



Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

October 14, 2004

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

TO: Interested Parties / Applicant

RE: Cabinets by Nichols, Inc. / 081-18210-00033

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

### Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures  
FNPER.dot 9/16/03



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

**Cabinets by Nichols, Inc.  
40 West Old Plank Road  
Bargersville, Indiana 46106**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F081-18210-00033	
Issued by:Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:October 14, 2004  Expiration Date:October 14, 2009

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## SECTION A SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary wood cabinet manufacturing source.

Authorized individual:	President
Source Address:	40 West Old Plank Road, Bargersville, Indiana 46106
Mailing Address:	P.O. Box 545, Bargersville, Indiana 46106
General Source Phone:	(317) 422-5188
SIC Code:	2434
Source Location Status:	Johnson
	Nonattainment for ozone under the 8-hour standard
	Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP)
	Minor Source, under PSD Rules and Nonattainment
	NSR;
	Minor Source, Section 112 of the Clean Air Act

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

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

- (a) One (1) woodworking facility, identified as WW-1, operating at a maximum rate of 171.72 pounds of solid wood per hour and 187.03 pounds of plywood per hour, utilizing a baghouse (ID #BW-1) for particulate emission control, exhausting back into the building through vent S/V ID# 1;
- (b) One (1) flat paint coating line, consisting of three (3) spray booths, identified as PB-15, PB-16, and PB-17, constructed in 1986, 1994, and 1974, respectively, each operating at a maximum rate of 360 parts per hour, each equipped with high volume low pressure (HVLP) spray equipment and dry filters for particulate emission control, exhausting through stacks ID # 15, 16, and 17, respectively; and
- (c) One (1) spray paint coating line, consisting of three (3) spray booths, identified as PB-21, PB-22, and PB-23, each constructed in 1999, each operating at a maximum rate of 90 parts per hour, each equipped with high volume low pressure (HVLP) spray equipment and dry filters for particulate emission control, exhausting through stacks ID # 21, 22, and 23, respectively.

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

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

- (a) Natural-gas fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
  - (1) Two (2) drying ovens on the spray paint line, each with a maximum heat input capacity of one (1) MMBtu per hour;

- (b) Infrared cure equipment:
  - (1) One (1) drying ovens on the flat paint coating line; and
- (c) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment.

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

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

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

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

## **SECTION B GENERAL CONDITIONS**

### **B.1 Permit No Defense [IC 13]**

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

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

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

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

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

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

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

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

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

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

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

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

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

### **B.8 Duty to Provide Information [326 IAC 2-8-4(5)(E)]**

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1 when furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

### **B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]**

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

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

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

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

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

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

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

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
  - (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
  - (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, 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 No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,  
Telephone No.: 317-233-5674 (ask for Compliance Section)  
Facsimile No.: 317-233-5967
  - (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

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

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

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

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

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

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

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

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

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

Request for renewal shall be submitted to:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

and

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

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

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

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

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

B.19 Permit Revision Requirement [326 IAC 2-8-11.1]

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

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][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 FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

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

#### C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

**C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

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

All required notifications shall be submitted to:

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

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

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

### **Testing Requirements [326 IAC 2-8-4(3)]**

#### **C.9 Performance Testing [326 IAC 3-6]**

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

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

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

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

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

- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

#### **C.10 Compliance Requirements [326 IAC 2-1.1-11]**

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

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

#### **C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]**

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

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

#### **C.12 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 2-8-4] [326 IAC 2-8-5(a)(1)]**

#### **C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]**

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

#### **C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]**

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

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

**C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]**

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

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

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

**C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

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

**C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

### **Stratospheric Ozone Protection**

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

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

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

## SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) One (1) woodworking facility, identified as WW-1, operating at a maximum rate of 171.72 pounds of solid wood per hour and 187.03 pounds of plywood per hour, utilizing a baghouse (ID #BW-1) for particulate emission control, exhausting back into the building through vent S/V ID# 1;

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

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

#### D.1.1 Particulate [326 IAC 6-3-2] [326 IAC 2-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking facilities shall not exceed 0.84 pounds per hour when operating at a process weight rate of 187.03 pounds per hour.

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

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

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

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

Compliance with these limits shall also limit the source-wide potential to emit of PM to less than 250 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration, PSD) are not applicable.

#### D.1.2 PM<sub>10</sub> Emission Limitation [326 IAC 2-8-4] [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4, the PM-10 emissions from the woodworking facilities shall be limited to less than 0.84 pounds per hour.

Compliance with this limitation shall limit the source-wide potential to emit of PM<sub>10</sub> to less than 100 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70) are not applicable. Compliance with this requirement shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration, PSD) not applicable to this source.

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

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

### Compliance Determination Requirements

#### D.1.4 Particulate Control

In order to comply with condition D.1.1, the baghouse for particulate control shall be in operation and control emissions from the woodworking facility at all times that the woodworking facility is in operation.

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

**D.1.5 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.3, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
  
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (b) One (1) flat paint coating line, consisting of three (3) spray booths, identified as PB-15, PB-16, and PB-17, constructed in 1986, 1994, and 1974, respectively, each operating at a maximum rate of 360 parts per hour, each equipped with high volume low pressure (HVLP) spray equipment and dry filters for particulate emission control, exhausting through stacks ID # 15, 16, and 17, respectively; and
- (c) One (1) spray paint coating line, consisting of three (3) spray booths, identified as PB-21, PB-22, and PB-23, each constructed in 1999, each operating at a maximum rate of 90 parts per hour, each equipped with high volume low pressure (HVLP) spray equipment and dry filters for particulate emission control, exhausting through stacks ID # 21, 22, and 23, respectively.

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

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

#### D.2.1 Volatile Organic Compounds (VOC) Nonattainment New Source Review Minor Limit [326 IAC 2-1.1-5] [326 IAC 2-8-4]

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Pursuant to 326 IAC 2-8-4, the total combined VOC input usage at the flat and spray paint coating lines, including but not limited to the usage of sealants, bonding materials, adhesives, caulks, wood stains, paints and undercoatings, ceiling texture, cleaners and VOC solvents, shall be limited to less than 99.85 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit, including the potential to emit for insignificant activities, is required to limit the source-wide potential to emit of VOC to less than 100 tons per year.

Compliance with this limitation shall make the requirements of 326 IAC 2-7 (Part 70) and Nonattainment NSR (326 IAC 2-1.1-5) not applicable to the source.

#### D.2.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]

- 
- (a) Pursuant to 326 IAC 2-8-4, the total combined input usage of any single hazardous air pollutant (HAP) at the flat and spray paint coating lines shall be limited to less than 10 tons per twelve (12) consecutive month period. Compliance with this condition shall limit the source-wide potential to emit a single HAP to less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
  - (b) Pursuant to 326 IAC 2-8-4, the total combined input usage of all hazardous air pollutants (HAPs) at the flat and spray paint coating lines shall be limited to less than 25 tons per twelve (12) consecutive month period. Compliance with this condition shall limit the source-wide potential to emit total HAPs to less than 25 tons per 12 consecutive month period with compliance determined at the end of each month.

Compliance with these limitations shall make the requirements of 326 IAC 2-7 (Part 70) not applicable to the source.

**D.2.3 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.2.4 Particulate Matter (PM) [40 CFR 52 Subpart P]**

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Pursuant to 40 CFR 52 Subpart P, the PM from the flat and spray paint coating lines shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

**D.2.5 Particulate [326 IAC 6-3-2(d)]**

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

**D.2.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

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

**Compliance Determination Requirements**

**D.2.7 Volatile Organic Compounds (VOC)[326 IAC 8-1-2][326 IAC 8-1-4]**

---

Compliance with the VOC content and usage limitations contained in Conditions D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

#### **D.2.8 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 (15, 16, 17, 21, 22 and 23) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

#### **D.2.9 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.2.1 and D.2.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Condition D.2.1 and D.2.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
  - (1) The amount, and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The total VOC usage for each month;
  - (4) The total individual and combined HAP usage for each month;
  - (5) The weight of VOCs emitted for each compliance period; and
  - (6) The weight of total individual and combined HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.2.8, the Permittee shall maintain a log of weekly overspray observations, once per day and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.2.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 and D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

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

Source Name: Cabinets by Nichols, Inc.  
Source Address: 40 West Old Plank Road, Bargersville, IN 46106  
Mailing Address: P.O. Box 545, Bargersville, IN 46106  
FESOP No.: F081-18210-00033

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Cabinets by Nichols, Inc.  
Source Address: 40 West Old Plank Road, Bargersville, IN 46106  
Mailing Address: P.O. Box 545, Bargersville, IN 46106  
FESOP No.: F081-18210-00033

**This form consists of 2 pages**

**Page 1 of 2**

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
  - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

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

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

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

**Page 2 of 2**

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

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

A certification is not required for this report.

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

### FESOP Quarterly Report

Source Name: Cabinets by Nichols, Inc.  
 Source Address: 40 West Old Plank Road, Bargersville, IN 46106  
 Mailing Address: P.O. Box 545, Bargersville, IN 46106  
 FESOP No.: F081-18210-00033  
 Facility: flat and spray paint coating lines  
 Parameter: VOC, single and combined HAPs usages  
 Limit: (a) total VOC usage at the flat and spray paint coating lines, including but not limited to the usage of sealants, bonding materials, adhesives, caulks, wood stains, paints and undercoatings, ceiling texture, cleaners and VOC solvents, shall be limited to less than 99.85 tons per twelve (12) consecutive month period  
 (b) total usage of any single hazardous air pollutant (HAP) at the flat and spray paint coating lines shall be limited to less than 10 tons per twelve (12) consecutive month period  
 (c) combined usage of all hazardous air pollutants (HAPs) at the flat and spray paint coating lines shall be limited to less than 25 tons per twelve (12) consecutive month period

YEAR:

Month	Total Input Usage This Month (tons)			Total Input Usage Previous 11 Months (tons)			Total 12-Month Input Usage (tons)		
	VOC	Single* HAP	Combined HAPs	VOC	Single* HAP	Combined HAPs	VOC	Single* HAP	Combined HAPs
Month 1									
Month 2									
Month 3									

\*List the single HAP with the greatest emission rate

- 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**

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

Source Name: Cabinets by Nichols, Inc.  
Source Address: 40 West Old Plank Road, Bargersville, IN 46106  
Mailing Address: P.O. Box 545, Bargersville, IN 46106  
FESOP No.: F081-18210-00033

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

Page 1 of 2

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

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

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

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

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

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

Attach a signed certification to complete this report.

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

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

**Source Background and Description**

<b>Source Name:</b>	<b>Cabinets by Nichols, Inc.</b>
<b>Source Location:</b>	<b>40 West Old Plank Road, Bargersville, Indiana 46106</b>
<b>County:</b>	<b>Johnson</b>
<b>SIC Code:</b>	<b>2434</b>
<b>Operation Permit No.:</b>	<b>F081-10896-00033</b>
<b>Operation Permit Issuance Date:</b>	<b>August 10, 1999</b>
<b>Permit Renewal No.:</b>	<b>081-18210</b>
<b>Permit Reviewer:</b>	<b>Seema Roy/EVP</b>

On March 9, 2004, the Office of Air Quality (OAQ) had a notice published in the Daily Journal, Franklin, Indiana, stating that Cabinets by Nichols, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal to operate a stationary wood cabinet manufacturing source. The notice also stated that OAQ proposed to issue a Federally Enforceable State Operating Permit Renewal for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On April 6, 2004, Erin I. Surinak of Keramida Environmental, Inc. submitted comments on behalf of Cabinets by Nichols, Inc. on the proposed FESOP Renewal. The summary of the comments is as follows (bolded language has been added and the language with a line through it has been deleted):

**Comment #1**

**Condition D.2.8 Monitoring** This condition requires daily inspections to verify the placement, integrity and particle loading of the filters, weekly observations of the overspray from the stacks, and monthly inspections of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. IDEM has established guidance for Compliance Monitoring (CM) requirements since the start of issuing the 1990 CAA permits in Indiana. This guidance does not consider compliance-monitoring requirements necessary if the allowable emissions of PM/PM10 are less than 10 lbs/hour when using a control device. Since the uncontrolled potential to emit emissions is 2.47 lbs/hour (10.84 tons/year), compliance monitoring is not warranted.

## Response #1

Complying with the requirements of 326 IAC 6-3-2 can be especially variable for paint booths. The actual substrate being painted and the solids content of the paint being used can affect the process weight rate, the gallons or pounds of solids used, transfer efficiency, or other factors that directly affect actual, allowable, or potential emissions. While permit applications contain representative information regarding these factors, relying on this information as an ongoing demonstration of compliance is difficult if the factors are not themselves enforceable. The OAQ does not believe that it would be generally advisable to include these factors as permit conditions, to make them enforceable or to presume that they are so fixed they define a source's potential emissions because either could severely limit a source's operational flexibility. Properly operating the air pollution controls that are already in place is generally adequate to demonstrate compliance with 326 IAC 6-3 in lieu of a stack test and also assures compliance with applicable rules limiting fugitive dust, opacity, and (when necessary) Potential to Emit. The OAQ believes that checking the placement and integrity of the filters once a day is a very effective means of ensuring proper operation and ongoing compliance. Condition D.2.8 requires monitoring of the dry filters on the surface coating booths because the dry filters are required to be operated pursuant to 326 IAC 6-3-2 (d) and the OAQ believes that the monitoring requirements are necessary to ensure compliance with 326 IAC 6-3-2(d) (Particulate Emission Limitations). Therefore, no change has been made to the permit as a result of this comment.

## Comment #2

**D.2.9 (b) Record Keeping Requirements** incorrectly cites D.2.9 to document compliance. The reference to D.2.9 should be removed.

## Response #2

Condition D.2.9 (b) has been revised as follows:

- (b) To document compliance with Conditions ~~D.2.8 and D.2.9~~, the Permittee shall maintain a log of weekly overspray observations, once per day and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

Upon further review, the OAQ has decided to make the following changes to the FESOP Renewal. Bolded language has been added and the language with a line through it has been deleted.

1. Condition B.22 (c) has been revised as follows:

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, ~~I/M & Billing~~, **Licensing, and Training** Section), to determine the appropriate permit fee.

2. Condition D.1.1 has been revised as follows:

### D.1.1 Particulate [326 IAC 6-3-2] **[326 IAC 2-2]**

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Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking facilities shall not exceed 0.84 pounds per hour when operating at a process weight rate of 187.03 pounds per hour.

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

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

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

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

**Compliance with these limits shall also limit the source-wide potential to emit of PM to less than 250 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration, PSD) are not applicable.**

- Page 2 of 10 of TSD erroneously stated under the Air Pollution Control Justification as an Integral Part of the Process Section that the baghouse would be considered as an integral part of the woodworking facility and that the permitting level would be determined using the potential to emit after the baghouse. The baghouse will **not** be considered as an integral part of the woodworking facility because the woodworking equipment can operate without the baghouse. Therefore, the calculation spreadsheet (Appendix A, Page 4 of 6) has been revised. Although the TSD itself will not be revised, as it is a historical document, the following is being provided to show how the Unrestricted Potential Emissions has been affected as a result of the baghouse not being considered as an integral part of the woodworking facility:

#### Unrestricted Potential Emissions

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

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	Less than 100 <b>Greater than 250</b>
PM-10	Less than 100 <b>Greater than 250</b>
SO <sub>2</sub>	Less than 100
VOC	Greater than 100
CO	Less than 100
NO <sub>x</sub>	Less than 100

- Since the unrestricted potential emissions of PM10 are greater than 250 tons per year, a PM10 limit to render the requirements of 326 IAC 2-7 (Part 70) and 326 IAC (2-2) (PSD) not applicable is required. In order to make the PM-10 limit federally enforceable a new Condition D.1.2 has been added to Section D.1 of the permit to include a short term PM-10 limit in pounds per hour to make the requirements of 326 IAC 2-7 and 326 IAC 2-2 (PSD) not applicable. The table of contents has been revised accordingly:

**D.1.2 PM<sub>10</sub> Emission Limitation [326 IAC 2-8-4][326 IAC 2-2]**

---

**Pursuant to 326 IAC 2-8-4, the PM-10 emissions from the woodworking facilities shall be limited to less than 0.84 pounds per hour.**

**Compliance with these limitations shall limit the source-wide potential to emit of PM<sub>10</sub> to less than 100 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70) are not applicable. Compliance with these requirements shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration, PSD) not applicable to this source.**

5. Condition D.1.4 (a) now renumbered as D.1.5 (a) has been revised as follows:

**D.1.4 5 Record Keeping Requirements**

---

- (a) To document compliance with Condition D.1.2 3, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
6. On April 15, 2004, the United States Environmental Protection Agency (U.S. EPA) named 23 Indiana counties and one partial county nonattainment for the new 8-hour ozone standard. The designations became effective on June 15, 2004. Johnson County has been designated as nonattainment for the 8-hour ozone standard. The following has been added to A.1 General Information:

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

---

The Permittee owns and operates a stationary wood cabinet manufacturing source.

Authorized individual:	President
Source Address:	40 West Old Plank Road, Bargersville, Indiana 46106
Mailing Address:	P.O. Box 545, Bargersville, Indiana 46106
General Source Phone:	317) 422-5188
SIC Code:	2434
Source Location Status:	Johnson
Source Status:	<b>Nonattainment for ozone under the 8-hour standard</b> Attainment for all <b>other</b> criteria pollutants Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules <b>and Nonattainment NSR</b> ; Minor Source, Section 112 of the Clean Air Act

7. The state has initiated a rulemaking to adopt the federal 8-hour ozone nonattainment designation into 326 IAC 1-4. The applicability of the state nonattainment NSR program, 326 IAC 2-3 (Emission Offset), relies on the attainment designations in 326 IAC 1-4. Until the state rule has been updated, IDEM will rely on 326 IAC 2-1.1-5(a)(1) to apply minor limits to remain below the nonattainment NSR thresholds. 326 IAC 2-1.1-5(a)(1) clarifies that IDEM cannot issue a permit or modification that will cause or contribute to a violation of the National Air Quality Standards (NAAQS). Johnson County has been designated as nonattainment for the 8-hour ozone standard. Therefore, the following change was made to D.2.1 to clarify that the limit is making all (state and federal) nonattainment NSR not applicable.

**D.2.1 Volatile Organic Compounds (VOC) Nonattainment New Source Review Minor Limit [326 IAC 2-1.1-5] [326 IAC 2-8-4]**

Pursuant to 326 IAC 2-8-4, the total combined VOC input usage at the flat and spray paint coating lines, including but not limited to the usage of sealants, bonding materials, adhesives, caulks, wood stains, paints and undercoatings, ceiling texture, cleaners and VOC solvents, shall be limited to less than 99.85 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit, including the potential to emit for insignificant activities, is required to limit the source-wide potential to emit of VOC to less than 100 tons per year.

Compliance with this limitation shall make the requirements of 326 IAC 2-7 (Part 70) **and Nonattainment NSR (326 IAC 2-1.1-5)** not applicable to the source.

8. Although the TSD itself will not be revised as it is a historical document and the TSD was correct at the time of public notice, the following is being provided to show how the county attainment status has been affected as a result of the 8-hour ozone standard designations. The county attainment status regarding other pollutants remains unchanged; therefore will not be shown below other than in the table.

**County Attainment Status**

The source is located in Johnson County.

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

- ~~(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Johnson County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.~~
- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) 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 NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Johnson County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for nonattainment new source review.**

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

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

**Source Background and Description**

<b>Source Name:</b>	<b>Cabinets by Nichols, Inc.</b>
<b>Source Location:</b>	<b>40 West Old Plank Road, Bargersville, Indiana 46106</b>
<b>County:</b>	<b>Johnson</b>
<b>SIC Code:</b>	<b>2434</b>
<b>Operation Permit No.:</b>	<b>F081-10896-00033</b>
<b>Operation Permit Issuance Date:</b>	<b>August 10, 1999</b>
<b>Permit Renewal No.:</b>	<b>081-18210</b>
<b>Permit Reviewer:</b>	<b>Seema Roy/EVP</b>

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Cabinets by Nichols, Inc. relating to the operation of a stationary wood cabinet manufacturing source.

**Permitted Emission Units and Pollution Control Equipment**

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

- (a) One (1) woodworking facility, identified as WW-1, operating at a maximum rate of 171.72 pounds of solid wood per hour and 187.03 pounds of plywood per hour, utilizing a baghouse (ID #BW-1) for particulate emission control, exhausting back into the building through vent S/V ID# 1;
- (b) One (1) flat paint coating line, consisting of three (3) spray booths, identified as PB-15, PB-16, and PB-17, constructed in 1986, 1994, and 1974, respectively, each operating at a maximum rate of 360 parts per hour, each equipped with high volume low pressure (HVLP) spray equipment and dry filters for particulate emission control, exhausting through stacks ID # 15, 16, and 17, respectively; and
- (c) One (1) spray paint coating line, consisting of three (3) spray booths, identified as PB-21, PB-22, and PB-23, each constructed in 1999, each operating at a maximum rate of 90 parts per hour, each equipped with high volume low pressure (HVLP) spray equipment and dry filters for particulate emission control, exhausting through stacks ID # 21, 22, and 23, respectively.

**Unpermitted Emission Units and Pollution Control Equipment**

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

**Insignificant Activities**

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

- (a) Natural-gas fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
  - (1) Two (2) drying ovens on the spray paint line, each with a maximum heat input capacity of one (1) MMBtu per hour

- (b) Infrared cure equipment:
  - (1) One (1) drying ovens on the flat paint coating line; and
- (c) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment.

### **Existing Approvals**

The source has been operating under the previous FESOP F081-10896-00033, issued on August 10, 1999, with an expiration date of August 10, 2004, and the following amendments and revisions:

- (a) First Reopening R081-13057-00033 issued on August 16, 2000.

All conditions from previous approvals were incorporated into this FESOP.

### **Air Pollution Control Justification as an Integral Part of the Process**

The company submitted the following justification as part of the original application for F081-10896-00033, issued on August 10, 1999 such that the baghouse be considered as an integral part of the woodworking facility:

- (a) The woodworking facility can not operate without the baghouse.

IDEM, OAQ evaluated the justifications and agreed that the baghouse would be considered as an integral part of the woodworking facility. Therefore, the permitting level will be determined using the potential to emit after the baghouse. Operating conditions in the proposed permit will specify that this baghouse shall operate at all times when the woodworking facility is in operation.

### **Enforcement Issue**

There are no enforcement actions pending.

### **Recommendation**

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

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

An administratively complete FESOP renewal application for the purposes of this review was received on October 28, 2003.

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

### **Emission Calculations**

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

### Unrestricted Potential Emissions

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

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	Less than 100
PM-10	Less than 100
SO <sub>2</sub>	Less than 100
VOC	Greater than 100
CO	Less than 100
NO <sub>x</sub>	Less than 100

HAPs	Unrestricted Potential Emissions (tons/yr)
Xylene	Less than 10
Toluene	Greater than 10
Formaldehyde	Less than 10
Methanol	Less than 10
Ethyl Benzene	Less than 10
MIBK	Less than 10
Total	Greater than 25

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

### Potential to Emit After Issuance

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

Process/emission unit	Potential To Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Woodworking Facility	3.67 <sup>(1)</sup>	1.15 <sup>(2)</sup>	-	-	-	-	-
Surface Coating Operations	0.27 <sup>(3)</sup>	0.27 <sup>(3)</sup>	-	<99.85 <sup>(4)</sup>	-	-	<10 (single) <25 (total)
Insignificant Activities	0.02	0.07	0.01	0.05	0.74	0.88	Negligible
Total Emissions	3.87	1.49	0.01	<99.9	0.74	0.88	<10 (single) <25 (total)

- (1) Reflects the PM emissions based on 326 IAC 6-3-2 (e) allowable and 8760 hours of operation per year.
- (2) Based on 99.9% control efficiency of the baghouse.
- (3) Reflects the use of particulate matter control devices which shall be operated at all times the processes are in operation. Assumes all PM equal to PM<sub>10</sub>.
- (4) Based on limited VOC usage for surface coating applications, which requires limiting the potential to emit of VOC to less than 100 tons per 12 consecutive month period such that the requirement of 326 IAC 2-7 shall not apply.

**County Attainment Status**

The source is located in Johnson County.

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

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Johnson County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) Johnson County has been classified as attainment or unclassifiable for the 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 for the source section.
- (c) Fugitive Emissions  
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

## Source Status

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

Pollutant	Emissions (tons/yr)
PM	3.87
PM-10	1.48
SO <sub>2</sub>	0.01
VOC	98.05
CO	0.74
NO <sub>x</sub>	0.88
Single HAP	<10
Combination HAPs	<25

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

## Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 61, and 326 IAC 20 and 40 CFR Part 63) applicable to this source since the source is not a major source of hazardous air pollutants pursuant to 40 CFR Part 63.2. The source shall continue to limit coating material usage such that single and combined HAP emissions are limited to less than 10 tons per year and 25 tons per year, respectively, and remain an area source of HAPs pursuant to 40 CFR Part 63.2.

The National Emission Standards for Wood Furniture Manufacturing Operations 40 CFR 63, Subpart JJ, does not apply to the this source because it will limit single HAP usage to less than 10 tons per year and total HAP usage to less than 25 tons per year.

This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20, (40 CFR Part 63, Subpart QQQQ for Wood Building products Surface Coating), effective as of May 28, 2003, because as a FESOP source it is not a major source of hazardous air pollutants pursuant to 40 CFR Part 63.2.

- (c) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are not applicable to this source because it is not a major source of hazardous air pollutant (HAP) emissions (i.e., the source does not have the potential to emit 10 tons per year or greater of a single HAP or 25 tons per year or greater of a combination of HAPs, after enforceable controls and/or limitations).
- (d) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable to this source. Such requirements apply to a pollutant-specific emissions unit (PSEU), as defined in 40 CFR 64.1, at a major source that is required to obtain a Part 70 or 71 permit if the PSEU meets the following criteria:
- (1) The unit is subject to an emission limitation or standard for an applicable regulated air pollutant,
  - (2) The unit uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard, and

- (3) The unit has a potential to emit (PTE) before controls equal to or greater than 100 percent of the amount (tons per year) of the pollutant required for a source to be classified as a Part 70 major source.

This source is a FESOP source and is not a major Part 70 source. Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this source.

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

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

Although some of the equipment for the source were constructed after the August 7, 1977 rule applicability date, this source is not considered a major source because it is not one of the 28 listed source categories and it has always maintained the potential to emit after enforceable controls of less than 250 tons per year of any criteria pollutant. As a FESOP source the total input usage of VOC shall be limited to less than 100 tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration, PSD) shall not apply.

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

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the PTE 10 tons per year of any HAP or 25 tons per year of the combination of HAPs, and is constructed or reconstructed after July 27, 1997, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT).

Booths PB-15, PB-16 and PB-17 were constructed in 1986, 1994 and 1974, respectively, prior to the July 27, 1997 rule applicability date. Therefore, the requirements of this rule do not apply to booths PB-15, PB-16 and PB-17.

Booths PB-21, PB-22 and PB-23, each constructed in 1999, after the rule applicability date are potentially subject to the rule. However, as a source subject to the requirements of 326 IAC 2-8-4, the source shall limit the source wide HAPs emissions, including those of booths PB-21, PB-22 and PB-23 to less than 10 tpy and 25 tpy for single and combined HAP emissions, respectively. Therefore the requirements of this rule do not apply to booths PB-21, PB-22 and PB-23.

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

This source is located in Johnson County, which is not one of the specifically listed counties, nor does the source have the potential to emit CO, VOC, NO<sub>x</sub>, PM<sub>10</sub>, or SO<sub>2</sub> in amounts at or exceeding one-hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

#### **326 IAC 2-8-4 (FESOP)**

Pursuant to this rule the following condition shall apply to this wood cabinet manufacturing source:

- (a) The amount of VOCs delivered to the applicators plus the amount of VOCs used for clean-up solvents shall be limited to less than 99.85 tons per twelve (12) consecutive month period. This usage limit is required to limit the source wide potential to emit of VOC to less than 100 tons per 12 consecutive month period with compliance determined at the end of each month. Compliance with this limit shall make 326 IAC 2-7 not applicable.

- (b) The amount of any single HAP delivered to the applicators plus the amount of any single HAP used for clean-up solvents shall be limited to less than 10 tons per twelve (12) consecutive month period. The amount of any combination of HAPs delivered to the applicators plus the amount of any combination of HAPs used for clean-up solvents shall be limited to less than 25 tons per twelve (12) consecutive month period. These usage limits are required to limit the source wide potential to emit of any single HAP and any combination of HAPs to less than 10 tons and 25 tons, respectively, per 12 consecutive month period with compliance determined at the end of each month. Compliance with this limit shall make 326 IAC 2-7 not applicable.

#### 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 Alternating Opacity Exemptions), opacity shall meet the following, unless otherwise stated in the permit:

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

#### State Rule Applicability – Individual Facilities

##### 326 IAC 6-3-2 (Process Operations)

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

Pursuant to 40 CFR 52 Subpart P, the particulate matter (PM) from the flat paint coating line and the spray paint coating line shall each be limited by the following:

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

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

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications. The source shall comply with this requirement by continuing to use dry filters for each coating operation.

- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking facility WW-1 shall not exceed 0.84 pounds per hour when operating at a process weight rate of 187.03 pound per hour.

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

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

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

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

The woodworking facility is equipped with a baghouse for particulate control. With a baghouse with 99.9% control efficiency, the maximum controlled particulate emission rate from the woodworking operation is 0.26 pound per hour, which is less than 0.84 pound of particulate per hour. Therefore, the woodworking operation shall comply with 326 IAC 6-3-2 by using a baghouse for particulate control at all times during operation.

#### 326 IAC 8-1-6 (General Provisions Relating to VOC Rules)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, which have potential volatile organic compound (VOC) emissions of 25 tons per year or more, and which are not otherwise regulated by another provision of Article 8. This rule does not apply to this source because the source is subject to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating).

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

Pursuant to 326 IAC 8-2-1 (Applicability) and 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), facilities constructed in a listed county before November 1, 1980, which are located at a source with potential emissions of 100 tons per year or more of VOC, and which meet the criteria of 326 IAC 8-2-12(a), shall comply with the applicable requirements of 326 IAC 8-2-12. Facilities existing in specifically listed counties as of July 1, 1990, or that are newly constructed in any county after July 1, 1990, with actual emissions of greater than 15 pounds of VOC per day before add-on controls, shall likewise comply with the applicable requirements of 326 IAC 8-2-12.

The flat and spray coating line are subject to this rule because booth PB-16 for the flat paint coating line and all the three booths (PB-21, PB-22 and PB-23) for the spray paint coating line were constructed after the July 1, 1990 applicability date and have actual emissions of greater than 15 pounds of VOC per day before add-on controls. Therefore, 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.

The flat and the spray paint coating lines will utilize High Volume Low Pressure (HVLP) Spray Application systems in order to comply with the requirements of 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating).

#### 326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule applies to sources existing as of January 1, 1980, located in Lake and Marion Counties, as well as to facilities commencing operation after October 7, 1974 and prior to January 1, 1980 that are located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This rule does not apply to this source because the source is subject to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating).

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

The requirements of this rule apply to stationary sources located in Lake, Porter, Clark and Floyd Counties that emit or have the potential to emit VOCs at levels equal to or greater than 25 tons per year in Lake and Porter Counties; 100 tons per year in Clark and Floyd Counties; and to any coating facility that emits or has the potential to emit 10 tons per year or greater in Lake, Porter, Clark or Floyd County. The source is located in Johnson County. Therefore, this rule is not applicable to this source.

#### 326 IAC 8-11 (Wood Furniture Coating)

This source is not subject to 326 IAC 8-11. This rule applies to any person performing wood furniture operations in Lake, Porter, Clark or Floyd County. The source is located in Johnson County. Therefore, this rule is not applicable to this source.

### **Compliance Requirements**

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

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

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

1. The flat and the spray coating lines have applicable compliance monitoring conditions as specified below:
  - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (15, 16,17, 21, 22 and 23) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

These monitoring conditions are necessary because the dry filters for the surface coating facilities must operate properly to ensure compliance with 326 IAC 5-1 (Opacity), 326 IAC 6-3-2 (Process Operations), and 326 IAC 2-8-4 (FESOP).

There are no specific compliance monitoring requirements applicable to the woodworking facility, WW-1, because it has a baghouse as a control device and the allowable emissions for the controlled pollutant are less than 10 lb/hr.

### **Conclusion**

The renewed operation of this wood cabinet manufacturing source shall be subject to the conditions of the FESOP F081-18210-00033.

**Appendix A: Emission Calculations**

Company Name: Cabinets by Nichols, Inc.  
Address City IN Zip: 69 West State Road 144, Bargersville, IN 46106  
FESOP Renewal No.: F081-18210-00033  
Reviewer: Seema Roy

<b>Uncontrolled Potential Emissions (tons/year)</b>				
Emissions Generating Activity				
Pollutant	Natural Gas Combustion	Surface Coating Operations	Woodworking Operations	TOTAL
PM	0.02	10.84	1.15	12.0
PM10	0.07	10.84	1.15	12.1
SO2	0.01	0.00	0.00	0.0
NOx	0.88	0.00	0.00	0.9
VOC	0.05	113.96	0.00	114.0
CO	0.74	0.00	0.00	0.7
total HAPs	negl.	47.43	0.00	47.4
worst case single HAP	negl.	(Toluene) 35.27	0.00	35.3
Total emissions based on rated capacity at 8,760 hours/year.				
<b>Controlled Potential Emissions (tons/year)</b>				
Emissions Generating Activity				
Pollutant	Natural Gas Combustion	Surface Coating Operations	Woodworking Operations	TOTAL
PM	0.02	0.27	1.15	1.4
PM10	0.07	0.27	1.15	1.5
SO2	0.01	0.00	0.00	0.0
NOx	0.88	0.00	0.00	0.9
VOC	0.05	<99.85	0.00	<99.9
CO	0.74	0.00	0.00	0.7
total HAPs	negl.	<25	0.00	<25
worst case single HAP	negl.	<10	0.00	<10

Total emissions based on rated capacity at 8,760 hours/year, after enforceable control and limits.

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

**Company Name: Cabinets by Nichols, Inc.  
Address City IN Zip: 69 West State Road 144, Bargersville, IN 46106  
FESOP Renewal No.: F081-18210-00033  
Reviewer: Seema Roy**

Coating Material	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (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	
Topcoat	7.91	62.70%	0.0%	62.7%	0.0%	30.00%	1.110000	gal/hour	4.96	4.96	5.51	132.12	24.11	3.59	16.53	75%	
Sealer	7.54	69.80%	0.0%	69.8%	0.0%	30.20%	1.110000	gal/hour	5.26	5.26	5.84	140.20	25.59	2.77	17.43	75%	
Stain	8.27	75.38%	0.0%	75.4%	0.0%	12.55%	0.440000	gal/hour	6.23	6.23	2.74	65.83	12.01	0.98	49.67	75%	
Primer	6.98	81.67%	0.0%	81.7%	0.0%	11.06%	1.110000	gal/hour	5.70	5.70	6.33	151.86	27.72	1.56	51.54	75%	
Paint	6.65	75.86%	0.0%	75.9%	0.0%	14.00%	1.110000	gal/hour	5.04	5.04	5.60	134.39	24.53	1.95	36.03	75%	
<b>Uncontrolled Potential Emissions</b>	<b>Add worst case coating to all solvents</b>										<b>26.02</b>	<b>624.41</b>	<b>113.96</b>	<b>10.84</b>			
<b>Limited Potential Emissions</b>													<b>&lt;99.85</b>				



## Appendix A: Woodworking Particulate Emissions

Company Name: Cabinets by Nichols, Inc.  
 Address City IN Zip: 69 West State Road 144, Bargersville, IN 46106  
 FESOP Renewal No.: F081-18210-00033  
 Reviewer: Seema Roy

Uncontrolled Potential Emissions (tons/year)					
A. Baghouse					
Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Air flow rate (ACFM)	Control Efficiency	Total (tons/yr)
DC1	1	0.00087	35101.6	99.90%	1146.50
Total Emissions Based on Rated Capacity at 8,760 Hours/Year					<b>1146.50</b>

Controlled Potential Emissions (tons/year)					
A. Baghouse					
Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Air flow rate (ACFM)	Control Efficiency	Total (tons/yr)
DC1	1	0.00087	35101.6	99.90%	1.15

Total Emissions Based on Rated Capacity at 8,760 Hours/Year and source control:

**1.15**

Methodology:

Potential (uncontrolled):

Emissions rate (PM) = PM after controls (ton/yr)/(1-control efficiency)

Potential (controlled):

Emissions rate (PM) = Grain loading per actual cubic foot of air outlet (gr/cf)\*Air flow rate in actual cubic feet per minute\*60 minutes per hour/7000 grains per pound/2000 pounds\*8760 hours per year.

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

**Two (2) Drying Ovens**

**Company Name: Cabinets by Nichols, Inc.  
Address City IN Zip: 69 West State Road 144, Bargersville, IN 46106  
FESOP Renewal No.: F081-18210-00033  
Reviewer: Seema Roy**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
2.0	17.5

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.02	0.07	0.01	0.88	0.05	0.74

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

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

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

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

**Two (2) Drying Ovens**

**Company Name: Cabinets by Nichols, Inc.**  
**Address City IN Zip: 69 West State Road 144, Bargersville, IN 46106**  
**FESOP Renewal No.: F081-18210-00033**  
**Reviewer: Seema Roy**

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.840E-05	1.051E-05	6.570E-04	1.577E-02	2.978E-05

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	4.380E-06	9.636E-06	1.226E-05	3.329E-06	1.840E-05

Methodology is the same as page 6.

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