



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: April 11, 2005
RE: Haas Cabinet Company / T019-18030-00016
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

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

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

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

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

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

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

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

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

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

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

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

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



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PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Haas Cabinet Company
625 West Utica Street
Sellersburg, Indiana 47172**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

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

Operation Permit No.: T019-18030-00016	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: April 11, 2005 Expiration Date: April 11, 2010

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary wood kitchen cabinets manufacturing plant.

Responsible Official:	Vice President
Source Address:	625 West Utica Street, Sellersburg, Indiana 47172
Mailing Address:	625 West Utica Street, Sellersburg, Indiana 47172
General Source Phone Number:	(812) 246-4431
SIC Code:	2434
County Location:	Clark
Source Location Status:	Basic Nonattainment for ozone under the 8-hour standard Maintenance for ozone under the 1-hour standard Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Major Source, under Nonattainment NSR; Major Source, Section 112 of the Clean Air Act

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

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

- (a) Seven (7) surface coating operations, consisting of the following:
 - (1) Six (6) spray booths, constructed in 1965 or prior, using an air assisted airless spray application method, each with a maximum capacity of 595 units per hour of kitchen components, identified as Booths 1, 2 and 9 through 12, with dry filters for particulate control; and
 - (2) One surface coating line, consisting of one (1) UV spray booth, constructed in 1997, using an air assisted airless spray application method, with a maximum capacity of 2,560 pounds per hour or 595 units per hour of kitchen components, identified as Booth 14, with water wash for particulate control.
- (b) Five (5) above ground storage tanks, identified as Tanks a through e, installed in 1978, storing stain, top coat, and sealer. Tanks a through c each with a volume capacity of 3500 gallons and Tanks d and e each with a volume capacity of 4500 gallons.

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

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

- (a) Woodworking operation identified as A, B and C, equipped with three (3) baghouses for particulate matter control, installed in 1973, with an airflow of no greater than one twenty-five thousand (125,000) cubic feet of air per minute and grain loading less than three-thousandths (0.003) grain per dry standard cubic foot, exhausting to stack/vents, identified as A, B and C. [326 IAC 6-1-2(a)]
- (b) One (1) natural gas-fired boiler with heat input capacity of five (5) million Btu per hour, installed in 1973. [326 IAC 6-1-2(b)]
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-1-2(a)]
- (d) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. [326 IAC 6-1-2(a)]
- (e) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-1-2(a)]

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

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

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

SECTION B

GENERAL CONDITIONS

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

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

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

- (a) 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 of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

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

- (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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (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.11 Emergency Provisions [326 IAC 2-7-16]

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, 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 2-7-5(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
 - (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

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

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

- (a) All terms and conditions of permits established prior to T019-18030-00016 and issued pursuant to permitting programs approved into the state implementation plan have been either
- (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this combined permit, all previous registrations and permits are superseded by this combined new source review and part 70 operating permit.

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

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

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

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

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

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

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.

- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

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

Request for renewal shall be submitted to:

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

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

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

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

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

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

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the 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 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

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

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

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

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

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade 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 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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

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

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

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

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

C.1 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.2 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

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

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

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

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

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

C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, 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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

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

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, 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 "responsible official" as defined by 326 IAC 2-7-1(34).

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

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

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

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

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

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

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on August 5, 1999.
- (b) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (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 a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

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

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

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

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

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

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

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

The statement must be submitted to:

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

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

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

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

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

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

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

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, 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 “responsible official” as defined by 326 IAC 2-7-1(34).

- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-3-1 (ll)), and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
 - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report shall be submitted within sixty (60) days after the end of the year and contain the following:
 - (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-3-2(c)(3).
 - (4) Any other information that the Permittee deems fit to include in this report,

Reports required in this part shall be submitted to:

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

- (h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

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

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

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) Seven (7) surface coating operations, consisting of the following:
- (1) Six (6) spray booths, constructed in 1965 or prior, using an air assisted airless spray application method, each with a maximum capacity of 595 units per hour of kitchen components, identified as Booths 1, 2, 9 thru 12, with dry filters for particulate control; and
 - (2) One surface coating line, consisting of one (1) UV spray booth, constructed in 1997, using an air assisted airless spray application method, with a maximum capacity of 2,560 pounds per hour or 595 units per hour of kitchen components, identified as Booth 14, with water wash 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 2-7-5(1)]

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

Pursuant to T019-5797-00016, issued on August 5, 1999, the use of VOC, including coatings, dilution solvents, and cleaning solvents shall be less than 249 tons per 12 consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the source-wide potential to emit of VOC to less than 250 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

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

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

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

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

D.1.3 Wood Furniture Coatings [326 IAC 8-11]

Pursuant to 326 IAC 8-11, the requirements for the wood furniture manufacturing operations of spray booths 1 through 11 include the following conditions:

- (a) The VOC emissions shall be limited by the following:

- (1) For wood furniture manufacturing operations using acid-cured alkyd amino vinyl sealers and acid-cured alkyd amino conversion varnish topcoats, the following:
 - (A) The sealer shall contain no more than two and three tenths (2.3) pounds VOC per pound solids, as applied.
 - (B) The topcoat shall contain no more than two (2.0) pounds VOC per pound solids, as applied.
- (b) The strippable spray booth coating shall contain no more than eight tenths (0.8) pounds VOC per pound solids, as applied.

D.1.4 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2(a), particulate matter (PM) emissions from each of the seven (7) spray booths 1, 2, 9 through 12 and 14 shall be limited to seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (gr/dscf) of exhaust air).

D.1.5 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the seven (7) spray booths (1, 2, 9 thru 12 and 14), except when otherwise specified in 40 CFR 63, Subpart JJ.

D.1.6 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

- (a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of December 7, 1998.
- (b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:
 - (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
 - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or
 - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or
 - (C) Use a combination of (A) and (B).
 - (2) Limit VHAP emissions contact adhesives as follows:
 - (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pound VHAP per pound solids.
 - (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one one (1.0) pound VHAP per pound solids.

- (3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

D.1.7 Work Practice Standards [40 CFR 63.803]

The Permittee shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

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

D.1.8 Work Practice Standards [326 IAC 8-11-4]

The Permittee shall prepare and maintain a written work practice implementation plan as specified in 326 IAC 8-11-4. The plan shall include the following conditions:

- (a) All equipment shall be maintained according to the manufacturer's specifications;
- (b) Spray guns shall be cleaned in an enclosed device that minimizes solvent evaporation, recirculates solvent for reuse, and collects solvent for disposal or recycling;
- (c) All finishing materials, gluing materials, cleaning materials, washoff materials, and organic solvents shall be stored in and pumped or drained in closed containers;
- (d) Conventional air spray guns shall not be used for applying finishing materials except as specified in 326 IAC 8-11-4(c);
- (e) Use closed tanks for washoff operations and drain parts to minimize dripping; and
- (f) An organic solvent accounting form shall be maintained to record the following:
 - (1) The quantity and type of organic solvent used each month for washoff and cleaning;
 - (2) The number of pieces washed off, and the reason for the washoff; and

- (3) The quantity of spent solvent generated from each activity, and the quantity that is recycled on-site or disposed off-site each month.

D.1.9 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for spray booths 1, 2, 9 through 12 and 14 and their control devices .

Compliance Determination Requirements

D.1.10 Testing Requirements [326 IAC 2-7-6(1),(6)] [40 CFR 63]

Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.

D.1.11 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC content and usage limitations contained in Conditions D.1.1, D.1.3 and D.1.6 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.

D.1.12 Particulate Control

In order to comply with Condition D.1.4, the water wash for booth No. 14 and the dry filters for booth Nos. 1, 2 and 9 through 12 for particulate control shall be in operation and control emissions from the seven (7) spray booths at all times that these facilities are in operation.

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

D.1.13 Monitoring

- (a) For spray booths Nos. 1, 2 and 9 through 12, daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from spray booths 1, 2 and 9 through 12 stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) For spray booth 14, daily inspections shall be performed to verify that the water level of the water pans meet the manufacturer's recommended level. To monitor the performance of the water wash, the water level of the water pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water wash. To monitor the performance of the water wash, weekly inspections of the water pans shall be conducted to verify placement and configuration meet recommendations of the manufacturer. In addition, weekly observations shall be made of the overspray from the surface coating booth stacks while one or more of the booths are in operation. 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) 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.

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

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

D.1.14 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.3, 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 emission limits established in Condition D.1.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) A list of each finishing material and strippable booth coating subject to the emission limitations in 326 IAC 8-11-3.
 - (2) The VOC and solids content, as applied, of each finishing material and strippable booth coating subject to the emission limitations in 326 IAC 8-11-3, and copies of data sheets documenting how the as-applied values were determined.
 - (3) Copies of all compliance certification reports sent to IDEM.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain records in

accordance with (1) through (4) below. Records maintained for (1) through (4) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.1.6.

- (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
 - (2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
 - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.
 - (4) The VHAP content in weight percent of each thinner used.
- (d) To document compliance with Conditions D.1.7 and D.1.8, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plans.
- (e) To document compliance with Condition D.1.13, the Permittee shall maintain a log of weekly overspray observations, weekly observations of the water level in the water pans, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.15 Reporting Requirements

- (a) A semi-annual Continuous Compliance Report to document compliance with Condition D.1.6 and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported.

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

- (1) January 1 through June 30.
 - (2) July 1 through December 31.
 - (3) December 1 through December 31, 1998.
- (b) The report required in (a) of this condition shall be submitted to:

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

and

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

D.1.16 Reporting Requirements

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

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (b) Five (5) above ground storage tanks, identified as Tanks a through e, installed in 1978, storing stain, top coat, and sealer. Tanks a through c each with a volume capacity of 3500 gallons and Tanks d and e each with a volume capacity of 4500 gallons.

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

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

D.2.1 Record Keeping and Reporting Requirements [326 IAC 8-9]

- (a) Pursuant to 326 IAC 8-9-1 (a) & (b) (Volatile Organic Liquid Storage Vessels), the Permittee shall maintain a record and submit to the department a report containing the following information for each vessel:
- (1) The vessel identification number.
 - (2) The vessel dimensions.
 - (3) The vessel capacity.
- (b) All records required by paragraph (a) of this condition shall be maintained for the life of the affected vessel.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

The following insignificant activity which is specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Woodworking operation identified as A, B and C, equipped with three (3) baghouses for particulate matter control, installed in 1973, with an airflow of no greater than one twenty-five thousand (125,000) cubic feet of air per minute and grain loading less than three-thousandths (0.003) grain per dry standard cubic foot, exhausting to stack/vents, identified as A, B and C. [326 IAC 6-1-2]

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

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

D.3.1 Baghouse Limitations [326 IAC 2-7-1(21)(G)(xxix)] [40 CFR Part 64]

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

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

Compliance with the above monitoring condition in Condition D.3.1(c) shall also satisfy the requirements of 40 CFR 64, Compliance Assurance Monitoring for the woodworking process.

D.3.2 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter emissions from each of the woodworking facilities A, B and C shall be limited to seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (gr/dscf) of exhaust air).

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

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

Compliance Determination Requirements

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

The baghouses for particulate control shall be in operation at all times when the woodworking facilities are in operation.

D.3.5 Baghouse Inspections [326 IAC 2-7-21(1)(G)(xxix)(FF)] [40 CFR Part 64]

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

Compliance with the above monitoring conditions shall also satisfy the requirements of 40 CFR 64, Compliance Assurance Monitoring for the woodworking process.

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

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

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Compliance with the above monitoring conditions shall also satisfy the requirements of 40 CFR 64, Compliance Assurance Monitoring for the woodworking process.

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

D.3.7 Record Keeping Requirements

- (a) To document compliance with Condition D.3.5, the Permittee shall maintain records of the results of the inspections required under Condition D.3.1(c) and Condition D.3.5.

- (b) To document compliance with Condition D.3.1(c), the Permittee shall maintain records of daily visible emission notations of the baghouse exhaust.
- (c) The Permittee shall maintain records of corrective actions to document compliance with D.3.1(c) and 326 IAC 2-7-21(1)(G)(xxix)(GG)(dd).
- (d) To document compliance with Condition D.3.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.4

FACILITY CONDITIONS

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

The following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (b) One (1) natural gas-fired boiler with heat input capacity of five (5) million Btu per hour, installed in 1973. [326 IAC 6-1-2(b)]
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-1-2(a)]
- (d) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. [326 IAC 6-1-2(a)]
- (e) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-1-2(a)]

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

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

D.4.1 Particulate Matter (PM) [326 IAC 6-1-2]

- (a) Pursuant to 326 IAC 6-1-2(b)(3)(Nonattainment Area Particulate Limitations), particulate matter emissions from the natural gas fired boiler shall be limited to one-hundredth (0.01) grain per dry standard cubic foot (gr/dscf) of exhaust air.
- (b) Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter emissions from the cutting/welding; trimming; and grinding and machining operations shall be limited to seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (gr/dscf) of exhaust air).

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Haas Cabinet Company, Inc.
Source Address: 625 West Utica Street, Sellersburg, Indiana 47172
Mailing Address: 625 West Utica Street, Sellersburg, Indiana 47172
Part 70 Permit No.: T019-18030-00016

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Haas Cabinet Company, Inc.
Source Address: 625 West Utica Street, Sellersburg, Indiana 47172
Mailing Address: 625 West Utica Street, Sellersburg, Indiana 47172
Part 70 Permit No.: T019-18030-00016

This form consists of 2 pages

Page 1 of 2

- | |
|--|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">C The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); andC The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16. |
|--|

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

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

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
Type of Pollutants Emitted: TSP, PM-10, SO 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**

Part 70 Quarterly Report

Source Name: Haas Cabinet Company, Inc.
Source Address: 625 West Utica Street, Sellersburg, Indiana 47172
Mailing Address: 625 West Utica Street, Sellersburg, Indiana 47172
Part 70 Permit No.: T019-18030-00016
Facility: Seven (7) spray booths, 1, 2, 9-12 and 14
Parameter: VOC Usage
Limit: The total input usage of volatile organic compounds (VOC) at the seven (7) spray booths 1, 2, 9-12 and 14, including coatings, dilution solvents, and cleaning solvents, shall be limited to less than 249 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR:

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

No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

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

**PART 70 OPERATING PERMIT
 SEMI-ANNUAL REPORT FORM
 VOC Usage**

Source Name: Haas Cabinet Company, Inc.
 Source Address: 625 West Utica Street, Sellersburg, Indiana 47172
 Mailing Address: 625 West Utica Street, Sellersburg, Indiana 47172
 Part 70 Permit No.: T019-18030-00016
 Facility: Seven (7) spray booths, 1, 2, 9-12 and 14
 Parameter: VOC Content
 Limit: (a) Topcoat & Sealers Systems:
 (1) Acid Cured Topcoat - 2.0 lb VOC/ lb solids
 (2) Acid Cured Sealer - 2.3 lb VOC/ lb solids
 (b) Strippable spray booth coating - 0.8 lb VOC/lb solids

YEAR: _____

Month	Top coat & Sealer - Acid cured topcoat	Top coat & Sealer - Acid cured sealer	Strippable spray booth coating
Month 1			
Month 2			
Month 3			
Month 4			
Month 5			
Month 6			

- No deviation occurred in this month.
- Deviation/s occurred in this month.
 Deviation has been reported on: _____

Submitted by: _____
 Title/Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

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

**PART 70 OPERATING PERMIT
 SEMI-ANNUAL REPORT FORM**

VOC and VHAP usage - Wood Furniture NESHAP

Source Name: Haas Cabinet Company, Inc.
 Source Address: 625 West Utica Street, Sellersburg, Indiana 47172
 Mailing Address: 625 West Utica Street, Sellersburg, Indiana 47172
 Part 70 Permit No.: T019-18030-00016
 Facility: Seven (7) spray booths, 1, 2, 9-12 and 14
 Parameter: VOC and VHAPs Contents - NESHAP
 Limit: (1) Finishing materials (stains) -1.0 lb VHAP/lb Solids
 (2) Finishing materials (washcoats, sealers, topcoats, basecoats, enamels – 1.0 lb VHAP/lb Solids
 (3) Thinners used for on-site formulation of washcoats, basecoats and enamels - 3% VHAP content by weight
 (4) All other thinner mixtures - 10% VHAP content by weight
 (5) Foam adhesives meeting the upholstered seating flammability requirements – 1.8 lb VHAP/lb Solids
 (6) All other contact adhesives – 1.0 lb VHAP/lb Solids
 (7) Strippable spray booth material - 0.8 pounds VOC per pound solids

YEAR: _____

Month	Finishing materials (lb VHAP/lb Solid)		Thinners used for on-site formulation (% by weight)	All other thinner mixtures (% by weight)	Foam Adhesives (upholstered) (lb VHAP/lb Solid)	Contact Adhesives (lb VHAP/lb Solid)	Strippable spray booth material (lb VOC/lb Solid)
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Month 1							
Month 2							
Month 3							
Month 4							
Month 5							
Month 6							

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

Submitted by: _____
 Title/Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

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

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

Source Name: Haas Cabinet Company, Inc.
 Source Address: 625 West Utica Street, Sellersburg, Indiana 47172
 Mailing Address: 625 West Utica Street, Sellersburg, Indiana 47172
 Part 70 Permit No.: T019-18030-00016

Months: _____ **to** _____ **Year:** _____

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

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

Form Completed By:

Title/Position:

Date:

Phone:

Attach a signed certification to complete this report.

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

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

Source Background and Description

Source Name:	Haas Cabinet Company, Inc.
Source Location:	625 West Utica Street, Sellersburg, Indiana 47172
County:	Clark
SIC Code:	2434
Operation Permit No.:	T019-5797-00016
Operation Permit Issuance Date:	August 5, 1999
Permit Renewal No.:	019-18030-00016
Permit Reviewer:	AB/EVP

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Renewal application from Haas Cabinet Company, Inc. relating to the operation of a wood kitchen cabinets manufacturing operation.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Seven (7) surface coating operations, consisting of the following:
 - (1) Six (6) spray booths, constructed in 1965 or prior, using an air assisted airless spray application method, each with a maximum capacity of 595 units per hour of kitchen components, identified as Booths 1, 2 and 9 through 12, with dry filters for particulate control; and
 - (2) One surface coating line, consisting of one (1) UV spray booth, constructed in 1997, using an air assisted airless spray application method, with a maximum capacity of 2,560 pounds per hour or 595 units per hour of kitchen components, identified as Booth 14, with water wash for particulate control.
- (b) Five (5) above ground storage tanks, identified as Tanks a through e, installed in 1978, storing stain, top coat, and sealer. Tanks a through c each with a volume capacity of 3500 gallons and Tanks d and e each with a volume capacity of 4500 gallons.

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) Woodworking operation identified as A, B and C, equipped with three (3) baghouses for particulate matter control, installed in 1973, with an airflow of no greater than one twenty-five thousand (125,000) cubic feet of air per minute and grain loading less than three-thousandths (0.003) grain per dry standard cubic foot, exhausting to stack/vents, identified as A, B and C. [326 IAC 6-1-2(a)]

- (b) One (1) natural gas-fired boiler with heat input capacity of five (5) million Btu per hour, installed in 1973. [326 IAC 6-1-2(b)]
- (c) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (d) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (e) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (f) Other categories with emissions below insignificant thresholds (VOC less than three (3) pounds per hour), including:
 - Wipe on-wipe off cleaning operation.
- (g) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38°C (100°F) or;
 - (2) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (h) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-1-2(a)]
- (i) Infrared cure equipment.
- (j) Exposure chambers ("towers", "columns"), for curing of ultraviolet inks and ultra-violet coatings where heat is the intended discharge.
- (k) Using 80 tons or less of welding consumables for structural steel and bridge fabrication activities.
- (l) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (m) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (n) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (o) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. [326 IAC 6-1-2(a)]
- (p) Paved and unpaved roads and parking lots with public access.
- (q) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (r) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

- (s) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (t) On-site fire and emergency response training approved by the department.
- (u) Emergency gasoline generators not exceeding 110 horsepower.
- (v) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-1-2(a)]
- (w) Filter or coalescer media changeout.

Existing Approvals

The source has constructed or has been operating under the following previous approvals:

- (a) Part 70 Permit No. 019-5797-00016, issued on August 5, 1999; and
- (b) First Reopening No. 019-13165-00016, issued on September 26, 2001.

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

The following terms and conditions from previous approvals (i.e., T019-5797-00016, issued on August 5, 1999) have been revised in this Part 70 permit renewal:

- (a) Section A, Emissions Units and Pollution Control Equipment Summary and Condition D.5:

Reason changed: The one (1) incinerator model 112B (charge capacity of 95 pounds per hour) has been removed from service. The Permittee does not intend to use this equipment in the future and reference to such, including related permit conditions, are not included herein.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

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

An administratively complete Part 70 permit renewal application for the purposes of this review was received on September 17, 2003.

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

Emission Calculations

See Appendix A: pages 1 through 6 of this document for detailed emission calculations.

Potential to Emit of the Source

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

The source was issued a Part 70 Operating Permit on August 5, 1999. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of the original Part 70 operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Spray Booths (1, 2, 9-12 and 14)	75.26 (1)	75.26 (1)	--	< 249 (2)	--	--	> 249 (single) > 249 (total)
Woodworking (A, B, C)	99.51 (3)	99.51 (3)	--	--	--	--	--
Insignificant Activities (4)	Negl.	0.2	Negl.	0.1	0.8	2.2	Negl.
Total PTE	174.77	174.77	Negl.	< 250	0.8	2.2	> 250 (single) > 250 (total)

(1) PM and PM10 controlled emissions.

(2) Per Condition D.1.1, such that the source-wide VOC emissions will be limited to less than 250 tons per year.

(3) PM and PM10 allowable emissions, based on 326 IAC 6-1-2.

(4) Reflective of 5.0 MMBtu/hour natural gas boiler.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM-10 and VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

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

Pollutant	Actual Emissions (tons/year)
PM	No data
PM-10	0
SO ₂	No data
VOC	103
CO	No data
NO _x	No data
HAP (specify)	No data

County Attainment Status

The source is located in Clark County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-hour Ozone	Maintenance
8-hour Ozone	Basic Nonattainment
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 and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Clark County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for nonattainment new source review.
- (b) Clark County has been classified as attainment or unclassifiable in Indiana for all other other 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.

Part 70 Permit Conditions

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

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

Federal Rule Applicability

- (a) The one (1) natural gas fired boiler installed in 1973, rated at 5.0 MMBtu per hour, is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc) because the boiler is rated at less than the rule applicability threshold of 10 MMBtu/hr.
- (b) The five (5) above ground storage tanks, identified as a through e, constructed in 1978, are not subject to the requirements of the New Source Performance Standards, 326 IAC 12, (40 CFR 60.110, Subpart Kb), because each tank has storage capacity at or below 4,500 gallons, which is less than the rule applicability threshold of 40 cubic meters (m³) (10,567 gallons).
- (c) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, apply to a pollutant-specific emissions unit (PSEU), as defined in 40 CFR 64.1, at a major source that is required to obtain a Part 70 or 71 permit if the PSEU meets the following criteria:
 - (1) the unit is subject to an emission limitation or standard for an applicable regulated air pollutant,
 - (2) the unit uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard, and
 - (3) the unit has a potential to emit (PTE) before controls equal to or greater than 100 percent of the amount (tons per year) of the pollutant required for a source to classified as a Part 70 major source.

The spray booths, as PSEUs, at this Part 70 source, are not subject to the CAM rule. Pursuant to 40 CFR 64.2(b)(1)(i), *Exemptions*, the requirements of this rule do not apply to any emission limit or standard proposed by the Administrator after November 15, 1990 pursuant to section 111 or 112 of the Act. The surface coating units are subject to the requirements of 40 CFR 63, Subpart JJ, which is a section 112 emission limit established after November 15, 1990. Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, do not apply to these PSEUs.

Each of the three (3) woodworking operations, A, B and C, as PSEUs at this Part 70 source, have an uncontrolled PTE of PM10 of greater than 100 tons per year, and each uses a control device (baghouse) to comply with an emission limitation or standard (i.e., 326 IAC 6-1). Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are applicable to the woodworking operations. The CAM plan, which was submitted by the Permittee for the woodworking operations, shall satisfy the 40 CFR 64 Compliance Assurance Monitoring requirements. The specific monitoring requirements for the associated baghouse are listed under the "Compliance Requirement" section.

- (d) This source is subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, 40 CFR 63, Subpart JJ.

Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations, including spray booths 1, 2, 9-12 and 14, shall comply with the following conditions upon startup:

- (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
 - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or
 - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or
 - (C) Use a combination of (A) and (B).
- (2) Limit VHAP emissions contact adhesives as follows:
 - (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pound VHAP per pound solids.
 - (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.
- (3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.
- (4) The owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:
 - (A) Operator training course.
 - (B) Leak inspection and maintenance plan.
 - (C) Cleaning and washoff solvent accounting system.
 - (D) Chemical composition of cleaning and washoff solvents.
 - (E) Spray booth cleaning.
 - (F) Storage requirements.
 - (G) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
 - (H) Line cleaning.
 - (I) Gun cleaning.
 - (J) Washoff operations.
 - (K) Formulation assessment plan for finishing operations.
- (5) Records shall be maintained in accordance with (A) through (D) below. Records maintained for (A) through (D) shall be complete and sufficient to establish compliance with the VHAP usage limits.

- (A) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
 - (B) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
 - (C) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.
 - (D) The VHAP content in weight percent of each thinner used.
- (6) An Initial Compliance Report shall be submitted within sixty (60) days following start up. The Initial Compliance Report must include data from the entire month that the compliance date falls.
- (7) A semi-annual Continuous Compliance Report shall be submitted within thirty (30) days after the end of the six (6) months being reported.

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

- (A) January 1 through June 30.
- (B) July 1 through December 31.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not subject to the requirements of 326 IAC 2-2. This source was constructed prior to the August 7, 1977 applicability date, was a minor source when first built and is not one of the 28 listed source categories. This source is not a major stationary source because emissions of PM, PM10 and VOC have always been less than 250 tons per year. Since 1977 the source has made the following modification:

One spray booth (No. 14), constructed in 1997, with unrestricted potential emissions of VOC, PM/PM10 of 1362.85 and 653.91 tons per year, respectively. Pursuant to T019-5797-00016, issued on August 5, 1999, the source limited total input usage of volatile organic compounds (VOC) at the seven (7) coating booths 1, 2, 9-12 and 14, including coatings, dilution solvents, and cleaning solvents to less than 249 tons per 12 consecutive month period. The PM/PM10 emissions are controlled to less than 250 tons per year using a water wash system. The VOC and PM/PM10 emissions are less than the PSD major modification emissions threshold of 250 tons per year, therefore, the installation of this unit was a minor modification to an existing minor source.

For this Title V Renewal permit review, the source shall continue to limit the seven (7) coating booths 1, 2, 9-12 and 14 VOC usages, such that the source wide potential to emit of VOC, including insignificant activities, is limited to less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) do not apply.

On April 15, 2004, the United States Environment Protection Agency (USEPA) named 23 Indiana counties and one partial county nonattainment for the new 8-hour ozone standard. The designations became effective on June 15, 2004, with Clark County being designated as nonattainment for the 8-hour ozone standard. This notwithstanding, the PSD minor limitation established in the permit for source VOC emissions (i.e., paragraph (a) above) remains unchanged, as it is based on source operations prior to June 15, 2004 when Clark County was attainment for the 1-hour ozone standard.

Nonattainment New Source Review (NSR)

This existing source is located in Clark County which was redesignated on June 15, 2004 as a basic nonattainment area for the 8 hour ozone standard. Upon this redesignation, the source became a major source because it has a potential to emit of VOC at greater than the nonattainment NSR applicability threshold of 100 tons per year. As such, any modification made to this source after June 15, 2004 shall be reviewed pursuant to the requirements of nonattainment NSR. No modifications have occurred at this source since June 15, 2004.

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

Pursuant to 326 IAC 2-4.1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of any combination of HAPs, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). This source is subject to the National Emissions Standards for Hazardous Air Pollutants 40 CFR Part 63, Subpart JJ. Compliance with 40 CFR Part 63, Subpart JJ will satisfy the requirements of 326 IAC 2-4.1.

326 IAC 2-6 (Emission Reporting)

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

326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability – Individual Facilities

326 IAC 6-1-2 (Particulate Matter Emissions Limitations)

Pursuant to 326 IAC 6-1-1 (Applicability) specifically listed sources or facilities, or sources or facilities not specifically listed but located in a listed county and having either a potential to emit (PTE) 100 tons per year (tpy) or more or actual emissions of 10 tpy or more of PM, are subject to the rule requirements.

This source is located in Clark County, which is listed in 326 IAC 6-1-17. However, the source is not specifically listed in 326 IAC 6-1-17 and, therefore, 326 IAC 6-1-17 does not apply. This notwithstanding, since actual PM from the source is greater than 10 tons per year, the requirements of 326 IAC 6-1-2 are applicable as discussed below:

- (a) Pursuant to 326 IAC 6-1-2(a), particulate matter (PM) emissions from each of the seven (7) spray booths Nos. 1, 2, 9-12 and 14 shall be limited to seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (gr/dscf) of exhaust air).

The dry filters shall be in operation at all times that the six (6) spray booths Nos. 1, 2 and 9-12 are in operation, in order to comply with this limit. The water wash system shall be in operation at all times that the one (1) spray booth (No. 14) is in operation, in order to comply with this limit.

- (b) Pursuant to 326 IAC 6-1-2(a), particulate matter emissions from each of the woodworking facilities A, B and C shall be limited to seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (gr/dscf) of exhaust air).

The design outlet grain loading for each of the baghouses controlling woodworking facilities A, B and C is 0.01 gr/dscf, therefore, these facilities can comply with the rule 326 IAC 6-1-2. The three (3) baghouses venting through stacks A, B, and C shall be in operation at all times the respective woodworking facilities are in operation, in order to comply with this limit.

- (c) Pursuant to 326 IAC 6-1-2(b)(3), the 5.0 MMBtu per hour natural gas boiler shall be limited to one-hundredth (0.01) grain per dry standard cubic foot (gr/dscf) of exhaust air).
- (d) Pursuant to 326 IAC 6-1-2(a), the insignificant activities listed earlier as (g), (n) and (u) (i.e., welding, trimming and machining) shall be limited to seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (gr/dscf) of exhaust air).

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

The manufacturing processes at this source are subject to the requirements of 326 IAC 6-1-2, as discussed above, and the requirements of 326 IAC 6-3-2 are not applicable.

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

The 5.0 MMBtu per hour boiler is subject to the requirements of 326 IAC 6-1-2, as discussed above, and the requirements of 326 IAC 6-2-3 are not applicable.

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

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

- (a) Each woodworking baghouse shall not exhaust to the atmosphere greater than one hundred twenty-five thousand (125,000) cubic feet of air per minute and shall not emit particulate matter with a diameter less than ten (10) microns in excess of three-thousandths (0.003) grain per dry standard cubic foot of outlet air.
- (b) The opacity from each baghouse shall not exceed ten percent (10%).

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

This source is subject to 326 IAC 8-2-12 for each of spray booths Nos. 1, 2, 9-12 and 14 since they are facilities of the type described in 326 IAC 8-1-12, and the source is located in Clark County and it has a potential to emit of 100 tons per year of VOC. Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

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. Since Haas Cabinet Company uses air assisted airless spray application, they are in compliance with 326 IAC 8-2-12.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)

The requirements of this rule apply to stationary sources located in Lake, Porter, Clark and Floyd Counties that emit or have the potential to emit VOCs at levels equal to or greater than 25 tons per year in Lake and Porter Counties; 100 tons per year in Clark and Floyd Counties; and to any coating facility that emits or has the potential to emit 10 tons per year or greater in Lake, Porter, Clark or Floyd County. Even though the source has potential VOC emissions greater than ten (10) tons per year from the coating facilities, each of the surface coating booths is subject to 326 IAC 8-2-12 and, pursuant to 326 IAC 8-7-2 (Applicability), the VOC emitted from these facilities is not considered in the rule applicability determination. Excluding such facility emissions, the PTE of VOC from the facilities and source are below the stated rule thresholds and the requirements of 326 IAC 8-7 do not apply.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

Pursuant to 326 IAC 8-9-1, on and after October 1, 1995 stationary vessels used to store volatile organic liquids (VOL) must comply with the requirement of the rule if located in Clark, Floyd, Lake or Porter Counties. Stationary vessels Tanks a through e, with capacities less than 39,000 gallons, are only subject to the reporting and record keeping requirements of 326 IAC 8-9-6(a) & (b). These records shall be maintained for the life of each vessel including the vessel identification number, the vessel dimensions, and the vessel capacity.

326 IAC 8-11 (Wood Furniture Coatings)

This source is subject to 326 IAC 8-11 because it is located in Clark County with the SIC code of 2434 and has potential emissions greater than 25 tons of VOC per year.

Pursuant to 326 IAC 8-11, the requirements for the wood furniture manufacturing operations include the following conditions:

- (a) The VOC emissions shall be limited by the following:
 - (1) For wood furniture manufacturing operations using acid-cured alkyd amino vinyl sealers and acid-cured alkyd amino conversion varnish topcoats, the following:
 - (A) The sealer shall contain no more than two and three tenths (2.3) pounds VOC per pound solids, as applied.
 - (B) The topcoat shall contain no more than two (2.0) pounds VOC per pound solids, as applied.
- (b) The strippable spray booth coating shall contain no more than eight tenths (0.8) pounds VOC per pound solids, as applied.

- (c) The source shall follow work practice standards as specified in 326 IAC 8-11-4.
- (d) A semi-annual summary report shall be prepared and submitted to IDEM, OAQ, to document the ongoing compliance status of the wood furniture coating operations.

Based on the information submitted by the source and calculations made, the coatings used at this facility are in compliance with the requirements of this rule.

Testing Requirements

While IDEM may require compliance testing at any time to determine if the source is in compliance with an applicable limit or standard, compliance testing is not required for this permit. Compliance testing is not required since the coating material usage and related VOC and volatile organic HAP emissions continue to assume an emission factor of 2,000 pounds of pollutant emitted per ton of pollutant input to the coating operation, and the overspray is required to be controlled by dry filters. Also, the woodworking operations are controlled by baghouse with controlled emissions below the relevant allowable particulate matter emission rates.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

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

1. The woodworking operation has applicable compliance monitoring conditions as specified below:
 - (a) Visible emissions from the baghouse shall be observed daily using procedures in accordance with Method 22 and normal or abnormal emissions are recorded. In the event abnormal emissions are observed for greater than six (6) minutes in duration, the following shall occur:
 - (i) The baghouse shall be inspected.
 - (ii) Corrective actions, such as replacing or reseating bags, are initiated, when necessary.

- (b) An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.
- (c) In the event that bag failure has been observed:
 - (i) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
 - (ii) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the baghouse for the woodworking operation must operate properly to ensure compliance with 326 IAC 2-7 (Part 70 Permit), 326 IAC 6-1-2 (Particulate Emission Limitations) and 40 CFR 64, Compliance Assurance Monitoring.

- 2. The spray booths 1, 2, 9 through 12 and 14 have applicable compliance monitoring conditions as specified below:
 - (a) For spray booths 1, 2, 9 through 12, daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

- (b) For spray booth 14, daily inspections shall be performed to verify that the water level of the water pans meet the manufacturer's recommended level. To monitor the performance of the water wash, the water level of the water pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water wash. To monitor the performance of the water wash, weekly inspections of the water pans shall be conducted to verify placement and configuration meet recommendations of the manufacturer. In addition, weekly observations shall be made of the overspray from the surface coating booth stacks while one or more of the booths are in operation. 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) 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.
- (d) 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 waterwash for the spray booths must operate properly to ensure compliance with 326 IAC 6-1-2 (Particulate Emission Limitations), 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70).

Conclusion

The operation of this wood kitchen cabinet manufacturing operation shall be subject to the conditions of this Part 70 permit T019-18030-00016.

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

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

Source Background and Description

Source Name:	Haas Cabinet Company, Inc.
Source Location:	625 West Utica Street, Sellersburg, Indiana 47172
County:	Clark
SIC Code:	2434
Operation Permit No.:	T019-18030-00016
Permit Reviewer:	Alic Bent/EVP

On October 25, 2004, the Office of Air Quality (OAQ) had a notice published in the Evening News in Clark County, Indiana, stating that Haas Cabinet Company, Inc. had applied for a Part 70 permit renewal for the operation of a stationary wood kitchen cabinets manufacturing plant. The notice also stated that OAQ proposed to issue a Part 70 Permit for this operation and provided information on how the public could review the proposed Part 70 Permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Permit should be issued as proposed.

Upon further review, IDEM has decided to make the following changes to the Part 70 Permit. Bolded language has been added and the language with a line through it has been deleted.

1. The signature blocks, P.O. box and the zip code on the cover page of the permit along with Commissioner and Governor's name have been revised to reflect the latest model update.
2. Conditions B.2, B.13 and B.16 (now re-numbered B.17) have been revised and Condition B.3 added to the permit to further address and clarify the permit term and the term of the conditions. Condition B.4 (Termination of Right to Operate) has been moved and re-numbered B.14. All other Section B conditions have been re-numbered accordingly.

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

- (a)** This permit, T019-18030-00016, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b)** **If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.**

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

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

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

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

(a) All terms and conditions of ~~previous~~ permits **established prior to T019-18030-00016 and** issued pursuant to permitting programs approved into the state implementation plan have been either:

- (1) incorporated as originally stated,
- (2) revised **under 326 IAC 2-7-10.5**, or
- (3) deleted **under 326 IAC 2-7-10.5**.

~~by this permit.~~

(b) **Provided that all terms and conditions are accurately reflected in this combined permit**, all previous registrations and permits are superseded by this **combined new source review and part 70 operating** permit.

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

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

B.167 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

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

Request for renewal shall be submitted to:

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

(b) ~~Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]~~

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

- ~~(A)~~ **(1)** Submitted at least nine (9) months prior to the date of the expiration of this permit; and

~~(B)~~ (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

~~(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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.~~

(c) ~~Right to Operate After Application for Renewal [326 IAC 2-7-3]~~
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

~~(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]~~
If IDEM, OAQ fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

3. Condition B.20 (now re-numbered B.21) has been updated to include a new paragraph "b" concerning modifications to a major source.

B.201 Source Modification Requirement [326 IAC 2-7-10.5] [326 IAC 2-3-2]

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

(b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-3-2.

4. The record keeping and reporting requirements have been revised to reflect NSR reform provision at the major sources.

C.187 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-3]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

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

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

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, 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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) **If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-3-1 (II)), and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:**
 - (1) **The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and**
 - (2) **The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).**
- (g) **The report shall be submitted within sixty (60) days after the end of the year and contain the following:**
 - (1) **The name, address, and telephone number of the major stationary source.**
 - (2) **The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.**
 - (3) **The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-3-2(c)(3).**
 - (4) **Any other information that the Permittee deems fit to include in this report,**

Reports required in this part shall be submitted to:

**Indiana Department of Environmental Management
Air Compliance Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015**
- (h) **The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.**

Appendix A: Emission Calculations

Company Name: Haas Cabinet Company, Inc.
Address City IN Zip: 625 West Utica Street, Sellersburg, Indiana 47172
Permit No.: T019-18030-00016
Reviewer: Alic Bent / EVP

Uncontrolled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Natural Gas Combustion	Woodworking (A, B, C)	Spray Booths (1, 2, 9-12 & 14)	TOTAL
PM	0.04	995.07	1,505.13	2,500.2
PM10	0.20	995.07	1,505.13	2,500.4
SO2	negl.	0.00	0.00	0.0
NOx	2.20	0.00	0.00	2.2
VOC	0.10	0.00	3,797.20	3,797.3
CO	1.80	0.00	0.00	1.8
total HAPs	negl.	0.00	1,391.82	1,391.8
worst case single HAP	negl.	0.00	479.12	479.1
Total emissions based on rated capacity at 8,760 hours/year.				
Controlled/Limited Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Natural Gas Combustion	Woodworking (A, B, C)	Spray Booths (1, 2, 9-12 & 14)	TOTAL
PM	0.04	99.51	75.26	174.8
PM10	0.20	99.51	75.26	175.0
SO2	negl.	0.00	0.00	0.0
NOx	2.20	0.00	0.00	2.2
VOC	0.10	0.00	< 249	< 250
CO	1.80	0.00	0.00	1.8
total HAPs	negl.	0.00	< 249	< 250
worst case single HAP	negl.	0.00	< 249	< 250
Total emissions based on rated capacity at 8,760 hours/year, after control.				

Company Name: Haas Cabinet Company, Inc.
Plant Location: 625 West Utica Street, Sellersburg, Indiana 47172
Permit No.: 019-18030-00016
Permit Reviewer: Alic Bent / EVP

Material	Booth Number	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Ethyl Benzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Total
Honey Stain	1, 2, 9-12	7.442	0.029	595	0.00%	0.00%	0.00%	1.00%	0.00	0.00	0.00	5.62	5.62
Sealer	1, 2, 9-12	7.88	0.07	595	0.00%	32.10%	0.00%	0.00%	0.00	461.45	0.00	0.00	461.45
Durasyn Clear Top Coat AUF0664	1, 2, 9-12	7.88	0.07	595	15.00%	10.00%	1.00%	5.00%	215.63	143.75	14.38	71.88	445.63
Light Maple Stain	1, 2, 9-12	6.768	0.035	595	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Spice Stain	1, 2, 9-12	6.823	0.015	595	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
UV topcoat	14	7.79	0.118	595	0.00%	20.00%	0.00%	0.00%	0.00	479.12	0.00	0.00	479.12
									215.63	1084.31	14.38	77.50	1391.82

Total Uncontrolled Potential Emissions

METHODOLOGY

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

**Appendix A: Emissions Calculations
Particulate Emissions
Wood Working Operation**

**Company Name: Haas Cabinet Company, Inc.
Address City IN Zip: 625 Utica Street, Sellersburg, Indiana 47172
Part 70: 019-18030-00016
Reviewer: AB / EVP**

Unit A:								
PM/PM10:	0.003 gr/acf outlet x	22950 acf/min x	60 min/hr /	7000 gr/lb x	4.38 ton/yr / lb/hr /	0.01 (1- control efficiency) =	258.48 tons/yr (uncontrolled)	
	where the baghouse control efficiency is listed a		99.00%				2.58 tons/yr (controlled)	
Unit B:								
PM/PM10:	0.003 gr/acf outlet x	40200 acf/min x	60 min/hr /	7000 gr/lb x	4.38 ton/yr / lb/hr /	0.01 (1- control efficiency) =	452.77 tons/yr (uncontrolled)	
	where the baghouse control efficiency is listed a		99.00%				4.53 tons/yr (controlled)	
Unit C:								
PM/PM10:	0.003 gr/acf outlet x	25200 acf/min x	60 min/hr /	7000 gr/lb x	4.38 ton/yr / lb/hr /	0.01 (1- control efficiency) =	283.82 tons/yr (uncontrolled)	
	where the baghouse control efficiency is listed a		99.00%				2.84 tons/yr (controlled)	
						Total Emissions:	995.07 tons/yr (uncontrolled)	
						Total Emissions:	9.95 tons/yr (controlled)	

Methodology

Uncontrolled PM/PM10 = grain loading (gr/acf outlet) * Flow rate (acfm) * (60 min/hr) * (1 lb/7000 gr) * 4.38 (tons/yr / lb/hr) / (1- control efficiency %)

Equivalent Pound per Hour (lb/hr) Allowable Emission Rates Pursuant to 326 IAC 6-1-2:

Allowable emission limit, pursuant to 326 IAC 6-1-2 0.03 gr/dscf. Assuming ambient exhaust conditions, negligible moisture and PM equals PM10, this is equivalent to

Unit A:	0.03 gr/cu ft x	22950 cu ft/min x	60 min/hr /	7000 gr/lb =	5.90 lb/hr	(25.85	ton PM & PM10/yr)
Unit B:	0.03 gr/cu ft x	40200 cu ft/min x	60 min/hr /	7000 gr/lb =	10.34 lb/hr	(45.28	ton PM & PM10/yr)
Unit C:	0.03 gr/cu ft x	25200 cu ft/min x	60 min/hr /	7000 gr/lb =	6.48 lb/hr	(28.38	ton PM & PM10/yr)

Compliance with these limits shall result in the source-wide PTE of PM and PM10 limited to less than 250 tons per year and, therefore, the requirements of 326 IAC 2-2 (PSD) do not apply. The source shall comply as shown above.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

**Company Name: Haas Cabinet Company, Inc.
Address City IN Zip: 625 West Utica Street, Sellersburg, IN 47172
Permit No.: T019-18030-00016
Reviewer: AB/EVP**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
5.0	43.8

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.042	0.2	0.0	2.2	0.1	1.8

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Small Industrial Boiler

HAPs Emissions

Company Name: Haas Cabinet Company, Inc.

Address City IN Zip: 625 West Utica Street, Sellersburg, IN 47172

Permit No.: T019-18030-00016

Reviewer: AB/EVP

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	4.599E-05	2.628E-05	1.643E-03	3.942E-02	7.446E-05

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.095E-05	2.409E-05	3.066E-05	8.322E-06	4.599E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.

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