INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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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: February 18, 2005

RE: Paoli Inc. / 117-20071-00014

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

Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER-AM.dot 1/10/05

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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February 18, 2005

Mr. Michael McCracken
Paoli, Inc.
P.O. Box 30
Paoli, Indiana 47454

Re: 117-20071-00014
4th Administrative Amendment to
Title V 117-6003-00014

Dear Mr. McCracken:

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

1. There is one (1) 3.06 MMBtu/hr natural gas fired boiler listed in Condition A.3(c) as an insignificant activity. This unit was permitted to construct in CP #117-9309-00014, issued on March 20, 1998. The Permittee stated that they actually constructed two (2) 2.07 MMBtu/hr natural gas fired boilers, instead of one (1) 3.06 MMBtu/hr natural gas fired boiler, and requested a revision to the descriptions of the insignificant activities.

   This change will increase the potential to emit NOx (major pollutant) from 1.58 tons/yr to 1.81 tons/yr. Combined with the potential to emit of other emission units permitted in CP #117-9309-00014, issued on March 20, 1998, the construction project permitted in CP #117-9309-00014 is still a PSD minor modification. Therefore, this change will not affect the permitting level of CP #117-9309-00014.

   According to Condition B.13 (b)(4) - Permit Shield in T117-6003-00014, issued on March 29, 2002, the 15.57 MMBtu/hr wood fired boiler (referred to as boiler B1) has never been constructed. Therefore, the only boilers at this source are two (2) 2.07 MMBtu/hr natural gas fired boilers. Pursuant to 326 IAC 6-2-4(a), indirect heating facilities constructed after September 12, 1983, shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

   Where Pt = emission rate limit (lbs/MMBtu)
   Q = total source heat input capacity (MMBtu/hr)

   The emission rate limit for each of the 2.07 MMBtu/hr boilers calculated from the equation above equals:

$$Pt = \frac{1.09}{(2.07)^{0.26}} = 0.90 \text{ lbs/MMBtu}$$

   However, 326 IAC 6-2-4(a) also states that if Q is less than 10 MMBtu/hr, Pt shall not exceed 0.6 lbs/MMBtu. Therefore, the PM emission limit for each insignificant natural gas fired boiler is 0.6 lbs/MMBtu.

   Since the two (2) 2.07 MMBtu/hr natural gas fired boilers are considered insignificant activities according to 326 IAC 2-7-1(21)(G), the requested changes will be incorporated into the source's Part 70 permit through an administrative amendment, pursuant to 326 IAC 2-7-11(a)(8). Therefore, Condition A.3 and Section D.8 have been revised as follows:

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

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

(c) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour: **two (2) 2.07**~~one (1) 3.6~~ MMBtu/hr boiler**s, constructed in 1998**. [326 IAC 6-2-4]

SECTION D.8 FACILITY OPERATION CONDITIONS

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

. . . .

(c) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour: **two (2) 2.07**~~one (1) 3.6~~ MMBtu/hr boiler**s, constructed in 1998**. [326 IAC 6-2-4]

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

D.8.2 Particulate Matter (PM) Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to ~~CP 117-9309-00014, issued on March 20, 1998 and pursuant to~~ 326 IAC 6-2-4, the PM emissions from **each of the two (2) 2.07** ~~the 3.6~~ MMBtu/hr natural gas-fired boiler**s** shall not exceed 0.6 pounds per million BTU heat input.

All other conditions of the permit shall remain unchanged and in effect. Please find attached a copy of the revised permit.

Pursuant to Contract No. A305-5-65, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Yu-Lien Chu, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7871 to speak directly to Ms. Chu. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, and ask for Duane Van Laningham or extension 3-6878, or dial (317) 233-6878.

Sincerely,

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

Attachments
ERG/YC
cc: File - Orange County
U.S. EPA, Region V
Orange County Health Department
Southwest Regional Office
Air Compliance Section Inspector - Gene Kelso
Compliance Data Section
Administrative and Development
Technical Support and Modeling - Michele Boner

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PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

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

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

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

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

First Administrative Amendment No.: 117-18430-00014, issued February 10, 2004.
Second Administrative Amendment No.: 117-18980-00014, issued June 10, 2004.
Third Administrative Amendment No.: 117-19590-00014, issued August 10, 2004.

Fourth Administrative Amendment No. 117-20071-00014	Pages Affected: 11 and 67
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: February 18, 2005

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary source that manufacturers and coats wood office furniture.

Responsible Official:	Michael D. McCracken, Vice President of Operations
Source Address:	201 E. Martin Street, Orleans, IN, 47452
Mailing Address:	P.O. Box 30, Paoli, IN, 47454
General Source Phone Number:	(812) 723-2791
SIC Code:	2521
County Location:	Orange
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

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

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

Surface Coating Operations

(a) One (1) NGR #3 Booth, identified as F2A, constructed in 1994, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack F2A.

(b) One (1) Topcoat #1 Booth, identified as F6A, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F6A.

(c) One (1) Topcoat #2 Booth, identified as F6B, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F6B.

(d) One (1) SAP #1 Booth, identified as F1, constructed in 1994, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack F1.

(e) One (1) SAP #3 Booth, identified as F12, constructed in 1994, with a maximum capacity of 9.375 units per hour, using SAP stains and clearcoats and emissions controlled by a dry filter, exhausting to stack F12.

(f) One (1) NGR #1 Booth, identified as F2, constructed in 1994, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack F2.

(g) One (1) Washcoat Booth, identified as F3, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F3.

(h) One (1) Wipestain Booth, identified as F4, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F4.

(i) One (1) Sealer Booth, identified as F5, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F5.

(j) One (1) Topcoat #3 Booth, identified as F6, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F6.

(k) One (1) Repair Booth, identified as F13, constructed in 1994, with a maximum capacity of 3.75 units per hour, emissions controlled by a dry filter, exhausting to stack F13.

(l) One (1) SAP Booth, identified as F15, constructed in 1994, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F15.

(m) One (1) NGR #1 Booth, identified as F16, constructed in 1994, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F16.

(n) One (1) Repair Booth, identified as F10, constructed in 1994, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F10.

(o) One (1) SAP/NGR #1 Booth, identified as F14, constructed in 1994, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F14.

(p) One (1) Wipestain Booth, identified as F11, constructed in 1994, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F11.

(q) One (1) Topcoat Booth, identified as F8, constructed in 1994, with a maximum capacity of 3.75 units per hour, emissions controlled by a dry filter, exhausting to stack F8.

(r) One (1) Drawer Enamel Booth, identified as F9, constructed in 1994, with a maximum capacity of 37.5 units per hour, emissions controlled by a dry filter, exhausting to stack F9.

(s) One (1) Drawer Coat Booth, identified as F7, constructed in 1994, with a maximum capacity of 37.5 units per hour, emissions controlled by a dry filter, exhausting to stack F7.

(t) One (1) SAP #2 Booth, identified as F18, constructed in 1995, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack F18.

(u) One (1) NGR #2 Booth, identified as G1, constructed in 1995, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack G1.

(v) One (1) Washcoat Booth, identified as F17, constructed in 1995, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F17.

(w) One (1) Wipestain Booth, identified as F19, constructed in 1995, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F19.

(x) One (1) Topcoat #1and #3 Booth, identified as F23, constructed in 1995, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F23.

(y) One (1) Topcoat #2 and Sealer Booth, identified as F22, constructed in 1995, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F22.

(z) One (1) SAP Booth, identified as F45, constructed in 1998, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F45.

(aa) One (1) NGR Booth, identified as F46, constructed in 1998, with a maximum capacity of 7 units per hour, emissions controlled by a dry filter, exhausting to stack F46.

(bb) One (1) Washcoat Booth, identified as F47, constructed in 1998, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F47.

(cc) One (1) Topcoat and Sealer Booth, identified as F25, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F25.

(dd) One (1) Repair Booth, identified as F24, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F24.

(ee) One (1) SAP/NGR #1 Booth, identified as F20, constructed in 1995, with a maximum capacity of 3.125 units per hour, emissions controlled by a dry filter, exhausting to stack F20.

(ff) One (1) Washcoat Booth, identified as F21, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F21.

(gg) One (1) Topcoat and Sealer Booth, identified as C12, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack C12.

(hh) One (1) Wipestain Booth, identified as F26, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F26.

(ii) One (1) Repair Booth, identified as F44, constructed in 1997, with a maximum capacity of 1.25 units per hour, emissions controlled by a dry filter, exhausting to stack F44.

(jj) One (1) SAP Booth, identified as C1, constructed in 1995, with a maximum capacity of 67.5 units per hour, emissions controlled by a dry filter, exhausting to stack C1.

(kk) One (1) NGR Booth, identified as C2, constructed in 1995, with a maximum capacity of 67.5 units per hour, emissions controlled by a dry filter, exhausting to stack C2.

(ll) One (1) SAP/NGR #1 Booth, identified as C3, constructed in 1995, with a maximum capacity of 10 units per hour, emissions controlled by a dry filter, exhausting to stack C3.

(mm) One (1) SAP/NGR #3 Booth, identified as C10, constructed in 1995, with a maximum capacity of 10 units per hour, emissions controlled by a dry filter, exhausting to stack C10.

(nn) One (1) Washcoat Booth, identified as C4, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C4.

(oo) One (1) Wipestain Booth, identified as C5, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C5.

(pp) One (1) Sealer #1 Booth, identified as C8, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C8.

(qq) One (1) Topcoat #1 and Sealer #2 Booth, identified as C7, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C7.

(rr) One (1) Topcoat #2 Booth, identified as C6, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C6.

(ss) One (1) Repair Booth, identified as C9, constructed in 1995, with a maximum capacity of 9 units per hour, emissions controlled by a dry filter, exhausting to stack C9.

(tt) One (1) Mix Booth, identified as C11, constructed in 1997, with a maximum capacity of 1 unit per hour, emissions controlled by a dry filter, exhausting to stack C11.

(uu) One (1) Repair Booth, identified as F30, constructed in 1998, with a maximum capacity of 1.25 units per hour, emissions controlled by a dry filter, exhausting to stack F30.

(vv) One (1) Wipestain Booth, identified as F27, constructed in 1999, with a maximum capacity of 7 units per hour, emissions controlled by a dry filter, exhausting to stack F27.

(ww) One (1) Topcoat #1 and #3 Booth, identified as F29, constructed in 1999, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F29.

(xx) One (1) Topcoat #2 and Sealer Booth, identified as F28, constructed in 1999, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F28.

(yy) One (1) Robotic Spray Booth, identified as U1, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by water pans, exhausting to stack U1.

(zz) One (1) Topcoat Booth, identified as U1A/U1B/U1C/U2, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by dry filters, exhausting to stacks U1A, U1B, U1C, or U2.

(aaa) One (1) NGR Booth, identified as U3, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by a dry filter, exhausting to stack U3.

(bbb) One (1) Sealer Booth, identified as U4, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by a dry filter, exhausting to stack U4.

(ccc) One (1) Wipestain Booth, identified as U5, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by a dry filter, exhausting to stack U5.

(ddd) One (1) Washcoat Booth, identified as U6, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by a dry filter, exhausting to stack U6.

Wood Milling and Assembly Operations

(eee) One (1) Wood Milling Process, identified as DC4/6, constructed in 1995, with a maximum capacity of 6,622.65 pounds per hour, emissions controlled by two baghouses, DC 4 and DC 6, each with an outlet grain loading of 0.008 gr/dscf and exhaust gas flow rate of 61,000 dscfm, exhausting to stacks 4 and 6.

(fff) One (1) Furniture Assembly Process, identified as DC4/6, constructed in 1995, with a maximum capacity of 6,622.65 pounds per hour, emissions controlled by two baghouses, DC4 and DC6, each with an outlet grain loading of 0.008 gr/dscf and exhaust gas flow rate of 61,000 dscfm, exhausting to stacks 4 and 6.

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

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

(a) Woodworking facilities, identified as DC7/8 and DC9/10, constructed in 1996, with a maximum capacity of 4,800 pounds per hour, with an air flow rate no greater than 125,000 cubic feet of air per minute and a grain loading no greater than 0.003 grains per dry standard cubic feet of outlet air, emissions controlled by two baghouses, exhausting to stack 7. [326 IAC 2-7-1(21)(G)(xxix)][326 IAC 6-3-2]

(b) 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. [326 IAC 6-3-2]

(c) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour: two (2) 2.07 MMBtu/hr boilers, constructed in 1998. [326 IAC 6-2-4]

(d) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(e) Paved and unpaved roads and parking lots with public access.

(f) Other activities with particulate emissions equal to or less than 5 lb/hr or 25 lb/day: Woodworking operations and sawdust storage.

(g) Activities with VOC emissions equal to or less than 3 lb/hour or 15 lb/day: Two (2) dip tanks with a total maximum capacity of 42.125 units per hour; one (1) test booth, identified as R&D1, constructed in 1998, with a maximum capacity of 12 oz. stain per 8 hour day.

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

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

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

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

B.3 Enforceability [326 IAC 2-7-7]

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

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

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

B.5 Severability [326 IAC 2-7-5(5)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

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

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

(b) The Permittee shall furnish to IDEM, OAQ within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) Noncompliance with any provisions of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.

(c) 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.

(d) 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.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

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

and

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

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

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. 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.

B.12 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

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

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

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

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

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

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

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The

Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

(b) In addition to the applicability determinations set forth in Sections D of this permit, the IDEM, OAQ has made the following determinations regarding this source:

(1) Condition 8(a) from CP 117-5122-00014, issued on August 26, 1996, limiting the facilities U1, U1A/U1B/U1C/U2, U3, U4, U5, U6, U7, U8, and U9 to less than 3.24 tons of VOC per month has been modified to reflect the fact that booths U7, U8, and U9 were never constructed. Therefore, this limit applies to booths U1, U1A/U1B/U1C/U2, U3, U4, U5, and U6.

(2) Condition 8(b) from CP 117-5122-00014, issued on August 26, 1996, listing requirements pursuant to 326 IAC 2-2, is not applicable because IDEM, OAQ has determined that the Tellus Plant lines 1 and 2, consisting of sixteen (16) spray booths (T1-T16), were never constructed.

(3) Condition 8(c) from CP 117-5122-00014, issued on August 26, 1996, listing requirements pursuant to 326 IAC 2-2, is not applicable because IDEM, OAQ has determined that the Tellus Line, Off Gun Line, Deskline 2 additions, Conference Table Line additions, Drawer Assembly Line additions, and Chair Line additions were never constructed.

(4) Condition 7 from CP 117-4210-00014, issued on March 28, 1995, listing requirements pursuant to 326 IAC 6-2-4 is not applicable because IDEM, OAQ has determined that the wood-fired boiler B1, was never constructed.

(5) Conditions 12, 13, and 14 from CP 117-9309-00014, issued on March 20, 1998, limiting PM emissions from the Finish Sander, listing compliance requirements for the baghouse controlling emissions from the Finish Sander, and listing monitoring requirements from the Finish Sander's exhaust are not applicable because IDEM, OAQ has determined that the Finish Sander is no longer in operation as it has been removed from the source.

(6) Conditions 4, 9, 10, and 11 from CP 117-4210-00014, issued on March 28, 1995, requiring testing of, limiting emissions from, and requiring monitoring of baghouse DC2 are not applicable because IDEM, OAQ has determined that the baghouse DC2, was never constructed.

(7) Condition 4 from CP 117-4210-00014, issued on March 28, 1995, requiring testing of baghouses DC4 and DC6 is not applicable because IDEM, OAQ has determined that the controlled PM emissions from baghouses DC4 and DC6 are less than the allowable emissions required pursuant to 326 IAC 6-3-2. The baghouse specifications stated in the original construction permit application indicated that the maximum particulate matter (PM) emissions from the woodworking baghouses would exceed the allowable PM emissions pursuant to 326 IAC 6-3-2 (Process Operations). Based on the design outlet grain loadings and air flow rates stated in the original application, the potential PM emissions after control were originally estimated at 32.02 pounds per hour. Pursuant to 326 IAC 6-3, the allowable PM emission rate is 9.145 pounds per hour for a process weight rate of 6,622.65 pounds per hour. Therefore, the outlet grain loadings for baghouses DC4 and DC6 were limited to 0.008 gr/dscf. These limits reduced the PM potential to emit to 9.10 pounds per hour to achieve compliance with the allowable PM emission rate. Stack testing was required to demonstrate that the reduced outlet grain loadings were not being exceeded at the maximum production rate.

The Office of Air Quality (OAQ) received and reviewed an application from Paoli, Inc. for a permit revision to PSD permit, CP 117-4210-00014, as previously amended by A 117-8544-00014. The application requested removal of the stack testing requirement for two baghouse dust collectors on the woodworking operations, identified as DC4 and DC6.

Removal of the stack test requirements have been approved by the OAQ Compliance Branch, provided that there is a condition that there are no visible emissions from the building openings. This requirement was already included in the original permit. Visible emission notations, quarterly inspection, and bag failure requirements have been added consistent with current compliance monitoring requirements for Title V woodworking sources.

(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ has issued the modifications. [326 IAC 2-7-12(c)(7)]

(i) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting program approved into the state implementation plan have been either:

(1) Incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

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

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

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

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

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

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

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

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

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

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

Request for renewal shall be submitted to:

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

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

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

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

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

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ**,** takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ**,** any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

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

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

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality

100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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

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

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

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

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

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

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

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

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, OA, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy any records that must be kept under the conditions of this permit;

(c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

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

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

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)]

(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.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Identification of Emission Units and Stacks [326 IAC 2-7-6]

The Permittee shall maintain an up-to-date plant layout print that clearly identifies the location each spray booth and stack exhaust at the source. The plant layout print, which will be kept at the source, will facilitate compliance determination, inspections, monitoring, and record keeping for each spray booth and exhaust stack.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.3 Opacity [326 IAC 5-1]

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

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

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

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

C.6 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). 326 IAC 6-4-2(4) is not federally enforceable.

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

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

C.8 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.9 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, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, 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) 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 that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

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

C.10 Performance Testing [326 IAC 3-6]

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

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

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

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

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ , if the source 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.11 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. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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

C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality

100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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

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

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

C.13 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

(a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once an hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.14 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.

C.15 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(b) Whenever a condition in this permit requires the measurement of a flow rate, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

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

C.16 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

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

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

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

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

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

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

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

(f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.17 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP);

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

C.18 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee

documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall constitute a violation of the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within “normal” parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.19 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The 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.20 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) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1st 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.

C.21 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.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

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

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) 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.

Stratospheric Ozone Protection

C.23 Compliance with 40 CFR 82 and 326 IAC 22-1

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

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

Deskline 1:

(a) One (1) NGR #3 Booth, identified as F2A, constructed in 1994, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack F2A.

(b) One (1) Topcoat #1 Booth, identified as F6A, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F6A.

(c) One (1) Topcoat #2 Booth, identified as F6B, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F6B.

(k) One (1) Repair Booth, identified as F13, constructed in 1994, with a maximum capacity of 3.75 units per hour, emissions controlled by a dry filter, exhausting to stack F13.

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

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

D.1.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to 117-2932-00014, issued January 12, 1994, facilities F2A, F6A, F6B, and F13 shall use less than 20 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per month. This usage limit is required to limit the potential to emit of VOC from these booths to less than 240 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.1.2 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply to the paint booths except when otherwise specified in 40 CFR Part 60, Subpart JJ.

D.1.3 Wood Furniture Manufacturing Limits [40 CFR Part 63, Subpart JJ]

(a) The wood furniture coating operations are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 14, (40 CFR 63 Subpart JJ). A copy of this rule is attached. Pursuant to 40 CFR 63.800, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:

(1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:

(A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of 1.0 pound VHAP per pound solids; or

(B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content on one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. Solvent and thinner mixtures used for other purposes have a ten percent (10%) maximum VHAP content by weight; or

(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or

(D) Use a combination of (A), (B), and (C).

(2) Limit VHAP emissions from contact adhesives as follows:

(A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed one and eight-tenths (1.8) pound VHAP per pound solids.

(B) For all contact adhesives (except aerosols and contact adhesives applied to nonporous substances) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.

(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.

(3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

(b) Pursuant to 40 CFR 63.803, the owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within the first sixty (60) calendar days of startup. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803.

(1) Operator training courses.

(2) Leak inspection and maintenance plan.

(3) Cleaning and washoff solvent accounting system.

(4) Chemical composition of cleaning and washoff solvents.

(5) Spray booth cleaning.

(6) Storage requirements.

(7) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).

(8) Line cleaning.

(9) Gun cleaning.

(10) Washoff operations.

(11) Formulation assessment plan for finishing operations.

(c) Pursuant to 40 CFR 63, Subpart JJ, an Initial Compliance Report must be submitted within sixty (60) calendar days of startup and a Continuous Compliance Demonstration Report must be submitted within thirty (30) days following every six (6) month period, thereafter.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 117-2932-00014, issued January 12, 1994, and 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

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

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

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

Pursuant to 326 IAC 6-3-2, the PM from the surface coating operations shall be limited by the following equation:

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

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

D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and the dry filters.

Compliance Determination Requirements

D.1.7 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each quarter based on the total volatile organic compound usage for the previous twelve month consecutive period.

D.1.8 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.9 Particulate Matter (PM)

Pursuant to 117-2932-00014, issued January 12, 1994, and in order to comply with D.1.5, the dry filters for PM control shall be in proper placement and control emissions from the paint booths at all times when the paint booths are in operation.

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

D.1.10 Operator Training Program

The permittee shall implement an operator training program.

(a) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.

(b) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.

(c) All operators shall be given refresher training annually.

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

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

D.1.11 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) The volume weighted VOC content of the coatings used for each month;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.1.10, the Permittee shall maintain copies of the training program, the list of trained operators, additional inspections prescribed by the Preventive Maintenance Plan, and training records shall be maintained on site or available within 1 hour for inspection by IDEM.

(c) To document compliance with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.1.3.

(1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.

(2) The VHAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.

(3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable spray booth coating used.

(4) The VHAP content in weight percent of each thinner used.

(5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.

(d) To document compliance with Condition D.1.3(b), the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.

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

D.1.12 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(b) A semi-annual Continuous Compliance Report to document compliance with Condition D.1.3 and the Certification form, shall be submitted to the addresses listed in Section C - General Reporting Requirements of this permit, within thirty (30) days after the end of the six (6) months being reported.

The six (6) month periods shall cover the following months:

(1) January 1 through June 30.

(2) July 1 through December 31.

(c) The report required by (b) of this condition shall be submitted to:

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

and

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

SECTION D.2 FACILITY OPERATION CONDITIONS

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

Deskline 1:

(d) One (1) SAP #1 Booth, identified as F1, constructed in 1994, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack F1.

(e) One (1) SAP #3 Booth, identified as F12, constructed in 1994, with a maximum capacity of 9.375 units per hour, using SAP stains and clearcoats and emissions controlled by a dry filter, exhausting to stack F12.

(f) One (1) NGR #1 Booth, identified as F2, constructed in 1994, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack F2.

(g) One (1) Washcoat Booth, identified as F3, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F3.

(h) One (1) Wipestain Booth, identified as F4, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F4.

(i) One (1) Sealer Booth, identified as F5, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F5.

(j) One (1) Topcoat #3 Booth, identified as F6, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F6.

Deskline 2:

(l) One (1) SAP Booth, identified as F15, constructed in 1994, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F15.

(m) One (1) NGR #1 Booth, identified as F16, constructed in 1994, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F16.

Deskline 1 & 2:

(n) One (1) Repair Booth, identified as F10, constructed in 1994, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F10.

Deskline 5:

(o) One (1) SAP/NGR #1 Booth, identified as F14, constructed in 1994, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F14.

(p) One (1) Wipestain Booth, identified as F11, constructed in 1994, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F11.

(q) One (1) Topcoat Booth, identified as F8, constructed in 1994, with a maximum capacity of 3.75 units per hour, emissions controlled by a dry filter, exhausting to stack F8.

SECTION D.2 FACILITY OPERATION CONDITIONS (continued)

Drawerline:

(r) One (1) Drawer Enamel Booth, identified as F9, constructed in 1994, with a maximum capacity of 37.5 units per hour, emissions controlled by a dry filter, exhausting to stack F9.

(s) One (1) Drawer Coat Booth, identified as F7, constructed in 1994, with a maximum capacity of 37.5 units per hour, emissions controlled by a dry filter, exhausting to stack F7.

(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 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to 117-2759-00014, issued August 6, 1994, facilities F1 through F12, and F14 through F16 shall use less than 20 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per month. This usage limit is required to limit the potential to emit of VOC from these booths to less than 240 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.2.2 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply to the paint booths except when otherwise specified in 40 CFR Part 60, Subpart JJ.

D.2.3 Wood Furniture Manufacturing Limits [40 CFR Part 63, Subpart JJ]

(a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 14, (40 CFR 63 Subpart JJ). A copy of this rule is attached. Pursuant to 40 CFR 63.800, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:

(1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:

(A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of 1.0 pound VHAP per pound solids; or

(B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content on one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. Solvent and thinner mixtures used for other purposes have a ten percent (10%) maximum VHAP content by weight; or

(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or

(D) Use a combination of (A), (B), and (C).

(2) Limit VHAP emissions from contact adhesives as follows:

(A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed one and eight-tenths (1.8) pound VHAP per pound solids.

(B) For all contact adhesives (except aerosols and contact adhesives applied to nonporous substances) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.

(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.

(3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

(b) Pursuant to 40 CFR 63.803, the owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within the first sixty (60) calendar days of startup. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803.

(1) Operator training courses.

(2) Leak inspection and maintenance plan.

(3) Cleaning and washoff solvent accounting system.

(4) Chemical composition of cleaning and washoff solvents.

(5) Spray booth cleaning.

(6) Storage requirements.

(7) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).

(8) Line cleaning.

(9) Gun cleaning.

(10) Washoff operations.

(11) Formulation assessment plan for finishing operations.

(c) Pursuant to 40 CFR 63, Subpart JJ, an Initial Compliance Report must be submitted within sixty (60) calendar days of startup and a Continuous Compliance Demonstration Report must be submitted within thirty (30) days following every six (6) month period, thereafter.

D.2.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 117-2759-00014, issued August 6, 1994, and 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application

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

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

D.2.5 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the PM from the surface coating operations shall be limited by the following equation:

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

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

D.2.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and the dry filters.

Compliance Determination Requirements

D.2.7 VOC Emissions

Compliance with Condition D.2.1 shall be demonstrated within 30 days of the end of each quarter based on the total volatile organic compound usage for the previous twelve month consecutive period.

D.2.8 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.2.1 and D.2.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.9 Particulate Matter (PM)

Pursuant to 117-2759-00014, issued August 6, 1994 and in order to comply with D.2.5, the dry filters for PM control shall be in proper placement and control emissions from the paint booths at all times when the paint booths are in operation.

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

D.2.10 Operator Training Program

The permittee shall implement an operator training program.

(a) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the particulate control

system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.

(b) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.

(c) All operators shall be given refresher training annually.

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

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

D.2.11 Record Keeping Requirements

(a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.1.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) The volume weighted VOC content of the coatings used for each month;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.2.10, the Permittee shall maintain copies of the training program, the list of trained operators, additional inspections prescribed by the Preventive Maintenance Plan, and training records shall be maintained on site or available within 1 hour for inspection by IDEM.

(c) To document compliance with Condition D.2.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.2.3.

(1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.

(2) The VHAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.

(3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable spray booth coating used.

(4) The VHAP content in weight percent of each thinner used.

(5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.

(d) To document compliance with Condition D.2.3(b), the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.

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

D.2.12 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(b) A semi-annual Continuous Compliance Report to document compliance with Condition D.2.3 and the Certification form, shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, within thirty (30) days after the end of the six (6) months being reported.

The six (6) month periods shall cover the following months:

(1) January 1 through June 30.

(2) July 1 through December 31.

(c) The report required by (b) of this condition shall be submitted to:

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

and

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

SECTION D.3 FACILITY OPERATION CONDITIONS

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

Deskline 1:

(t) One (1) SAP #2 Booth, identified as F18, constructed in 1995, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack F18.

(u) One (1) NGR #2 Booth, identified as G1, constructed in 1995, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack G1.

Deskline 2:

(v) One (1) Washcoat Booth, identified as F17, constructed in 1995, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F17.

(w) One (1) Wipestain Booth, identified as F19, constructed in 1995, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F19.

(x) One (1) Topcoat #1and #3 Booth, identified as F23, constructed in 1995, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F23.

(y) One (1) Topcoat #2 and Sealer Booth, identified as F22, constructed in 1995, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F22.

Deskline 3:

(z) One (1) SAP Booth, identified as F45, constructed in 1998, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F45.

(aa) One (1) NGR Booth, identified as F46, constructed in 1998, with a maximum capacity of 7 units per hour, emissions controlled by a dry filter, exhausting to stack F46.

(bb) One (1) Washcoat Booth, identified as F47, constructed in 1998, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F47.

Deskline 4:

(cc) One (1) Topcoat and Sealer Booth, identified as F25, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F25.

(dd) One (1) Repair Booth, identified as F24, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F24.

Deskline 6:

(ee) One (1) SAP/NGR #1 Booth, identified as F20, constructed in 1995, with a maximum capacity of 3.125 units per hour, emissions controlled by a dry filter, exhausting to stack F20.

(ff) One (1) Washcoat Booth, identified as F21, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F21.

(gg) One (1) Topcoat and Sealer Booth, identified as C12, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack C12.

SECTION D.3 FACILITY OPERATION CONDITIONS (Continued)

(hh) One (1) Wipestain Booth, identified as F26, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F26.

(ii) One (1) Repair Booth, identified as F44, constructed in 1997, with a maximum capacity of 1.25 units per hour, emissions controlled by a dry filter, exhausting to stack F44.

Chairline:

(jj) One (1) SAP Booth, identified as C1, constructed in 1995, with a maximum capacity of 67.5 units per hour, emissions controlled by a dry filter, exhausting to stack C1.

(kk) One (1) NGR Booth, identified as C2, constructed in 1995, with a maximum capacity of 67.5 units per hour, emissions controlled by a dry filter, exhausting to stack C2.

(ll) One (1) SAP/NGR #1 Booth, identified as C3, constructed in 1995, with a maximum capacity of 10 units per hour, emissions controlled by a dry filter, exhausting to stack C3.

(mm) One (1) SAP/NGR #3 Booth, identified as C10, constructed in 1995, with a maximum capacity of 10 units per hour, emissions controlled by a dry filter, exhausting to stack C10.

(nn) One (1) Washcoat Booth, identified as C4, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C4.

(oo) One (1) Wipestain Booth, identified as C5, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C5.

(pp) One (1) Sealer #1 Booth, identified as C8, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C8.

(qq) One (1) Topcoat #1 and Sealer #2 Booth, identified as C7, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C7.

(rr) One (1) Topcoat #2 Booth, identified as C6, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C6.

(ss) One (1) Repair Booth, identified as C9, constructed in 1995, with a maximum capacity of 9 units per hour, emissions controlled by a dry filter, exhausting to stack C9.

(tt) One (1) Mix Booth, identified as C11, constructed in 1997, with a maximum capacity of 1 unit per hour, emissions controlled by a dry filter, exhausting to stack C11.

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

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

D.3.1 Best Available Control Technology (BACT) Condition (326 IAC 2-2-3(a))

Pursuant to CP 117-4210-00014, issued March 28, 1995, and 326 IAC 2-2-3(a), facilities F17 through F26, F44 through F47, G1, and C1 through C12, shall use:

(a) Less than thirty-seven (37) tons of VOC, including coatings, dilution solvents, and cleaning solvents, per month. This limit is equivalent to less than four hundred and forty-five (445) tons VOC, calculated on a twelve month average rolled on a monthly basis.

This usage limit is based upon actual hours of operation and has been determined to serve as the BACT for this source;

(b) Dry filters for overspray control; and

(c) HVLP spray application methods when applying SAP stain, NGR, and washcoats; and air-assisted airless or airless application methods when applying sealers, topcoats, fillers, and wipestains.

In addition, the following pollution prevention techniques shall be applied:

(d) The cleanup solvents shall be stored in closed containers with soft gasketed spring-loaded closures,

(e) The cleanup rags saturated with solvent be stored, transported, and disposed of in containers that are closed tightly, and

(f) The spray guns used are the type that can be cleaned without the need for spraying the solvent into the air.

D.3.2 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply to the paint booths except when otherwise specified in 40 CFR Part 60, Subpart JJ.

D.3.3 Wood Furniture Manufacturing Limits [40 CFR Part 63, Subpart JJ]

(a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 14, (40 CFR 63 Subpart JJ). A copy of this rule is attached. Pursuant to 40 CFR 63.800, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:

(1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:

(A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of 1.0 pound VHAP per pound solids; or

(B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content on one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. Solvent and thinner mixtures used for other purposes have a ten percent (10%) maximum VHAP content by weight; or

(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or

(D) Use a combination of (A), (B), and (C).

(2) Limit VHAP emissions from contact adhesives as follows:

(A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed one and eight-tenths (1.8) pound VHAP per pound solids.

(B) For all contact adhesives (except aerosols and contact adhesives applied to nonporous substances) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.

(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.

(3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

(b) Pursuant to 40 CFR 63.803, the owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within the first sixty (60) calendar days of startup. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803.

(1) Operator training courses.

(2) Leak inspection and maintenance plan.

(3) Cleaning and washoff solvent accounting system.

(4) Chemical composition of cleaning and washoff solvents.

(5) Spray booth cleaning.

(6) Storage requirements.

(7) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).

(8) Line cleaning.

(9) Gun cleaning.

(10) Washoff operations.

(11) Formulation assessment plan for finishing operations.

(c) Pursuant to 40 CFR 63, Subpart JJ, an Initial Compliance Report must be submitted within sixty (60) calendar days of startup and a Continuous Compliance Demonstration Report must be submitted within thirty (30) days following every six (6) month period, thereafter.

D.3.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

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

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application

Dip-and-Drain Application

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

D.3.5 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to CP 117-4210-00014, issued March 28, 1995, and pursuant to 326 IAC 6-3-2, the PM from the surface coating operations shall be limited by the following equation:

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

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

D.3.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and the dry filters.

Compliance Determination Requirements

D.3.7 VOC Emissions

Compliance with Condition D.3.1 shall be demonstrated within 30 days of the end of each quarter based on the total volatile organic compound usage for the previous twelve month consecutive period.

D.3.8 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.3.1 and D.3.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.3.9 Particulate Matter (PM)

Pursuant to CP 117-4210-00014, issued March 28, 1995, and in order to comply with Conditions D.3.1 and D.3.5, the dry filters for PM control shall be in proper placement and control emissions from the surface coating facilities at all times when the paint booths are in operation.

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

D.3.10 Operator Training Program

The permittee shall implement an operator training program.

(a) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.

(b) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the

completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.

(c) All operators shall be given refresher training annually.

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

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

D.3.11 Record Keeping Requirements

(a) To document compliance with Condition D.3.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.3.1.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) The volume weighted VOC content of the coatings used for each month;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.3.10, the Permittee shall copies of the training program, the list of trained operators, additional inspections prescribed by the Preventive Maintenance Plan, and training records shall be maintained on site or available within 1 hour for inspection by IDEM.

(c) To document compliance with Condition D.3.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.3.3.

(1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.

(2) The VHAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.

(3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable spray booth coating used.

(4) The VHAP content in weight percent of each thinner used.

(5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.

(d) To document compliance with Condition D.3.3(b), the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.

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

D.3.12 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Condition D.3.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A semi-annual Continuous Compliance Report to document compliance with Condition D.3.3 and the Certification form, shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, within thirty (30) days after the end of the six (6) months being reported.

The six (6) month periods shall cover the following months:

(1) January 1 through June 30.

(2) July 1 through December 31.

(c) The report required by (b) of this condition shall be submitted to:

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

and

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

SECTION D.4 FACILITY OPERATION CONDITIONS

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

Deskline 2:

(uu) One (1) Repair Booth, identified as F30, constructed in 1998, with a maximum capacity of 1.25 units per hour, emissions controlled by a dry filter, exhausting to stack F30.

Deskline 3:

(vv) One (1) Wipestain Booth, identified as F27, constructed in 1999, with a maximum capacity of 7 units per hour, emissions controlled by a dry filter, exhausting to stack F27.

(ww) One (1) Topcoat #1 and #3 Booth, identified as F29, constructed in 1999, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F29.

(xx) One (1) Topcoat #2 and Sealer Booth, identified as F28, constructed in 1999, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F28.

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

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

D.4.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to 117-5122-00014, issued on August 27, 1996, facilities F27, F28, F29, and F30 shall use less than 2.86 tons of VOC per month, including coatings, dilution solvents, and cleaning solvents. This usage limit is required to limit the potential to emit of VOC, from these booths, to less than 34.3 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.4.2 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply to the paint booths except when otherwise specified in 40 CFR Part 60, Subpart JJ.

D.4.3 Wood Furniture Manufacturing Limits [40 CFR Part 63, Subpart JJ]

(a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 14, (40 CFR 63 Subpart JJ). A copy of this rule is attached. Pursuant to 40 CFR 63.800, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:

(1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:

(A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of 1.0 pound VHAP per pound solids; or

(B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content on one (1.0) pound VHAP per pound solid, as applied. Thinners used for

on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. Solvent and thinner mixtures used for other purposes have a ten percent (10%) maximum VHAP content by weight; or

(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or

(D) Use a combination of (A), (B), and (C).

(2) Limit VHAP emissions from contact adhesives as follows:

(A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed one and eight-tenths (1.8) pound VHAP per pound solids.

(B) For all contact adhesives (except aerosols and contact adhesives applied to nonporous substances) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.

(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.

(3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

(b) Pursuant to 40 CFR 63.803, the owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within the first sixty (60) calendar days of startup. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803.

(1) Operator training courses.

(2) Leak inspection and maintenance plan.

(3) Cleaning and washoff solvent accounting system.

(4) Chemical composition of cleaning and washoff solvents.

(5) Spray booth cleaning.

(6) Storage requirements.

(7) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).

(8) Line cleaning.

(9) Gun cleaning.

(10) Washoff operations.

(11) Formulation assessment plan for finishing operations.

(c) Pursuant to 40 CFR 63, Subpart JJ, an Initial Compliance Report must be submitted within sixty (60) calendar days of startup and a Continuous Compliance Demonstration Report must be submitted within thirty (30) days following every six (6) month period, thereafter.

D.4.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 117-5122-00014, issued on August 27, 1996, and 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

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

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

D.4.5 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the PM from the surface coating operations shall be limited by the following equation:

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

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

D.4.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and the dry filters.

Compliance Determination Requirements

D.4.7 VOC Emissions

Compliance with Condition D.4.1 shall be demonstrated within 30 days of the end of each quarter based on the total volatile organic compound usage for the previous twelve month consecutive period.

D.4.8 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.4.1 and D.4.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.4.9 Particulate Matter (PM)

In order to comply with D.4.5, the dry filters for PM control shall be in proper placement and control emissions from the paint booths at all times when the paint booths are in operation.

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

D.4.10 Operator Training Program

The permittee shall implement an operator training program.

(a) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.

(b) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.

(c) All operators shall be given refresher training annually.

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

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

D.4.11 Record Keeping Requirements

(a) To document compliance with Condition D.4.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.4.1.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) The volume weighted VOC content of the coatings used for each month;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.4.10, the Permittee shall maintain copies of the training program, the list of trained operators, additional inspections prescribed by the Preventive Maintenance Plan, and training records shall be maintained on site or available within 1 hour for inspection by IDEM.

(c) To document compliance with Condition D.4.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be

complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.4.3.

(1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.

(2) The VHAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.

(3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable spray booth coating used.

(4) The VHAP content in weight percent of each thinner used.

(5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.

(d) To document compliance with Condition D.4.3(b), the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.

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

D.4.12 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Condition D.4.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(b) A semi-annual Continuous Compliance Report to document compliance with Conditions D.4.3 and the Certification form, shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, within thirty (30) days after the end of the six (6) months being reported.

The six (6) month periods shall cover the following months:

(1) January 1 through June 30.

(2) July 1 through December 31.

(c) The report required by (b) of this condition shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-601
and

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

SECTION D.5 FACILITY OPERATION CONDITIONS

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

UV Line:

(yy) One (1) Robotic Spray Booth, identified as U1, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by water pans, exhausting to stack U1.

(zz) One (1) Topcoat Booth, identified as U1A/U1B/U1C/U2, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by dry filters, exhausting to stacks U1A, U1B, U1C, or U2.

(aaa) One (1) NGR Booth, identified as U3, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by a dry filter, exhausting to stack U3.

(bbb) One (1) Sealer Booth, identified as U4, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by a dry filter, exhausting to stack U4.

(ccc) One (1) Wipestain Booth, identified as U5, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by a dry filter, exhausting to stack U5.

(ddd) One (1) Washcoat Booth, identified as U6, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by a dry filter, exhausting to stack U6.

(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.5.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to 117-9309-00014, issued on March 20, 1998, facilities U1A/U1B/U1C/U2, U4, U5, and U6, shall use less than 3.24 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per month. This usage limit is required to limit the potential to emit of VOC, from these booths, to less than 39 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.5.2 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply to the paint booths except when otherwise specified in 40 CFR Part 60, Subpart JJ.

D.5.3 Wood Furniture Manufacturing Limits [40 CFR Part 63, Subpart JJ]

(a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 14, (40 CFR 63 Subpart JJ). A copy of this rule is attached. Pursuant to 40 CFR 63.800, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:

(1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:

(A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of 1.0 pound VHAP per pound solids; or

(B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content on one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. Solvent and thinner mixtures used for other purposes have a ten percent (10%) maximum VHAP content by weight; or

(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or

(D) Use a combination of (A), (B), and (C).

(2) Limit VHAP emissions from contact adhesives as follows:

(A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed one and eight-tenths (1.8) pound VHAP per pound solids.

(B) For all contact adhesives (except aerosols and contact adhesives applied to nonporous substances) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.

(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.

(3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

(b) Pursuant to 40 CFR 63.803, the owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within the first sixty (60) calendar days of startup. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803.

(1) Operator training courses.

(2) Leak inspection and maintenance plan.

(3) Cleaning and washoff solvent accounting system.

(4) Chemical composition of cleaning and washoff solvents.

(5) Spray booth cleaning.

(6) Storage requirements.

(7) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).

(8) Line cleaning.

(9) Gun cleaning.

(10) Washoff operations.

(11) Formulation assessment plan for finishing operations.

(c) Pursuant to 40 CFR 63, Subpart JJ, an Initial Compliance Report must be submitted within sixty (60) calendar days of startup and a Continuous Compliance Demonstration Report must be submitted within thirty (30) days following every six (6) month period, thereafter.

D.5.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 117-9309-00014, issued on March 20, 1998, and 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

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

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

D.5.5 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 117-9309-00014, issued on March 20, 1998, and 326 IAC 6-3-2, the PM from the surface coating operations shall be limited by the following equation:

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

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

D.5.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and the dry filters.

Compliance Determination Requirements

D.5.7 VOC Emissions

Compliance with Condition D.5.1 shall be demonstrated within 30 days of the end of each quarter based on the total volatile organic compound usage for the previous twelve month consecutive period.

D.5.8 Volatile Organic Compounds (VOC)

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

compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.5.9 Particulate Matter (PM)

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

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

D.5.10 Operator Training Program

The permittee shall implement an operator training program.

(a) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.

(b) Training shall include proper filter alignment, filter inspection and maintenance, proper pan water level, water pan inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.

(c) All operators shall be given refresher training annually.

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

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

D.5.11 Record Keeping Requirements

(a) To document compliance with Condition D.5.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.5.1.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) The volume weighted VOC content of the coatings used for each month;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.5.10, the Permittee shall maintain copies of the training program, the list of trained operators, additional inspections prescribed by the

Preventive Maintenance Plan, and training records shall be maintained on site or available within 1 hour for inspection by IDEM.

(c) To document compliance with Condition D.5.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.5.3.

(1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.

(2) The VHAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.

(3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable spray booth coating used.

(4) The VHAP content in weight percent of each thinner used.

(5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.

(d) To document compliance with Condition D.5.3(b), the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.

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

D.5.12 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Condition D.5.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(b) A semi-annual Continuous Compliance Report to document compliance with Condition D.5.3 and the Certification form, shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, within thirty (30) days after the end of the six (6) months being reported.

The six (6) month periods shall cover the following months:

(1) January 1 through June 30.

(2) July 1 through December 31.

(c) The report required by (b) of this condition shall be submitted to:

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

and

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

SECTION D.6 FACILITY OPERATION CONDITIONS

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

Wood Milling and Assembly Operations:

(eee) One (1) Wood Milling Process, identified as DC4/6, constructed in 1995, with a maximum capacity of 6,622.65 pounds per hour, emissions controlled by two baghouses, DC 4 and DC 6, each with an outlet grain loading of 0.008 gr/dscf and exhaust gas flow rate of 61,000 dscfm, exhausting to stacks 4 and 6.

(fff) One (1) Furniture Assembly Process, identified as DC4/6, constructed in 1995, with a maximum capacity of 6,622.65 pounds per hour, emissions controlled by two baghouses, DC 4 and DC 6, each with an outlet grain loading of 0.008 gr/dscf and exhaust gas flow rate of 61,000 dscfm, exhausting to stacks 4 and 6.

(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.6.1 Best Available Control Technology (BACT) Condition

Pursuant to CP 117-4210-00014, issued on March 28, 1995, the baghouses have been determined to be BACT for the Wood Milling and Furniture Assembly processes. The allowable outlet grain loadings from baghouses DC4 and DC6 are 0.008 grains per dry standard cubic foot (gr/dscf) each, with the input gas flow rates not to exceed 61,000 dry standard cubic feet per minute (dscfm) each. The PM emissions from the Wood Milling and Furniture Assembly operations shall be in compliance provided that the visible emissions from stacks 4 and 6 are limited to ten (10) percent opacity and there no are visible emissions from the building openings.

The equivalent allowable particulate matter (PM) emissions for the wood milling and assembly processes are 18.3 tons per year, each. Compliance with this limit will satisfy the requirements of 326 IAC 6-3-2.

D.6.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to CP 117-4210-00014, issued on March 28, 1995**,** and pursuant to 326 IAC 6-3-2, the PM from the Wood Milling and Furniture Assembly processes shall not exceed 9.14 pounds per hour each when operating at a process weight rate of 6,622.65 pounds per hour.

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

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

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

D.6.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.6.4 Particulate Matter (PM)

Pursuant to CP 117-4210-00014, issued on March 28, 1995, and in order to comply with Conditions D.6.1 and D.6.2, the baghouses for PM control shall be in operation and control emissions from the Wood Milling and Furniture Assembly operations at all times that the facilities are in operation.

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

D.6.5 Visible Emissions Notations

(a) Daily visible emission notations of the Wood Milling and Furniture Assembly stack exhaust (stacks 4 and 6) shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.6.6 Parametric Monitoring

Pursuant to CP 117-4210-00014, issued on March 28, 1995, the Permittee shall record the total static pressure drop across the baghouses used in conjunction with the Wood Milling and Furniture Assembly operations, at least once weekly when the wood milling and furniture assembly are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.6.7 Broken or Failed Bag Detection

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. Operations may continue only if

there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). 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 violation of this permit.

(b) For single compartment baghouses, 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.6.8 Record Keeping Requirements

(a) To document compliance with Condition D.6.5, the Permittee shall maintain records of daily visible emission notations of the wood milling and furniture assembly stack exhaust when venting to the atmosphere.

(b) To document compliance with Condition D.6.6, the Permittee shall maintain the following:

(1) Weekly records of the inlet and outlet differential static pressure during normal operation when venting to the atmosphere; and

(2) Documentation of the dates vents are redirected.

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

SECTION D.7 FACILITY OPERATION CONDITIONS

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

Woodworking Operations:

(a) Woodworking facilities, identified as DC7/8 and DC9/10, constructed in 1996, with a maximum capacity of 4,800 pounds per hour, with an air flow rate no greater than 125,000 cubic feet of air per minute and a grain loading no greater than 0.003 grains per dry standard cubic feet of outlet air, emissions controlled by two baghouses, exhausting to stack 7.

(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.7.1 Baghouse Limitations [326 IAC 2-7-1(21)(G)(xxix)]

The woodworking operations controlled by a baghouse shall be an insignificant activity for Title V permitting purposes provided that the baghouse operations meet the requirements of 326 IAC 2-7-1(21)(G)(xxix), including the following:

(a) Each woodworking baghouse shall not exhaust to the atmosphere greater than one hundred twenty-five thousand (125,000) cubic feet of air per minute and shall not emit particulate matter with a diameter less than ten (10) microns in excess of three-thousandths (0.003) 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, when exhausting to the atmosphere, 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.

Compliance with these limitations will satisfy the requirements of Condition D.7.2 (326 IAC 2-2) and D.7.3 (326 IAC 6-3-2).

D.7.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to CP 117-5122-00014, issued on August 26, 1996, the particulate emissions from the woodworking facilities exhausting to stack 7 shall not exceed 5.7 pounds PM per hour and 3.4 pounds PM-10 per hour. This limit is required to limit the potential to emit of PM to less than 25 tons and PM-10 to less than 15 tons, per 12 consecutive month period. Compliance with this limit will satisfy the requirements of 326 IAC 6-3-2.

Compliance with these limits makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.7.3 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 the PM emissions from the woodworking facilities exhausting to stack 7 shall not exceed 7.37 pounds PM per hour when operating at a process weight rate of 4,800 pounds per hour.

The pounds per hour limitations were calculated with the following equation:

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

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

D.7.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.7.5 Particulate Matter (PM) [326 IAC 2-7-1(21)(G)(xxix)(DD)]

Pursuant to CP 117-5122-00014, issued on August 26, 1996, and in order to comply with conditions D.7.1, D.7.2 and D.7.3, the baghouse/cyclone combination for PM control shall be in operation and control emissions from the woodworking facilities exhausting to stack 7 at all times that the facilities are in operation.

D.7.6 Baghouse Inspections [326 IAC 2-7-21(1)(G)(xxix)(FF)]

An inspection shall be performed each calender 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.7.7 Visible Emissions Notations

Should the source elect to not have the woodworking operations considered an insignificant activity for Title V permitting purposes, the Method 22 readings required in Condition D.7.1(c) are not required, and will be replaced by the following:

(a) Daily visible emission notations of the Woodworking Process stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.7.8 Broken or Failed Bag Detection

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. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). 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 violation of this permit.

(b) For single compartment baghouses, 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.7.9 Record Keeping Requirements

(a) To document compliance with Conditions D.7.1(c) and D.7.7, the Permittee shall maintain records of daily visible emission notations of the baghouse exhaust when exhausting to the atmosphere.

(b) To document compliance with Condition D.7.6, the Permittee shall maintain records of the results of the inspections required under Condition D.7.6 and the dates the vents are redirected.

(c) The Permittee shall maintain records of corrective actions to document compliance with 326 IAC 2-7-21(1)(G)(xxix)(GG)(dd).

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

SECTION D.8 FACILITY OPERATION CONDITIONS

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

(b) 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. [326 IAC 6-3-2]

(c) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour: two (2) 2.07 MMBtu/hr boilers, constructed in 1998. [326 IAC 6-2-4]

(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.8.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), insignificant sources of particulate matter shall not exceed the allowable PM emission rate based on the following equation:

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

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

D.8.2 Particulate Matter (PM) Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, the PM emissions from each of the two (2) 2.07 MMBtu/hr natural gas-fired boilers shall not exceed 0.6 pounds per million BTU heat input.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Paoli, Inc.
Source Address: 201 E. Martin Street, Orleans, IN, 47452
Mailing Address: P.O. Box 30, Paoli, IN, 47454
Part 70 Permit No.: T117-6003-00014

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

Please check what document is being certified:

Annual Compliance Certification Letter

Test Result (specify) _____

Report (specify) _____

Notification (specify) _____

Affidavit (specify) _____

Other (specify) _____

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

Signature:
Printed Name:
Title/Position:
Phone:
Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Paoli, Inc.
Source Address: 201 E. Martin Street, Orleans, IN, 47452
Mailing Address: P.O. Box 30, Paoli, IN, 47454
Part 70 Permit No.: T117-6003-00014

This form consists of 2 pages **Page 1 of 2**

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

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

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

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

PART 70 OPERATING PERMIT
Semi-Annual Report
VOC and VHAP usage - Wood Furniture NESHAP

Source Name: Paoli, Inc.
Source Address: 201 E. Martin Street, Orleans, IN, 47452
Mailing Address: P.O. Box 30, Paoli, IN, 47454
Part 70 Permit No.: T117-6003-00014
Facilities: All surface coating booths
Parameter: VOC and VHAPs - NESHAP
Limit:
(1) Finishing operations -1.0 lb VHAP/lb Solids
(2) Thinners used for on-site formulation of washcoats, basecoats and enamels - 3% VHAP content by weight
(3) All other thinners - 10% VHAP content by weight
(4) Foam adhesives meeting the upholstered seating flammability requirements - 1.8 lb VHAP/lb Solids
(5) All other contact adhesives - 1.0 lb VHAP/lb Solids
(6) Strippable spray booth material - 0.8 pounds VOC per pound solids

Month	Finishing Operations (lb VHAP/lb Solid)	Thinners (% by weight)	Thinner/Solvent mixtures (% by weight)	Foam adhesives (upholstered) (lb VHAP/lb Solid)	Contact adhesives (lb VHAP/lb Solid)	Strippable spray booth material (lb VOC/lb Solid)
1						
2						
3						
4						
5						
6						

No deviation occurred in this six month period.

Deviation/s occurred in this six month period.
Deviation has been reported on:_____

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

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

Part 70 Quarterly Report

Source Name: Paoli, Inc.
Source Address: 201 E. Martin Street, Orleans, IN, 47452
Mailing Address: P.O. Box 30, Paoli, IN, 47454
Part 70 Permit No.: T117-6003-00014
Facilities: Spray booths F2A, F6A, F6B, and F13
Parameter: Aggregate VOCs delivered to the applicators, including coatings, dilution solvents, and cleaning solvents
Limit: Less than 20 tons per month (less than 240 tons per 12 consecutive month period)

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on: _____

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Paoli, Inc.
Source Address: 201 E. Martin Street, Orleans, IN, 47452
Mailing Address: P.O. Box 30, Paoli, IN, 47454
Part 70 Permit No.: T117-6003-00014
Facilities: Spray booths F1 through F12, and F14 through F16
Parameter: Aggregate VOCs delivered to the applicators, including coatings, dilution solvents, and cleaning solvents
Limit: less than 20 tons per month (less than 240 tons per 12 consecutive month period)

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on: _____

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Paoli, Inc.
Source Address: 201 E. Martin Street, Orleans, IN, 47452
Mailing Address: P.O. Box 30, Paoli, IN, 47454
Part 70 Permit No.: T117-6003-00014
Facilities: Spray booths F17 through F26, F44 through F47, G1, and C1 through C12, inclusive
Parameter: Aggregate VOCs delivered to the applicators, including coatings, dilution solvents, and cleaning solvents
Limit: Less than 37 tons per month (less than 445 tons calculated on a twelve month average rolled on a monthly basis)

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on: _____

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Paoli, Inc.
Source Address: 201 E. Martin Street, Orleans, IN, 47452
Mailing Address: P.O. Box 30, Paoli, IN, 47454
Part 70 Permit No.: T117-6003-00014
Facilities: Spray booths F27, F28, F29, and F30
Parameter: Aggregate VOCs delivered to the applicators, including coatings, dilution solvents, and cleaning solvents
Limit: Less than 2.86 tons per month (less than 34.3 tons per 12 consecutive month period)

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on: _____

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Paoli, Inc.
Source Address: 201 E. Martin Street, Orleans, IN, 47452
Mailing Address: P.O. Box 30, Paoli, IN, 47454
Part 70 Permit No.: T117-6003-00014
Facilities: All spray booths of the UV line; U1A, U1B, U1C, U1, U2, U3, U4, U5, and U6
Parameter: Aggregate VOCs delivered to the applicators, including coatings, dilution solvents, and cleaning solvents
Limit: Less than 3.24 tons per month (less than 39 tons per 12 consecutive month period)

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on: _____

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

Attach a signed certification to complete this report.

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

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Paoli, Inc.
Source Address: 201 E. Martin Street, Orleans, IN, 47452
Mailing Address: P.O. Box 30, Paoli, IN, 47454
Part 70 Permit No.: T117-6003-00014

Months: _____ **to** _____ **Year:** _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".
NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.
THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

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

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.