



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: September 26, 2006
RE: Dubois Wood Products, Inc. / 037-18076-00023
FROM: Nisha Sizemore
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.



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.in.gov/idem

PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

Dubois Wood Products, Inc. (Plant 1)
707 East 6th Street
Huntingburg, Indiana 47542

White River Table Company (Plant 2)
Railroad Avenue
Huntingburg, Indiana 47542

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

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

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

| | |
|---|--|
| Operation Permit No.: T 037-18076-00023 | |
| Issued by: Origin signed by Nisha Sizemore, Chief Permits Branch Office of Air Quality | Issuance Date: September 26, 2006 Expiration Date: September 26, 2011 |

TABLE OF CONTENTS

| | | |
|----------|---|----|
| A | SOURCE SUMMARY | 5 |
| A.1 | General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)] | |
| A.2 | Part 70 Source Definition [326 IAC 2-7-1(22)] | |
| A.3 | Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)] | |
| A.4 | Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] | |
| A.5 | Part 70 Permit Applicability [326 IAC 2-7-2] | |
| B | GENERAL CONDITIONS | 7 |
| B.1 | Definitions [326 IAC 2-7-1] | |
| 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)] | |
| B.3 | Term of Conditions [326 IAC 2-1.1-9.5] | |
| B.4 | Enforceability [326 IAC 2-7-7] | |
| B.5 | Severability [326 IAC 2-7-5(5)] | |
| B.6 | Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)] | |
| B.7 | Duty to Provide Information [326 IAC 2-7-5(6)(E)] | |
| B.8 | Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)] | |
| B.9 | Annual Compliance Certification [326 IAC 2-7-6(5)] | |
| B.10 | Preventive Maintenance Plan [326 IAC 2-7-5(1),(3)and (13)] [326 IAC 2-7-6(1)and(6)] [326 IAC 1-6-3] | |
| B.11 | Emergency Provisions [326 IAC 2-7-16] | |
| B.12 | Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12] | |
| B.13 | Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5] | |
| B.14 | Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)] | |
| B.15 | Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)] | |
| 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] | |
| B.17 | Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)] | |
| B.18 | Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12] [40 CFR 72] | |
| B.19 | Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)] | |
| B.20 | Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5] | |
| B.21 | Source Modification Requirement [326 IAC 2-7-10.5] | |
| B.22 | Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-17-3-2] [IC 13-30-3-1] | |
| B.23 | Transfer of Ownership or Operational Control [326 IAC 2-7-11] | |
| B.24 | Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7] | |
| B.25 | Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314] [326 IAC 1-1-6] | |
| C | SOURCE OPERATION CONDITIONS | 18 |
| | Emission Limitations and Standards [326 IAC 2-7-5(1)] | |
| C.1 | Opacity [326 IAC 5-1] | |
| C.2 | Open Burning [326 IAC 4-1] [IC 13-17-9] | |
| C.3 | Incineration [326 IAC 4-2] [326 IAC 9-1-2] | |
| C.4 | Fugitive Dust Emissions [326 IAC 6-4] | |
| C.5 | Stack Height [326 IAC 1-7] | |
| C.6 | Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M] | |
| | Testing Requirements [326 IAC 2-7-6(1)] | |
| C.7 | Performance Testing [326 IAC 3-6] | |

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

C.11 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

C.13 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

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

C.15 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]

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1 FACILITY OPERATION CONDITIONS: Surface Coating Operations 25

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

D.1.2 Volatile Organic Compounds (VOC)

D.1.3 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR 63, Subpart A]

D.1.4 Wood Furniture NESHAP [40 CFR 63.800, Subpart JJ]

D.1.5 Work Practice Standards [40 CFR 63.803]

D.1.6 Particulate Matter (PM) [326 IAC 6.5-1-2]

D.1.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

D.1.8 Hazardous Air Pollutants (HAPs) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

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

D.1.9 Monitoring

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

D.1.10 Record Keeping Requirements

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

D.1.12 Reporting Requirements

D.2 FACILITY OPERATION CONDITIONS: Woodworking Shops 30

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

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

D.2.2 PM and PM₁₀ Emission Limitations [326 IAC 2-2] [326 IAC 2-1.1-5]

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

D.2.4 Particulate Control [326 IAC 2-7-6(6)]

Compliance Assurance Monitoring Requirements

D.2.5 Visible Emissions Notations [40 CFR 64, Compliance Assurance Monitoring (CAM)]

D.2.6 Baghouse Inspections [40 CFR 64, Compliance Assurance Monitoring (CAM)]

D.2.7 Broken or Failed Bag Detection [40 CFR 64, Compliance Assurance Monitoring (CAM)]

D.2.8 Cyclone Inspections [40 CFR 64, Compliance Assurance Monitoring (CAM)]

D.2.9 Cyclone Failure Detection [40 CFR 64, Compliance Assurance Monitoring (CAM)]

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

D.2.10 Record Keeping Requirements

D.3 FACILITY OPERATION CONDITION: Wood-Fired Boilers 33

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

D.3.1 Particulate Matter (PM) [326 IAC 6.5-1-2]

D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

D.3.3 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR Part 63, Subpart A]

D.3.4 National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters [40 CFR Part 63, Subpart DDDDD]

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

D.3.5 Visible Emissions Notations

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

D.3.6 Record Keeping Requirements

D.3.7 National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters - Notification Requirements [40 CFR 63, Subpart DDDDD]

D.3.8 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12] [326 IAC 2-7-5]

D.4 FACILITY OPERATION CONDITIONS: Insignificant Activities 36

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

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

Certification 38

Emergency Occurrence Report 39

Part 70 Semi-Annual Report 41

Quarterly Deviation and Compliance Monitoring Report 42

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, A.3 and A.4 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 wood parts machining and finishing source.

| | |
|------------------------------|---|
| Responsible Official: | Vice-President |
| Source Address: | Plant 1: 707 East 6 th Street & Plant 2: Railroad Ave., Huntingburg, Indiana 47542 |
| Mailing Address: | P.O. Box 386, Huntingburg, Indiana 47542 |
| General Source Phone Number: | 812 - 683 - 3613 |
| SIC Code: | 2499 |
| County Location: | Dubois |
| Source Location Status: | Basic Nonattainment for PM _{2.5} Attainment for all other criteria pollutants |
| Source Status: | Part 70 Permit Program Minor Source, under PSD Major Source, Section 112 of the Clean Air Act |

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

This wood parts machining and finishing source consists of two (2) plants:

- (a) Plant 1, Dubois Wood Products, Inc, is located at 707 East 6th Street, Huntingburg, Indiana, and
- (b) Plant 2, White River Table Company is located at Railroad Avenue, Huntingburg, Indiana.

Since the two (2) plants are located on contiguous or adjacent properties, belong to the same industrial grouping, and under common control of the same entity, they will be considered one (1) source, effective from the July 12, 1999 issuance date of the Part 70 Operating Permit (T 037-5996-00023).

A.3 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) Five (5) spray booths, located at Plant 1 - Line #2, identified as SC-1, constructed in 1969, exhausting to Stack SC-1, and SC-8 through SC-11, constructed in 1996, exhausting to Stacks SC-8 through SC-11, all equipped with high volume low pressure (HVLP) spray applicators and dry filters for particulate control, maximum Line #2 capacity: 58 wood furniture parts per hour.
- (b) Three (3) spray booths, located at Plant 2, identified as SC-4 through SC-6, constructed in 1969, exhausting to Stacks SC-1 through SC-3, equipped with high volume low pressure (HVLP) spray applicators and dry filters for particulate control, maximum capacity: 34 wood furniture parts per hour.

- (c) One (1) dip tank, located at Plant 2, identified as DT-1, constructed in 1984, exhausting to Stack DT, maximum capacity: 34 wood furniture parts per hour.
- (d) One (1) woodworking shop, located at Plant 1, identified as WW1-1, constructed in 1986, equipped with two (2) baghouses, identified as CD-1 and NF-1, and one (1) cyclone, identified as CY-1, connected in series, exhausting to Stack WW-1, maximum capacity: 58 wood furniture parts per hour and 3.57 tons of wood per hour.
- (e) One (1) woodworking shop, located at Plant 2, identified as WW2-1, constructed in 1983, equipped with an internally vented baghouse, identified as CY-2, maximum capacity: 34 wood furniture parts per hour and 0.75 tons of wood per hour.
- (f) One (1) wood-fired boiler, located at Plant 1, identified as WFB-1, equipped with fly ash arrestors, constructed in 1945, exhausted through Stack WFB-1, rated at 5.84 million British thermal units per hour.
- (g) One (1) wood-fired boiler, located at Plant 2, identified as WFB-2, equipped with fly ash arrestors, constructed in 1945, exhausted through Stack WFB-2, rated at 2.3 million British thermal units per hour.

A.4 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):

Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]

A.5 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, T 037-5996-00023, 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 no later than July 1 of each year to:

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

and

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

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

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

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

- (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: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865
Southwest Regional Office: 812-380-2305, Facsimile Number: 812-380-2304

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46204-2251

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) 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 compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

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

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

- (a) All terms and conditions of permits established prior to T 037-5996-00023 and issued pursuant to permitting programs approved into the state implementation plan have been either
- (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this combined permit, all previous registrations and permits are superseded by this Part 70 operating permit

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

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

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

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

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

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

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

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

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

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

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

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

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

Request for renewal shall be submitted to:

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

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

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

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

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

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

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

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

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
Indianapolis, Indiana 46204-2251

and

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

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

- (5) The Permittee maintains records on-site 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]

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

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

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

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

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

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

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

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

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

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

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

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Opacity [326 IAC 5-1]

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

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

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

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

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

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

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

C.5 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. 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.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

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

- (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 46204-2251

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

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

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

operation begins.

C.10 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.11 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 shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

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

within ninety (90) days after the date of issuance of this permit.

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

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) 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.12 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.13 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely

recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

- (1) initial inspection and evaluation
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
- (1) monitoring results;
 - (2) review of operation and maintenance procedures and records;
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
- (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ, that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ, may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

C.15 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
Indianapolis, Indiana 46204-2251

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

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

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

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

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

Indiana Department of Environmental Management

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C - General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ, under 326 IAC 17.1.

Stratospheric Ozone Protection

C.18 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)]: Surface Coating Operations

- (a) Five (5) spray booths, located at Plant 1 - Line #2, identified as SC-1, constructed in 1969, exhausting to Stack SC-1, and SC-8 through SC-11, constructed in 1996, exhausting to Stacks SC-8 through SC-11, all equipped with high volume low pressure (HVLP) spray applicators and dry filters for particulate control, maximum Line #2 capacity: 58 wood furniture parts per hour.
- (b) Three (3) spray booths, located at Plant 2, identified as SC-4 through SC-6, constructed in 1969, exhausting to Stacks SC-1 through SC-3, equipped with high volume low pressure (HVLP) spray applicators and dry filters for particulate control, maximum capacity: 34 wood furniture parts per hour.
- (c) One (1) dip tank, located at Plant 2, identified as DT-1, constructed in 1984, exhausting to Stack DT, maximum capacity: 34 wood furniture parts per hour.

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

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

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

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

D.1.2 Volatile Organic Compounds (VOC)

Any change or modification which may increase the potential to emit VOC from the entire source to two hundred and fifty (250) tons per year or greater shall obtain prior approval from IDEM, OAQ.

D.1.3 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 eight (8) spray booths and one (1) dip tank described in this section except when otherwise specified in 40 CFR 63 Subpart JJ.

D.1.4 Wood Furniture NESHAP [40 CFR 63.800, Subpart JJ]

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

- (a) Limit the volatile hazardous air pollutants (VHAP) emissions from finishing operations as follows:
 - (1) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or
 - (2) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or
 - (3) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or
 - (4) Use a combination of (1), (2), and (3).
- (b) Limit VHAP emissions contact adhesives as follows:
 - (1) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pounds VHAP per pound solids.
 - (2) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.
 - (3) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.
- (c) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

D.1.5 Work Practice Standards [40 CFR 63.803]

The Permittee shall maintain a written work practice implementation plan. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

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

(h) Line cleaning.

- (i) Gun cleaning.
- (j) Washoff operations.
- (k) Formulation assessment plan for finishing operations.

D.1.6 Particulate Matter (PM) [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(a) (Particulate emission limitations), particulate matter (PM) emissions from the eight (8) spray booths shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.

D.1.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.8 Hazardous Air Pollutants (HAPs) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VHAP content and usage limitations contained in Condition D.1.4 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" HAPs data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4

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

D.1.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks SC-1, SC-4 through SC-6, and SC-8 through SC-11 while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.1.10 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2 the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with Condition D.1.2. 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.

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

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

- (a) To document compliance with Condition D.1.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP content and usage limits established in Condition D.1.4.
 - (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
 - (2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
 - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.
 - (4) The VHAP content in weight percent of each thinner used.
 - (5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.12 Reporting Requirements

- (a) A semi-annual Continuous Compliance Report to document compliance with Condition D.1.4 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.

- (b) The report required in (a) of this condition shall be submitted to:

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

and

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

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (d) One (1) woodworking shop, located at Plant 1, identified as WW1-1, constructed in 1986, equipped with two (2) baghouses, identified as CD-1 and NF-1, and one (1) cyclone, identified as CY-1, connected in series, exhausting to Stack WW-1, maximum capacity: 58 wood furniture parts per hour and 3.57 tons of wood per hour.
- (e) One (1) woodworking shop, located at Plant 2, identified as WW2-1, constructed in 1983, equipped with an internally vented baghouse, identified as CY-2, maximum capacity: 34 wood furniture parts per hour and 0.75 tons of wood per hour.

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

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

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

Pursuant to 326 IAC 6.5-1-2(a) (Particulate emission limitations), particulate matter (PM) emissions from the woodworking shops, identified as WW1-1 and WW2-1, shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.

D.2.2 PM and PM₁₀ Emission Limitations [326 IAC 2-2] [326 IAC 2-1.1-5]

The PM and PM₁₀ emissions from the woodworking shops, identified as WW1-1 and WW2-1, shall each be limited to less than a total of 16.8 pounds per hour. Compliance with these PM and PM₁₀ emission limits shall ensure that the entire source, which is not one of the twenty-eight (28) listed source categories, is minor pursuant to 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.2.4 Particulate Control [326 IAC 2-7-6(6)]

- (a) In order to comply with Conditions D.2.1 and D.2.2 the cyclone and baghouses for particulate control shall be in operation and control emissions from the woodworking shops at all times that the woodworking shops are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

Compliance Assurance Monitoring Requirements

D.2.5 Visible Emissions Notations [40 CFR 64, Compliance Assurance Monitoring (CAM)]

Pursuant to 40 CFR 64, Compliance Assurance Monitoring (CAM):

- (a) Visible emission notations of the woodworking shop, located at Plant 1, identified as WW1-1, stack exhaust WW-1 shall be performed once per day during normal daylight operations.

Daily visible emission notations of the woodworking shop, located at Plant 2, identified as WW2-1, shall be performed once per day during normal daylight operations when exhausting to the atmosphere.

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

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

D.2.6 Baghouse Inspections [40 CFR 64, Compliance Assurance Monitoring (CAM)]

Pursuant to 40 CFR 64, Compliance Assurance Monitoring (CAM), an inspection shall be performed each calendar quarter of all bags controlling the woodworking shop located at Plant 1, identified as WW1-1, and the woodworking shop located at Plant 2, identified as WW2-1 when venting to the atmosphere. A baghouse inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.2.7 Broken or Failed Bag Detection [40 CFR 64, Compliance Assurance Monitoring (CAM)]

Pursuant to 40 CFR 64, Compliance Assurance Monitoring (CAM):

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

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

D.2.8 Cyclone Inspections [40 CFR 64, Compliance Assurance Monitoring (CAM)]

Pursuant to 40 CFR 64, Compliance Assurance Monitoring (CAM), an inspection shall be performed each calendar quarter of all cyclones controlling the woodworking operation when venting to the atmosphere. A cyclone inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors.

D.2.9 Cyclone Failure Detection [40 CFR 64, Compliance Assurance Monitoring (CAM)]

Pursuant to 40 CFR 64, Compliance Assurance Monitoring (CAM):

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

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

D.2.10 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the woodworking shop stack exhausts when exhausting to the atmosphere.
- (b) To document compliance with Conditions D.2.6 and D.2.8, the Permittee shall maintain records of the results of the inspections required under Conditions D.2.5 and D.2.8 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS

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

- (f) One (1) wood-fired boiler, located at Plant 1, identified as WFB-1, equipped with fly ash arrestors, constructed in the 1960's, exhausted through Stack WFB-1, rated at 5.84 million British thermal units per hour.
- (g) One (1) wood-fired boiler, located at Plant 2, identified as WFB-2, equipped with fly ash arrestors, constructed in the 1960's, exhausted through Stack WFB-2, rated at 2.3 million British thermal units per hour.

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

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

D.3.1 Particulate Matter (PM) [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2 (b)(1)(C), the PM emissions from the 5.84 and 2.3 million British thermal units per hour heat input wood-fired boilers shall not exceed an emission rate of greater than 0.6 pounds of PM per million British thermal units heat input.

D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

D.3.3 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply to the facilities described in this section except when otherwise specified in 40 CFR Part 63, Subpart DDDDD.

D.3.4 National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters [40 CFR Part 63, Subpart DDDDD]

(a) The affected source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, (40 CFR 63, Subpart DDDDD), as of November 12, 2004. Pursuant to this rule, the Permittee must comply with 40 CFR 63, Subpart DDDDD on and after September 13, 2007.

(b) The following emissions unit comprises the affected source for the solid fuel boiler sub-category:

Any boiler with a capacity less than ten (10) million British thermal units per hour, burn solid fuel, and do not burn liquid fuel either alone or in conjunction with gaseous fuels from the following equipment:

- (1) One (1) wood-fired boiler, located at Plant 1, identified as WFB-1, equipped with fly ash arrestors, constructed in 1945, exhausted through Stack WFB-1, rated at 5.84 million British thermal units per hour.
- (2) One (1) wood-fired boiler, located at Plant 2, identified as WFB-2, equipped with fly ash arrestors, constructed in 1945, exhausted through Stack WFB-2, rated at 2.3 million British thermal units per hour.

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

D.3.5 Visible Emissions Notations

- (a) Visible emission notations of the wood-fired boiler stack exhausts WFB-1 and WFB-2 shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

D.3.6 Record Keeping Requirements

- (a) To document compliance with Condition D.3.3, the Permittee shall maintain records of visible emission notations of the wood-fired boiler stack exhausts WFB-1 and WFB-2 once per day.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.7 National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters - Notification Requirements [40 CFR 63, Subpart DDDDD]

- (a) Pursuant to 40 CFR 63.7545(a) and 40 CFR 63.7506(b), the Permittee submitted an Initial Notification containing the information specified in 40 CFR 63.9(b)(2) by March 12, 2005, as required by 40 CFR 63.7545(b).

- (b) The notification required by paragraph (a) was submitted to:

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

and

United States Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

D.3.8 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12] [326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ, to include information from the notification of compliance status in the Title V permit.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ, to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart DDDDD, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than the date that the notification of compliance status, specified in 40 CFR 63.7545(e) and 40 CFR 63.9(h), is due.
- (c) The significant permit modification application shall be submitted to:

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

SECTION D.4

FACILITY OPERATION CONDITIONS

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

Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]

(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 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover

while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Dubois Wood Products, Inc. (Plant 1) & White River Table Company (Plant 2)
Source Address: Plant 1: 707 East 6th Street & Plant 2: Railroad Avenue, Huntingburg, Indiana
Mailing Address: P.O. Box 386, Huntingburg, Indiana 47542
Part 70 Permit No.: T 037-18076-00023

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Dubois Wood Products, Inc. (Plant 1) & White River Table Company (Plant 2)
Source Address: Plant 1: 707 East 6th Street & Plant 2: Railroad Avenue, Huntingburg, Indiana 47542
Mailing Address: P.O. Box 386, Huntingburg, Indiana 47542
Part 70 Permit No.: T 037-18076-00023

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) C The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16. |
|--|

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

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

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

Page 2 of 2

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

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

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

Part 70 Semi-Annual Report

Source Name: Dubois Wood Products, Inc. (Plant 1) & White River Table Company (Plant 2)
 Source Address: Plant 1: 707 East 6th Street & Plant 2: Railroad Avenue, Huntingburg, Indiana 47542
 Mailing Address: P.O. Box 386, Huntingburg, Indiana 47542
 Part 70 Permit No.: T 037-18076-00023
 Facilities: Spray Booths & Dip Tank (SC-1, SC-4, SC-5, SC-6, SC-8, SC-9, SC-10, SC-11 & DT-1)
 Parameter: VOC and VHAPs
 Limit: (1) Finishing operations -1.0 lb VHAP/lb Solids
 (2) Thinners used for on-site formulation of washcoats, basecoats and enamels - 3% VHAP content by weight
 (3) All other thinner mixtures - 10% VHAP content by weight
 (4) Foam adhesives meeting the upholstered seating flammability requirements - 1.8 lb VHAP/lb Solids
 (5) All other contact adhesives - 1.0 lb VHAP/lb Solids
 (6) Strippable spray booth material - 0.8 pounds VOC per pound solids

YEAR: _____

| Month | Finishing Operations (lb VHAP/lb solid) | Thinners Used for On-site Formulation (% by weight) | All Other Thinner Mixtures (% by weight) | Foam Adhesives (upholstered) (lb VHAP/lb solid) | Contact Adhesives (lb VHAP/lb solid) | Strippable Spray Booth Material (lb VHAP/lb solid) |
|-------|---|---|--|---|--------------------------------------|--|
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on: _____

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

Attach a signed certification to complete this report.

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

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

Source Name: Dubois Wood Products, Inc. (Plant 1) & White River Table Company (Plant 2)
 Source Address: Plant 1: 707 East 6th Street & Plant 2: Railroad Avenue, Huntingburg, Indiana 47542
 Mailing Address: P.O. Box 386, Huntingburg, Indiana 47542
 Part 70 Permit No.: T 037-18076-00023

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: | Dubois Wood Products, Inc. (Plant 1) & White River Table Company (Plant 2) |
| Source Location: | Plant 1: 707 East 6th Street & Plant 2: Railroad Avenue, Huntingburg, Indiana 47542 |
| County: | Dubois |
| SIC Code: | 2499 |
| Operation Permit No.: | T 037-5996-00023 |
| Operation Permit Issuance Date: | July 12, 1999 |
| Permit Renewal No.: | T 037-18076-00023 |
| Permit Reviewer: | Frank P. Castelli |

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Renewal application from Dubois Wood Products, Inc. (Plant 1) & White River Table Company (Plant 2) relating to the operation of a wood parts machining and finishing source.

Source Definition

The source definition from the previous Part 70 Operating Permit was incorporated into this permit as follows:

This wood parts machining and finishing source consists of two (2) plants:

- (a) Plant 1, Dubois Wood Products, Inc, is located at 707 East 6th Street, Huntingburg, Indiana, and
- (b) Plant 2, White River Table Company is located at Railroad Avenue, Huntingburg, Indiana.

Since the two (2) plants are located in contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Five (5) spray booths, located at Plant 1 - Line #2, identified as SC-1, constructed in 1969, exhausting to Stack SC-1, and SC-8 through SC-11, constructed in 1996, exhausting to Stacks SC-8 through SC-11, all equipped with high volume low pressure (HVLP) spray applicators and dry filters for particulate control, maximum Line #2 capacity: 58 wood furniture parts per hour.
- (b) Three (3) spray booths, located at Plant 2, identified as SC-4 through SC-6, constructed in 1969, exhausting to Stacks SC-1 through SC-3, equipped with high volume low pressure (HVLP) spray applicators and dry filters for particulate control, maximum capacity: 34 wood furniture parts per hour.
- (c) One (1) dip tank, located at Plant 2, identified as DT-1, constructed in 1984, exhausting to Stack DT, maximum capacity: 34 wood furniture parts per hour.

- (d) One (1) woodworking shop, located at Plant 1, identified as WW1-1, constructed in 1986, equipped with two (2) baghouses, identified as CD-1 and NF-1, and one (1) cyclone, identified as CY-1, connected in series, exhausting to Stack WW-1, maximum capacity: 58 wood furniture parts per hour and 3.57 tons of wood per hour.
- (e) One (1) woodworking shop, located at Plant 2, identified as WW2-1, constructed in 1983, equipped with an internally vented baghouse, identified as CY-2, maximum capacity: 34 wood furniture parts per hour and 0.75 tons of wood per hour.
- (f) One (1) wood-fired boiler, located at Plant 1, identified as WFB-1, equipped with fly ash arrestors, constructed in 1945, exhausted through Stack WFB-1, rated at 5.84 million British thermal units per hour.
- (g) One (1) wood-fired boiler, located at Plant 2, identified as WFB-2, equipped with fly ash arrestors, constructed in 1945, exhausted through Stack WFB-2, rated at 2.3 million British thermal units per hour.

Unpermitted Emission Units and Pollution Control Equipment

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

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

There are no proposed emission units 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) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu per hour, except where total capacity of equipment operated by one (1) stationary source exceeds 2,000,000 Btu per hour.
- (b) VOC or HAP storage vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids.
- (c) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]
- (d) The following equipment related to manufacturing activities not resulting in the emission of HAPs; brazing equipment, cutting torches, soldering equipment, welding equipment.
- (e) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (f) Water-based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (g) Paved and unpaved roads and parking lots with public access.
- (h) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

Existing Approvals

The source has been operating under the following previous approvals:

The source has been operating under the previous Part 70 Operating Permit T 037-5996-00023, issued on July 12, 1999, and the following amendments and modifications:

- (a) First Reopening No.: R 037-13193-00023, issued on October 15, 2001, and
- (b) First Administrative Amendment AAT 037-20048-00023, issued on November 23, 2004.

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 proposed permit. All previous registrations and permits are superseded by this permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 Operating 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 Operating Permit renewal application for the purposes of this review was received on September 25, 2003. Additional information was received on December 21, 2004 and January 18 and 19, 2005.

Emission Calculations

See pages 1 through 6 of Appendix A 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 July 12, 1999. The table below summarizes the potential to emit, reflecting all limits, of all emission units including modifications since the Part 70 Operating Permit was issued. 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/yr) | | | | | | |
|----------------------------|-----------------------------|------------------|-----------------|-------|------|-----------------|--------------------|
| | PM | PM ₁₀ | SO ₂ | VOC | CO | NO _x | HAPs |
| Surface Coating Operations | 11.7 | 11.7 | - | 173 | - | - | Greater Than 10/25 |
| Woodworking Shops | Less Than 73.9 | Less Than 73.9 | - | - | - | - | - |
| Wood-Fired Boilers | 14.3 | 13.4 | 0.891 | 0.463 | 21.4 | 17.5 | 1.19 |
| Insignificant Activities | 1.0 | 1.0 | 0.500 | 1.00 | 1.00 | 1.00 | 0.500 |
| Total Emissions | 101 | Less Than 100 | 1.39 | 174 | 22.4 | 18.5 | Greater Than 10/25 |

Notes: The PM and PM₁₀ emissions from the surface coating operation are the full potential to emit from overspray before controls.

The PM emissions from the wood-fired boilers are the uncontrolled potential to emit PM based on USEPA AP-42 emission factors which also comply with the PM emission rate specified by 326 IAC 6.5-1-2 (b)(1)(C) of 0.6 pounds of PM per million British thermal unit of heat input, equivalent to a total of 21.4 tons per year. The PM₁₀ emissions from the wood-fired boilers are the uncontrolled potential to emit PM₁₀.

The PM and PM₁₀ emissions from the woodworking shops have been limited to a total of less than 16.8 pounds of PM and PM₁₀ per hour, equivalent to less than a total of 73.9 tons per year.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC and PM₁₀ are equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

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

| Pollutant | Actual Emissions (tons/year) |
|------------------|---|
| PM | - |
| PM ₁₀ | 1.92 |
| SO ₂ | 0.09 |
| VOC | 25.7 |
| CO | 2.46 |
| NO _x | 1.76 |

County Attainment Status

The source is located in Dubois County, but not in Bainbridge Township.

| Pollutant | Status |
|-------------------|---------------------|
| PM _{2.5} | Basic Nonattainment |
| PM ₁₀ | Attainment |
| SO ₂ | Attainment |
| NO ₂ | Attainment |
| 1-Hour Ozone | Attainment |
| 8-Hour Ozone | Attainment |
| CO | Attainment |
| Lead | Attainment |

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Dubois County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section of this document.
- (b) Dubois County has been classified as nonattainment for PM_{2.5} in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions pursuant to the Nonattainment New Source Review requirements. See the State Rule Applicability - Entire Source section of this document.
- (c) Dubois County has been classified as attainment or unclassifiable in Indiana for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section of this document.

Part 70 Operating 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 Operating Permits.
- (b) Monitoring and related record keeping requirements which assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) This source does involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 that has the potential to emit before controls equal to or greater than the major source threshold for PM₁₀, that is subject to an emission limitation or standard for PM, where PM is the surrogate for PM₁₀. The woodworking shop, located at Plant 1, identified as WW1-1, equipped with two (2) baghouses and one (1) cyclone, connected in series, and the woodworking shop, located at Plant 2, identified as WW2-1, equipped with an internally vented baghouse, both use control devices as defined in 40 CFR Part 64.1 to comply with that emission limitation or standard (326 IAC 6.5). Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are included in the permit for the wood-working shops.

The following compliance assurance monitoring conditions are applicable to the wood-working shops. The woodworking shops are not large pollutant-specific emission units because the potential to emit PM₁₀ is less than the major source level of one hundred (100) tons per year after control.

- (1) Parameters to Monitor
 - Visible Emissions Notations
- (2) Inspection and Maintenance Activities
 - Cyclone/Baghouse Inspections
- (b) The requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40), Subparts D, Da, Db, and Dc are not included in this permit for the two (2) wood-fired boilers, identified as WFB-1 and WFB-2, rated at 5.84 and 2.3 million British thermal units per hour, respectively, because each of the boilers was constructed in 1945, prior to the applicability dates of each of these subparts.
- (c) There are no other New Source Performance Standards included in the permit for this source.
- (d) The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the eight (8) spray booths described in this section except when otherwise specified in 40 CFR 63 Subpart JJ.
- (e) This source is subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 20, (40 CFR 63.800, Subpart JJ).

This source has been subject to the requirements of this rule since December 7, 1998 and has been complying with all the requirements of this rule since that applicability date. A summary of the requirements of this rule is as follows:

- (1) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:
 - (A) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
 - (i) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or
 - (ii) 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
 - (iii) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or
 - (iv) Use a combination of (i), (ii), and (iii).
 - (B) Limit VHAP emissions contact adhesives as follows:
 - (i) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pounds VHAP per pound solids.
 - (ii) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.
 - (iii) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.
 - (C) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.
- (2) The Permittee will maintain a written work practice implementation plan. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:
 - (A) Operator training course.
 - (B) Leak inspection and maintenance plan.
 - (C) Cleaning and washoff solvent accounting system.
 - (D) Chemical composition of cleaning and washoff solvents.

- (E) Spray booth cleaning.
 - (F) Storage requirements.
 - (G) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
 - (H) Line cleaning.
 - (I) Gun cleaning.
 - (J) Washoff operations.
 - (K) Formulation assessment plan for finishing operations.
- (g) The two (2) wood-fired boilers are designated as affected sources under 40 CFR 63, Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial and Institutional Boilers and Process Heaters since they are located at a major source of HAPs. This rule was published in the Federal Register on September 13, 2004, and became effective on November 12, 2004. The two (2) wood-fired boilers rated at heat input capacity 5.84 and 2.3 million British thermal units per hour, respectively, are each classified as a small solid fuel boiler by this rule, because they each have a capacity less than ten (10) million British thermal units per hour, burn solid fuel, and do not burn liquid fuel either alone or in conjunction with gaseous fuels.

Dubois Wood Products "commenced" construction of the wood-fired boilers prior to January 13, 2003. Therefore, these boilers each with a rating of less than ten (10) million British thermal units per hour pursuant to 40 CFR 63.7490(d), is not considered a new boiler under 40 CFR 63, Subpart DDDDD.

- (A) The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the affected source after the effective date of 40 CFR 63, Subpart DDDDD, except when otherwise specified in 40 CFR 63 Subpart DDDDD. A copy of the signed, final rule is available at <http://www.epa.gov/ttn/atw/boiler/boilerpg.html>.
- (B) Pursuant to 40 CFR 63.7506(b), the only requirements that apply to the existing affected source for the solid fuel subcategory are the initial notification requirements in 40 CFR 63.9(b) that specified that notification was to be submitted by March 12, 2005, which is within 120 days of the effective date of the as required by 40 CFR 63.7545(b).

The compliance date for the existing wood-fired boilers is September 13, 2007.

- (h) The requirements of the National Emission Standards for Hazardous Air Pollutants, 326 IAC 20, (40 CFR 63.4680 - 63.4781, Subpart QQQQ) Wood Building Products Surface Coating are not included in this permit because this wood parts machining and finishing source does not coat doors, windows, exterior siding, interior wall paneling, flooring and/or trim.
- (i) The requirements of the National Emission Standards for Hazardous Air Pollutants, 326 IAC 20, (40 CFR 63.2230 - 2292, Subpart DDDD) Plywood and Composite Wood Products are not included in this permit because this wood parts machining and finishing source does not manufacture plywood or composite wood products.

- (j) There are no other National Emission Standards for Hazardous Air Pollutants included in the permit for this source.

State Rule Applicability – Entire Source

326 IAC 2-1.1-5 (Air quality requirements)

Dubois County has been designated as non-attainment for PM_{2.5} in 70 FR 943 dated January 5, 2005. According to the April 5, 2005 EPA memo titled “Implementation of New Source Review Requirements in PM_{2.5} Nonattainment Areas” authored by Steve Page, Director of OAQPS, until EPA promulgates the PM_{2.5} major NSR regulations, states should assume that a major stationary source’s PM₁₀ emissions represent PM_{2.5} emissions. IDEM will use the PM₁₀ nonattainment major NSR program as a surrogate to address the requirements of nonattainment major NSR for the PM_{2.5} NAAQS. A major source in a nonattainment area is a source that emits or has the potential to emit one hundred (100) tons per year of any regulated pollutant. Dubois Wood Products, Inc. (Plant 1) & White River Table Company (Plant 2) have been limited to a potential to emit of PM₁₀ below one hundred (100) tons per year. The PM₁₀ emissions from the woodworking shops shall be limited to a total of less than 16.8 pounds per hour. Compliance with this limit, coupled with the uncontrolled potential to emit PM₁₀ from the surface coating operations and the wood-fired boilers, ensures that the potential to emit PM₁₀ from the entire source is less than one hundred (100) tons per year.

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

The PM emissions from the woodworking shops shall be limited to a total of less than 16.8 pounds per hour. Compliance with this limit, coupled with the uncontrolled potential to emit PM from the surface coating operations and the wood-fired boilers, ensures that the potential to emit PM from the entire source is less than two hundred and fifty (250) tons per year.

The potential to emit PM₁₀ from the entire source has been limited to less than one hundred (100) tons per year as detailed in the preceding section regarding 326 IAC 2-1.1-5 (Air quality requirements).

The potential to emit all of the other criteria pollutants from this source is less than two hundred fifty (250) tons per year. Therefore, this source, which is not one of the twenty-eight (28) listed source categories, is a minor source pursuant to 326 IAC 2-2, PSD.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit pursuant to 326 IAC 2-7, Part 70. 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:

- (a) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (b) 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.

326 IAC 5-1 (Opacity Limitations)

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

permit:

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

State Rule Applicability – Individual Facilities

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

Although the operation of this source will emit greater than ten (10) tons per year of a single HAP and twenty-five (25) tons per year of a combination of HAPs, 326 IAC 2-4.1 does not apply to any of the facilities because all facilities were constructed prior to the after July 27, 1997 applicability date of this rule.

326 IAC 6.5-1-2 (Particulate Matter Limitations)

This source is located in Dubois County, which is listed in 326 IAC 6.5-4, but Dubois Wood Products, Inc. (Plant 1) & White River Table Company (Plant 2) is not specifically listed in 326 IAC 6.5-4. Since the potential PM emissions from this source are greater than one hundred (100) tons per year, the requirements of 326 IAC 6.5-1-2 are applicable.

- (a) Pursuant to 326 IAC 6.5-1-2(a), the eight (8) spray booths at this source shall not allow or permit discharge to the atmosphere any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic meter (0.03 grain per dry standard cubic foot).
- (b) Pursuant to 326 IAC 6.5-1-2(a), the dip tank at this source shall not allow or permit discharge to the atmosphere any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic meter (0.03 grain per dry standard cubic foot). The dip tank operations are in compliance since no particulate is generated by the dip tank operations.
- (c) Pursuant to 326 IAC 6.5-1-2(a), the woodworking operations equipped with baghouses and a cyclone, identified as CD-1, NF-1, CY-2 and CY-1 at this source shall not allow or permit discharge to the atmosphere any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic meter (0.03 grain per dry standard cubic foot). The baghouses shall be in operation at all times the woodworking operations are in operation, in order to comply with this limit.

Page 4 of 6 of Appendix A shows that all baghouses and cyclone are in compliance with this rule.

- (d) Pursuant to 326 IAC 6.5-1-2(b)(1)(C), the wood-fired boilers, each with a rating of less than 25.0 million British thermal unit per hour, shall not exceed a PM emission rate of greater than 0.6 pounds of PM per million British thermal unit heat input.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The potential SO₂ emissions from each of the two (2) wood-fired boilers are less than ten (10) pounds per hour and twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 7-1.1 are not included in this permit for either of the wood-fired boilers.

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

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furnishings 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.

The eight (8) spray booths are equipped with high volume low pressure (HVLP) spray applicators and the dip tank utilizes a dip and drain application method. Therefore, all surface coating operations comply with this rule.

State Rule Applicability – Insignificant Activities

326 IAC 8-3-2 (Cold Cleaner Operations)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

- (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Testing Requirements

(a) Past Stack Tests

The Part 70 Operating Permit, T 037-5996-00023, issued on July 12, 1999, did not require a stack test of either the spray booths or the woodworking operations. The emissions from the spray booths are based upon material usage and the MSDSs and are documented by the record keeping requirements. The emissions from the woodworking operations are all controlled, subject to compliance monitoring, and are calculated to be well below the allowable PM emission limit pursuant to 326 IAC 6.5-1.

(b) Proposed stack test

No proposed stack tests have been incorporated into the proposed Part 70 Operating Permit Renewal. Since the AP-42 PM emission factor of 0.4 pounds per million British thermal units per hour is less than the 0.6 pounds per million British thermal units per hour limit, the PM emission rate from the small wood-fired boilers does not need to be verified. In addition, both of the boilers have fly ash arrestors, and therefore the emission rate is considerably less than the AP-42 emission factor.

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:

(a) The eight (8) spray booths have applicable compliance monitoring conditions as specified below:

- (1) 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 SC-1, SC-4 through SC-6, and SC-8 through SC-11 while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

These monitoring conditions are necessary because dry filters must operate properly to ensure compliance with 326 IAC 6.5 (Particulate Matter Limitations Except Lake County) and 326 IAC 2-7 (Part 70).

- (b) The woodworking shops at Plant 1 and Plant 2 have applicable compliance monitoring conditions as specified below:

- (1) Visible emission notations of the woodworking shop, located at Plant 1, identified as WW1-1, stack exhaust WW-1 shall be performed once per day during normal daylight operations.

Visible emission notations of the woodworking shop, located at Plant 2, identified as WW2-1, shall be performed once per day during normal daylight operations when exhausting to the atmosphere.

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

- (2) An inspection shall be performed each calendar quarter of all bags controlling the woodworking shop located at Plant 1, identified as WW1-1 and the woodworking shop located at Plant 2, identified as WW2-1, when venting to the atmosphere. A baghouse inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.
- (3) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the woodworking shops.

Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

- (4) An inspection shall be performed each calendar quarter of all cyclones controlling the woodworking operation when venting to the atmosphere. A cyclone inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors.
- (5) For a cyclone controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

For a cyclone controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the woodworking shops. 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).

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

These monitoring conditions are necessary because the baghouses and cyclone must operate properly to ensure compliance with 326 IAC 6.5 (Particulate Matter Limitations Except Lake County) and 326 IAC 2-7 (Part 70).

- (c) The wood-fired boilers, identified as WFB-1 and WFB-2, have applicable compliance monitoring conditions as specified below:

Visible emission notations of the wood-fired boiler stack exhausts WFB-1 and WFB-2 shall be performed once per day during normal daylight operations.

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

This monitoring condition is necessary because the wood-fired boilers must operate properly to ensure compliance with 326 IAC 5-1 (Opacity Limitations), 326 IAC 6.5 (Particulate Matter Limitations Except Lake County) and 326 IAC 2-7 (Part 70).

Conclusion

The operation of this wood parts machining and finishing source shall be subject to the conditions of this Part 70 Operating Permit T 037-18076-00023.

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

Company Name: Dubois Wood Products, Inc. (Plant 1) & White River Table Company (Plant 2)
Address City IN Zip: 707 East 6th Street (Plant 1) & Railroad Avenue, Huntingburg, Indiana 47542
Permit Number: T 037-18076
Plt ID: 037-00023
Reviewer: Frank P. Castelli
Application Date: September 25, 2003

| Material | Density (Lb/Gal) | Weight % Volatile (H2O & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (unit/hour) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | Particulate Potential (ton/yr) | lb VOC/gal solids | Transfer Efficiency |
|---|------------------|------------------------------------|----------------|-------------------|----------------|---------------------------------|------------------------|---------------------|---|----------------------------------|-------------------------------|------------------------------|-----------------------------|--------------------------------|-------------------|---------------------|
| Plant 1, Line 2 = Booths SC-1, SC-8, SC-9, SC-10 and SC-11 | | | | | | | | | | | | | | | | |
| D64NC37 | 10.27 | 34.30% | 0.0% | 34.3% | 0.0% | 65.70% | 0.000007 | 58.000 | 3.52 | 3.52 | 0.001 | 0.034 | 0.006 | 0.003 | 5.36 | 75% |
| D64NC38 | 12.10 | 30.50% | 0.0% | 30.5% | 0.0% | 69.50% | 0.000007 | 58.000 | 3.69 | 3.69 | 0.001 | 0.036 | 0.007 | 0.004 | 5.31 | 75% |
| D70TH3 | 10.83 | 37.40% | 0.0% | 37.4% | 0.0% | 62.60% | 0.000034 | 58.000 | 4.05 | 4.05 | 0.008 | 0.192 | 0.035 | 0.015 | 6.47 | 75% |
| M60B8 | 7.47 | 71.90% | 0.0% | 71.9% | 0.0% | 28.10% | 0.000117 | 58.000 | 5.37 | 5.37 | 0.036 | 0.875 | 0.160 | 0.016 | 19.11 | 75% |
| M69W1 | 7.68 | 70.10% | 0.0% | 70.1% | 0.0% | 29.90% | 0.000103 | 58.000 | 5.38 | 5.38 | 0.032 | 0.772 | 0.141 | 0.015 | 18.01 | 75% |
| P63N5 | 7.81 | 76.50% | 0.0% | 76.5% | 0.0% | 23.50% | 0.000007 | 58.000 | 5.97 | 5.97 | 0.002 | 0.058 | 0.011 | 0.001 | 25.42 | 75% |
| P63R1559 | 7.38 | 85.70% | 0.0% | 85.7% | 0.0% | 14.30% | 0.000103 | 58.000 | 6.32 | 6.32 | 0.038 | 0.907 | 0.165 | 0.007 | 44.23 | 75% |
| P63WXB0149 | 7.02 | 89.60% | 0.0% | 89.6% | 0.0% | 10.40% | 0.000014 | 58.000 | 6.29 | 6.29 | 0.005 | 0.123 | 0.022 | 0.001 | 60.48 | 75% |
| P63WXN1634 | 7.01 | 96.29% | 0.0% | 96.3% | 0.0% | 3.71% | 0.002207 | 58.000 | 6.75 | 6.75 | 0.864 | 20.737 | 3.784 | 0.036 | 181.94 | 75% |
| R1K3 | 6.20 | 100.00% | 0.0% | 100.0% | 0.0% | 0.00% | 0.000069 | 58.000 | 6.20 | 6.20 | 0.025 | 0.595 | 0.109 | 0.000 | N/A | 75% |
| R1K4 | 6.35 | 100.00% | 0.0% | 100.0% | 0.0% | 0.00% | 0.000034 | 58.000 | 6.35 | 6.35 | 0.013 | 0.301 | 0.055 | 0.000 | N/A | 75% |
| R1KA2 | 6.50 | 100.00% | 0.0% | 100.0% | 0.0% | 0.00% | 0.000069 | 58.000 | 6.50 | 6.50 | 0.026 | 0.624 | 0.114 | 0.000 | N/A | 75% |
| R6K21 | 6.60 | 100.00% | 0.0% | 100.0% | 0.0% | 0.00% | 0.000034 | 58.000 | 6.60 | 6.60 | 0.013 | 0.312 | 0.057 | 0.000 | N/A | 75% |
| R6K34 | 7.65 | 100.00% | 0.0% | 100.0% | 0.0% | 0.00% | 0.000069 | 58.000 | 7.65 | 7.65 | 0.031 | 0.735 | 0.134 | 0.000 | N/A | 75% |
| R6K35 | 7.91 | 100.00% | 0.0% | 100.0% | 0.0% | 0.00% | 0.000448 | 58.000 | 7.91 | 7.91 | 0.206 | 4.933 | 0.900 | 0.000 | N/A | 75% |
| R6K9 | 6.59 | 100.00% | 0.0% | 100.0% | 0.0% | 0.00% | 0.000069 | 58.000 | 6.59 | 6.59 | 0.026 | 0.633 | 0.116 | 0.000 | N/A | 75% |
| R6KH18 | 7.31 | 100.00% | 0.0% | 100.0% | 0.0% | 0.00% | 0.000340 | 58.000 | 7.31 | 7.31 | 0.144 | 3.460 | 0.631 | 0.000 | N/A | 75% |
| R7K322 | 6.60 | 100.00% | 0.0% | 100.0% | 0.0% | 0.00% | 0.000103 | 58.000 | 6.60 | 6.60 | 0.039 | 0.946 | 0.173 | 0.000 | N/A | 75% |
| S61R503 | 8.70 | 70.00% | 0.0% | 70.0% | 0.0% | 30.00% | 0.000007 | 58.000 | 6.09 | 6.09 | 0.002 | 0.059 | 0.011 | 0.001 | 20.30 | 75% |
| S61WXN1687 | 7.03 | 96.30% | 0.0% | 96.3% | 0.0% | 3.70% | 0.000207 | 58.000 | 6.77 | 6.77 | 0.081 | 1.951 | 0.356 | 0.003 | 182.97 | 75% |
| S61WXN1724 | 6.78 | 96.80% | 0.0% | 96.8% | 0.0% | 3.20% | 0.001145 | 58.000 | 6.56 | 6.56 | 0.436 | 10.460 | 1.909 | 0.016 | 205.10 | 75% |
| S61WXN1836 | 6.64 | 99.20% | 0.0% | 99.2% | 0.0% | 0.80% | 0.001103 | 58.000 | 6.59 | 6.59 | 0.421 | 10.113 | 1.846 | 0.004 | 823.36 | 75% |
| S61WXN2079 | 6.87 | 99.20% | 0.0% | 99.2% | 0.0% | 0.80% | 0.000069 | 58.000 | 6.82 | 6.82 | 0.027 | 0.655 | 0.119 | 0.000 | 851.88 | 75% |
| S61WXN2227 | 6.96 | 97.20% | 0.0% | 97.2% | 0.0% | 2.80% | 0.000552 | 58.000 | 6.77 | 6.77 | 0.217 | 5.198 | 0.949 | 0.007 | 241.61 | 75% |
| S61WXN2312 | 6.90 | 98.80% | 0.0% | 98.8% | 0.0% | 1.20% | 0.000014 | 58.000 | 6.82 | 6.82 | 0.006 | 0.133 | 0.024 | 0.000 | 568.10 | 75% |
| S61WXN235 | 6.66 | 98.95% | 0.0% | 99.0% | 0.0% | 1.05% | 0.000510 | 58.000 | 6.59 | 6.59 | 0.195 | 4.678 | 0.854 | 0.002 | 627.63 | 75% |
| S61WXN263 | 6.65 | 97.59% | 0.0% | 97.6% | 0.0% | 2.41% | 0.000207 | 58.000 | 6.49 | 6.49 | 0.078 | 1.870 | 0.341 | 0.002 | 269.28 | 75% |
| S61WXN655 | 6.67 | 98.70% | 0.0% | 98.7% | 0.0% | 1.30% | 0.000103 | 58.000 | 6.58 | 6.58 | 0.039 | 0.944 | 0.172 | 0.001 | 506.41 | 75% |
| S61WXR522 | 6.64 | 99.10% | 0.0% | 99.1% | 0.0% | 0.90% | 0.001000 | 58.000 | 6.58 | 6.58 | 0.382 | 9.160 | 1.672 | 0.004 | 731.14 | 75% |
| S61XX4520 | 6.96 | 97.50% | 0.0% | 97.5% | 0.0% | 2.50% | 0.000276 | 58.000 | 6.79 | 6.79 | 0.109 | 2.607 | 0.476 | 0.003 | 271.44 | 75% |
| S61Y2200 | 6.65 | 99.00% | 0.0% | 99.0% | 0.0% | 1.00% | 0.000552 | 58.000 | 6.58 | 6.58 | 0.211 | 5.059 | 0.923 | 0.002 | 658.35 | 75% |
| S61Y2212 | 6.93 | 98.20% | 0.0% | 98.2% | 0.0% | 1.80% | 0.001124 | 58.000 | 6.81 | 6.81 | 0.444 | 10.648 | 1.943 | 0.009 | 378.07 | 75% |
| S64TH2 | 6.55 | 95.73% | 0.0% | 95.7% | 0.0% | 4.27% | 0.001034 | 58.000 | 6.27 | 6.27 | 0.376 | 9.025 | 1.647 | 0.018 | 146.85 | 75% |
| S64WXN2012 | 8.15 | 62.70% | 0.0% | 62.7% | 0.0% | 37.30% | 0.000103 | 58.000 | 5.11 | 5.11 | 0.031 | 0.733 | 0.134 | 0.020 | 13.70 | 75% |
| S64XNB0150 | 6.47 | 96.20% | 0.0% | 96.2% | 0.0% | 3.80% | 0.000014 | 58.000 | 6.22 | 6.22 | 0.005 | 0.121 | 0.022 | 0.000 | 163.79 | 75% |
| S64XXN1250 | 7.06 | 83.30% | 0.0% | 83.3% | 0.0% | 16.70% | 0.000366 | 58.000 | 5.88 | 5.88 | 0.125 | 2.996 | 0.547 | 0.027 | 35.22 | 75% |
| S64XXN1505 | 6.88 | 84.00% | 0.0% | 84.0% | 0.0% | 16.00% | 0.000034 | 58.000 | 5.78 | 5.78 | 0.011 | 0.274 | 0.050 | 0.002 | 36.12 | 75% |
| S64XXN1565 | 6.71 | 97.00% | 0.0% | 97.0% | 0.0% | 9.30% | 0.000717 | 58.000 | 6.51 | 6.51 | 0.271 | 6.496 | 1.186 | 0.009 | 69.99 | 75% |
| S64XXN1570 | 6.97 | 85.40% | 0.0% | 85.4% | 0.0% | 14.60% | 0.000372 | 58.000 | 5.95 | 5.95 | 0.128 | 3.082 | 0.563 | 0.024 | 40.77 | 75% |
| S64XXN1613 | 7.43 | 75.80% | 0.0% | 75.8% | 0.0% | 24.20% | 0.000372 | 58.000 | 5.63 | 5.63 | 0.122 | 2.916 | 0.532 | 0.042 | 23.27 | 75% |
| S64XXN1688 | 8.37 | 56.30% | 0.0% | 56.3% | 0.0% | 43.70% | 0.000207 | 58.000 | 4.71 | 4.71 | 0.057 | 1.358 | 0.248 | 0.048 | 10.78 | 75% |
| S64XXN1697 | 7.08 | 83.00% | 0.0% | 83.0% | 0.0% | 17.00% | 0.001324 | 58.000 | 5.88 | 5.88 | 0.451 | 10.830 | 1.977 | 0.101 | 34.57 | 75% |
| S64XXN1725 | 7.09 | 78.60% | 0.0% | 78.6% | 0.0% | 21.40% | 0.001634 | 58.000 | 5.57 | 5.57 | 0.528 | 12.675 | 2.313 | 0.157 | 26.04 | 75% |
| S64XXN1802 | 7.22 | 80.80% | 0.0% | 80.8% | 0.0% | 19.20% | 0.001310 | 58.000 | 5.83 | 5.83 | 0.443 | 10.638 | 1.941 | 0.115 | 30.38 | 75% |
| S64XXN1805 | 6.81 | 89.30% | 0.0% | 89.3% | 0.0% | 10.70% | 0.000241 | 58.000 | 6.08 | 6.08 | 0.085 | 2.040 | 0.372 | 0.011 | 56.83 | 75% |
| S64XXN1837 | 6.89 | 98.20% | 0.0% | 98.2% | 0.0% | 1.80% | 0.001090 | 58.000 | 6.77 | 6.77 | 0.428 | 10.266 | 1.874 | 0.009 | 375.89 | 75% |
| S64XXN2013 | 6.74 | 90.70% | 0.0% | 90.7% | 0.0% | 9.30% | 0.000103 | 58.000 | 6.11 | 6.11 | 0.037 | 0.876 | 0.160 | 0.004 | 65.73 | 75% |
| S64XXN2078 | 7.10 | 82.90% | 0.0% | 82.9% | 0.0% | 17.10% | 0.000172 | 58.000 | 5.89 | 5.89 | 0.059 | 1.409 | 0.257 | 0.013 | 34.42 | 75% |
| S64XXN2080 | 7.66 | 69.20% | 0.0% | 69.2% | 0.0% | 30.80% | 0.000034 | 58.000 | 5.30 | 5.30 | 0.010 | 0.251 | 0.046 | 0.005 | 17.21 | 75% |
| S64XXN2104 | 8.18 | 63.20% | 0.0% | 63.2% | 0.0% | 36.80% | 0.000986 | 58.000 | 5.17 | 5.17 | 0.296 | 7.096 | 1.295 | 0.189 | 14.05 | 75% |

**Appendix A: Emission Calculations
Woodworking Operations**

Company Name: Dubois Wood Products, Inc. (Plant 1) & White River Table Company (Plant 2)
Address City IN Zip: 707 East 6th Street (Plant 1) & Railroad Avenue, Huntingburg, Indiana 47542
Part 70: T 037-18076
Plt ID: 037-00023
Reviewer: Frank P. Castelli
Application Date: September 25, 2003

| Unit ID | Control Efficiency (%) | Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.) | Gas or Air Flow Rate (acfm.) | PM Emission Rate before Controls (lb/hr) | PM Emission Rate before Controls (tons/yr) | PM Emission Rate after Controls (lb/hr) | PM Emission Rate after Controls (tons/yr) | Allowable PM Emissions |
|---------|------------------------|---|------------------------------|--|--|---|---|---|
| | | | | | | | | 326 IAC 6-1 0.03 grains/cub. Ft (lb/hr) |
| Plant 1 | | | | | | | | |
| CD-1 | 99.5% | 0.0100 | 38250 | 655.71 | 2872.0 | 3.28 | 14.360 | 9.84 |
| NF-1 | 99.5% | 0.0100 | 25000 | 428.57 | 1877.1 | 2.14 | 9.386 | 6.43 |
| Plant 2 | | | | | | | | |
| CY-2 | 99.5% | 0.0100 | 12600 | 216.00 | 946.1 | 1.08 | 4.730 | 3.24 |
| | | | | Total | 5695 | | 28.5 | |

Methodology

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

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

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

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

Allowable Rate of Emissions = 0.03 grains per dry standard foot of outlet air pursuant to 326 IAC 6-1.

| Allowable PM Emissions 326 IAC 6-1 0.03 grains/cub. Ft (tons/yr) |
|---|
| 43.1 |
| 28.2 |
| 14.2 |
| 85.4 |

**Appendix A: Emissions Calculations
External Combustion Boiler**

Dry Wood

**Company Name: Dubois Wood Products, Inc. (Plant 1) & White River Table Company (Plant 2)
Address City IN Zip: 707 East 6th Street (Plant 1) & Railroad Avenue, Huntingburg, Indiana 47542
Part 70 Renewal: T 037-18076**

Plt ID: 037-00023

Reviewer: Frank P. Castelli

Date: September 25, 2003

Dry Wood - Wood-Fired Boilers
Capacity (MMBtu/hr)

5.84

Capacity (tons/hr)

0.0744

PM Control Efficiency

85%

| Emission Factor in lb/MMBtu | Pollutant | | | | | | |
|--|-----------|-------|--------|-------|------|-------|------|
| | PM* | PM10* | PM2.5* | SO2 | NOx | VOC | CO** |
| | 0.4 | 0.377 | 0.327 | 0.025 | 0.49 | 0.013 | 0.6 |
| Potential Emissions Before Controls in tons/yr | 10.2 | 9.64 | 8.36 | 0.639 | 12.5 | 0.333 | 15.3 |
| Potential Emissions After Controls in tons/yr | 1.53 | 1.45 | 1.25 | 0.639 | 12.5 | 0.333 | 15.3 |

Capacity (MMBtu/hr)

2.30

Capacity (tons/hr)

0.0293

PM Control Efficiency

85%

| Emission Factor in lb/MMBtu | Pollutant | | | | | | |
|--|-------------|-------------|-------------|--------------|-------------|--------------|-------------|
| | PM* | PM10* | PM2.5* | SO2 | NOx | VOC | CO** |
| | 0.4 | 0.377 | 0.327 | 0.025 | 0.49 | 0.013 | 0.6 |
| Potential Emissions Before Controls in tons/yr | 4.03 | 3.80 | 3.29 | 0.252 | 4.94 | 0.131 | 6.04 |
| Potential Emissions After Controls in tons/yr | 0.604 | 0.570 | 0.494 | 0.252 | 4.94 | 0.131 | 6.04 |
| Total Before Controls | 14.3 | 13.4 | 11.7 | 0.891 | 17.5 | 0.463 | 21.4 |
| Total After Controls | 2.14 | 2.02 | 1.75 | 0.891 | 17.5 | 0.463 | 21.4 |

*The PM10 and PM2.5 emission factors include the condensable PM emission factor of 0.017 lb/MMBtu, measured by EPA Method 202 (or equivalent) and the appropriate filterable PM emission factor, measured by EPA Method 5 (or equivalent). The PM emission factor is filterable PM measured by EPA Method 5 (or equivalent).

**The CO emission factor is for stokers and dutch ovens/fuel cells.

Methodology

To convert from tons/hr capacity to MMBtu/hr capacity:

Heat Input Capacity (MMBtu/hr) = Capacity (tons/hr) x Higher Heating Value of wood fuel (Btu/lb) x (1 MMBtu/10⁶ Btu) x 2000 lbs/1 ton

Emission Factors are from AP-42 Chapter 1.6 (revised 3/02), SCCs #1-0X-009-YY where X = 1 for utilities, 2 for industrial, and 3 for commercial/institutional; Y = 01 for bark-fired boilers, 02 for bark and wet wood-fired boilers, 03 for wet wood-fired boilers, and 08 for dry wood-fired boilers

Emissions (tons/yr) = Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8760hrs/yr x 1ton/2000lbs

Company Name: Dubois Wood Products, Inc. (Plant 1) & White River Table Company (Plant 2)
 Address City IN Zip: 707 East 6th Street (Plant 1) & Railroad Avenue, Huntingburg, Indiana 47542
 Part 70: T 037-18076
 Plt ID: 037-00023
 Reviewer: Frank P. Castelli
 Date: September 25, 2003

Wood-Fired Boiler
 Capacity (MMBtu/hr)

5.84

| | Selected Hazardous Air Pollutants | | | | | Total HAPs |
|--------------------------------|-----------------------------------|---------|--------------|-------------------|---------|------------|
| | Acrolein | Benzene | Formaldehyde | Hydrogen Chloride | Styrene | |
| Emission Factor in lb/MMBtu | 4.0E-03 | 4.2E-03 | 4.4E-03 | 1.9E-02 | 1.9E-03 | |
| Potential Emissions in tons/yr | 0.1023 | 0.1074 | 0.1125 | 0.4860 | 0.0486 | 0.8569 |

Capacity (MMBtu/hr)

2.30

| | Selected Hazardous Air Pollutants | | | | | Total HAPs |
|--------------------------------|-----------------------------------|--------------|--------------|-------------------|--------------|-------------|
| | Acrolein | Benzene | Formaldehyde | Hydrogen Chloride | Styrene | |
| Emission Factor in lb/MMBtu | 4.0E-03 | 4.2E-03 | 4.4E-03 | 1.9E-02 | 1.9E-03 | |
| Potential Emissions in tons/yr | 0.0403 | 0.0423 | 0.0443 | 0.1914 | 0.0191 | 0.3375 |
| Total | 0.143 | 0.150 | 0.157 | 0.677 | 0.068 | 1.19 |

Methodology

To convert from tons/hr capacity to MMBtu/hr capacity:

$$\text{Heat Input Capacity (MMBtu/hr)} = \text{Capacity (tons/hr)} \times \text{Higher Heating Value of wood fuel (Btu/lb)} \times (1 \text{ MMBtu}/10^6 \text{ Btu}) \times 2000 \text{ lbs/1 ton}$$

Emission Factors are from AP-42 Chapter 1.6 (revised 3/02), SCCs #1-0X-009-YY where X = 1 for utilities, 2 for industrial, and 3 for commercial/institutional; Y = 01 for bark-fired boilers, 02 for bark and wet wood-fired boilers, 03 for wet wood-fired boilers, and 08 for dry wood-fired boilers

$$\text{Emissions (tons/yr)} = \text{Capacity (MMBtu/hr)} \times \text{Emission Factor (lb/MMBtu)} \times 8760\text{hrs/yr} \times 1\text{ton}/2000\text{lbs}$$

These factors include the five HAPs with the highest AP-42 emission factors.