



*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: July 25, 2005  
RE: Flexcel-Jasper Power Drive 037-20050-00085  
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 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 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 Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) 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.

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

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

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

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
*We make Indiana a cleaner, healthier place to live.*

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July 25, 2005

Mr. Randy Keefer  
General Manager  
flexcel – Jasper Power Drive  
1220 Power Drive  
Jasper, IN 47549

Re: 037-20050-00085  
First Minor Permit Modification to  
Part 70 T037-6952-00085

Dear Mr. Keefer

flexcel – Jasper Power Drive, Inc. was issued a Part 70 permit on March 28, 2002 for a furniture parts manufacturing plant. An application to modify the source was received by the Office of Air Quality (OAQ) on September 7, 2004. Pursuant to the provisions of 326 IAC 2-7-12, a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The Permittee has requested to modify the existing Part 70 permit by changing the description of the two dust collector units. The Permittee is requesting to amend the existing Part 70 permit to correct the description of one of the specifically regulated insignificant activities listed in Section A.3 (a).

The previous description was written as follows:

- (a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
  - (1) plastic and wood machining controlled by baghouses. [326 IAC 6-1].

The description of insignificant activities listed in Section A.3 (a) should have been written as:

- (a) Woodworking consisting of grinding and machining operations and plastic machining operations controlled by the following dust collectors units with a design grain loading of less than or equal to 0.03 grains per actual cubic foot:
  - (1) One (1) Donaldson Day 156-RFH-10 unit with gas flow rate of 20,000 actual cubic feet per minute;
  - (2) One (1) Torit Day 276 RFW unit, with gas flow rate of 35,000 actual cubic feet per minute; and

- (3) One (1) canister type Murphy Rodgers – MRAL-14 unit, use in the sample shop area with gas flow rate of 4000 actual cubic feet minute, and venting inside the building.

This modification will be a minor modification to flexcel – Jasper Power Drive's current Title V permit. Pursuant to the provisions of 326 IAC 2-7-12 (b)(1) a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document (TSD).

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the revised permit based on this minor modification.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Femi Ogunsola, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or at 973-575-2555, extension 3241, or dial 1-800-451-6027, and ask for extension 3-6878

Sincerely,

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

Attachments  
FO/EVP

cc: File – Dubois County  
U.S. EPA, Region V  
Dubois County Health Department  
Air Compliance Section Inspector: Gene Kelso  
Compliance Data Section  
Administrative and Development  
Technical Support and Modeling



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## PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**flexcel Jasper Power Drive  
1220 Power Drive  
Jasper , Indiana 47549**

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

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

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

Operation Permit No.: T037-6952-00085	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: March 28, 2002 Expiration Date: March 28, 2007

First Significant Permit Modification No.: 037-16032-00085, issued on March 6, 2003  
Second Significant Permit Modification No.: 037-15478-00085, issued on April 15, 2007  
Third Significant Permit Modification No. 037-18203-00085, issued on December 15, 2003

First Minor Permit Modification No.: 037-20050-00085    Affected pages:4, 5, 16, 23, 29, 29a, 29b	
Issued by: Original signed by Nysa L. James, Section Chief Permits Branch Office of Air Quality	Issuance Date: July 25, 2005

## 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.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

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The Permittee owns and operates a stationary source which manufactures molded plastic parts for the furniture industry.

Responsible Official:	General Manager
Source Address:	1220 Power Drive, Jasper, IN 47549
Mailing Address:	1600 Royal Ave, Jasper, IN 47549
General Source Phone Number:	(812) 634-3443
SIC Code:	2519, 3089
County Location:	Dubois
Source Location Status:	Non-Attainment for PM2.5 Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Minor Source under PSD Minor Source under Emission Offset

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

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

- (a) Sixteen (16) spray booths, identified as Nos. 1-16, constructed in 1984, using HVLP guns to coat molded plastic or wood parts, using water pans and/or dry filters as control, and exhausting to stacks identified as Nos. 1-16.
- (b) Sanding operation consisting of three (3) sanders and a planer, using two (2) dust collectors (Donaldson/Day, 1985; Torit/Day, 1995). Each dust collector has a maximum unit capacity of 282.33 pounds per hour.
- (c) Ten (10) spray booths, identified as Nos. 17-26, constructed in 1990, using HVLP guns to coat molded plastic or wood parts, using water pans and/or dry filters as control, and exhausting to stacks identified as Nos. 17-26.
- (d) Two (2) spray booths, identified as I&K and booth 30, constructed in 1994, using HVLP guns to coat molded plastic or wood parts, using water pans and/or dry filters as control, and exhausting to stacks identified as Nos. 30-31.

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

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

- (a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and including deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations and consisting of:

- (1) One (1) Donaldson Day 156-RFH-10 unit with gas flow rate of 20,000 actual cubic feet minute;
  - (2) One (1) Torit Day 276 RFW unit, with gas flow rate of 35,000 actual cubic feet minute; and
  - (3) One (1) canister type Murphy Rodgers – MRAL-14 unit, use in the sample shop area with gas flow rate of 4000 actual cubic feet minute, and venting inside the building.
- (b) Paved and unpaved roads and parking lots with public access.
- (c) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (d) Other activities or categories below insignificant thresholds:
- (1) One (1) dust collector with a maximum throughput capacity of 6,000 cubic feet minute. This is a small unit used only for the sample shop.
  - (2) Hand-held sanders and grinders.

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

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

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

- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

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

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

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

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

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

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

#### C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

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

The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204

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

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

#### C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required data, reports and support information 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 kept 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.

## SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (a) Woodworking consisting of grinding and machining operations and plastic machining operations controlled by the following dust collectors units with a design grain loading of less than or equal to 0.03 grains per actual cubic foot:
  - (1) One (1) Donaldson Day 156-RFH-10 unit with gas flow rate of 20,000 actual cubic feet per minute.
  - (2) One (1) Torit Day 276 RFW unit, with gas flow rate of 35,000 actual cubic feet per minute; and
  - (3) One (1) canister type Murphy Rodgers – MRAL-14 unit, use in the sample shop area with gas flow rate of 4000 actual cubic feet per minute, and venting inside the building.
- (b) Sanding operation consisting of three (3) sanders and one (1) planer, using two (2) dust collectors (Donaldson/Day; Torit/Day). Each dust collector has a maximum unit capacity of 282.33 pounds per hour.
- (c) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
  - (1) Natural gas-fired air makeup, heating units, furnaces and oven burners.
- (d) Other activities or categories below insignificant thresholds:
  - (1) One (1) dust collector with a maximum throughput capacity of 6,000 CFM. This is a small unit used only for the sample shop.
  - (2) hand held sanders and grinders.

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

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

#### D.2.1 Baghouse Limitations [326 IAC 2-7-1(21)(G)(xxx)]

The woodworking operations controlled by dust collectors identified as one (1) Donaldson Day unit, one (1) Torit Day unit and one (1) canister type Murphy Rodgers unit shall be an insignificant activity for Title V permitting purposes provided that the dust collectors operations meet the requirements of 326 IAC 2-7-1(21)(G)(xxx), including the following:

- (a) Each woodworking baghouse shall not exhaust to the atmosphere greater than forty thousand (40,000) cubic feet of air per minute and shall not emit particulate matter with a diameter less than ten (10) microns in excess of one-hundredth (0.01) grain per dry standard cubic foot of outlet air.
- (b) The opacity from each baghouse shall not exceed ten percent (10%).
- (c) Visible emissions from the baghouse shall be observed daily using procedures in accordance with Method 22 and normal or abnormal emissions are recorded. In the event abnormal emissions are observed for greater than six (6) minutes in duration, the following shall occur:

- (1) The baghouse shall be inspected.
- (2) Corrective actions, such as replacing or reseating bags, are initiated, when necessary.

**D.2.2 Particulate Matter (PM) [326 IAC 6-1-2]**

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Pursuant to 326 IAC 6-1-2(a)(Non-attainment Area Particulate Limitations), particulate matter (PM) emissions from the woodworking facilities shall be limited to 0.03 grains per dry standard cubic foot of exhaust air.

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

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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 its control device.

**Compliance Determination Requirements**

**D.2.4 Particulate Control [326 IAC 2-7-21(1)(G)(xxx)(DD)]**

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

**D.2.5 Baghouse Inspections [326 IAC 2-7-21(1)(G)(xxx)(FF)]**

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

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

**D.2.6 Broken or Failed Bag Detection**

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In the event that bag failure has been observed:

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

this permit (Section B - Emergency Provisions).

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

**D.2.7 Record Keeping Requirements**

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- (a) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.1(c) and Condition D.2.6 and the dates the vents are redirected.
- (b) To document compliance with Condition D.2.1(c) or Condition D.2.6, the Permittee shall maintain records of daily visible emission notations of the baghouse exhaust.
- (c) The Permittee shall maintain records of corrective actions to document compliance with 326 IAC 2-7-21(1)(G)(xxx)(GG)(dd)
- (d) To document compliance with Condition D.2.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Minor Permit Modification to a Part 70 Operating Permit

#### Source Background and Description

<b>Source Name:</b>	<b>flexcel – Jasper Power Drive</b>
<b>Source Location:</b>	<b>1220 Power Drive, Jasper, IN 47549</b>
<b>County:</b>	<b>Dubois</b>
<b>SIC Code:</b>	<b>3089</b>
<b>Operation Permit No.:</b>	<b>T037-6952-00085</b>
<b>Operation Permit Issuance Date:</b>	<b>March 28, 2002</b>
<b>Minor Permit Modification No.:</b>	<b>MPM 037-20050-00085</b>
<b>Permit Reviewer:</b>	<b>FO/EVP</b>

The Office of Air Quality (OAQ) has reviewed a modification application from flexcel – Jasper Power Drive, relating to the operation of a furniture parts manufacturing plant.

#### History

flexcel – Jasper Power Drive was issued Part 70 operating permit T037-6952-00085 on March 28, 2002. On September 7, 2004, flexcel – Jasper Power Drive to OAQ to correct the description of one of the specifically regulated insignificant activities listed in Section A.3 (a). The gas flow rates of the dust collector units was stated to be less than or equal to 4000 actual cubic feet per minute. The source is requesting that the description should reflect correct flow rates of 35,000, 20,000 and 4000 actual cubic feet per minute for Torit, Donaldson and Murphy Rodgers dust collector units respectively.

#### Explanation of Modification Requested

On September 7, 2004, flexcel – Jasper Power Drive submitted a request to change the description of one of listed insignificant activities since the previous description does not represent the source actual equipment it intended to describe. The revised description is as follows:

Woodworking consisting of grinding and machining operations and plastic machining operations controlled by the following dust collectors units with a design grain loading of less than or equal to 0.03 grains per actual cubic foot:

- (1) One (1) Donaldson Day 156-RFH-10 unit with gas flow rate of 20,000 actual cubic feet per minute.
- (2) One (1) Torit Day 276 RFW unit, with gas flow rate of 35,000 actual cubic feet per minute; and
- (3) One (1) canister type Murphy Rodgers – MRAL-14 unit, use in the sample shop area with gas flow rate of 4000 actual cubic feet per minute, and venting inside the building.

Pursuant to 326 IAC 2-7-1(21)(G)(xxix), woodworking equipment – one (1) Donaldson Day unit and one (1) Torit Day unit – shall comply with compliance requirements listed under this rule to remain as insignificant activities.

### Existing Approvals

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

- (a) Operation Permit, T037-6952-00085, issued on March 28, 2002;
- (b) First Significant Permit Modification No. 037-16032-00085, issued on March 6, 2003;
- (c) Second Significant Permit Modification No. 037-15478-00085, issued on April 15, 2003;  
and
- (d) Third Significant Permit Modification No. 037-18203-00085, issued on December 15, 2003.

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

### Enforcement Issue

There is no enforcement action with the equipment proposed in the modification.

### Recommendation

The staff recommends to the Commissioner that the Minor Permit Modification 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 application for the purposes of this review was received on September 7, 2004.

### Justification for Modification

The Part 70 operating permit is being modified through a Part 70 Minor Permit Modification. The modification will increase the gas flow rate for Torit Day and Donaldson Day units to 35,000 and 20,000 cubic feet per minute from 4,000 cubic feet per minute as was previously described. Pursuant to 326 IAC 2-7-1 (21) (G) (xxix), there are additional requirements that the source should comply with which will be incorporated into the permit through this minor modification. Therefore, pursuant to 326 IAC 2-7-12(b), this modification request is reviewed as a minor permit modification.

### County Attainment Status

The source is located in Dubois County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	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 emissions and NOx are considered when evaluating the rule applicability relating to ozone. Dubois 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. See the State Rule Applicability for the source section.
- (b) Dubois 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. 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 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.

**Existing Source Status**

Existing Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/or as otherwise limited):

	PM (tons/yr)	PM <sub>10</sub> (tons/yr)	SO <sub>2</sub> (tons/yr)	NO <sub>x</sub> (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Worst Case Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Source	>100, <250	>100, <250	<100	<100	<250.0	<100	<10.0	<25.0

- (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 IAC 2-7.

**Federal Rule Applicability**

- (a) This modification does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 for VOC and PM<sub>10</sub>:
  - (1) with the potential to emit before controls equal to or greater than the major source threshold for VOC and PM<sub>10</sub>,
  - (2) that is subject to an emission limitation or standard for VOC and PM<sub>10</sub>, and
  - (3) uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable to this modification.

- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) incorporated into this source because of this modification.

- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) incorporated into the permit because of this modification.

### **State Rule Applicability - Entire Source**

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

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

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

Potential to emit of volatile organic compounds has been limited to less than two hundred fifty (250) ton per year for the entire source. The source is not one of the twenty-eight (28) listed source categories. Therefore, 326 IAC 2-2 does not apply.

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

The modification at this source will emit no HAP. Moreover, the single worst case and combined total HAP emissions for the entire source has been limited to less than the applicable levels of 10 and 25 tons per year, respectively. Therefore, 326 IAC 2-4.1 does not apply

### **State Rule Applicability - Individual Facilities**

The state rule applicabilities for individual facilities at this source remain unchanged as a result of this modification except the following:

#### 326 IAC 6-1-2 (Nonattainment Area Particulate Limitations)

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Particulate Limitations) the following particulate matter (PM) limits apply:

- (a) The particulate matter (PM) from the spray booths (SB1 - SB26; SB30; I&K) shall be limited to 0.03 grains per dry standard cubic foot.

The water pans and/or dry filters shall be in operation at all times the spray booths are in operation, in order to comply with this limit.

- (b) The particulate matter (PM) from the sanding operations shall be limited to 0.03 grains per dry standard cubic foot.

The two (2) dust collectors shall be in operation at all times the sanding operations are operating, in order to comply with this limit.

- (c) The insignificant activities consisting of plastic and wood machining controlled by fiber mesh baghouse type dust collectors , one (1) Donaldson Day, Torit Day and carnister type Murphy Rodgers with air flow rates of 35,000, 20,000 and 4000 CFM respectively; and one (1) dust collector with a maximum throughput capacity of 6,000 CFM; and hand held sanders and grinders, shall each be limited to 0.03 grains per dry standard cubic foot.

## Compliance Requirements

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

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also 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 modification has compliance monitoring requirements as specified below:

- (a) Visible emissions from the baghouse shall be observed daily using procedures in accordance with Method 22 and normal or abnormal emissions are recorded. In the event abnormal emissions are observed for greater than six (6) minutes in duration, the following shall occur:
  - (1) The baghouse shall be inspected.
  - (2) Corrective actions, such as replacing or reseating bags, are initiated, when necessary.
- (b) An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.
- (c) In the event that bag failure has been observed:
  - (1) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

- (2) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B Emergency Provisions).
- (d) An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.
- (e) The baghouses for particulate control shall be in operation at all times when the woodworking facilities are in operation.

## Changes Proposed

### 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.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

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The Permittee owns and operates a stationary source which manufactures molded plastic parts for the furniture industry.

Responsible Official:	<del>Jack Nagy</del> /General Manager Jasper Plastics
Source Address:	1220 Power Drive, Jasper, IN 47549
Mailing Address:	1600 Royal Ave, Jasper, IN 47549
General Source Phone Number:	(812) 634-3443
SIC Code:	2519, 3089
County Location:	Dubois
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source under PSD

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

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

- (a) Sixteen (16) spray booths, identified as Nos. 1-16, constructed in 1984, using HVLP guns to coat molded plastic **or wood** parts, using water pans and/or dry filters as control, and exhausting to stacks identified as Nos. 1-16.
- (b) Sanding operation consisting of three (3) sanders and a planer, using two (2) dust collectors (Donaldson/Day, 1985; Torit/Day, 1995). Each dust collector has a maximum unit capacity of 282.33 pounds per hour.
- (c) Ten (10) spray booths, identified as Nos. 17-26, constructed in 1990, using HVLP guns to coat molded plastic **or wood** parts, using water pans and/or dry filters as control, and exhausting to stacks identified as Nos. 17-26.
- (d) Two (2) spray booths, identified as I&K and booth 30, constructed in 1994, using HVLP guns to coat molded plastic **or wood** parts, using water pans and/or dry filters as control, and exhausting to stacks identified as Nos. 30-31.

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

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

- (a) ~~Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.~~

~~(1) plastic and wood machining controlled by baghouses. [326 IAC 6-1].~~

**Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and including deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations and consisting of:**

- (1) One (1) Donaldson Day 156-RFH-10 unit with gas flow rate of 20,000 actual cubic feet per minute;
- (2) One (1) Torit Day 276 RFW unit, with gas flow rate of 35,000 actual cubic feet per minute; and
- (3) One (1) canister type Murphy Rodgers – MRAL-14 unit, use in the sample shop area with gas flow rate of 4000 actual cubic feet per minute, and venting inside the building.

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

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- (a) ~~The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:~~

- ~~(1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);~~
- ~~(2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.~~

- (b) ~~The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:~~

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

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

- ~~(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.~~
- (a) Pursuant to 326 IAC 2-6-3(b)(3), starting in 2006 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:.**
- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);**
  - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) (“Regulated pollutant, which is used only for purposes of Section 19 of this rule”) from the source, for purpose of fee assessment.**

**The statement must be submitted to:**

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

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

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

**SECTION D.2**

**FACILITY OPERATION CONDITIONS**

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

- (a) ~~Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.~~  
~~(1) plastic and wood machining controlled by baghouses~~
- Woodworking consisting of grinding and machining operations and plastic machining operations controlled by the following dust collectors units with a design grain loading of less than or equal to 0.03 grains per actual cubic foot:**
- (1) **One (1) Donaldson Day 156-RFH-10 unit with gas flow rate of 20,000 actual cubic feet per minute.**
- (2) **One (1) Torit Day 276 RFW unit, with gas flow rate of 35,000 actual cubic feet per minute; and**
- (3) **One (1) canister type Murphy Rodgers – MRAL-14 unit, use in the sample shop area with gas flow rate of 4000 actual cubic feet per minute, and venting inside the building.**
- (b) Sanding operation consisting of three (3) sanders and one (1) planer, using two (2) dust collectors (Donaldson/Day; Torit/Day). Each dust collector has a maximum unit capacity of 282.33 pounds per hour.
- (c) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (1) Natural gas-fired air makeup, heating units, furnaces and oven burners.
- (d) Other activities or categories below insignificant thresholds:
- (1) One (1) dust collector with a maximum throughput capacity of 6,000 CFM. This is a small unit used only for the sample shop.
- (2) hand held sanders and grinders.

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

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

**D.2.1 Baghouse Limitations [326 IAC 2-7-1(21)(G)(xxx)]**

The woodworking operations controlled by dust collectors identified as one (1) Donaldson Day unit, one (1) Torit Day unit and one (1) canister type Murphy Rodgers unit shall be an insignificant activity for Title V permitting purposes provided that the dust collectors operations meet the requirements of 326 IAC 2-7-1(21)(G)(xxx), including the following:

- (a) Each woodworking baghouse shall not exhaust to the atmosphere greater than forty thousand (40,000) cubic feet of air per minute and shall not emit particulate matter with a diameter less than ten (10) microns in excess of one-hundredth (0.01) grain per dry standard cubic foot of outlet air.

- (b) The opacity from each baghouse shall not exceed ten percent (10%).**
- (c) Visible emissions from the baghouse shall be observed daily using procedures in accordance with Method 22 and normal or abnormal emissions are recorded. In the event abnormal emissions are observed for greater than six (6) minutes in duration, the following shall occur:**
  - (1) The baghouse shall be inspected.**
  - (2) Corrective actions, such as replacing or reseating bags, are initiated, when necessary.**

**D.2.42 Particulate Matter (PM) [326 IAC 6-1-2]**

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Pursuant to 326 IAC 6-1-2(a)(Non-attainment Area Particulate Limitations), particulate matter (PM) emissions from the ~~insignificant activities~~ **woodworking facilities** shall be limited to 0.03 grains per dry standard cubic foot **of exhaust air**.

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

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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 its control device.**

**Compliance Determination Requirements**

**D.2.4 Particulate Control [326 IAC 2-7-21(1)(G)(xxx)(DD)]**

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

**D.2.5 Baghouse Inspections [326 IAC 2-7-21(1)(G)(xxx)(FF)]**

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

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

### **D.2.6 Broken or Failed Bag Detection**

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In the event that bag failure has been observed:

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

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

### **D.2.7 Record Keeping Requirements**

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- (a) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.1(c) and Condition D.2.6 and the dates the vents are redirected.
- (b) To document compliance with Condition D.2.1(c) or Condition D.2.6, the Permittee shall maintain records of daily visible emission notations of the baghouse exhaust.
- (c) The Permittee shall maintain records of corrective actions to document compliance with 326 IAC 2-7-21(1)(G)(xxx)(GG)(dd)
- (d) To document compliance with Condition D.2.3, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## **Conclusion**

The operation of the modification shall be subject to the conditions of the attached proposed Part 70's **Minor Permit Modification No. 037-20050-00085**.

## Indiana Department of Environmental Management Office of Air Quality

### Addendum to the Technical Support Document for a Minor Permit Modification to a Part 70 Operating Permit

<b>Source Name:</b>	flexcel – Jasper Power Drive
<b>Source Location:</b>	1220 Power Drive, Jasper, Indiana 47549
<b>County:</b>	Dubois
<b>SIC Code:</b>	2519, 3089
<b>Operation Permit No.:</b>	T037-6952-00085
<b>Operation Permit Issuance Date:</b>	March 28, 2002
<b>Permit Modification No.:</b>	037-20050-00085
<b>Permit Reviewer:</b>	Alic Bent/EVP

On December 21, 2004, the Office of Air Quality (OAQ) had a notice published in The Herald in Jasper, Indiana, stating that flexcel – Jasper Power Drive had applied for a Part 70 permit modification application to correct the description of one of the specifically regulated insignificant activities listed in section A.3 (a). The notice also stated that OAQ proposed to issue a minor permit modification for this operation and provided information on how the public could review the proposed Part 70 minor permit modification 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 minor permit modification should be issued as proposed.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted).

1. The P.O. box and the zip code on the cover page of the permit along with Commissioner and Governor's name have been revised to reflect the latest update.
2. Dubois County has been designated as non-attainment for PM2.5 in 70 FR 943 dated January 5, 2005. The following has been added to the Technical Support Document to state that Dubois County has been designated as non-attainment.

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented as part of the record regarding this permit decision.

## State Rule Applicability – Entire Source

### 326 IAC 2-3 Emission Offset

Dubois County has been designated as non-attainment for PM2.5 in 70 FR 943 dated January 5, 2005. According to the April 5, 2005 EPA memo titled “Implementation of New Source Review Requirements in PM2.5 Nonattainment Areas” authored by Steve Page, Director of OAQPS, until EPA promulgates the PM2.5 major NSR regulations, states should assume that a major stationary source’s PM10 emissions represent PM2.5 emissions. IDEM will use the PM-10 nonattainment major NSR program as a surrogate to address the requirements of nonattainment major NSR for the PM2.5 NAAQS. A significant emissions increase would be a net emissions increase or the potential of 15 tpy or greater of PM10. flexcel-Jasper Power Drive is a PM2.5 nonattainment minor NSR source and this modification involves descriptive changes only and does not result in an increase in the potential to emit of PM10. Therefore, assuming that PM10 emissions represent PM2.5 emissions, 326 IAC 2-3 does not apply.

### County Attainment Status

The source is located in Dubois County.

Pollutant	Status
<b>PM2.5</b>	<b>non-attainment</b>
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
1-hour Ozone	attainment
8-hour Ozone	attainment
CO	attainment
Lead	attainment

- (b) Dubois County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability for the source section.
- (bc) Dubois 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. See the State Rule Applicability for the source section.

Section A.1 – General Information of the permit has been revised to show the current PM2.5 attainment status of the County.

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

The Permittee owns and operates a stationary source which manufactures molded plastic parts for the furniture industry.

Responsible Official: General Manager  
Source Address: 1220 Power Drive, Jasper, IN 47549  
Mailing Address: 1600 Royal Ave, Jasper, IN 47549  
General Source Phone Number: (812) 634-3443  
SIC Code: 2519, 3089  
County Location: Dubois  
Source Location Status: **Non-Attainment for PM2.5**

Source Status:                   Attainment for all **other** criteria pollutants  
  Part 70 Permit Program  
  Minor Source under PSD  
  **Minor Source under Emission Offset**

3.       Section B.24 has been revised to include the recent changes regarding the phone number for the Permittee to call on annual fee payment.

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

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- (a)       The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b)       Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c)       The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-~~0425~~ **4230** (ask for OAQ, ~~Technical Support and Modeling Section~~ **Billing, Licensing and Training Section**), to determine the appropriate permit fee.
4.       Indiana was required to incorporate credible evidence provisions into state rules consistent with the SIP call published by U.S. EPA in 1997 (62 FR 8314). Indiana has incorporated the credible evidence provision in 326 IAC 1-1-6. This rule is effective March 16, 2005; therefore, the condition reflecting this rule will be incorporated into your permit as follows:

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

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