pounds per square inch (gauge) at the point of atomization. Airless and air-assisted airless spray technologies are not conventional air spray because the coating is not atomized by mixing it with compressed air. Electrostatic spray technology is also not considered conventional air spray because an electrostatic charge is employed to attract the coating to the workpiece.~~

~~*Data quality objective (DQO) approach* means a set of approval criteria that must be met so that data from an alternative test method can be used in determining the capture efficiency of a control system. For additional information, see *Guidelines for Determining Capture Efficiency*, January 1994. (Docket No. A-93-10, Item No. IV-B-1).~~

~~*Day* means a period of 24 consecutive hours beginning at midnight local time, or beginning at a time consistent with a facility's operating schedule.~~

~~*Disposed offsite* means sending used organic HAP solvent or coatings outside of the facility boundaries for disposal.~~

~~*Emission* means the release or discharge, whether directly or indirectly, of HAP into the ambient air.~~

~~*Enamel* means a coat of colored material, usually opaque, that is applied as a protective topcoat over a basecoat, primer, or previously applied enamel coats. In some cases, another finishing material may be applied as a topcoat over the enamel.~~

~~*Equipment leak* means emissions of VHAP from pumps, valves, flanges, or other equipment used to transfer or apply coatings, adhesives, or organic HAP solvents.~~

~~*Equivalent method* means any method of sampling and analyzing for an air pollutant that has been demonstrated to the Administrator's satisfaction to have a consistent and quantitatively known relationship to the reference method, under specific conditions.~~

~~*Finishing material* means a coating used in the wood furniture industry. Such materials include, but are not limited to, stains, basecoats, washcoats, enamels, sealers, and topcoats.~~

~~*Finishing operation* means those operations in which a finishing material is applied to a substrate and is subsequently air-dried, cured in an oven, or cured by radiation.~~

~~*Foam adhesive* means a contact adhesive used for gluing foam to fabric, foam to foam, and fabric to wood.~~

~~*Gluing operation* means those operations in which adhesives are used to join components, for example, to apply a laminate to a wood substrate or foam to fabric.~~

~~*Incidental wood furniture manufacturer* means a major source that is primarily engaged in the manufacture of products other than wood furniture or wood furniture components and that uses no more than 100 gallons per month of finishing material or adhesives in the manufacture of wood furniture or wood furniture components.~~

~~*Incinerator* means, for the purposes of this industry, an enclosed combustion device that thermally oxidizes volatile organic compounds to CO and CO<sub>2</sub>. This term does not include devices that burn municipal or hazardous waste material.~~

*Janitorial maintenance* means the upkeep of equipment or building structures that is not directly related to the manufacturing process, for example, cleaning of restroom facilities.

*Lower confidence limit (LCL) approach* means a set of approval criteria that must be met so that data from an alternative test method can be used in determining the capture efficiency of a control system. For additional information, see *Guidelines for Determining Capture Efficiency*, January 1994. (Docket No. A-93-10, Item No. IV-B-1).

*Material safety data sheet (MSDS)* means the documentation required for hazardous chemicals by the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard (29 CFR Part 1910) for a solvent, cleaning material, contact adhesive, coating, or other material that identifies select reportable hazardous ingredients of the material, safety and health considerations, and handling procedures.

*Noncompliant coating/contact adhesive* means a finishing material, contact adhesive, or strippable booth coating that has a VHAP content (VOC content for the strippable booth coating) greater than the emission limitation presented in Table 3 of this subpart.

*Nonporous substrate* means a surface that is impermeable to liquids. Examples include metal, rigid plastic, flexible vinyl, and rubber.

*Normally closed container* means a container that is closed unless an operator is actively engaged in activities such as emptying or filling the container.

*Operating parameter value* means a minimum or maximum value established for a control device or process parameter that, if achieved by itself or in combination with one or more other operating parameter values, determines that an owner or operator has complied with an applicable emission limit.

*Organic HAP solvent* means a HAP that is a volatile organic liquid used for dissolving or dispersing constituents in a coating or contact adhesive, adjusting the viscosity of a coating or contact adhesive, or cleaning equipment. When used in a coating or contact adhesive, the organic HAP solvent evaporates during drying and does not become a part of the dried film.

*Overall control efficiency* means the efficiency of a control system, calculated as the product of the capture and control device efficiencies, expressed as a percentage.

*Permanent total enclosure* means a permanently installed enclosure that completely surrounds a source of emissions such that all emissions are captured and contained for discharge through a control device. For additional information, see *Guidelines for Determining Capture Efficiency*, January 1994. (Docket No. A-93-10, Item No. IV-B-1).

*Recycled onsite* means the reuse of an organic HAP solvent in a process other than cleaning or washoff.

*Reference method* means any method of sampling and analyzing for an air pollutant that is published in Appendix A of 40 CFR part 60.

*Research or laboratory facility* means any stationary source whose primary purpose is to conduct research and development to develop new processes and products where such source is operated under the close supervision of technically trained personnel and is not engaged in the manufacture of products for commercial sale in commerce, except in a de minimis manner.

*Responsible official* has the meaning given to it in 40 CFR part 70, State Operating Permit Programs (Title V permits).

*Sealer* means a finishing material used to seal the pores of a wood substrate before additional coats of finishing material are applied. Special purpose finishing materials that are used in some finishing systems to optimize aesthetics are not sealers.

~~*Solvent* means a liquid used in a coating or contact adhesive to dissolve or disperse constituents and/or to adjust viscosity. It evaporates during drying and does not become a part of the dried film.~~

~~*Stain* means any color coat having a solids content by weight of no more than 8.0 percent that is applied in single or multiple coats directly to the substrate. It includes, but is not limited to, nongrain raising stains, equalizer stains, prestains, sap stains, body stains, no-wipe stains, penetrating stains, and toners.~~

~~*Storage containers* means vessels or tanks, including mix equipment, used to hold finishing, gluing, cleaning, or washoff materials.~~

~~*Strippable spray booth material* means a coating that:~~

~~(1) Is applied to a spray booth wall to provide a protective film to receive over-spray during finishing operations;~~

~~(2) That is subsequently peeled off and disposed; and~~

~~(3) By achieving (1) and (2) of this definition reduces or eliminates the need to use organic HAP solvents to clean spray booth walls.~~

~~*Substrate* means the surface onto which a coating or contact adhesive is applied (or into which a coating or contact adhesive is impregnated).~~

~~*Temporary total enclosure* means an enclosure that meets the requirements of §63.805(e)(1) (i) through (iv) and is not permanent, but constructed only to measure the capture efficiency of pollutants emitted from a given source. Additionally, any exhaust point from the enclosure shall be at least four equivalent duct or hood diameters from each natural draft opening. For additional information, see *Guidelines for Determining Capture Efficiency*, January 1994. (Docket No. A-93-10, Item No. IV-B-1).~~

~~*Thinner* means a volatile liquid that is used to dilute coatings or contact adhesives (to reduce viscosity, color strength, and solids, or to modify drying conditions).~~

~~*Topcoat* means the last film-building finishing material that is applied in a finishing system.~~

~~*Touchup and repair* means the application of finishing materials to cover minor finishing imperfections.~~

~~*VHAP* means any volatile hazardous air pollutant listed in Table 2 to Subpart JJ.~~

~~*VHAP of potential concern* means any VHAP from the list in table 6 of this subpart.~~

~~*Volatile organic compound (VOC)* means any organic compound which participates in atmospheric photochemical reactions, that is, any organic compound other than those which the Administrator designates as having negligible photochemical reactivity. A VOC may be measured by a reference method, an equivalent method, an alternative method, or by procedures specified under any rule. A reference method, an equivalent method, or an alternative method, however, may also measure nonreactive organic compounds. In such cases, the owner or operator may exclude the nonreactive organic compounds when determining compliance with a standard. For a list of compounds that the Administrator has designated as having negligible photochemical reactivity, refer to 40 CFR part 51.10.~~

~~*Washcoat* means a transparent special purpose finishing material having a solids content by weight of 12.0 percent by weight or less. Washcoats are applied over initial stains to protect, to control color, and to stiffen the wood fibers in order to aid sanding.~~

~~*Washoff operations* means those operations in which organic HAP solvent is used to remove coating from wood furniture or a wood furniture component.~~

~~Wood furniture means any product made of wood, a wood product such as rattan or wicker, or an engineered wood product such as particleboard that is manufactured under any of the following standard industrial classification codes: 2434, 2511, 2512, 2517, 2519, 2521, 2531, 2541, 2599, or 5712.~~

~~Wood furniture component means any part that is used in the manufacture of wood furniture. Examples include, but are not limited to, drawer sides, cabinet doors, seat cushions, and laminated tops. However, foam seat cushions manufactured and fabricated at a facility that does not engage in any other wood furniture or wood furniture component manufacturing operation are excluded from this definition.~~

~~Wood furniture manufacturing operations means the finishing, gluing, cleaning, and washoff operations associated with the production of wood furniture or wood furniture components.~~

(b) The nomenclature used in this subpart has the following meaning:

(1)  $A_k$  = the area of each natural draft opening (k) in a total enclosure, in square meters.

(2)  $C_e$  = the VHAP content of a finishing material (c), in kilograms of volatile hazardous air pollutants per kilogram of coating solids (kg VHAP/kg solids), as supplied. Also given in pounds of volatile hazardous air pollutants per pound of coating solids (lb VHAP/lb solids).

(3)  $C_{aj}$  = the concentration of VHAP in gas stream (j) exiting the control device, in parts per million by volume.

(4)  $C_{bi}$  = the concentration of VHAP in gas stream (i) entering the control device, in parts per million by volume.

(5)  $C_{di}$  = the concentration of VHAP in gas stream (i) entering the control device from the affected source, in parts per million by volume.

(6)  $C_{ik}$  = the concentration of VHAP in uncontrolled gas stream (k) emitted directly to the atmosphere from the affected source, in parts per million by volume.

(7) E = the emission limit achieved by an emission point or a set of emission points, in kg VHAP/kg solids (lb VHAP/lb solids).

(8) F = the control device efficiency, expressed as a fraction.

(9) FV = the average inward face velocity across all natural draft openings in a total enclosure, in meters per hour.

(10) G = the VHAP content of a contact adhesive, in kg VHAP/kg solids (lb VHAP/lb solids), as applied.

(11) M = the mass of solids in finishing material used monthly, kg solids/month (lb solids/month).

(12) N = the capture efficiency, expressed as a fraction.

(13)  $Q_{aj}$  = the volumetric flow rate of gas stream (j) exiting the control device, in dry standard cubic meters per hour.

(14)  $Q_{bi}$  = the volumetric flow rate of gas stream (i) entering the control device, in dry standard cubic meters per hour.

(15)  $Q_{di}$  = the volumetric flow rate of gas stream (i) entering the control device from the emission point, in dry standard cubic meters per hour.

(16)  $Q_{ik}$  = the volumetric flow rate of uncontrolled gas stream (k) emitted directly to the atmosphere from the emission point, in dry standard cubic meters per hour.

~~(17)  $Q_{in,i}$  = the volumetric flow rate of gas stream (i) entering the total enclosure through a forced makeup air duct, in standard cubic meters per hour (wet basis).~~

~~(18)  $Q_{out,j}$  = the volumetric flow rate of gas stream (j) exiting the total enclosure through an exhaust duct or hood, in standard cubic meters per hour (wet basis).~~

~~(19) R = the overall efficiency of the control system, expressed as a percentage.~~

~~(20) S = the VHAP content of a solvent, expressed as a weight fraction, added to finishing materials.~~

~~(21) W = the amount of solvent, in kilograms (pounds), added to finishing materials during the monthly averaging period.~~

~~(22) ac = after the control system is installed and operated.~~

~~(23) bc = before control.~~

### ~~63.802 Emission limits.~~

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

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

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

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

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

~~(b) Each owner or operator of a new affected source subject to this subpart shall:~~

~~(2) Limit VHAP emissions from contact adhesives by achieving a VHAP limit for contact adhesives, excluding aerosol adhesives and excluding contact adhesives applied to nonporous substrates, of no greater than 0.2 kg VHAP/kg solids (0.2 lb VHAP/lb solids), as applied, using either of the compliance methods in §63.804(e).~~

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

### ~~§ 63.803 Work practice standards.~~

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

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

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

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

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

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

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

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

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

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

~~(2) An inspection schedule;~~

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

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

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

~~(ii) Final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three months.~~

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

~~(i) The production speed is too high or the part shape is too complex for one operator to coat the part and the application station is not large enough to accommodate an additional operator; or~~

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

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

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

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

~~(1) Using normally closed tanks for washoff; and~~

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

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

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

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

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

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

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

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

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

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

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

~~approach to be used to reduce emissions, a timetable for implementing the plan, and a schedule for submitting notification of progress.~~

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

#### **~~§ 63.804— Compliance procedures and monitoring requirements.~~**

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

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

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

~~(2) Use a control system with an overall control efficiency (R) such that the value of  $G_{ae}$  is no greater than 1.0.~~

$$R = [(G_{be} - G_{ae}) / G_{be}] (100) \text{—Equation 3}$$

~~(e) The owner or operator of a new affected source subject to §63.802(b)(2) shall comply with the provisions using either of the following methods:~~

~~(1) Use compliant contact adhesives with a VHAP content no greater than 0.2 kg VHAP/kg solids (0.2 lb VHAP/lb solids), as applied; or~~

#### **~~§ 63.805— Performance test methods.~~**

~~(a) The EPA Method 311 of appendix A of part 63 shall be used in conjunction with formulation data to determine the VHAP content of the liquid coating. Formulation data shall be used to identify VHAP present in the coating. The EPA Method 311 shall then be used to quantify those VHAP identified through formulation data. The EPA Method 311 shall not be used to quantify HAP such as styrene and formaldehyde that are emitted during the cure. The EPA Method 24 (40 CFR part 60, appendix A) shall be used to determine the solids content by weight and the density of coatings. If it is demonstrated to the satisfaction of the Administrator that a coating does not release VOC or HAP byproducts during the cure, for example, all VOC and HAP present in the coating is solvent, then batch formulation information shall be accepted. The owner or operator of an affected source may request approval from the Administrator to use an alternative method for determining the VHAP content of the coating. In the event of any inconsistency between the EPA Method 24 or Method 311 test data and a facility's formulation data, that is, if the EPA Method 24/311 value is higher, the EPA Method 24/311 test shall govern unless after consultation, a regulated source could demonstrate to the satisfaction of the enforcement agency that the formulation data were correct. Sampling procedures shall follow the guidelines presented in "Standard Procedures for Collection of Coating and Ink Samples for VOC Content Analysis by Reference Method 24 and Reference Method 24A," EPA 340/1-91-010. (Docket No. A-93-10, Item No. IV-A-1).~~

**~~§ 63.806—Recordkeeping requirements.~~**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**~~§ 63.807—Reporting requirements.~~**

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

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

**§ 63.808—Implementation and enforcement.**

~~(a) This subpart can be implemented and enforced by the U.S. EPA, or a delegated authority such as the applicable State, local, or Tribal agency. If the U.S. EPA Administrator has delegated authority to a State, local, or Tribal agency, then that agency, in addition to the U.S. EPA, has the authority to implement and enforce this subpart. Contact the applicable U.S. EPA Regional Office to find out if implementation and enforcement of this subpart is delegated to a State, local, or Tribal agency.~~

~~(b) In delegating implementation and enforcement authority of this subpart to a State, local, or Tribal agency under subpart E of this part, the authorities contained in paragraph (c) of this section are retained by the Administrator of U.S. EPA and cannot be transferred to the State, local, or Tribal agency.~~

~~(c) The authorities that cannot be delegated to State, local, or Tribal agencies are as specified in paragraphs (c)(1) through (5) of this section.~~

~~(1) Approval of alternatives to the requirements in §§63.800, 63.802, and 63.803(a)(1), (b), (c) introductory text, and (d) through (l).~~

~~(2) Approval of alternatives to the monitoring and compliance requirements in §§63.804(f)(4)(iv)(D) and (E), 63.804(g)(4)(iii)(C), 63.804(g)(4)(vi), and 63.804(g)(6)(vi).~~

~~(3) Approval of major alternatives to test methods under §63.7(e)(2)(ii) and (f), as defined in §63.90, and as required in this subpart, as well as approval of any alternatives to the specific test methods under §§63.805(a), 63.805(d)(2)(v), and 63.805(e)(1).~~

~~(4) Approval of major alternatives to monitoring under §63.8(f), as defined in §63.90, and as required in this subpart.~~

~~(5) Approval of major alternatives to recordkeeping and reporting under §63.10(f), as defined in §63.90, and as required in this subpart.~~

**Table 1 to Subpart JJ of Part 63—General Provisions Applicability to Subpart JJ**

Reference	Applies to subpart JJ	Comment
63.1(a)	Yes	
63.1(b)(1)	No	Subpart JJ specifies applicability.
63.1(b)(2)	Yes	
63.1(b)(3)	Yes	
63.1(c)(1)	No	Subpart JJ specifies applicability.
63.1(c)(2)	No	Area sources are not subject to subpart JJ.
63.1(c)(4)	Yes	
63.1(c)(5)	Yes	
63.1(e)	Yes	
63.2	Yes	Additional terms are defined in 63.801(a) of subpart JJ. When overlap between subparts A and JJ occurs, subpart JJ takes precedence.
63.3	Yes	Other units used in subpart JJ are defined in 63.801(b).
63.4	Yes	
63.5	Yes	
63.6(a)	Yes	
63.6(b)(1)	Yes	
63.6(b)(2)	Yes	
63.6(b)(3)	Yes	
63.6(b)(4)	No	May apply when standards are proposed under Section 112(f) of the CAA.
63.6(b)(5)	Yes	
63.6(b)(7)	Yes	
63.6(c)(1)	Yes	
63.6(c)(2)	No	
63.6(c)(5)	Yes	
63.6(e)(1)	Yes	
63.6(e)(2)	Yes	
63.6(e)(3)	Yes	Applies only to affected sources using a control device to comply with the rule.
63.6(f)(1)	No	Affected sources complying through the procedures specified in 63.804 (a)(1);

\_\_\_\_\_ (a)(2), (b), (c)(1),  
\_\_\_\_\_ (d)(1), (d)(2),  
\_\_\_\_\_ (e)(1), and (e)(2) are  
\_\_\_\_\_ subject to the  
\_\_\_\_\_ emission standards at  
\_\_\_\_\_ all times, including  
\_\_\_\_\_ periods of startup,  
\_\_\_\_\_ shutdown, and  
\_\_\_\_\_ malfunction.

63.6(f)(2)..... Yes

63.6(f)(3)..... Yes

63.6(g)..... Yes

63.6(h)..... No.....

63.6 (i)(1)-(i)(3)..... Yes

63.6(i)(4)(i)..... Yes

63.6(i)(4)(ii)..... No.....

63.6 (i)(5)-(i)(14)..... Yes

63.6(i)(16)..... Yes

63.6(j)..... Yes

63.7..... Yes..... Applies only to  
\_\_\_\_\_ affected sources using  
\_\_\_\_\_ a control device to  
\_\_\_\_\_ comply with the rule.

63.8..... Yes..... Applies only to  
\_\_\_\_\_ affected sources using  
\_\_\_\_\_ a control device to  
\_\_\_\_\_ comply with the rule.

63.9(a)..... Yes

63.9(b)..... Yes..... Existing sources are  
\_\_\_\_\_ required to submit  
\_\_\_\_\_ initial notification  
\_\_\_\_\_ report within 270 days  
\_\_\_\_\_ of the effective date.

63.9(c)..... Yes

63.9(d)..... Yes

63.9(e)..... Yes..... Applies only to  
\_\_\_\_\_ affected sources using  
\_\_\_\_\_ a control device to  
\_\_\_\_\_ comply with the rule.

63.9(f)..... No

63.9(g)..... Yes..... Applies only to  
\_\_\_\_\_ affected sources using  
\_\_\_\_\_ a control device to  
\_\_\_\_\_ comply with the rule.

63.9(h)..... Yes..... 63.9(h)(2)(ii) applies  
\_\_\_\_\_ only to affected  
\_\_\_\_\_ sources using a  
\_\_\_\_\_ control device to  
\_\_\_\_\_ comply with the rule.

63.9(i)..... Yes

63.9(j)..... Yes

63.10(a)..... Yes

63.10(b)(1)..... Yes

63.10(b)(2)..... Yes..... Applies only to  
\_\_\_\_\_ affected sources using

\_\_\_\_\_ a control device to  
 \_\_\_\_\_ comply with the rule.  
 63.10(b)(3)..... Yes  
 63.10(e)..... Yes  
 63.10(d)(1)..... Yes  
 63.10(d)(2)..... Yes..... Applies only to  
 \_\_\_\_\_ affected sources using  
 \_\_\_\_\_ a control device to  
 \_\_\_\_\_ comply with the rule.  
 63.10(d)(3)..... No  
 63.10(d)(4)..... Yes  
 63.10(d)(5)..... Yes..... Applies only to  
 \_\_\_\_\_ affected sources using  
 \_\_\_\_\_ a control device to  
 \_\_\_\_\_ comply with the rule.  
 63.10(e)..... Yes..... Applies only to  
 \_\_\_\_\_ affected sources using  
 \_\_\_\_\_ a control device to  
 \_\_\_\_\_ comply with the rule.  
 63.10(f)..... Yes  
 63.11..... No  
 63.12-63.15..... Yes

**Table 2 to Subpart JJ of Part 63—List of Volatile Hazardous Air Pollutants**

Chemical name	CAS No.
Acetaldehyde.....	75070
Acetamide.....	60355
Acetonitrile.....	75058
Acetophenone.....	98862
2-Acetylaminofluorine.....	53963
Acrolein.....	107028
Acrylamide.....	79061
Acrylic acid.....	79107
Acrylonitrile.....	107131
Allyl chloride.....	107051
4-Aminobiphenyl.....	92671
Aniline.....	62533
o-Anisidine.....	90040
Benzene.....	71432
Benzidine.....	92875
Benzotrichloride.....	98077
Benzyl chloride.....	100447
Biphenyl.....	92524
Bis (2-ethylhexyl) phthalate (DEHP).....	117817
Bis (chloromethyl) ether.....	542881
Broomcorn.....	75252
1,3-Butadiene.....	106990
Carbon disulfide.....	75150
Carbon tetrachloride.....	56235
Carbonyl sulfide.....	463581

Catechol.....	120809
Chloroacetic acid.....	79118
2-Chloroacetophenone.....	532274
Chlorobenzene.....	108907
Chloroform.....	67663
Chloromethyl methyl ether.....	107302
Chloroprene.....	126998
Cresols (isomers and mixture).....	1319773
o-Cresol.....	95487
m-Cresol.....	108394
p-Cresol.....	106445
Cumene.....	98828
2,4-D (2,4-Dichlorophenoxyacetic acid, including salts and esters).....	94757
DDE (1,1-Dichloro-2,2-bis(p-chlorophenyl)ethylene).....	72559
Diazomethane.....	334883
Dibenzofuran.....	132649
1,2-Dibromo-3-chloropropane.....	96128
Dibutylphthalate.....	84742
1,4-Dichlorobenzene.....	106467
3,3[prime]-Dichlorobenzidine.....	91941
Dichloroethyl ether (Bis(2-chloroethyl)ether).....	111444
1,3-Dichloropropene.....	542756
Diethanolamine.....	111422
N,N-Dimethylaniline.....	121697
Diethyl sulfate.....	64675
3,3[prime]-Dimethoxybenzidine.....	119904
4-Dimethylaminoazobenzene.....	60117
3,3[prime]-Dimethylbenzidine.....	119937
Dimethylcarbamoyl chloride.....	79447
N,N-Dimethylformamide.....	68122
1,1-Dimethylhydrazine.....	57147
Dimethyl phthalate.....	131113
Dimethyl sulfate.....	77781
4,6-Dinitro-o-cresol, and salts.....	534521
2,4-Dinitrophenol.....	51285
2,4-Dinitrotoluene.....	121142
1,4-Dioxane (1,4-Dioxolane).....	123911
1,2-Diphenylhydrazine.....	122667
Epichlorohydrin (1-Chloro-2,3-epoxypropane).....	106898
1,2-Epoxybutane.....	106887
Ethyl acrylate.....	140885
Ethylbenzene.....	100414
Ethyl carbamate (Urethane).....	51796
Ethyl chloride (Chloroethane).....	75003
Ethylene dibromide (Dibromoethane).....	106934
Ethylene dichloride (1,2-Dichloroethane).....	107062
Ethylene glycol.....	107211
Ethylene oxide.....	75218
Ethylene thiourea.....	96457
Ethylidene dichloride (1,1-Dichloroethane).....	75343
Formaldehyde.....	50000
Glycol ethers a.....	
Hexachlorobenzene.....	118741
Hexachloro-1,3-butadiene.....	87683

Hexachloroethane.....	67724
Hexamethylene-1,6-diisocyanate.....	822060
Hexamethylphosphoramide.....	680319
Hexane.....	110543
Hydrazine.....	302012
Hydroquinone.....	123319
Isophorone.....	78591
Maleic anhydride.....	108316
Methanol.....	67561
Methyl bromide (Bromomethane).....	74839
Methyl chloride (Chloromethane).....	74873
Methyl chloroform (1,1,1-Trichloroethane).....	71556
Methyl ethyl ketone (2-Butanone).....	78933
Methylhydrazine.....	60344
Methyl iodide (Iodomethane).....	74884
Methyl isobutyl ketone (Hexone).....	108101
Methyl isocyanate.....	624839
Methyl methacrylate.....	80626
Methyl tert-butyl ether.....	1634044
4,4[prime]-Methylenobis (2-chloroaniline).....	101144
Methylene chloride (Dichloromethane).....	75092
4,4[prime]-Methylenediphenyl diisocyanate (MDI).....	101688
4,4[prime]-Methylenedianiline.....	101779
Naphthalene.....	91203
Nitrobenzene.....	98953
4-Nitrobiphenyl.....	92933
4-Nitrophenol.....	100027
2-Nitropropane.....	79469
N-Nitroso-N-methylurea.....	684935
N-Nitrosodimethylamine.....	62759
N-Nitrosomorpholine.....	59892
Phenol.....	108952
p-Phenylenediamine.....	106503
Phosgene.....	75445
Phthalic anhydride.....	85449
Polychlorinated biphenyls (Aroclors).....	1336363
Polycyclic Organic Matter b.....	
1,3-Propane sultone.....	1120714
beta-Propiolactone.....	57578
Propionaldehyde.....	123386
Propoxur (Baygon).....	114261
Propylene dichloride (1,2-Dichloropropane).....	78875
Propylene oxide.....	75569
1,2-Propylenimine (2-Methyl aziridine).....	75558
Quinone.....	106514
Styrene.....	100425
Styrene oxide.....	96093
2,3,7,8-Tetrachlorodibenzo-p-dioxin.....	1746016
1,1,2,2-Tetrachloroethane.....	79345
Tetrachloroethylene (Perchloroethylene).....	127184
Toluene.....	108883
2,4-Toluenediamine.....	95807
Toluene-2,4-diisocyanate.....	584849
o-Toluidine.....	95534
1,2,4-Trichlorobenzene.....	120821

1,1,2-Trichloroethane.....	79005
Trichloroethylene.....	79016
2,4,5-Trichlorophenol.....	95954
2,4,6-Trichlorophenol.....	88062
Triethylamine.....	121448
Trifluralin.....	1582098
2,2,4-Trimethylpentane.....	540841
Vinyl acetate.....	108054
Vinyl bromide.....	593602
Vinyl chloride.....	75014
Vinylidene chloride (1,1-Dichloroethylene).....	75354
Xylenes (isomers and mixture).....	1330207
o-Xylene.....	95476
m-Xylene.....	108383
p-Xylene.....	106423

a Includes mono- and di-ethers of ethylene glycol, diethylene glycols and triethylene glycol; R-(OCH<sub>2</sub>CH<sub>2</sub>)<sub>n</sub>-OR where: n = 1, 2, or 3; R = alkyl or aryl groups R[prime] = R, H, or groups which, when removed, yield glycol ethers with the structure: R-(OCH<sub>2</sub>CH<sub>2</sub>)<sub>n</sub>-OH. Polymers are excluded from the glycol category.

b Includes organic compounds with more than one benzene ring, and which have a boiling point greater than or equal to 100°C.

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

	Existing	New source
Emission point	source	

Contact Adhesives:

- (a) Use compliant contact adhesives (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied) based on following criteria:
  - i. For aerosol adhesives, and for contact adhesives applied to nonporous substrates..... d NA d NA
  - ii. For foam adhesives used in products that meet flammability requirements.... 1.8 0.2
  - iii. For all other contact adhesives (including foam adhesives used in products that do not meet flammability requirements); or..... 1.0 0.2
- (b) Use a control device..... e 1.0 e 0.2

a The limits refer to the VHAP content of the coating, as applied.

b Washcoats, basecoats, and enamels must comply with the limits presented in this table if they are purchased premade, that is, if they are not formulated onsite by thinning other finishing materials. If they are formulated onsite, they must be formulated using compliant finishing materials, i.e., those that meet the limits specified in this table, and thinners containing no more than 3.0 percent VHAP by

~~—weight.~~

~~c The control device must operate at an efficiency that is equivalent to no greater than 1.0 kilogram (or 0.8 kilogram) of VHAP being emitted from the affected emission source per kilogram of solids used.~~

~~d There is no limit on the VHAP content of these adhesives.~~

~~e The control device must operate at an efficiency that is equivalent to no greater than 1.0 kilogram (or 0.2 kilogram) of VHAP being emitted from the affected emission source per kilogram of solids used.~~

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

Chemical name	CAS No.
4-Aminobiphenyl.....	92671
Styrene oxide.....	96093
Diethyl sulfate.....	64675
N-Nitrosomorpholine.....	59892
Dimethyl formamide.....	68122
Hexamethylphosphoramide.....	680319
Acetamide.....	60355
4,4[prime]-Methylenedianiline.....	101779
o-Anisidine.....	90040
2,3,7,8-Tetrachlorodibenzo-p-dioxin.....	1746016
Beryllium salts.....	
Benzidine.....	92875
N-Nitroso-N-methylurea.....	684935
Bis (chloromethyl) ether.....	542881
Dimethyl carbamoyl chloride.....	79447
Chromium compounds (hexavalent).....	
1,2-Propylenimine (2-Methyl aziridine).....	75558
Arsenic and inorganic arsenic compounds.....	99999904
Hydrazine.....	302012
1,1-Dimethyl hydrazine.....	57147
Beryllium compounds.....	7440417
1,2-Dibromo-3-chloropropane.....	96128
N-Nitrosodimethylamine.....	62759
Cadmium compounds.....	
Benzo (a) pyrene.....	50328
Polychlorinated biphenyls (Aroclors).....	1336363
Heptachlor.....	76448
3,3[prime]-Dimethyl benzidine.....	119937
Nickel subsulfide.....	12035722
Acrylamide.....	79061
Hexachlorobenzene.....	118741
Chlordane.....	57749
1,3-Propane sultone.....	1120714
1,3-Butadiene.....	106990
Nickel refinery dust.....	
2-Acetylaminoflourine.....	53963
3,3[prime]-Dichlorobenzidine.....	53963
Lindane (hexachlorocyclohexane, gamma).....	58899
2,4-Toluene diamine.....	95807

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

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

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

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

CAS No.	Chemical name	EPA de minimis, tons/yr*
92671	4-Aminobiphenyl	1.0
96093	Styrene oxide	1.0
64675	Diethyl sulfate	1.0
59892	N-Nitrosomorpholine	1.0
68122	Dimethyl formamide	1.0
680319	Hexamethylphosphoramide	0.01
60355	Acetamide	1.0
101779	4,4[prime]-Methylenedianiline	1.0
90040	o-Anisidine	1.0
1746016	2,3,7,8-Tetrachlorodibenzo-p-dioxin	0.0000006
92875	Benzidine	0.00003
684935	N-Nitroso-N-methylurea	0.00002
542881	Bis(chloromethyl) ether	0.00003
79447	Dimethyl carbamoyl chloride	0.002
75558	1,2-Propylenimine (2-Methyl aziridine)	0.0003
57147	1,1-Dimethyl hydrazine	0.0008
96128	1,2-Dibromo-3-chloropropane	0.001
62759	N-Nitrosodimethylamine	0.0004
50328	Benzo (a) pyrene	0.001
1336363	Polychlorinated biphenyls (Aroclors)	0.0009
76448	Heptachlor	0.002
119937	3,3[prime]-Dimethyl benzidine	0.001
79061	Acrylamide	0.002

118741.....	Hexachlorobenzene.....	0.004
57749.....	Chlordane.....	0.005
1120714.....	1,3-Propane sultone.....	0.003
106990.....	1,3-Butadiene.....	0.007
53963.....	2-Acetylaminoflourine.....	0.0005
91941.....	3,3[prime] Dichlorobenzidine.....	0.02
58899.....	Lindane (hexachlorocyclohexane, gamma)-	0.005
95807.....	2,4-Toluene diamine.....	0.002
111444.....	Dichloroethyl ether (Bis(2- chloroethyl)ether)-	0.006
122667.....	1,2-Diphenylhydrazine.....	0.009
8001352.....	Toxaphene (chlorinated camphene)-	0.006
121142.....	2,4-Dinitrotoluene.....	0.002
119904.....	3,3[prime] Dimethoxybenzidine.....	0.01
50000.....	Formaldehyde.....	0.2
101144.....	4,4[prime] Methylene bis(2- chloroaniline)-	0.02
107131.....	Acrylonitrile.....	0.03
106934.....	Ethylene dibromide(1,2- Dibromoethane)-	0.01
72559.....	DDE (1,1 p-chlorophenyl 1,2- dichloroethylene)-	0.01
510156.....	Chlorobenzilate.....	0.04
62737.....	Dichlorvos.....	0.02
75014.....	Vinyl chloride.....	0.02
75218.....	Ethylene oxide.....	0.09
96457.....	Ethylene thiourea.....	0.06
593602.....	Vinyl bromide (bromoethene).....	0.06
67663.....	Chloroform.....	0.09
87865.....	Pentachlorophenol.....	0.07
51796.....	Ethyl carbamate (Urethane).....	0.08
107062.....	Ethylene dichloride (1,2- Dichloroethane)-	0.08
78875.....	Propylene dichloride (1,2- Dichloropropane)-	0.1
56235.....	Carbon tetrachloride.....	0.1
71432.....	Benzene.....	0.2
140885.....	Ethyl acrylate.....	0.1
75569.....	Propylene oxide.....	0.5
62533.....	Aniline.....	0.1
106467.....	1,4-Dichlorobenzene(p).....	0.3
88062.....	2,4,6-Trichlorophenol.....	0.6
117817.....	Bis (2-ethylhexyl) phthalate (DEHP)-	0.5
95534.....	o-Toluidine.....	0.4
114261.....	Propoxur.....	2.0
79016.....	Trichloroethylene.....	1.0
123911.....	1,4-Dioxane (1,4-Diethyleneoxide)-	0.6
75070.....	Acetaldehyde.....	0.9
75252.....	Broomcorn.....	2.0
133062.....	Captan.....	2.0
106898.....	Epichlorohydrin.....	2.0
75092.....	Methylene chloride (Dichloromethane)-	4.0

127184.....	Tetrachloroethylene (Perchloroethylene)-	4.0
53703.....	Dibenz (ah) anthracene.....	0.01
218019.....	Chrysene.....	0.01
60117.....	Dimethyl aminoazobenzene.....	1.0
56553.....	Benzo (a) anthracene.....	0.01
205992.....	Benzo (b) fluoranthene.....	0.01
79469.....	2-Nitropropane.....	1.0
542756.....	1,3-Dichloropropene.....	1.0
57976.....	7,12-Dimethylbenz (a) anthracene.....	0.01
225514.....	Benz(c)acridine.....	0.01
193395.....	Indeno(1,2,3-cd)pyrene.....	0.01
189559.....	1,2:7,8-Dibenzopyrene.....	0.01
79345.....	1,1,2,2-Tetrachloroethane.....	0.03
91225.....	Quinoline.....	0.0006
75354.....	Vinylidene chloride (1,1- Dichloroethylene)-	0.04
87683.....	Hexachlorobutadiene.....	0.09
82688.....	Pentachloronitrobenzene (Quintobenzene)-	0.03
78591.....	Isophorone.....	0.7
79005.....	1,1,2-Trichloroethane.....	0.1
74873.....	Methyl chloride (Chloromethane)..	1.0
67721.....	Hexachloroethane.....	0.5
1582098.....	Trifluralin.....	0.9
1319773.....	Cresols/Cresylic acid (isomers and mixture)-	1.0
108394.....	m-Cresol.....	1.0
75343.....	Ethylidene dichloride (1,1- Dichloroethane)-	1.0
95487.....	o-Cresol.....	1.0
106445.....	p-Cresol.....	1.0
74884.....	Methyl iodide (Iodomethane).....	1.0
100425.....	Styrene.....	1.0
107051.....	Allyl chloride.....	1.0
334883.....	Diazomethane.....	1.0
95954.....	2,4,5-Trichlorophenol.....	1.0
133904.....	Chloramben.....	1.0
106887.....	1,2-Epoxybutane.....	1.0
108054.....	Vinyl acetate.....	1.0
126998.....	Chloroprene.....	1.0
123319.....	Hydroquinone.....	1.0
92933.....	4-Nitrobiphenyl.....	1.0
56382.....	Parathion.....	0.1
13463393.....	Nickel Carbonyl.....	0.1
60344.....	Methyl hydrazine.....	0.006
151564.....	Ethylene imine.....	0.0003
77781.....	Dimethyl sulfate.....	0.1
107302.....	Chloromethyl methyl ether.....	0.1
57578.....	beta-Propiolactone.....	0.1
100447.....	Benzyl chloride.....	0.04
98077.....	Benzotrichloride.....	0.0006
107028.....	Acrolein.....	0.04
584849.....	2,4-Toluene diisocyanate.....	0.1
75741.....	Tetramethyl lead.....	0.01

78002.....	Tetraethyl lead.....	0.01
12108133.....	Methylcyclopentadienyl manganese.....	0.1
624839.....	Methyl isocyanate.....	0.1
77474.....	Hexachlorocyclopentadiene.....	0.1
62207765.....	Fluomine.....	0.1
10210681.....	Cobalt carbonyl.....	0.1
79118.....	Chloroacetic acid.....	0.1
534521.....	4,6-Dinitro-o-cresol, and salts..	0.1
101688.....	Methylene diphenyl diisocyanate..	0.1
108952.....	Phenol.....	0.1
62384.....	Mercury, (acetato-o) phenyl.....	0.01
98862.....	Acetophenone.....	1.0
108316.....	Maleic anhydride.....	1.0
532274.....	2-Chloroacetophenone.....	0.06
51285.....	2,4-Dinitrophenol.....	1.0
109864.....	2-Methoxy ethanol.....	10.0
98953.....	Nitrobenzene.....	1.0
74839.....	Methyl bromide (Bromomethane)....	10.0
75150.....	Carbon disulfide.....	1.0
121697.....	N,N-Dimethylaniline.....	1.0
106514.....	Quinone.....	5.0
123386.....	Propionaldehyde.....	5.0
120809.....	Catechol.....	5.0
85449.....	Phthalic anhydride.....	5.0
463581.....	Carbonyl sulfide.....	5.0
132649.....	Dibenzofurans.....	5.0
100027.....	4-Nitrophenol.....	5.0
540841.....	2,2,4-Trimethylpentane.....	5.0
111422.....	Diethanolamine.....	5.0
822060.....	Hexamethylene-1,6-diisocyanate...	5.0
.....	Glycol ethersa.....	5.0
.....	Polycyclic organic matterb.....	0.01

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

a Except for ethylene glycol butyl ether, ethylene glycol ethyl ether (2-ethoxy ethanol), ethylene glycol hexyl ether, ethylene glycol methyl ether (2-methoxyethanol), ethylene glycol phenyl ether, ethylene glycol propyl ether, ethylene glycol mono-2-ethylhexyl ether, diethylene glycol butyl ether, diethylene glycol ethyl ether, diethylene glycol methyl ether, diethylene glycol hexyl ether, diethylene glycol phenyl ether, diethylene glycol propyl ether, triethylene glycol butyl ether, triethylene glycol ethyl ether, triethylene glycol methyl ether, triethylene glycol propyl ether, ethylene glycol butyl ether acetate, ethylene glycol ethyl ether acetate, and diethylene glycol ethyl ether acetate.

b Except for benzo(b)fluoranthene, benzo(a)anthracene, benzo(a)pyrene, 7,12-dimethylbenz(a)anthracene, benz(c)acridine, chrysene, dibenz(ah)anthracene, 1,2:7,8-dibenzopyrene, indeno(1,2,3-cd)pyrene, but including dioxins and furans.

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations**

**Company Name: Hartson-Kennedy Cabinet Top Company, Inc.  
Address City IN Zip: 28322 County Road 20 West, Elkhart, IN 46517  
Permit Number: T 039-17698  
Plt ID: 039-00318  
Reviewer: Frank P. Castelli  
Application Date: June 25, 2003**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Ultra form Con-Bond 2621	6.60	81.00%	32.3%	48.7%	32.3%	12.00%	21.40000	1.660	4.75	3.21	114.18	2740.3	500.1	97.6	26.79	50%
E Top Con-Bond 2621	6.60	81.00%	32.3%	48.7%	32.3%	12.00%	21.40000	0.830	4.75	3.21	57.09	1370.2	250.1	48.8	26.79	50%
Dura/Diamond Con-Bond 2621	6.60	81.00%	32.3%	48.7%	32.3%	12.00%	21.40000	0.550	4.75	3.21	37.83	907.9	165.7	32.3	26.79	50%
Ultra form Toluene	7.26	100.00%	0.0%	100.0%	0.0%	0.00%	1.00000	1.660	7.26	7.26	12.05	289.2	52.8	0.00	N/A	50%
E Top Toluene	7.26	100.00%	0.0%	100.0%	0.0%	0.00%	1.00000	0.830	7.26	7.26	6.03	144.6	26.4	0.00	N/A	50%
Dura/Diamond Toluene	7.26	100.00%	0.0%	100.0%	0.0%	0.00%	1.00000	0.550	7.26	7.26	3.99	95.8	17.5	0.00	N/A	50%
Custom Area H-582-C Thinner	6.92	100.00%	34.0%	66.0%	35.6%	0.00%	1.00000	1.500	7.09	4.57	6.85	164.4	30.0	0.00	N/A	50%

PM Control Efficiency: 85.00%

**State Potential Emissions**

**Add worst case coating to all solvents**

<b>Uncontrolled</b>	<b>238.0</b>	<b>5712.6</b>	<b>1042.5</b>	<b>178.7</b>
<b>Controlled</b>	<b>238.0</b>	<b>5712.6</b>	<b>1042.5</b>	<b>26.8</b>

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

**Appendix A: Emission Calculations  
HAP Emission Calculations**

**Company Name:** Hartson-Kennedy Cabinet Top Company, Inc.  
**Address City IN Zip:** 28322 County Road 20 West, Elkhart, IN 46517  
**Permit Number:** T 039-17698  
**Plt ID:** 039-00318  
**Permit Reviewer:** Frank P. Castilli  
**Application Date:** June 25, 2003

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Toluene	Weight % MEK	Weight % Hexane	Weight % Methanol	Toluene Emissions (ton/yr)	MEK Emissions (ton/yr)	Hexane Emissions (ton/yr)	Methanol Emissions (ton/yr)
Ultra form Con-Bond 2621	6.60	21.4	1.66	0.10%	7.20%	9.10%	0.00%	1.03	73.94	93.45	0.00
E Top Con-Bond 2621	6.60	21.4	0.83	0.10%	7.20%	9.10%	0.00%	0.51	36.97	46.73	0.00
ura/Diamond Con-Bond 262	6.60	21.4	0.55	0.10%	7.20%	9.10%	0.00%	0.34	24.50	30.96	0.00
Ultra form Toluene	7.26	1.0	1.66	100.00%	0.00%	0.00%	0.00%	52.79	0.00	0.00	0.00
E Top Toluene	7.26	1.0	0.83	100.00%	0.00%	0.00%	0.00%	26.39	0.00	0.00	0.00
Dura/Diamond Toluene	7.26	1.0	0.55	100.00%	0.00%	0.00%	0.00%	17.49	0.00	0.00	0.00
ustom Area H-582-C Thinn	6.92	1.0	1.50	50.00%	0.00%	0.00%	15.00%	22.73	0.00	0.00	6.82
Total State Potential Emissions								<b>121.3</b>	<b>135.4</b>	<b>171.1</b>	<b>6.82</b>

**METHODOLOGY**

**Total HAPs 434.6 tons/yr**

HAPS emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs

**Appendix A: Emission Calculations  
Baghouse Operations**

**Company Name: Hartson-Kennedy Cabinet Top Company, Inc.  
Address City IN Zip: 28322 County Road 20 West, Elkhart, IN 46517  
Part 70 Renewal: T 039-17698  
Plt ID: 039-00318  
Reviewer: Frank P. Castelli  
Application Date: June 25, 2003**

**Cyclone and Baghouse in Series**

Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	Emission Rate before Controls (lb/hr)	Emission Rate before Controls (tons/yr)	Emission Rate after Controls (lb/hr)	Emission Rate after Controls (tons/yr)
Woodworking	99.5%	0.00105	22000.0	39.60	173.45	0.198	0.867

**Methodology**

Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (sq. ft.) ((cub. ft./min.)/sq. ft.) (60 min/hr) (lb/7000 grains)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

**Allowable Rate of Emissions**

Process Rate (lbs/hr)	Process Weight Rate (tons/hr)	Allowable Emissions (lbs/hr)
17160	8.58	17.31

**Methodology**

Allowable Emissions = 4.10(Process Weight Rate)^0.67