



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

December 10, 2004

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

TO: Interested Parties / Applicant

RE: Indiana Handle Company, Inc. / 177-17755-00006

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

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot 9/16/03



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

**Indiana Handle Company, Inc.
1514 West Main Street
Paoli, Indiana 47454**

(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 provision of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; and denial of a permit renewal application. 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 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F117-17755-00006	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: December 10, 2004 Expiration Date: December 10, 2009

TABLE OF CONTENTS

SECTION A	SOURCE SUMMARY	5
A.1	General Information [326 IAC 2-8-3(b)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3	Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(l)]	
A.4	FESOP Applicability [326 IAC 2-8-2]	
A.5	Prior Permits Superseded [326 IAC 2-1.1-9.5]	
SECTION B	GENERAL CONDITIONS	7
B.1	Permit No Defense [IC 13]	
B.2	Definitions [326 IAC 2-8-1]	
B.3	Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]	
B.4	Enforceability [326 IAC 2-8-6]	
B.5	Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]	
B.6	Severability [326 IAC 2-8-4(4)]	
B.7	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.8	Duty to Provide Information[326 IAC 2-8-4(5)(E)]	
B.9	Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.10	Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]	
B.11	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.12	Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]	
B.13	Emergency Provisions [326 IAC 2-8-12]	
B.14	Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]	
B.15	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]	
B.16	Permit Renewal [326 IAC 2-8-3(h)]	
B.17	Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]	
B.18	Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]	
B.19	Permit Revision Requirement [326 IAC 2-8-11.1]	
B.20	Inspection and Entry [326 IAC 2-8-5(a)(2)][IC13-14-2-2][IC 13-17-3-2][IC13-30-3-1]	
B.21	Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
B.22	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]	
B.23	Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314]	
SECTION C	SOURCE OPERATION CONDITIONS	16
	Emission Limitations and Standards [326 IAC 2-8-4(1)]	
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [40 CFR 52 Subpart P][326 IAC 6-3-2]	
C.2	Overall Source Limit [326 IAC 2-8]	
C.3	Opacity [326 IAC 5-1]	
C.4	Open Burning [326 IAC 4-1][IC 13-17-9]	
C.5	Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]	
C.6	Fugitive Dust Emissions [326 IAC 6-4]	
C.7	Operation of Equipment [326 IAC 2-8-5(a)(4)]	
C.8	Stack Height [326 IAC 1-7]	
C.9	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61 Subpart M]	
	Testing Requirements [326 IAC 2-8-4(3)]	
C.10	Performance Testing [326 IAC 3-6]	
	Compliance Requirements [326 IAC 2-1.1-11]	
C.11	Compliance Requirements [326 IAC 2-1.1-11]	

TABLE OF CONTENTS (Continued)

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

- C.12 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]
- C.13 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

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

- C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
- C.15 Compliance Response Plan -Preparation, Implementation, Records, and Reports [326 IAC 2-8-4][326 IAC 2-8-5]
- C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

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

- C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]
- C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

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

SECTION D.1 FACILITY OPERATION CONDITIONS..... 23

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

- D.1.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]
- D.1.2 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-3]
- D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

- D.1.4 Particulate Matter (PM)

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

- D.1.5 Visible Emissions Notations

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

- D.1.6 Record Keeping Requirements

SECTION D.2 FACILITY OPERATION CONDITIONS..... 25

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

- D.2.1 Particulate [326 IAC 6-3-2]
- D.2.2 FESOP [326 IAC 2-8-4]
- D.2.3 PSD Minor Limit [326 IAC 2-2]
- D.2.4 Preventative Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

- D.2.5 Particulate Control

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

- D.2.6 Visible Emissions Notations
- D.2.7 Cyclone Inspections
- D.2.8 Cyclone Failure Detection

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

- D.2.9 Record Keeping Requirements

TABLE OF CONTENTS (Continued)

SECTION D.3 FACILITY OPERATION CONDITIONS..... 27

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

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

D.3.2 Volatile Organic Compounds (VOC)

D.3.3 Hazardous Air Pollutants (HAP)

D.3.4 Particulate Matter (PM) [40 CFR 52 Subpart P]

D.3.5 Particulate [326 IAC 6-3-2(d)]

D.3.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

D.3.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

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

D.3.8 Monitoring

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

D.3.9 Record Keeping Requirements

Certification Form..... 31

Emergency Occurrence Form..... 32

Quarterly Deviation and Compliance Monitoring Report Form 34

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

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

Authorized individual:	Vice-President
Source Address:	1514 West Main Street, Paoli, Indiana 47454
Mailing Address:	P.O. Box 300, Paoli, Indiana 47454
General Source Phone:	(812) 723-3159
SIC Code:	2499
County	Orange
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) The following two (2) wood fired boilers:
- (1) One (1) wood fired boiler, constructed in 1996, identified as Boiler 1, with a maximum heat input rate of 9.6 million British thermal units (MMBtu) per hour, using a multi-clone for particulate control, and exhausting to stack S-1.
 - (2) One (1) wood/bark fired boiler, constructed in 1930, identified as Boiler 2, with a maximum heat input rating of 5.0 million British thermal units (MMBtu) per hour, and exhausting to stack S-2.
- (b) The following two (2) woodworking operations:
- (1) One (1) mill woodworking operation, constructed in 1975, identified as Wood-1, with a maximum throughput of 400 pounds of wood per hour, and using two (2) cyclones for particulate control.
 - (2) One (1) plant woodworking operation, constructed in 1932, identified as Wood-2, with a maximum throughput of 400 pounds of wood per hour, and using three (3) cyclones for particulate control.
- (c) Twelve (12) surface coating operations consisting of the following:
- (1) One (1) paint booth for wood furniture coating, constructed in 1956, identified as B-1, using dipping and HVLP spraying application methods, using dry filters for overspray control and exhausting at stack B-1.
 - (2) One (1) paint booth for wood furniture coating, constructed in 1956, identified as B-8, using dipping and HVLP spraying application methods, using dry filters and baffles for overspray control and exhausting at stack B-8.

- (3) Six (6) paint booths for wood furniture coating, constructed in 1956, identified as B-2, B-3, B-4, B-6, B-7 and B-10, equipped with HVLP spray guns, each using dry filters and baffles for overspray control and exhausting at stacks (B-2, B-3, B-4, B-6, B-7 and B-10, respectively).
- (4) One (1) paint booth for wood furniture coating, constructed in 1993, identified as B-5, equipped with an HVLP spray gun, using dry filters and baffles for overspray control and exhausting at stack B-5.
- (5) One (1) paint booth for wood furniture coating, constructed in 1993, identified as B-11, using dipping and HVLP spraying application methods, using dry filters for overspray control, and exhausting at stack B-11.
- (6) One (1) dip booth for wood furniture coating, constructed in 1956, identified as B-9 and using no controls.
- (7) One (1) dip booth for wood furniture coating, constructed in 1993, identified as D-1 and using no controls.

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

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

- (a) Infrared cure equipment.
- (b) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (c) Paved and unpaved roads and parking lots with public access.

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

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

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

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

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

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

B.3 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]

This permit 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.

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

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

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

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

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

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

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

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

B.8 Duty to Provide Information [326 IAC 2-8-4(5)(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 "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (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.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This

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

- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

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

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

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

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

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) 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.13 Emergency Provisions [326 IAC 2-8-12]

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

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

IDEM-Southwest Regional Office
Telephone No.: 1-888-672-8323 or 812-380-2305
Facsimile No.: 812-380-2304

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

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

Indianapolis, Indiana 46206-6015

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.
- (h) Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

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

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

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

B.16 Permit Renewal [326 IAC 2-8-3(h)]

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

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

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

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

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

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

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

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

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

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

and

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

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

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

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

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

- (d) 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.19 Permit Revision Requirement [326 IAC 2-8-11.1]

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

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC13-30-3-1]

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

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) 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, at reasonable times, 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 at reasonable times, 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, at reasonable times, 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.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

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

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

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

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

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][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) 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 317-233-4320 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314]

Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

- (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

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

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

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 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.4 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.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

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

C.6 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.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

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

C.8 Stack Height [326 IAC 1-7]

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

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

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

All required notifications shall be submitted to:

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

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

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 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 2-8-4(3)]

C.10 Performance Testing [326 IAC 3-6]

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

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

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

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the 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.11 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements 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 2-8-4] [326 IAC 2-8-5(a)(1)]

C.12 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

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

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

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

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

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

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:
- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan, and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of

the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

Stratospheric Ozone Protection

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

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

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) The following two (2) wood fired boilers:
- (1) One (1) wood fired boiler, constructed in 1996, identified as Boiler 1, with a maximum heat input rate of 9.6 million British thermal units (MMBtu) per hour, using a multi-clone for particulate control, and exhausting to stack S-1.
 - (2) One (1) wood/bark fired boiler, constructed in 1930, identified as Boiler 2, with a maximum heat input rating of 5.0 million British thermal units (MMBtu) per hour, and exhausting to stack S-2.

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

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

D.1.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to CP 117-4920, issued on April 24, 1996, and 326 IAC 6-2-4, the particulate matter emissions from the 9.6 MMBtu per hour wood fired boiler shall be limited to 0.6 pounds PM per MMBtu heat input.

D.1.2 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3, the particulate matter emissions from the 5.0 MMBtu per hour bark/wood-fired boiler shall be limited to 0.8 pounds PM per MMBtu heat input.

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.4 Particulate Matter (PM)

Pursuant to CP 117-4920, issued on April 24, 1996, the multi-clone for PM control shall be in operation at all times that the 9.6 MMBtu per hour wood-fired boiler is in operation.

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

D.1.5 Visible Emissions Notations

- (a) Visible emission notations of the 9.6 MMBtu per hour wood-fired multiclone stack exhaust and the 5.0 MMBtu bark/wood-fired boiler stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, D.1.2 and D.1.5, the Permittee shall maintain records of the daily visible emissions notations of the 9.6 MMBtu per hour wood-fired boiler multi-clone stack exhaust and the 5.0 MMBtu per hour bark/wood-fired boiler stack exhaust.
- (b) To document compliance with Condition D.1.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (b) The following two (2) woodworking operations:
- (1) One (1) mill woodworking operation, constructed in 1975, identified as Wood-1, with a maximum throughput of 400 pounds of wood per hour, and using two (2) cyclones for particulate control.
 - (2) One (1) plant woodworking operation, constructed in 1932, identified as Wood-2, with a maximum throughput of 400 pounds of wood per hour, and using three (3) cyclones for particulate control.

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

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

D.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from each of the woodworking facilities shall not exceed 1.39 pounds per hour when operating at a process weight rate of 400 pounds per hour. The pounds per hour limitation was calculated using the following equation:

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

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

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

D.2.2 FESOP [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), the particulate matter 10 microns or less (PM10) emissions from the woodworking facility shall not exceed 8.06 pounds per hour when operating at a process weight rate of 400 pounds per hour. Compliance with this PM10 limit makes the requirements of 326 IAC 2-7 not applicable and makes the source minor for PSD (326 IAC 2-2).

D.2.3 PSD Minor Limit [326 IAC 2-2]

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), the emissions of particulate matter (PM) from the woodworking facilities shall not exceed 15.3 pounds per hour, which is equivalent to 67 tons per twelve month consecutive period. Compliance with this PM limit makes the source minor for PSD (326 IAC 2-2).

D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.2.5 Particulate Control

Pursuant to FESOP 117-6054-00006, issued on October 16, 1998, and in order to comply with conditions D.2.1, D.2.2, D.2.3 the cyclones for particulate control shall be in operation and control emissions from the woodworking operations at all times that the woodworking operations are in operation.

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

D.2.6 Visible Emissions Notations

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

D.2.7 Cyclone Inspections

An inspection shall be performed each calendar quarter of all cyclones controlling the woodworking operation.

D.2.8 Cyclone Failure Detection

In the event that cyclone failure has been observed:

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

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

D.2.9 Record Keeping Requirements

- (a) To document compliance with Condition D.2.6, the Permittee shall maintain records of daily visible emission notations of the woodworking operation cyclones stack exhaust.
- (b) To document compliance with Condition D.2.7, the Permittee shall maintain records of the results of the inspections required under Condition D.2.7.
- (c) To document compliance with Condition D.2.4, 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.

SECTION D.3

FACILITY OPERATION CONDITIONS

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

- (c) Twelve (12) surface coating operations consisting of the following:
- (1) One (1) paint booth for wood furniture coating, constructed in 1956, identified as B-1, using dipping and HVLP spraying application methods, using dry filters for overspray control and exhausting at stack B-1.
 - (2) One (1) paint booth for wood furniture coating, constructed in 1956, identified as B-8, using dipping and HVLP spraying application methods, using dry filters and baffles for overspray control and exhausting at stack B-8.
 - (3) Six (6) paint booths for wood furniture coating, constructed in 1956, identified as B-2, B-3, B-4, B-6, B-7 and B-10, equipped with HVLP spray guns, each using dry filters and baffles for overspray control and exhausting at stacks (B-2, B-3, B-4, B-6, B-7 and B-10, respectively).
 - (4) One (1) paint booth for wood furniture coating, constructed in 1993, identified as B-5, equipped with an HVLP spray gun, using dry filters and baffles for overspray control and exhausting at stack B-5.
 - (5) One (1) paint booth for wood furniture coating, constructed in 1993, identified as B-11, using dipping and HVLP spraying application methods, using dry filters for overspray control, and exhausting at stack B-11.
 - (6) One (1) dip booth for wood furniture coating, constructed in 1956, identified as B-9 and using no controls.
 - (7) One (1) dip booth for wood furniture coating, constructed in 1993, identified as D-1 and using no controls.

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

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

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12, for surface coating units B-5, B-11 and D-1, the surface coating applied to wood furniture shall utilize one of the following application methods:

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

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

D.3.2 Volatile Organic Compounds (VOC)

The source's potential to emit VOC is less than one-hundred (100) tons per year. Therefore, the source is not subject to 326 IAC 2-7 (Part 70). Any change that would increase VOC emissions to greater than one-hundred (100) tons per year requires prior approval from IDEM, OAQ.

D.3.3 Hazardous Air Pollutants (HAP)

The source's potential to emit a single HAP is less than ten (10) tons per year and the source's potential to emit a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to 40 CFR 63, Subpart JJ and Part 70 [326 IAC 2-7]. Any change that would increase HAP emissions to greater than ten (10) tons per year of a single HAP or greater than twenty-five (25) tons per year of a combination of HAPs requires prior approval from IDEM, OAQ.

D.3.4 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the PM from the surface coating booths B-1, B-2, B-3, B-4, B-5, B-6, B-7, B-8, B-10 and B-11 shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.3.5 Particulate [326 IAC 6-3-2(d)]

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

D.3.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.3.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content and usage limitations contained in Condition D.3.2 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 2-8-4] [326 IAC 2-8-5(a)(1)]

D.3.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters and baffles. To monitor the performance of the dry filters and baffles, weekly observations shall be made of the overspray from the surface coating booth exhaust stacks B-1, B-2, B-3, B-4, B-5, B-6, B-7, B-8, B-10 and B-11 while one or more of the booths are in operation. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

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

D.3.9 Record Keeping Requirements

- (a) To document compliance with Condition D.3.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.3.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The amount and VOC content of each gel coat, resin, foam, surface coating, adhesive, catalyst, dilution solvent and cleaning solvent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) The total VOC usage for each month; and
 - (3) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.3.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits and/or the HAP emission limits established in Condition D.3.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The HAP 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 volume weighted HAP content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total HAP usage for each month; and
 - (6) The weight of HAPs emitted for each compliance period.
- (c) To document compliance with Conditions D.3.6 and D.3.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

- (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**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Indiana Handle Company, Inc.
Source Address: 1514 West Main Street, Paoli, Indiana 47454
Mailing Address: P.O. Box 300, Paoli, Indiana 47454
FESOP No.: 117-17755-00006

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Indiana Handle Company, Inc.
Source Address: 1514 West Main Street, Paoli, Indiana 47454
Mailing Address: P.O. Box 300, Paoli, Indiana 47454
FESOP No.: 117-17755-00006

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- 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
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

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

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

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , 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

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

Source Name: Indiana Handle Company, Inc.
Source Address: 1514 West Main Street, Paoli, Indiana 47454
Mailing Address: P.O. Box 300, Paoli, Indiana 47454
FESOP No.: 117-17755-00006

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>	
<p><input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Technical Support Document (TSD) for a Federally Enforceable Operating Permit
(FESOP) Renewal

Source Background and Description

Source Name:	Indiana Handle Company, Inc.
Source Location:	1514 West Main Street, Paoli, Indiana 47454
County:	Orange
SIC Code:	2499
Operation Permit No.:	117-6054-00006
Operation Permit Issuance Date:	October 16, 1998
Permit Renewal No.:	117-17755-00006
Permit Reviewer:	ERG/ST

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Indiana Handle Company, Inc. relating to the operation of a stationary miscellaneous wood products manufacturing plant.

Permitted Emission Units and Pollution Control Equipment

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

- (a) The following two (2) wood fired boilers:
 - (1) One (1) wood fired boiler, constructed in 1996, identified as Boiler 1, with a maximum heat input rate of 9.6 million British thermal units (MMBtu) per hour, using a multi-clone for particulate control, and exhausting to stack S-1.
 - (2) One (1) wood/bark fired boiler, constructed in 1930, identified as Boiler 2, with a maximum heat input rating of 5.0 million British thermal units (MMBtu) per hour, and exhausting to stack S-2.
- (b) The following two (2) woodworking operations:
 - (1) One (1) mill woodworking operation, constructed in 1975, identified as Wood-1, with a maximum throughput of 400 pounds of wood per hour, and using two (2) cyclones for particulate control.
 - (2) One (1) plant woodworking operation, constructed in 1932, identified as Wood-2, with a maximum throughput of 400 pounds of wood per hour, and using three (3) cyclones for particulate control.
- (c) Twelve (12) surface coating operations consisting of the following:
 - (1) One (1) paint booth for wood furniture coating, constructed in 1956, identified as B-1, using dipping and HVLP spraying application methods, using dry filters for overspray control and exhausting at stack B-1.
 - (2) One (1) paint booth for wood furniture coating, constructed in 1956, identified as B-8, using dipping and HVLP spraying application methods, using dry filters and baffles for overspray control and exhausting at stack B-8.

- (3) Six (6) paint booths for wood furniture coating, constructed in 1956, identified as B-2, B-3, B-4, B-6, B-7 and B-10, equipped with HVLP spray guns, each using dry filters and baffles for overspray control and exhausting at stacks (B-2, B-3, B-4, B-6, B-7 and B-10, respectively).
- (4) One (1) paint booth for wood furniture coating, constructed in 1993, identified as B-5, equipped with an HVLP spray gun, using dry filters and baffles for overspray control and exhausting at stack B-5.
- (5) One (1) paint booth for wood furniture coating, constructed in 1993, identified as B-11, using dipping and HVLP spraying application methods, using dry filters for overspray control, and exhausting at stack B-11.
- (6) One (1) dip booth for wood furniture coating, constructed in 1956, identified as B-9 and using no controls.
- (7) One (1) dip booth for wood furniture coating, constructed in 1993, identified as D-1 and using no controls.

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) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (c) Paved and unpaved roads and parking lots with public access.

Existing Approvals

The source has been operating under the previous FESOP 117-6054-00006, issued on October 16, 1998, with an expiration date of October 16, 2003, and the following amendments and revisions:

Reopening 117-13092-00006, issued December 12, 2001.

All conditions from previous approvals were incorporated into this FESOP.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP renewal application for the purposes of this review was received on May 22, 2003. Additional information was received on January 2, 2004.

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

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 3).

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	784
PM-10	781
SO ₂	1.60
VOC	32.5
CO	38.4
NO _x	25.4

HAPs	Unrestricted Potential Emissions (tons/yr)
Hydrogen Chloride	1.22
Methyl Ethyl Ketone	1.83
Methyl Isobutyl Ketone	0.95
Toluene	4.04
Xylene	3.29
All Other HAPs	1.27
Total	12.6

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM and PM10 are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.
- (b) 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.

Potential to Emit After Issuance

The source has opted to remain a FESOP source. 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 this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP.

Process/emission unit	Potential To Emit (tons/year)						Total HAPs*
	PM	PM-10	SO ₂	VOC	CO	NO _x	
Surface Coating and Dip Booths	0.43	0.43	0	21.6	0	0	10.11
Woodworking Operations	12.2	12.2	0	0	0	0	0
Wood-Fired Boilers	30.2	27.2	1.60	10.9	38.4	25.4	2.45
Total Emissions	42.8	39.8	1.60	32.5	38.4	25.4	12.6

* The potential to emit any single HAP is less than 10 tons per year.

County Attainment Status

The source is located in Orange County.

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

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) 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 emissions and NO_x are considered when evaluating the rule applicability relating to ozone. Orange County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NO_x were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Orange County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Fugitive Emissions
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 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.

Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	55
PM-10	99
SO ₂	--
VOC	99
CO	--
NO _x	--
Single HAP	9.4
Combination HAPs	24

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.
- (b) The requirements of the New Source Performance Standards for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971, 326 IAC 12, (40 CFR 60.40, Subpart D) are not included in this permit for the 9.6 MMBtu/hr wood fired

- boiler. The 9.6 MMBtu/hr wood fired boiler does not use fossil fuels and does not have a heat input capacity greater than 250 MMBtu per hour.
- (c) The requirements of the New Source Performance Standards for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978, 326 IAC 12, (40 CFR 60.40a, Subpart Da) are not included in this permit for the 9.6 MMBtu/hr wood fired boiler. The 9.6 MMBtu/hr wood fired boiler is not an Electric Utility Steam Generating Unit.
 - (d) The requirements of the New Source Performance Standards for Industrial-Commercial-Institutional Steam Generating Units, 326 IAC 12, (40 CFR 60.40b, Subpart Db) are not included in this permit for the 9.6 MMBtu/hr wood fired boiler. The heat input capacity from fuels combusted in the 9.6 MMBtu/hr wood fired boiler is less than 100 MMBtu/hr.
 - (e) The requirements of the New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units, 326 IAC 12, (40 CFR 60.40c, Subpart Dc) are not included in this permit for the 9.6 MMBtu/hr wood fired boiler. The maximum heat input rate of the 9.6 MMBtu/hr wood fired boiler is less than 10 MMBtu/hr.
 - (f) The requirements of 40 CFR 60, Subparts D, Da, Db and Dc are not included in this permit for the 5.0 MMBtu/hr boiler. The 5.0 MMBtu/hr boiler was constructed prior to the applicability dates of these NSPS.
 - (g) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this permit.
 - (h) The requirements of the National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing (40 CFR 63, Subpart JJ) are not included in this permit for the surface coating operations at this source. This source accepted limits on HAP emissions prior to the December 7, 1998 compliance date for existing affected sources that emitted less than 50 tons per year of HAPs in 1996. Currently, the entire source's potential to emit HAPs is less than 10 tons per year for a single HAP and less than 25 tons per year for a combination of HAPs. Recordkeeping requirements have been included in the draft permit to ensure that the source does not emit greater than the major source thresholds.
 - (i) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, (40 CFR 63, Subpart DDDDD) are not included in this permit for the 9.6 MMBtu/hr boiler and the 5.0 MMBtu/hr boiler. The source is not a major source of HAP.

State Rule Applicability – Entire Source

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

This source is not in one of the twenty-eight (28) source categories. The source was constructed prior to 1980 and was modified in 1993 and 1996. In 1980, the potential to emit before controls of PM and PM₁₀ was greater than 250 tons per year. The primary source of PM and PM₁₀ emissions were the woodworking facilities, which were equipped with particulate emissions control equipment at the time of their construction. The operation of this control equipment was required in previous permits to ensure compliance with a 1.4 pound per hour (6.13 ton per year) limit pursuant to 326 IAC 6-3. After controls, the source was a minor source under PSD. In 1993, the source constructed two (2) additional spray coating booths and one (1) dip coating booth. The increase in potential to emit for PM and PM₁₀ due to these additional facilities was less than one (1) ton per year and the increase in potential to emit for VOC due to these additional facilities was less than four (4) tons per year. In 1996, the source installed a 9.6 MMBtu/hr wood-fired boiler. The increase in potential to emit PM and PM₁₀ was less than 17.5 tons per year and 15.9 tons per year, respectively. Since these modifications did not result in an increase in criteria pollutants above the PSD applicability thresholds, PSD review was not required. The draft

FESOP includes limits for PM and PM₁₀ which make the source a minor source under PSD. The PM₁₀ limit is discussed under the FESOP requirements.

The following condition has been included in the draft permit:

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), the emissions of PM from the woodworking operations are limited to less than 15.3 pounds per hour, which is equivalent to less than 67 tons per twelve month consecutive period. Combined with other sources of PM emissions at this source, the total PM emissions are limited to less than 100 tons per twelve month consecutive period.

Compliance with the PM and PM₁₀ emission limits makes the source a minor source under PSD.

326 IAC 2-4.1-1 (New Source Toxics Control)

This source has not made any modifications after July 27, 1997 that have resulted in significant emissions of HAPs. Therefore the requirements of 326 IAC 2-4.1 (MACT) do not apply.

326 IAC 2-6 (Emission Reporting)

Since this source has accepted federally enforceable limits that make the provisions of 326 IAC 2-7 not applicable, this source is not subject to the reporting requirements of 326 IAC 2-6.

326 IAC 2-8-4 (FESOP)

Currently, the unrestricted potential emissions of PM₁₀ from the source exceed one hundred (100) tons per year. Pursuant to 326 IAC 2-8-4, and in order to limit the emissions of PM₁₀ to less than one-hundred (100) tons per year the following requirements shall apply:

- (a) The emissions of particulate matter less than 10 microns (PM₁₀) from each of the two (2) woodworking operations shall be limited to less than 8.06 pounds per hour, based on a process rate of 400 pounds of wood per hour and 8760 hours of operation per year. This is equivalent to less than 35.3 tons of PM₁₀ from each of the two (2) woodworking operations per twelve (12) consecutive month period, with compliance determined at the end of each month. Combined with PM₁₀ emissions from all other facilities at this source, this will limit PM₁₀ emissions from the entire source to less than 100 tons per year.
- (b) The source shall keep records sufficient to show compliance with the limits imposed in paragraph (a) above.

Therefore, the requirements of 326 IAC 2-7 (Part 70) and 326 IAC 2-2 (PSD) do not apply.

During the preparation of FESOP 117-6054-00006, the unrestricted potential to emit VOC and HAP was calculated to be greater than the Part 70 major source thresholds. As a result, the previous FESOP included limits on the amount of VOC and HAP that could be used. New data provided by the source in their FESOP renewal application shows that their current unrestricted potential to emit VOC and HAP are less than the Part 70 thresholds. Since changes to the types of paint can affect the potential emissions, IDEM has included the following conditions in the draft permit:

- (a) The source's potential to emit VOC is less than one-hundred (100) tons per year. Any change that would increase VOC emissions to greater than one-hundred (100) tons per year requires prior approval from IDEM, OAQ.
- (b) The source's potential to emit a single HAP is less than ten (10) tons per year and the source's potential to emit a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to 40 CFR 63, Subpart JJ and Part 70 [326 IAC 2-7]. Any change that would increase HAP emissions to greater than ten (10) tons per year of a single HAP or greater than twenty-five (25) tons per year of a combination of HAPs requires prior approval from IDEM, OAQ.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2(2) (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following limitations, 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 non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

Pursuant to 326 IAC 6-4, the source shall not generate fugitive dust to the extent that some portion of the material escapes beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located. A violation of this section would occur if air crossing the downwind boundaries of the site were to contain fugitive dust concentrations greater than sixty-seven percent (67%) in excess of ambient upwind concentrations.

State Rule Applicability – Wood-fired Boilers

326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating)

The 5.0 MMBtu/hr bark/wood-fired boiler was constructed prior to September 21, 1983. Pursuant to 326 IAC 6-2-3, boilers existing and in operation before September 21, 1983 shall be limited by the following equation or by 0.8 lbs per MMBtu/hr, whichever is more stringent:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

Where

- C = max ground level concentration (= 50 $\mu\text{m}/\text{m}^3$)
- Pt = emission rate limit (lbs/MMBtu)
- Q = total source heat input capacity (MMBtu/hr)
- N = number of stacks = 1
- a = plume rise factor = 0.67
- h = stack height (ft) = 45 ft

The emission rate limit established from the equation above equals:

$$Pt = \frac{50 \times 0.67 \times 45}{76.5 \times (5.0)^{0.75} \times 1^{0.25}} = 5.89 \text{ lbs/MMBtu}$$

Therefore, pursuant to 326 IAC 6-2-3(d), the most stringent PM emission limit for this boiler is 0.8 lbs/MMBtu.

Potential PM emissions from the 5.0 MMBtu/hr boiler are estimated to be 0.577 lbs/MMBtu. The 5.0 MMBtu/hr boiler can comply with this rule. (See Appendix A for detailed calculations)

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

Pursuant to CP 117-4920, issued on April 24, 1996, and 326 IAC 6-2-4, the particulate matter (PM) emissions from the 9.6 MMBtu/hr wood fired boiler shall be limited to 0.6 pounds of PM per MMBtu heat input.

Potential PM emissions from the 9.6 MMBtu/hr boiler are estimated to be 0.417 lbs/MMBtu. The 9.6 MMBtu/hr boiler can comply with this rule. (See Appendix A for detailed calculations)

State Rule Applicability - Woodworking operations

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

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate emissions from each of the woodworking operations (wood-1 and wood-2) shall not exceed 1.39 pounds per hour when operating at a process weight rate of 400 pounds per hour.

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

Interpolation of the data for the process weight rate up to 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 cyclones shall be in operation at all times the woodworking machinery is in operation, in order to comply with this limit.

State Rule Applicability - Surface Coating Operations

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

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

Pursuant to 40 CFR 52, Subpart P, the particulate matter (PM) from each of the spray coating operations (B-1 through B-8, B-10 and B-11) shall be limited by the following:

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

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

Under the rule revision, particulate from the surface coating operations shall be controlled by a dry particulate filter, baffles or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

326 IAC 8-1-6 (BACT)

(a) The requirements of 326 IAC 8-1-6 are not included in this permit for the surface coating booths B-1, B-2, B-3, B-4, B-6, B-7, B-8, B-9 and B-10. These facilities were constructed prior to the applicability date of January 1, 1980.

(b) The requirements of 326 IAC 8-1-6 are not included in this permit for the surface coating booths B-5, B-11 and D-1. These facilities are subject to the requirements of another Article 8 rule (326 IAC 8-2-12).

326 IAC 8-2-12 (Surface Coating Emissions Limitations)

(a) The requirements of 326 IAC 8-2-12 are not included in this permit for the surface coating booths B-1, B-2, B-3, B-4, B-6, B-7, B-8, B-9 and B-10. These facilities are located in Orange County and were constructed prior to the applicability date of July 1, 1990.

- (b) The source has declared that the three (3) surface coating booths B-5, B-11 and D-1 are subject to the requirements of 326 IAC 8-2-12. Pursuant to 326 IAC 8-2-12, the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods,

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

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system. These three (3) surface coating facilities use dipping and/or HVLP spray application methods, and are in compliance with the requirements of 326 IAC 8-2-12.

326 IAC 8-6 (Organic Solvent Emission Limitations)

The requirements of 326 IAC 8-6 are not included in this permit. The source is located in Orange County, was constructed prior to October 7, 1974 and does not have potential VOC emissions greater than 100 tons per year.

326 IAC 8-11 (Wood Furniture Coatings)

The requirements of 326 IAC 8-11 are not included in this permit. This source is located in Orange County. The requirements of 326 IAC 8-11-1 apply to sources located in Lake, Porter, Clark or Floyd County.

Testing Requirements

The facilities at this source do not have testing requirements.

- (a) **Wood-fired Boilers**
The wood-fired boilers at this source do not have a testing requirement for PM, NO_x, VOC and CO because the AP-42 emission factors used to calculate the potential to emit for these pollutants have a high rating. The wood-fired boilers at this source do not have a testing requirement for PM₁₀ because each of these emissions units accounts for a small portion of the total potential to emit for PM₁₀ from the source before controls.
- (b) **Woodworking Operations**
The woodworking operations at this source do not have a testing requirement. The woodworking operations are required by Conditions in the Permit to use cyclones to control PM and PM₁₀ emissions. Visible emission notations, quarterly inspection, and cyclone failure requirements have been added consistent with current compliance monitoring requirements for Title V woodworking sources. These monitoring requirements should be sufficient to ensure compliance with the particulate matter emission limitations specified in the Permit.
- (c) **Surface Coating Operations**
The surface coating operations do not have a testing requirement for PM, PM₁₀ or VOC. The surface coating operations at this source do not have a testing requirement for PM or PM₁₀ because each of these emission units accounts for a small portion of the total potential to emit for PM or PM₁₀ from the source before controls. The Permittee is not required to perform compliance stack tests on the surface coating facilities for VOC

emissions because there are no VOC control devices in operation and records must be kept of all VOCs used at the source.

- (d) IDEM may require testing at any time to determine if the facilities are in compliance with the emissions limitations contained in 326 IAC 5-1, 326 IAC 6-2, 326 IAC 6-3 and 326 IAC 2-8.

Compliance Requirements

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

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

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

1. The spray booths (emission units B-1 through B-8, B-10 and B-11) have applicable compliance monitoring conditions as specified below:
 - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters and baffles controlling emissions from spray booths B-1 through B-8, B-10 and B-11. To monitor the performance of the dry filters and baffles, weekly observations shall be made of the overspray from the surface coating booth stacks B-1 through B-8, B-10 and B-11 while the respective booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
 - (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
 - (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters and baffles for the spray booths must operate properly to ensure compliance with 326 IAC 6-3-2 (Process Operations).

2. The woodworking operation has applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emissions notations of the mill woodworking and plant woodworking cyclone stack exhausts shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
 - (b) An inspection shall be performed each calendar quarter of all cyclones controlling the woodworking operations.
 - (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the cyclones for the woodworking operations must operate properly to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-8-4 (FESOP).

3. The 9.6 MMBtu/hr wood-fired boiler and the 5.0 MMBtu/hr bark/wood-fired boiler have applicable compliance monitoring conditions as specified below:
 - (a) Once per shift visible emissions notations of the 9.6 MMBtu/hr wood-fired boiler multiclone stack exhaust and the 5.0 MMBtu/hr bark/wood-fired boiler stack exhaust shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
 - (b) An inspection shall be performed each calendar quarter of all cyclones controlling the 9.6 MMBtu/hr wood-fired boiler.
 - (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the wood-fired boilers and the multiclones controlling particulate emissions from the 9.6 MMbtu/hr boiler must operate properly to ensure compliance with 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating), 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), and 326 IAC 2-8-4 (FESOP).

Conclusion

The operation of this stationary miscellaneous wood products manufacturing plant shall be subject to the conditions of the FESOP 117-17755-00006.

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

**Addendum to the Technical Support Document
for Federally Enforceable State Operating Permit (FESOP) Renewal**

Source Background and Description

Source Name:	Indiana Handle Company, Inc.
Source Location:	1514 West Main Street, Paoli, Indiana 47454
County:	Orange
SIC Code:	2499
Permit Renewal No.:	F117-17755-00006
Permit Reviewer:	ERG/ST

On October 28, 2004, the Office of Air Quality (OAQ) had a notice published in the Paoli News-Republican, Paoli Indiana, stating that Indiana Handle Company, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal to operate a stationary miscellaneous wood products manufacturing plant. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table of Contents has been modified, if applicable, to reflect these changes.

1. In Section B.13(b)(4) of the Permit, the following corrections have been made to the telephone and facsimile numbers for the Southwest Regional Office:

B.13 Emergency Provisions [326 IAC 2-8-12]

.....

(b)

(4)

IDEM-Southwest Regional Office
Telephone No.: 1-888-672-8323 or 812-~~436-2570~~ **380-2305**
Facsimile No.: 812-~~436-2572~~ **380-2304**

2. The quarterly VOC and HAP reporting requirements included in the original FESOP permit (F117-6054-00006) issued on October 16, 1998, have not been included in this permit (F117-17755-00006). The PTE of this source for VOC and HAP exceeded the major source thresholds at the time that the original FESOP was issued, and the source accepted usage limits on VOC and HAP in order to qualify as a FESOP source. The permit required quarterly reporting to demonstrate ongoing compliance with these usage limits. Since 1998, the amount and composition of finishes used at this source have changed and the current PTE for this source for VOC and HAP are below the major

source thresholds. Therefore, no VOC or HAP usage limits are included in the permit and no reporting is required to demonstrate ongoing compliance. An explanation of this change to the conditions included in FESOP 117-6054-00006, issued on October 16, 1998, was inadvertently omitted from the TSD document that was placed on public notice.

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

**Appendix A: Emission Calculations
Combustion Emissions - Wood-Fired Boilers**

Company Name: Indiana Handle Company, Inc.
Address: 1514 West Main Street, Paoli, Indiana 47454
FESOP: 117-17755-00006
Plant ID: 117-00006
Reviewer: ERG/ST
Date: January 9, 2004

Pollutant Emission Factors								
Emission Factor (lbs/MMBtu)	PM *	PM10 *	SO ₂	NOx	CO	VOC	HAP (metals)	HAP (other)
Dry Wood	0.417	0.377	0.025	0.49	0.60	0.17	1.76E-03	3.66E-02
Bark	0.577	0.517	0.025	0.22	0.60	0.17	1.76E-03	3.66E-02

Potential To Emit (tons/yr)									
Emission Unit	Heat Input Capacity (MMBtu/hr)	PM	PM10	SO ₂	NOx	CO	VOC	HAP (metals)	HAP (other)
9.6 MMBtu Dry Wood-Fired Boiler	9.6	17.5	15.9	1.1	20.6	25.2	7.1	0.1	1.5
5.0 MMBtu Bark/Wood-Fired Boiler	5.0	12.6	11.3	0.5	4.8	13.1	3.7	0.0	0.8
PTE Totals for Boilers		30.2	27.2	1.60	25.4	38.4	10.9	0.11	2.34

Dry wood has a heat value of 8,000 Btu / lb. (AP-42, Chapter 1.6 - Wood Residue Combustion in Boilers, Page 1.6-1 (9/03)).

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

Emission Factors are from AP-42, Chapter 1.6 - Wood Residue Combustion in Boilers, (dry wood) Tables 1.6-1, 1.6-2, 1.6-3 and 1.6-4 (9/03). HAP emissions from the wood-fired boilers include acetaldehyde, acrolein, arsenic, benzene, chlorine, chromium, formaldehyde, hydrogen chloride, lead, manganese, nickel and styrene.

Methodology

PTE for PM, PM10, SO₂, NOx, CO, VOC, and HAP Emissions (tons/yr) = Heat Input Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8760 (hr/yr) x (1/2000) (tons/lb).

Appendix A: Emission Calculations
Particulate Emissions - Woodworking Operations

Company Name: Indiana Handle Company, Inc.
Address: 1514 West Main Street, Paoli, Indiana 47454
FESOP: 117-17755-00006
Plant ID: 117-00006
Reviewer: ERG/ST
Date: January 9, 2004

Emissions Unit	Process Weight Rate (lbs/hr)	Number of Cyclones	Control Efficiency (%)	Sawdust Collected* (lbs/hr)	PTE for Particulate Before Controls (tons/yr)	PTE for Particulate After Controls (tons/yr)
Mill Woodworking	400	2	99	50.0	221	2.19
Plant Woodworking	400	3	99	120.0	531	5.256
PTE TOTAL					752	7.45

Assume all sawdust collected is PM or PM10

Assume that for PTE Particulate After Controls, all PM = PM10

*Based on reported amount of sawdust collected from 10 hours of operations per day

Methodology

PTE Before Controls (tons/yr) = Sawdust Collected (lbs/hr) / (Control Efficiency %) x 8760 (hrs/yr) / 2000 (lbs/ton)

PTE After Controls (tons/yr) = Sawdust Collected (lbs/hr) x (1 - Control Efficiency %) x 8760 (hrs/yr) / 2000 (lbs/ton)

Compliance with 326 IAC 6-3-2(e) - Particulate Matter Emissions Limitations

Maximum Allowable Emissions = $E = 4.10 * P^{0.67}$

Where:

P= Process Rate in tons per hour

E = Rate of Emissions in pounds per hour

Maximum Allowable Emissions = **1.39 lbs/hr**

Calculated Emissions (lbs/hr)		
Mill Woodworking	0.50	lbs/hr
Plant Woodworking	1.20	lbs/hr

Calculated Emissions (lbs/hr) = Sawdust Collected (lb/hr) x (1 - Control Efficiency (%))

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

Appendix A: Emission Calculations
VOC, HAP and PM emissions: Surface Coating Operations

Company Name: Indiana Handle Company, Inc.
 Address: 1514 West Main Street, Paoli, Indiana 47454
 FESOP: 117-17755-0006
 Plant ID: 117-00006
 Reviewer: ERG/ST
 Date: January 9, 2004

Material Name	Material Density (lbs/gal)	Weight Percent VOC	* Annual Purchases (gal/yr)	** Maximum Annual Usage (gal/yr)	Fraction of Total Materials Usage	Application Method	*Reported VOC Emissions (tons/yr)	Potential to Emit (tons/yr)						
								VOC	Particulate (PM / PM10)		HAPs *			
								Maximum Annual VOC Emissions (tons/yr)	Particulate Emissions Before Controls (tons/yr)	Particulate Emissions After Controls (tons/yr)	Toluene	Methyl Ethyl Ketone	Methyl Isobutyl Ketone	Xylene
Lovoc Texurlac Clear 10937	7.92	58.62	55.0	231.7	0.0263	Spray	0.13	0.54	0.13	0.027	0.081	0.081	0.027	0.054
Opex M60 Flat Black Lacquer M60B16	7.47	79.00	55.0	231.7	0.0263	Spray	0.16	0.68	0.06	0.013	0.103	0.103	0.034	0.068
Opex M60 Semi Gloss Black Lacquer M60B9	8.28	76.00	55.0	231.7	0.0263	Spray	0.17	0.73	0.08	0.016	0.109	0.109	0.036	0.073
Lovoc Texurlac Clear - 10140	7.90	64.82	55.0	231.7	0.0263	Spray	0.14	0.59	0.11	0.023	0.089	0.089	0.03	0.059
IVC 70 Sheen Lacquer Topcoat 10649-70	7.65	79.89	55.0	231.7	0.0263	Spray	0.17	0.71	0.06	0.012	0.106	0.106	0.035	0.071
IVC 100 Sheen Lacquer Topcoat	7.65	78.18	55.0	231.7	0.0263	Spray	0.16	0.69	0.07	0.014	0.104	0.104	0.035	0.069
IVC 5 Sheen Lacquer Topcoat	7.72	76.70	55.0	231.7	0.0263	Spray	0.16	0.69	0.07	0.015	0.103	0.103	0.034	0.069
IVC Bright Silver Lacquer 72961-MR	7.41	81.85	55.0	231.7	0.0263	Spray	0.17	0.70	0.05	0.011	0.105	0.105	0.035	0.07
Jellico Catalyst for Topcoat LI-0645	8.95	61.30	55.0	231.7	0.0263	Spray	0.15	0.64	0.14	0.028	0.095	0.095	0.032	0.064
Jellico Catalyst Reducer LI-0942	7.79	77.90	55.0	231.7	0.0263	Spray	0.17	0.70	0.07	0.014	0.105	0.105	0.035	0.07
Jellico 25/30 Sheen Lohap Lacquer LF-0546	7.59	75.30	55.0	231.7	0.0263	Spray	0.16	0.66	0.08	0.015	0.099	0.099	0.033	0.066
Jellico 70/75 Sheen Urethane Lacquer	7.63	78.50	55.0	231.7	0.0263	Spray	0.16	0.69	0.07	0.013	0.104	0.104	0.035	0.069
Jellico Lohap Gloss Lacquer LC-0413	7.57	75.70	55.0	231.7	0.0263	Spray	0.16	0.66	0.07	0.015	0.1	0.1	0.033	0.066
Jellico Gloss Flow Coat Catalyzed Gloss Flow C	7.62	63.00	55.0	231.7	0.0263	Spray	0.13	0.56	0.11	0.023	0.083	0.083	0.028	0.056
Jellico 5/8 Sheen HL Lohap Lacquer LF-0583-A	7.63	75.80	55.0	231.7	0.0263	Spray	0.16	0.67	0.07	0.015	0.1	0.1	0.033	0.067
Jellico 45/50 H/L Lohap Lacquer LF-0491	7.59	75.30	55.0	231.7	0.0263	Spray	0.16	0.66	0.08	0.015	0.099	0.099	0.033	0.066
Jellico Gloss H/L Lohap Lacquer LF-0413	7.57	75.70	55.0	231.7	0.0263	Spray	0.16	0.66	0.07	0.015	0.1	0.1	0.033	0.066
Jellico 70/75 H/L Lohap Lacquer LF-0504	7.58	75.60	55.0	231.7	0.0263	Spray	0.16	0.66	0.07	0.015	0.1	0.1	0.033	0.066
Jellico F.G. Water White Lohap Gel Var VF-0181	7.79	62.6	55.0	231.7	0.0263	Spray	0.13	0.56	0.12	0.024	0.085	0.085	0.028	0.056
Mullis Petroleum Mineral Spirits 66	6.18	100.00	26.1	110.1	0.0125	Spray	0.08	0.34	0.00	0.000				
Mullis Petroleum T503 EPX Solvent	6.95	100.00	26.1	110.1	0.0125	Spray	0.09	0.38	0.00	0.000	0.191	0.096		
IVC WB Cleaning Solvent & Retarder	7.36	100.00	26.1	110.1	0.0125	Spray	0.10	0.41	0.00	0.000				
Jellico Lacquer Thinner LT-0117	6.60	100.00	26.1	110.1	0.0125	Spray	0.09	0.36	0.00	0.000	0.054			
Jellico Isopropyl Acetate L-006	7.29	100.00	26.1	110.1	0.0125	Spray	0.10	0.40	0.00	0.000				
Jellico Toluene L-002	7.26	100.00	26.1	110.1	0.0125	Spray	0.09	0.40	0.00	0.000	0.40			
Jellico Normal Butyl Acetate L-012	7.37	100.00	26.1	110.1	0.0125	Spray	0.10	0.41	0.00	0.000				
Jellico Glycol Ether EB L-007	7.51	100.00	26.1	110.1	0.0125	Spray	0.10	0.41	0.00	0.000				
IVC Lacquer Sealer 10691	7.71	79.14	41.8	176.1	0.0200	Spray	0.13	0.54	0.05	0.010	0.107	0.027	0.027	0.054
IVC Lacquer Sealer 10652-R3	7.71	76.09	41.8	176.1	0.0200	Spray	0.12	0.52	0.06	0.011	0.103	0.026	0.026	0.052
Jellico Lohap Sanding Sealer LS-0304-C	7.42	77.60	41.8	176.1	0.0200	Spray	0.12	0.51	0.05	0.010	0.101	0.025	0.025	0.051
Jellico Lohap Sanding Sealer LS-0304-A	7.39	77.70	41.8	176.1	0.0200	Spray	0.12	0.51	0.05	0.010	0.101	0.025	0.025	0.051
Jellico Lohap Vinyl Sealer LS-0194	7.15	83.20	41.8	176.1	0.0200	Spray	0.12	0.52	0.04	0.007	0.105	0.026	0.026	0.052
Jellico Clear Lohap Washcoat LC-0374-A	7.19	93.40	41.8	176.1	0.0200	Spray	0.14	0.59	0.01	0.003	0.118	0.03	0.03	0.059
Sherwin Williams White Vinyl Primer P65W4	9.43	53.00	41.8	176.1	0.0200	Spray	0.10	0.44	0.14	0.027	0.088	0.022	0.022	0.044
Jellico Black Vinyl Lohap Primer-1 VP-1234-A	7.80	78.70	41.8	176.1	0.0200	Spray	0.13	0.54	0.05	0.010	0.108	0.027	0.027	0.054
IVC GF White Booth Coating 7421	8.04	78.20	41.8	176.1	0.0200	Spray	0.13	0.55	0.05	0.011	0.111	0.028	0.028	0.055
U-C Coatings Bates Boothcoating	7.80	5.00	41.8	176.1	0.0200	Spray	0.01	0.03	0.23	0.046	0.007	0.00	0.00	0.00
IVC Orange Lightfast Dye Concentrate 61664	6.63	99.36	11.9	50.3	0.0057	Spray	0.04	0.17	0.00	0.000	0.041		0.008	0.066
IVC Red Lightfast Dye Concentrate 61622	7.46	96.28	11.9	50.3	0.0057	Spray	0.04	0.18	0.00	0.000	0.045		0.009	0.072
IVC Black Lightfast Dye Concentrate 61624	7.47	98.78	11.9	50.3	0.0057	Spray	0.04	0.19	0.00	0.000	0.046		0.009	0.074
IVC Brown Lightfast Dye Concentrate 61623	7.46	96.55	11.9	50.3	0.0057	Spray	0.04	0.18	0.00	0.000	0.045		0.009	0.072
IVC Yellow Lightfast Dye Concentrate 61621	7.43	97.42	11.9	50.3	0.0057	Spray	0.04	0.18	0.00	0.000	0.046		0.009	0.073
Jellico Dark Walnut No Wipe Dip WM-1983	7.97	79.90	11.9	50.3	0.0057	Spray	0.04	0.16	0.01	0.003	0.04		0.008	0.064
Jellico Burgundy Cherry Toner LM-2882	7.37	89.60	11.9	50.3	0.0057	Spray	0.04	0.17	0.01	0.001	0.042		0.008	0.066
Jellico Burgundy Cherry Wipe Stain WM-1962-A	8.55	67.40	11.9	50.3	0.0057	Spray	0.03	0.14	0.02	0.005	0.036		0.007	0.058
Jellico Cherry Edge Primer VP-0360	9.49	47.90	11.9	50.3	0.0057	Spray	0.03	0.11	0.04	0.009	0.029		0.01	0.046
Jellico 48M65 Cherry Wipe Stain LM-2860	7.60	70.60	11.9	50.3	0.0057	Spray	0.03	0.14	0.02	0.004	0.034		0.007	0.054
Jellico Natural Wipe Stain on Maple WM-2043	8.03	85.20	11.9	50.3	0.0057	Spray	0.04	0.17	0.01	0.002	0.043		0.009	0.069
Jellico Walnut Stain WM-1077	7.66	88.40	11.9	50.3	0.0057	Spray	0.04	0.17	0.01	0.002	0.043		0.009	0.068
Jellico Honey Wipe Stain LM-2909	7.45	71.30	11.9	50.3	0.0057	Spray	0.03	0.13	0.02	0.004	0.033		0.007	0.053
Jellico Scott Lamp Wipe Stain WM-2025	7.59	93.50	11.9	50.3	0.0057	Spray	0.04	0.18	0.00	0.001	0.045		0.009	0.071
Jellico Burnt Umber CA95 Wipe Stain LM-1814	7.40	78.50	11.9	50.3	0.0057	Spray	0.03	0.15	0.01	0.003	0.037		0.007	0.058
Jellico Batesville #2 Light Dip & Wipe LM-2910	7.76	91.40	11.9	50.3	0.0057	Spray	0.04	0.18	0.01	0.001	0.045		0.009	0.071
Jellico Burnt Sienna Lohap Wipe Stain LM-1813	7.51	76.40	11.9	50.3	0.0057	Spray	0.03	0.14	0.02	0.003	0.036		0.007	0.058
Jellico Cherry NGR Stain LN-0105	6.87	98.30	11.9	50.3	0.0057	Spray	0.04	0.17	0.00	0.000	0.042		0.008	0.068
Jellico Gold Glaze LM-2845	7.90	87.40	11.9	50.3	0.0057	Spray	0.04	0.17	0.01	0.002	0.043		0.009	0.069
Jellico Rotary Brown Premium Stain WM-1167	7.70	88.70	11.9	50.3	0.0057	Spray	0.04	0.17	0.01	0.002	0.043		0.009	0.069
Jellico Sycamore R.A. Dip/Wipe Stain WM-1893	8.38	69.90	11.9	50.3	0.0057	Spray	0.03	0.15	0.02	0.004	0.037		0.007	0.059
Jellico Topco Dark Mahogany NAW Stain WM-20	7.67	88.50	11.9	50.3	0.0057	Spray	0.04	0.17	0.01	0.002	0.043		0.009	0.068
Jellico Topco Dark Mahogany Lacquer Toner LM	7.42	88.20	11.9	50.3	0.0057	Spray	0.04	0.16	0.01	0.002	0.041		0.008	0.066
Jellico Topco Dark Mahogany N/W Stain WM-20	7.67	88.50	11.9	50.3	0.0057	Dip	0.04	0.17			0.043		0.009	0.068
Jellico Sycamore R.A. Dip/Wipe Stain WM-1893	8.38	69.90	11.9	50.3	0.0057	Dip	0.03	0.15			0.037		0.007	0.059
Jellico 49M34 Walnut Wipe Stain LM-1813	7.58	71.00	11.9	50.3	0.0057	Dip	0.03	0.14			0.034		0.007	0.054
Jellico Burnt Sienna Lohap Wipe Stain LM-1813	7.51	76.40	11.9	50.3	0.0057	Dip	0.03	0.14			0.036		0.007	0.058
Jellico Batesville #2 Light Dip & Wipe LM-2910	7.76	91.40	11.9	50.3	0.0057	Dip	0.04	0.18			0.045		0.009	0.071
Jellico Burnt Umber CA95 Wipe Stain LM-1814	7.40	78.50	11.9	50.3	0.0057	Dip	0.03	0.15			0.037		0.007	0.058
Jellico Scott Lamp Wipe Stain WM-2025	7.59	93.50	11.9	50.3	0.0057	Dip	0.04	0.18			0.045		0.009	0.071
Jellico Dark Walnut No Wipe Dip WM-1983	7.97	79.90	11.9	50.3	0.0057	Dip	0.04	0.16			0.04		0.008	0.064
Jellico Burgundy Cherry Wipe Stain WM-1962-A	8.55	67.40	11.9	50.3	0.0057	Dip	0.03	0.14			0.036		0.007	0.058
Jellico 48M65 Cherry Wipe Stain LM-2860	7.60	70.60	11.9	50.3	0.0057	Dip	0.03	0.14			0.034		0.007	0.054
Jellico Natural Wipe Stain on Maple WM-2043	8.03	85.20	11.9	50.3	0.0057	Dip	0.04	0.17			0.043		0.009	0.069
Jellico Honey Wipe Stain LM-2909	7.45	71.30	11.9	50.3	0.0057	Dip	0.03	0.13			0.033		0.007	0.053
TOTALS			2090.7		1.00		6.15	25.9	2.59	0.52	4.86	2.20	1.14	3.96

* Based on source reports of 6.1535 tons of VOC emissions in 2002.

** Based on 8760 hours of operation per year. Assume normal operations of 2080 hours per year.

Assume that total materials used are proportioned thusly: Solvents = 10%, Sealers and Primers = 20%, Stains = 20%, Topcoats = 50%.

Assume that 100% of VOC in the materials volatilizes and is emitted as VOC.

Assume 65% transfer efficiency for spray operations and 80% control efficiency for baffles and dry filters.

* HAPs estimates for Topcoats, Sealers and Stains are based on worst case HAP composition for these materials.

Methodology

Maximum Annual Usage (gal/yr) = Annual Purchases (gal/yr) x (8760/2080)

PTE VOC (tons/yr) = Material Density (lb/gal) x Weight % VOC x Max. Annual Usage (gal/yr) x 1 ton/2000 lbs

PTE PM/PM10 Before Controls (tons/yr) = Material Density (lb/gal) x (1 - Weight % VOC) x Max. Annual Usage (gal/yr) x (1 - Transfer Efficiency) x 1 ton/2000 lbs

PTE PM/PM10 After Controls (tons/yr) = Material Density (lb/gal) x (1 - Weight % VOC) x Max. Annual Usage (gal/yr) x (1 - Transfer Efficiency) x (1 - Control Efficiency) x 1 ton/2000 lbs

PTE HAPs (tons/yr) = PTE VOC (tons/yr) x Weight Percent HAPs