



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: March 15, 2005
RE: Spectrum Finishing, LTD / 087-19695-00060
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 1/10/05



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**NEW SOURCE CONSTRUCTION PERMIT
AND MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR QUALITY**

**Spectrum Finishing, LTD
1340 Industrial Drive
La Grange, Indiana 46761**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

| | |
|---|--|
| Operation Permit No.: MSOP 087-19695-00060 | |
| Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality | Issuance Date: March 15, 2005 Expiration Date: March 15, 2010 |

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 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 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary wood household furniture finishing plant.

Authorized Individual: General Manager
Source Address: 1340 Industrial Drive, La Grange, Indiana 46761
Mailing Address: 1340 Industrial Drive, La Grange, Indiana 46761
General Source Phone: (260) 463-7300
SIC Code: 2511
County Location: La Grange
Source Location Status: Attainment for all criteria pollutants
Source Status: Minor Source Operating Permit
Minor Source, under PSD Rules
Minor Source, Section 112 of the Clean Air Act
Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

This stationary source is approved to construct and operate the following emission units and pollution control devices:

- (a) Three (3) surface coating booths using HVLP spray equipment, identified as SG1, SG2 and SG3, constructed in 2004, with a maximum capacity of 22.2 wood chairs per hour each, using dry filters as control, and exhausting to stacks S1, S2A, S2B, S3A and S3B, respectively.
- (b) Four (4) downdraft sanding tables for scuff sanding chairs, identified as ST1, ST2, ST3, and ST4, constructed in 2004, with a maximum capacity of 5.55 wood chairs per hour each, with emissions controlled by a fabric filter, exhausting inside the building and then to general ventilation.
- (c) One (1) natural gas-fired air make-up unit, identified as A1, constructed in 2004, with a maximum capacity of 2.246 MMBtu/hr, with emissions exhausting to the atmosphere.
- (d) Seven (7) natural gas-fired radiant heaters, identified as R1 through R7, pre-existing onsite in 2004, with a maximum heat capacity of 0.1 MMBtu/hr each, with emissions exhausting through stacks R1 through R7, respectively.
- (e) One (1) natural gas-fired office heater, identified as H1, pre-existing onsite in 2004, with a maximum heat capacity of 0.075 MMBtu/hr, with emissions exhausting through stack H1.

SECTION B GENERAL CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

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 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Permit Term and Renewal [326 IAC 2-6.1-7(a)][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 of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.6 Modification to Permit [326 IAC 2]

Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.7 Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section.
 - (1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
 - (2) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2-6.1-6 and an Operation Permit Validation Letter is issued.

- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.
- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).

B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, IN 46204
- (d) The notification 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.

B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days (this time frame is determined on a case by case basis but no more than ninety (90) days) after issuance of this permit, including the following information on each emissions unit:
 - (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.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 PMP's 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 PMP 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 an "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.10 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

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

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a non-road engine, as defined in 40 CFR 89.2.

B.11 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [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 permitted 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 this title or the conditions of this permit or any operating permit revisions;

- (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 processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (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.12 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)]:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, shall issue a revised permit.

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.

B.13 Annual Fee Payment [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.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

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 non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

C.5 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or

not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

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

All required notifications shall be submitted to:

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

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 an "authorized individual" as defined by 326 IAC 2-7-1(34).

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

Testing Requirements

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

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. 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
Indianapolis, Indiana 46204

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ (and local agency) not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, (and local agency), 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.7 Compliance Requirements [326 IAC 2-1.1-11]

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

C.8 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.

Record Keeping and Reporting Requirements

C.9 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report

Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.10 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (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 when operation begins.

C.11 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204
- (b) 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.
- (c) Unless otherwise specified in this permit, any report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1

EMMISSIONS UNITS OPERATION CONDITIONS

Facility Description [326 IAC 2-6.1]:

- (a) Three (3) surface coating booths using HVLP spray equipment, identified as SG1, SG2 and SG3, constructed in 2004, with a maximum capacity of 22.2 wood chairs per hour each, using dry filters as control, and exhausting to stacks S1, S2A, S2B, S3A and S3B, respectively.
- (b) Four (4) downdraft sanding tables for scuff sanding chairs, identified as ST1, ST2, ST3, and ST4, constructed in 2004, with a maximum capacity of 5.55 wood chairs per hour each, with emissions controlled by a fabric filter, exhausting inside the building and then to general ventilation.
- (c) One (1) natural gas-fired air make-up unit, identified as A1, constructed in 2004, with a maximum capacity of 2.246 MMBtu/hr, with emissions exhausting to the atmosphere.
- (d) Seven (7) natural gas-fired radiant heaters, identified as R1 through R7, pre-existing onsite in 2004, with a maximum heat capacity of 0.1 MMBtu/hr each, with emissions exhausting through stacks R1 through R7, respectively.
- (e) One (1) natural gas-fired office heater, identified as H1, pre-existing onsite in 2004, with a maximum heat capacity of 0.075 MMBtu/hr, with emissions exhausting through stack H1.

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

Emission Limitations and Standards

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

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

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

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

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 2-7]

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

D.1.3 Hazardous Air Pollutants (HAP) [40 CFR 63, Subpart JJ] [326 IAC 20-14] [326 IAC 2-7]

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

D.1.4 Particulate [326 IAC 6-3-2(d)]

- (a) Particulate from the surface coating operations shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.1.5 Particulate [326 IAC 6-3-2(e)]

Pursuant to 326 IAC 6-3-2(e), the allowable rate of particulate emissions from each of the downdraft sanding tables (ST1, ST2, ST3, and ST4), each operating at a maximum process weight of 66.6 pounds per hour, shall be limited to five hundred fifty-one thousandths (0.551) pound per hour.

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC usage limitations contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 Particulate

The fabric filters shall be in operation at all times that the downdraft sanding tables are in operation, in order to comply with this limit.

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

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (1) The amount and VOC content of each coating material and solvent less water used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) The total VOC usage for each month; and
 - (3) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits and/or the HAP emission limits established in Condition D.1.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The amount and HAP content of each coating material and solvent used less water on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) The total HAP usage for each month; and
 - (3) The weight of HAPs emitted for each compliance period.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

| | |
|----------------------|---------------------------------|
| Company Name: | Spectrum Finishing, LTD |
| Address: | 1340 Industrial Drive |
| City: | La Grange, Indiana 46761 |
| Phone #: | (260) 463-7300 |
| MSOP #: | 087-19695-00060 |

I hereby certify that Spectrum Finishing, LTC is still in operation.
 no longer in operation.

I hereby certify that Spectrum Finishing, LTC is in compliance with the requirements of MSOP 087-19695-00060.
 not in compliance with the requirements of MSOP 087-19695-00060.

| |
|---------------------------------------|
| Authorized Individual (typed): |
| Title: |
| Signature: |
| Date: |

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

| |
|-----------------------|
| Noncompliance: |
| |
| |
| |

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-5967**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERM LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____

LOCATION: (CITY AND COUNTY) _____

PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____

CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

Mail to: Permit Administration & Development Section
Office of Air Quality
100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015

Spectrum Finishing, LTD
1340 Industrial Drive
La Grange, Indiana 46761

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)
4. I hereby certify that Spectrum Finishing, LTD, 1340 Industrial Drive, La Grange, Indiana, 46761, completed construction of the chair finishing plant on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on October 4, 2004 and as permitted pursuant to Construction Permit and Minor Source Operating Permit 087-19695-00060 issued on _____.
5. Additional (?operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit. (Delete this statement if it does not apply.)

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature

Date

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of
Indiana on this _____ day of _____, 20 _____.

My Commission expires: _____

Signature

Name (typed or printed)

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

Technical Support Document (TSD) for a
New Source Construction and Minor Source Operating Permit

Source Background and Description

| | |
|-----------------------|---|
| Source Name: | Spectrum Finishing, LTD |
| Source Location: | 1340 Industrial Drive, La Grange, Indiana 46761 |
| County: | La Grange |
| SIC Code: | 2511 |
| Operation Permit No.: | 087-19695-00060 |
| Permit Reviewer: | ERG/ST |

The Office of Air Quality (OAQ) has reviewed an application from Spectrum Finishing, LTD relating to the construction and operation of a wood household furniture finishing plant.

History

In 2004, Spectrum Finishing, LTD purchased an existing manufacturing building located at 1340 Industrial Drive, La Grange, Indiana 46761, from Dawn Enterprises, Inc. The operations to be performed at this source under this permit (MSOP 087-19695-00060) are in an entirely different source category (SIC code 2511 – Wood household furniture) than the operations performed in this building by the previous owners (SIC code 3711 – Motor Vehicles and Passenger Car Equipment). The operations performed on this site by the previous owners were exempt from permitting requirements under Exempt Construction and Operation Status 087-16813-00054, issued on December 20, 2002. Pre-existing equipment left onsite that will be used by the new owners includes three unequipped spray booth enclosures, seven radiant heaters and one office heater. The Permittee plans to add the HVLP spray guns and air pumps for the three (3) surface coating booths, four sanding tables and an air make-up unit under this permit.

Permitted Emission Units and Pollution Control Equipment

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

Unpermitted Emission Units and Pollution Control Equipment

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

New Emission Units and Pollution Control Equipment

The application includes information relating to the prior approval for the construction and/or operation of the following equipment pursuant to 326 IAC 2-8-4(11):

- (a) Three (3) surface coating booths using HVLP spray equipment, identified as SG1, SG2 and SG3, constructed in 2005, with a maximum capacity of 22.2 wood chairs per hour each, using dry filters as control, and exhausting to stacks S1, S2A, S2B, S3A and S3B, respectively.

- (b) Four (4) downdraft sanding tables for scuff sanding chairs, identified as ST1, ST2, ST3, and ST4, constructed in 2005, with a maximum capacity of 5.55 wood chairs per hour each, with emissions controlled by a fabric filter, exhausting inside the building and then to general ventilation.
- (c) One (1) natural gas-fired air make-up unit, identified as A1, constructed in 2005, with a maximum capacity of 2.246 MMBtu/hr, with emissions exhausting to the atmosphere.
- (d) Seven (7) natural gas-fired radiant heaters, identified as R1 through R7, pre-existing onsite in 2005, with a maximum heat capacity of 0.1 MMBtu/hr each, with emissions exhausting through stacks R1 through R7, respectively.
- (e) One (1) natural gas-fired office heater, identified as H1, pre-existing onsite in 2005, with a maximum heat capacity of 0.075 MMBtu/hr, with emissions exhausting through stack H1.

Note: Each wooden chair weighs approximately 12.0 pounds.

Existing Approvals

This is the first permit issued to this source.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

| Stack ID | Operation | Height (ft) | Diameter (ft) | Flow Rate (acfm) | Temperature (°F) |
|----------|-----------|-------------|---------------|------------------|------------------|
| S1 | SG1 | 22 | 2.0 | 7,300 | ambient |
| S2A | SG2 | 21 | 1.5 | 3,900 | ambient |
| S2B | SG2 | 21 | 1.5 | 3,900 | ambient |
| S3A | SG3 | 26 | 2.0 | 4,000 | ambient |
| S3B | SG3 | 26 | 2.0 | 4,000 | ambient |
| R1 | R1 | 18 | 0.5 | 500 | 460 |
| R2 | R2 | 19 | 0.5 | 500 | 460 |
| R3 | R3 | 20 | 0.5 | 500 | 460 |
| R4 | R4 | 20 | 0.5 | 500 | 460 |
| R5 | R5 | 20 | 0.5 | 500 | 460 |
| R6 | R6 | 17 | 0.5 | 500 | 460 |
| R7 | R7 | 16 | 0.5 | 500 | 460 |
| H1 | H1 | 18 | 0.5 | 500 | 460 |

Recommendation

The staff recommends to the Commissioner that the construction and operation 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.

A complete application for the purposes of this review was received on October 4, 2004.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document (Appendix A, pages 1 through 4).

Potential to Emit of the Source Before Controls

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

| Pollutant | Potential to Emit (tons/yr) |
|-----------------|-----------------------------|
| PM | 10.6 |
| PM-10 | 10.6 |
| SO ₂ | 0.01 |
| VOC | 68.2 |
| CO | 1.1 |
| NO _x | 1.3 |

| HAPs | Potential to Emit (tons/yr) |
|---------------|-----------------------------|
| Ethyl Benzene | 3.1 |
| Toluene | 5.7 |
| Xylene | 8.5 |
| All Others | 2.1 |
| Total | 19.4 |

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM₁₀, VOC, SO₂, NO_x, and CO are less than 100 tons per year. The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (b) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.

County Attainment Status

The source is located in La Grange County.

| Pollutant | Status |
|-----------------|------------|
| PM-10 | Attainment |
| SO ₂ | Attainment |
| NO ₂ | Attainment |
| 1-hour Ozone | Attainment |

| | |
|--------------|------------|
| 8-hour Ozone | Attainment |
| CO | Attainment |
| Lead | Attainment |

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (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 ozone. La Grange County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) La Grange County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Source Status

New Source PSD 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 | 1.5 |
| PM-10 | 1.5 |
| SO ₂ | 0.01 |
| VOC | 68.2 |
| CO | 1.1 |
| NO _x | 1.3 |
| Single HAP | 8.5 |
| Combination HAPs | 19.4 |

This new source is not a major stationary source because no attainment 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. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
(b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
(c) any combination of HAPs is less than 25 tons per year.

This is the first air approval issued to this source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this permit.

- (c) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations, Subpart JJ. The potential to emit for a single HAP is less than ten (10) tons per year and the potential to emit for a combination of HAPs is less than twenty-five tons per year. Pursuant to 40 CFR 63.2 and 40 CFR 63.800(a), this wood household furniture finishing plant does not meet the definition of an "affected source" because it is not a major source of HAP. Any change that would increase HAP emissions to greater than ten (10) tons per year of a single HAP or greater than twenty-five (25) tons per year of a combination of HAPs requires prior approval from IDEM, OAQ.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not in 1 of the 28 source categories and there are no applicable New Source Performance Standards that were in effect on August 7, 1980, therefore, fugitive emissions are not counted towards applicability of PSD.

The potential to emit for PM, PM₁₀, SO₂, NO_x, CO and VOC from this source are less than 250 tons per year. This source is a minor source under PSD.

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

The operation of the surface coating booths at this source will emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is located in La Grange County and is not required to operate under the Part 70 permit program. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

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

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

State Rule Applicability - Surface Coating Booths (SG1, SG2, SG3)

326 IAC 2-7 (Part 70)

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

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

Particulate from the surface coating operations shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

- (a) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (b) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

326 IAC 8-1-6 (New Facilities: General Reduction Requirements)

The surface coating operations at this source are subject to the requirements of 326 IAC 8-2-12. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

326 IAC 8-2-12 (Volatile Organic Compounds)

The surface coating operations at this source were constructed after July 1, 1990, apply coatings to wood furniture, and have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls. 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 surface coating operations will utilize HVLP spray application equipment. Therefore, the surface coating operations are in compliance with the requirements of 326 IAC 8-2-12.

State Rule Applicability - Woodworking Operations (ST1, ST2, ST3, ST4)

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

Pursuant to 326 IAC 6-3-2(e), the allowable rate of particulate emissions from each of the downdraft sanding tables (ST1, ST2, ST3, and ST4), each operating at a maximum process weight of 66.6 pounds per hour, shall be limited to five hundred fifty-one thousandths (0.551) pound per hour.

The fabric filters shall be in operation at all times that the downdraft sanding tables are in operation, in order to comply with this limit.

Conclusion

The construction and operation of this wood household furniture finishing plant shall be subject to the conditions of the New Source Construction and Minor Source Operating Permit 087-19695-00060.

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

**Company Name: Spectrum Finishing, LTD
Address: 1340 Industrial Drive, La Grange, Indiana 46761
Permit Number: M087-19695-00060
Reviewer: ERG/ST
Date: 10/21/2004**

Spray Booths SG1, SG2, SG3

| Material | Density (lb/gal) | Weight % Volatile (H ₂ O & Organics) | Weight % Water | Weight % Organics | Weight % Solids | Maximum Usage (gal/unit) | Maximum Throughput (units/hour) | PTE VOC (ton/yr) | Transfer Efficiency | PTE PM/PM10 Uncontrolled (ton/yr) | Control Efficiency | PTE PM/PM10 Controlled (ton/yr) |
|------------------|------------------|---|----------------|-------------------|-----------------|--------------------------|---------------------------------|------------------|---------------------|-----------------------------------|--------------------|---------------------------------|
| AL-107 stain | 7.38 | 96.1% | 0.00% | 0.96 | 3.93% | 0.035 | 22.2 | 24.2 | 75% | 0.25 | 80% | 0.05 |
| Catalyst Sealer | 7.65 | 67.8% | 0.00% | 0.68 | 32.2% | 0.035 | 22.2 | 17.7 | 75% | 2.10 | 80% | 0.42 |
| Catalyst Topcoat | 7.77 | 61.4% | 0.00% | 0.61 | 38.6% | 0.050 | 22.2 | 23.2 | 75% | 3.64 | 80% | 0.73 |
| PS-1800 thinner | 7.09 | 100% | 10.0% | 0.90 | 0.00% | 0.005 | 22.2 | 3.11 | 75% | 0.00 | 80% | 0.00 |
| Totals | | | | | | | | 68.2 | | 5.99 | | 1.20 |

Coatings are applied with HVLP equipment and controlled by dry filters.
Assume transfer efficiency of 75% for HVLP spray guns and control efficiency of 80% for dry filters.
Assume all VOC volatilizes and is emitted.

METHODOLOGY

PTE VOC (tons/yr) = Density (lb/gal) x Weight % Organics x Max. Usage (gal/unit) x Max. Throughput (units/hr) x 8760 (hr/yr) x 1/2000 (ton/lbs)
PTE PM/PM10 Uncontrolled (tons/yr) = Density (lb/gal) x Weight % Solids x Max. Usage (gal/unit) x Max. Throughput (units/hr) x (1- Transfer Efficiency (%)) x 8760 (hr/yr) x 1/2000 (ton/lbs)
PTE PM/PM10 Controlled (tons/yr) = Density (lb/gal) x Weight % Solids x Max. Usage (gal/unit) x Max. Throughput (units/hr) x (1- Transfer Efficiency (%)) x (1-Control Efficiency (%)) x 8760 (hr/yr) x 1/2000 (ton/lbs)

**Appendix A: Emission Calculations
HAP Emissions From Surface Coating Operations**

Company Name: Spectrum Finishing, LTD
Address: 1340 Industrial Drive, La Grange, Indiana 46761
Permit Number: M087-19695-00060
Reviewer: ERG/ST
Date: 10/21/2004

Spray Booths SG1, SG2, SG3

| Material | Density (lb/gal) | Max. Usage (gal/unit) | Maximum Throughput (unit/hour) | Weight % Xylene | Weight % Toluene | Weight % Formaldehyde | Weight % Methyl Ethyl Ketone | Weight % Methyl Isobutyl Ketone | Weight % Cumene | Weight % Ethylbenzene | Weight % Methanol |
|------------------|------------------|-----------------------|--------------------------------|-----------------|------------------|-----------------------|------------------------------|---------------------------------|-----------------|-----------------------|-------------------|
| AL-107 stain | 7.38 | 0.035 | 22.2 | 1.90% | 0.00% | 0.00% | 0.00% | 0.00% | 1.90% | 0.00% | 0.00% |
| Catalyst Sealer | 7.65 | 0.035 | 22.2 | 9.78% | 4.89% | 0.10% | 0.00% | 0.00% | 0.00% | 4.89% | 0.66% |
| Catalyst Topcoat | 7.77 | 0.050 | 22.2 | 14.5% | 4.83% | 0.97% | 0.00% | 0.00% | 0.00% | 4.83% | 1.03% |
| PS-1800 thinner | 7.09 | 0.005 | 22.2 | 0.00% | 75.0% | 0.00% | 10.0% | 10.0% | 0.00% | 0.00% | 0.00% |

| Material | Density (lb/gal) | Max. Usage (gal/unit) | Maximum Throughput (unit/hour) | PTE Xylene (ton/yr) | PTE Toluene (ton/yr) | PTE Formaldehyde (ton/yr) | PTE Methyl Ethyl Ketone (ton/yr) | PTE Methyl Isobutyl Ketone (ton/yr) | PTE Cumene (ton/yr) | PTE Ethylbenzene (ton/yr) | PTE Methanol (ton/yr) |
|------------------|------------------|-----------------------|--------------------------------|---------------------|----------------------|---------------------------|----------------------------------|-------------------------------------|---------------------|---------------------------|-----------------------|
| AL-107 stain | | (see above) | | 0.48 | 0.00 | 0.00 | 0.00 | 0.00 | 0.48 | 0.00 | 0.00 |
| Catalyst Sealer | | (see above) | | 2.55 | 1.27 | 0.03 | 0.00 | 0.00 | 0.00 | 1.27 | 0.17 |
| Catalyst Topcoat | | (see above) | | 5.47 | 1.83 | 0.37 | 0.00 | 0.00 | 0.00 | 1.83 | 0.39 |
| PS-1800 thinner | | (see above) | | 0.00 | 2.59 | 0.00 | 0.35 | 0.35 | 0.00 | 0.00 | 0.00 |

| | | | | | | | | |
|------------------------------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|
| Totals for Three (3) Booths | 8.50 | 5.69 | 0.39 | 0.35 | 0.35 | 0.48 | 3.10 | 0.56 |
|------------------------------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|

METHODOLOGY

PTE HAPS (tons/yr) = Density (lb/gal) x Max. Usage (gal/unit) x Max. Throughput (unit/hr) x Weight % HAP x 8760 (hrs/yr) x 1/2000 (ton/lbs)

**Appendix A: Emission Calculations
Particulate Emissions - Woodworking Operations**

Company Name: Spectrum Finishing, LTD
Address: 1340 Industrial Drive, La Grange, Indiana 46761
Permit Number: M087-19695-00060
Reviewer: ERG/ST
Date: 10/21/2004

1. PTE From Woodworking Operations - Downdraft Sanding Tables ST1, ST2, ST3, ST4

| Emission Unit ID | Outlet Grain Loading (gr/dscf) | Maximum Air Flow Rate (scfm) | Control Efficiency (%) | PTE of PM/PM10 After Control (lbs/hr) | PTE of PM/PM10 After Control (tons/yr) | PTE of PM/PM10 Before Control (lbs/hr) | PTE of PM/PM10 Before Control (tons/yr) |
|------------------|--------------------------------|------------------------------|------------------------|---------------------------------------|--|--|---|
| ST1 | 0.003 | 500 | 95.0% | 0.01 | 0.06 | 0.26 | 1.13 |
| ST2 | 0.003 | 500 | 95.0% | 0.01 | 0.06 | 0.26 | 1.13 |
| ST3 | 0.003 | 500 | 95.0% | 0.01 | 0.06 | 0.26 | 1.13 |
| ST4 | 0.003 | 500 | 95.0% | 0.01 | 0.06 | 0.26 | 1.13 |
| Total | | | | 0.05 | 0.23 | 1.03 | 4.51 |

Assume all PM emissions equal PM10 emissions.

Methodology

PTE of PM/PM10 After Control (lbs/hr) = Grain Loading (gr/dscf) x Max. Air Flow Rate (scfm) x 60 (mins/hr) x 1/7000 (lb/gr)

PTE of PM/PM10 Before Control (lbs/hr) = PTE of PM/PM10 After Control (lb/hr) / (1-Control Efficiency (%))

PTE of PM/PM10 After Control (tons/yr) = Grain Loading (gr/dscf) x Max. Air Flow Rate (scfm) x 60 (mins/hr) x 1/7000 (lb/gr) x 8760 (hr/yr) x 1 ton/2000 lbs

PTE of PM/PM10 Before Control (tons/yr) = PTE of PM/PM10 After Control (tons/yr) / (1-Control Efficiency (%))

2. Compliance with 326 IAC 6-3-2 - Particulate Matter Emissions Limitations

Maximum throughput for each downdraft sanding table is 5.55 chairs or 66.6 pounds of wood per hour.

Pursuant to 326 IAC 6-3-2(e)(2), the maximum allowable particulate emissions from emission units ST1, ST2, ST3 and ST4 = 0.551 pounds per hour.

| Emission Unit ID | Maximum Allowable Emissions (lb/hr) | Measured Emissions Before Controls (lb/hr) | Measured Emissions After Controls (lb/hr) |
|------------------|-------------------------------------|--|---|
| ST1 | 0.551 | 0.257 | 0.013 |
| ST2 | 0.551 | 0.257 | 0.013 |
| ST3 | 0.551 | 0.257 | 0.013 |
| ST4 | 0.551 | 0.257 | 0.013 |

The filters must be in operation at all times that the woodworking operations are in operation in order to ensure compliance with 326 IAC 6-3-2.

**Appendix A: Emissions Calculations
Natural Gas Fired Space Heaters**

Company Name: Spectrum Finishing, LTD
Address: 1340 Industrial Drive, La Grange, Indiana 46761
Permit Number: M087-19695-00060
Reviewer: ERG/ST
Date: 10/21/2004

| Description | Number of Emission Units | Emission Unit ID | Total Heat Input Capacity (MMBtu/hr) | Total Maximum Potential Throughput (MMCF/yr) |
|-----------------|--------------------------|------------------|--------------------------------------|--|
| Air Makeup Unit | 1 | A1 | 2.25 | 19.7 |
| Radiant Heaters | 7 | R1 - R7 | 0.70 | 6.13 |
| Office Heater | 1 | H1 | 0.08 | 0.66 |

| Emission Factor (lbs/MMCF) | | | | | | |
|----------------------------|-------|-----|-------|------|-----|------|
| PM* | PM10* | SO2 | NOX** | CO | VOC | HAPs |
| 7.6 | 7.6 | 0.6 | 100 | 84.0 | 5.5 | 0.09 |

| Potential To Emit (tons/yr) | | | | | | | |
|-----------------------------|-------------|-------------|-------------|-------------|-------------|-------------|----------------|
| Emission Unit ID | PM | PM10 | SO2 | NOX | CO | VOC | HAPs |
| A1 | 0.07 | 0.07 | 0.01 | 0.98 | 0.83 | 0.05 | 8.6E-04 |
| R1 - R7 | 0.02 | 0.02 | 0.00 | 0.31 | 0.26 | 0.02 | 2.7E-04 |
| H1 | 0.00 | 0.00 | 0.00 | 0.03 | 0.03 | 0.00 | 2.9E-05 |
| TOTALS | 0.10 | 0.10 | 0.01 | 1.32 | 1.11 | 0.07 | 1.2E-03 |

* PM and PM10 emission factor are for condensible and filterable PM and PM10 combined.

**Emission factor for NOX: Uncontrolled = 100 lb/MMCF

Emission factors are from AP-42, Chapter 1.4 - Natural Gas Combustion, Tables 1.4-1, 1.4-2, 1.4-3 and 1.4-4. SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03. (AP-42 Supplement D 7/98)

1 MMBtu = 1,000,000 Btu

1 MMCF = 1,000,000 cubic feet of gas

All Emission factors are based on normal firing.

Methodology

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

PTE (tons/yr) = Max. Potential Throughput (MMCF/yr) x Emission Factor (lbs/MMCF) x 1/2,000 (ton/lbs)

Total HAP emissions from the natural gas boiler are negligible.