



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

August 10, 2004

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

TO: Interested Parties / Applicant
RE: Paoli, Inc / 117-19590-00014
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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 from 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-AM.dot 9/16/03

August 10, 2004

Mr. Michael McCracken
Paoli, Inc.
P.O. Box 30
Orleans, Indiana 47452

Re: 117-19590-00014
3rd Administrative Amendment to
Title V 117-6003-00014

Dear Mr. McCracken:

Paoli, Inc., was issued a permit on March 28, 2002 for a stationary wood furniture manufacturing plant. A letter requesting a change was received on June 24, 2004. Pursuant to the provisions of 2-7-11, the permit is hereby administratively amended as follows.

Specifically, Paoli, Inc. submitted an application to revise Condition D.5.9 to reflect that the particulate emissions from booth U1 are controlled by a water pan system instead of a dry filter system.

Booth U1 is controlled by a water pan system while all of the other affected booths listed in Section D.5 are controlled by dry filter systems. The Office of Air Quality in Condition D.5.9, incorrectly identified all booths (including booth U1) as being controlled by dry filter system.

Therefore, Condition D.5.9 shall be corrected accordingly.

Correcting the control identification will not result in any changes to the production rate or emissions of any of the source emissions units, there are no new applicable requirements, and no changes to any existing requirements that result in a violation in a permit term.

Therefore, the proposed changes shall be incorporated into the existing source Part 70 permit via an administrative amendment pursuant to 326 IAC 2-7-11(a)(7) which states that any changes which revise descriptive information where the revision will not trigger a new applicable requirement or violate a permit term, may be incorporated into an existing source Part 70 permit via an administrative amendment.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

All questions should be directed to Scott Fulton at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, and ask for Scott Fulton or extension 3-5691, or dial (317) 233-5691.

Sincerely,

Original Signed by
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

SDF

cc: File - Orange County
U.S. EPA, Region V
Orange County Health Department
Air Compliance Section Inspector - Gene Kelso
Compliance Data Section
Administrative and Development - Sara Cloe
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Paoli, Inc.
201 E. Martin Street
Orleans, Indiana 47452**

(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.

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

Operation Permit No.: T117-6003-00014	Date Issued: March 28, 2002 Expiration Date: March 28, 2007
Issued by: Janet G. McCabe, Assistant Commissioner, Office of Air Quality	

1 st Administrative Amendment:	117-18430-00014	Date Issued:	February 10, 2004
2 nd Administrative Amendment:	117-18980-00014	Date Issued:	June 10, 2004

3 rd Administrative Amendment:: 117-19590-00014	Affected Page: 59
Issued by: Original Signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issued Date: August 10, 2004

D.5.8 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.5.1 and D.5.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.5.9 Particulate Matter (PM)

In order to comply with D.5.5, the water pan system for the robotic spray booth, identified as U1 and the dry filter systems for all of the other booths shall be in proper placement and control emissions from the paint booths at all times when the paint booths are in operation.

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

D.5.10 Operator Training Program

The permittee shall implement an operator training program.

- (a) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
- (b) Training shall include proper filter alignment, filter inspection and maintenance, proper pan water level, water pan inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.
- (c) All operators shall be given refresher training annually.

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

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

D.5.11 Record Keeping Requirements

- (a) To document compliance with Condition D.5.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.5.1.
 - (1) The amount and VOC 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) The volume weighted VOC content of the coatings used for each month;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for an Administrative Amendment to an Existing Source Part 70 Permit

Source Background and Description

Source Name:	Paoli, Inc.
Source Location:	201 East Martin Street, Orleans, IN 47452
County:	Orange
SIC Code:	2521
Part 70 Permit No.:	117-6003-00014
Date Issued:	March 28, 2002
Administrative Amendment No.:	117-19590-00014
Permit Reviewer:	SDF

The Office of Air Quality (OAQ) has reviewed an application from Paoli, Inc. relating to the operation of their existing wood office furniture manufacturing and coating operation.

Request

Specifically, on June 24, 2004, Paoli, Inc. submitted an application to revise Condition D.5.9 to reflect that the particulate emissions from booth U1 are controlled by a water pan system instead of a dry filter system.

Booth U1 is controlled by a water pan system while all of the other affected booths listed in Section D.5 are controlled by dry filter systems. The Office of Air Quality in Condition D.5.9, incorrectly identified all booths (including booth U1) as being controlled by dry filter system.

Therefore, Condition D.5.9 shall be corrected accordingly.

Correcting the control identification will not result in any changes to the production rate or emissions of any of the source emissions units, there are no new applicable requirements, and no changes to any existing requirements that result in a violation in a permit term.

Therefore, the proposed changes shall be incorporated into the existing source Part 70 permit via an administrative amendment pursuant to 326 IAC 2-7-11(a)(7) which states that any changes which revise descriptive information where the revision will not trigger a new applicable requirement or violate a permit term, may be incorporated into an existing source Part 70 permit via an administrative amendment.

Existing Approvals

The source has been operating under Part 70 permit 117-6003-00014, issued on March 28, 2002, First Administrative Amendment 117-18430-00014, issued on February 10, 2004, and Second Administrative Amendment 117-18980-00014, issued on June 10, 2004.

Recommendation

The staff recommends to the Commissioner that the administrative amendment 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.

Emission Calculations

The proposed changes will not result in an increase in any source emissions. Therefore, no emission calculations are necessary.

Unrestricted Potential Emissions Due to the Proposed Changes

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE due to the proposed changes before controls, limits, and standards. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	-
PM ₁₀	-
SO ₂	-
VOC	-
CO	-
NO _x	-

Note: For the purpose of determining Title V applicability for particulates, PM₁₀, not PM, is the regulated pollutant in consideration.

HAPs	Potential To Emit (tons/year)
Worst Case Single HAP	-
Combined HAPs	-

County Attainment Status

The source is located in Orange County.

Pollutant	Status
PM ₁₀	attainment or unclassifiable
SO ₂	attainment or unclassifiable
NO ₂	attainment or unclassifiable
Ozone	attainment or unclassifiable
CO	attainment or unclassifiable
Lead	attainment or unclassifiable

- (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. Orange County has been designated as attainment or unclassifiable for ozone. Therefore, the VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration, 326 IAC 2-2.
- (b) Orange County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Existing Source Status

Existing source emissions, as obtained from the TSD of Part 70 permit 117-6003-00014, issued on March 28, 2002:

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Worst Case Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Source	78.4	68.4	0.10	8.6	998.7	7.2	>10	>25
PSD Major Levels	250	250	250	250	250	250	-	-
Part 70 Major Levels	-	100	100	100	100	100	10	25

- (a) This existing source is a major PSD stationary source because the source VOC emissions are, after all applicable limits and standards, greater than the major source applicable level of 250 tons per year.
- (b) This existing source is a Title V major stationary source because the single and combined HAP emissions exceed their respective applicable levels of 10 and 25 tons per year.

Source Emissions After the Proposed Changes

Source emissions after the proposed changes (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Worst Case Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Source	78.4	68.4	0.10	8.6	998.7	7.2	>10	>25
Changes	-	-	-	-	-	-	-	-
Total	78.4	68.4	0.10	8.6	998.7	7.2	>10	>25

PSD Major Levels	250	250	250	250	250	250	-	-
Part 70 Major Levels	-	100	100	100	100	100	10	25

- (a) This source after the proposed changes is still a major PSD stationary source because the source VOC emissions are, after all applicable limits and standards, still greater than the major source applicable level of 250 tons per year.
- (b) The source after the proposed changes is still a Title V major stationary source because the single and combined HAP emissions still exceed their respective applicable levels of 10 and 25 tons per year

Federal Rule Applicability

The proposed changes do not trigger any new applicable federal rules and do not affect any of the existing applicable federal requirements.

State Rule Applicability - Entire Source

The proposed changes do not trigger any new entire source state rules and do not affect any of the existing entire source state rules.

State Rule Applicability - Individual Facilities

The proposed changes do not trigger any new individual facility state rules and do not affect any of the existing individual facility state rules.

Changes to the Permit

To incorporate the proposed changes into the permit, the following changes shall be made. All added information is indicated in bold type. All deleted information is struck-out.

Condition D.5.9:

Condition D.5.9 shall be changed as follows to reflect the fact that the particulate emissions from booth U1 are controlled by a water pan system and the particulate emissions from all of the other applicable booths are controlled by dry filter systems.

D.5.9 Particulate Matter (PM)

In order to comply with D.5.5, the ~~dry filters~~ **water pan** system for **the robotic spray booth, identified as U1 and the dry filter systems for all of the other booths** ~~PM control~~ shall be in proper placement and control emissions from the paint booths at all times when the paint booths are in operation.

Conclusion

The owner or operator shall operate the source equipment according to the requirements specified in Third Administrative Amendment 117-19590-00014 and all other existing active source approvals.