INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Mitchell E. Daniels, Jr.
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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: August 26, 2005

RE: MasterBrand Cabinets, Inc.-Ferdinand Operations / SSM 037-20223-00051

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

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot 1/10/05

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August 26, 2005

Mr. Willard Robertson
MasterBrand Cabinets, Inc. - Ferdinand Operations
P.O. Box 420
Jasper, Indiana 47546

Re: 037-20223-00051
First Significant Source Modification to
Part 70 Permit No.: T037-5930-00051

Dear Mr. Robertson:

MasterBrand Cabinets, Inc. - Ferdinand Operations was issued a Part 70 Operating Permit T037-5930-00051 on February 20, 2004 for a woodworking and surface coating operation manufacturing kitchen and bath cabinets. An application to modify the source was received on January 10, 2005. Pursuant to the provisions of 326 IAC 2-7-10.5, the following emission units are approved for construction at the source:

(e) One (1) finishing line, identified as Line A, to be constructed in 2005, consisting of the following facilities:

(1) Two (2) toner spray booths, identified as SB-40 and SB-41, equipped with spray application equipment as described in 326 IAC 8-2-12, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOK-1.

(2) Two (2) stain spray booths, identified as SB-44 and SB-45, equipped with spray application equipment as described in 326 IAC 8-2-12, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOK-1.

(3) Two (2) sealer booths, identified as SB-48 and SB-50, equipped with spray application equipment as described in 326 IAC 8-2-12, using UV curable coatings and dry filters for particulate control, and exhausting through stacks SBK-48 and SBK-50, respectively.

(4) Two (2) topcoat booths, identified as SB-49 and SB-51, equipped with spray application equipment as described in 326 IAC 8-2-12, using UV curable coatings and dry filters for particulate control, and exhausting through stacks SBK-49 and SBK-51, respectively.

(5) Two (2) sanding operations, controlled by a baghouse BH-8, and exhausting 22,500 cubic feet per minute through stack BHK-8A and 22,500 cubic feet per minute through stack BHK-8B.

(f) One (1) finishing line, identified as Line B, to be constructed in 2005, consisting of the following facilities:

(1) Two (2) toner spray booths, identified as SB-42 and SB-43, equipped with spray application equipment as described in 326 IAC 8-2-12, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOK-1.

(2) Two (2) stain spray booths, identified as SB-46 and SB-47, equipped with spray application equipment as described in 326 IAC 8-2-12, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOK-1.

(3) Two (2) sealer booths, identified as SB-52 and SB-54, equipped with spray application equipment as described in 326 IAC 8-2-12, using UV curable coatings and dry filters for particulate control, and exhausting through stacks SBK-52 and SBK-54, respectively.

(4) Two (2) topcoat booths, identified as SB-53 and SB-55, equipped with spray application equipment as described in 326 IAC 8-2-12, using UV curable coatings and dry filters for particulate control, and exhausting through stacks SBK-53 and SBK-55, respectively.

(5) Two (2) sanding operations, controlled by a baghouse BH-8, and exhausting 22,500 cubic feet per minute through stack BHK-8A and 22,500 cubic feet per minute through stack BHK-8B.

(g) One (1) woodworking cell, identified as MC-9, to be constructed in 2005, controlled by a 61,000 cubic feet per minute baghouse, identified as BH-9, and exhausting either internally or to stack BHK-9.

(h) One (1) woodworking cell, identified as MC-10, to be constructed in 2005, controlled by a 35,000 cubic feet per minute baghouse, identified as baghouse BH-10, and exhausting either internally or to stack BHK-10.

Insignificant Activities

(a) Eight (8) infrared ovens, identified as OV-22, OV-24, OV-26, OV-28, OV-31, OV-33, OV-35, and OV-37, to be constructed in 2005.

(b) One (1) halogen oven, identified as OV-20, equipped in conjunction with Line A, controlled by the existing RTO, and exhausting through stack RTOK-1.

(c) Four (4) UV ovens, identified as OV-23, OV-25, OV 27, and OV-30, equipped in conjunction with Line A.

(d) One (1) halogen oven, identified as OV-29, equipped in conjunction with Line A.

(e) One (1) halogen oven, identified as OV-21, equipped in conjunction with Line B, controlled by the existing RTO, and exhausting through stack RTOK-1.

(f) Four (4) UV ovens, identified as OV-32, OV-34, OV 36, and OV-39, equipped in conjunction with Line B.

(g) One (1) halogen oven, identified as OV-38, equipped in conjunction with Line B.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

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

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

This significant source modification authorizes construction of the new emission units. Operating conditions shall be incorporated into the Part 70 operating permit as a significant permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12. Operation is not approved until the significant permit modification has been issued.

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, 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, Indianapolis, Indiana, 46204, 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 - Dubois County
Dubois 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

MasterBrand Cabinets, Inc. - Ferdinand Operations
614 West Third Street
Ferdinand, Indiana 47532

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions.

Operation Permit No.: T037-5930-00051	
Original Signed By: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: February 20, 2004 Expiration Date: February 20, 2009

First Administrative Amendment No.: 037-19476-00051, issued August 27, 2004

First Significant Source Modification No.: 037-20223-00051	
Issued by: Original signed by Paul Dubenetzky, Chief Permits Branch Office of Air Quality	Issuance Date: August 26, 2005

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1, A.3, and A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary woodworking and surface coating operation manufacturing kitchen and bath cabinets.

Responsible Official:	Vice President Stock Operations
Source Address:	614 West Third Street, Ferdinand, Indiana 47532
Mailing Address:	One MasterBrand Cabinets Drive, P.O. Box 420, Jasper, Indiana 47546
General Source Phone Number:	(812) 482-2527
SIC Code:	2434
County Location:	Dubois
Source Location Status:	Nonattainment for PM 2.5 Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD ; Minor Source under Nonattainment NSR Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

This woodworking and surface coating company consists of two (2) plants:

(a) Plant 4 is located at 614 West Third Street, Ferdinand, Indiana 47532; and

(b) Plant 22 is located at 624 West Third Street, Ferdinand, Indiana 47532.

Since the two (2) plants are located on contiguous or adjacent properties, belong to the same industrial grouping, and are under common control of the same entity, they will be considered one (1) source, effective from the date of issuance of this Part 70 permit.

A.3 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:

(a) One (1) conventional surface coating line, constructed in 1973, comprised of the following surface coating facilities:

(1) One (1) toner booth, identified as TB-12, with a maximum capacity of 225 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stack T4;

(2) One (1) stain booth, identified as STB-13, with a maximum capacity of 225 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stack ST4;

(3) One (1) sealer booth, identified as SB-14, with a maximum capacity of 225 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stacks S3 and S4;

(4) One (1) top coat booth, identified as TCB-15, with a maximum capacity of 225 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stacks TC4 and TC5; and

(5) Two (2) parts booths, identified as PB-16 and PB-17, with a maximum capacity of 225 units per hour, each with particulate emissions controlled by a dry filter, and exhausting through stacks P1, P2, and P3.

(6) One (1) natural gas-fired oven identified as Ou-5, constructed in 1973, with a maximum heat input capacity of 1 Million British Thermal Units per hour (MMBtu), and exhausting to stack O1.

(b) One (1) electrostatic finishing line, comprised of the following facilities:

(1) One (1) toner spray booth, identified as TB-2, constructed in 1985, with a maximum capacity of 766 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stacks T1 and T2;

(2) Two (2) stain spray booths using electrostatic spray applicators, identified as STB-3 and STB-4, both constructed in 1985, each with a maximum capacity of 766 units per hour, each with particulate emissions controlled by a dry filter and VOC emissions controlled by a natural gas-fired regenerative thermal oxidizer with a heat input rate of 7.9 million British thermal units per hour (MMBtu/hr), constructed in 2003;

(3) Two (2) sealer spray booths using electrostatic spray applicators, identified as SB-7 and SB-8, both constructed in 1985, each with a maximum capacity of 766 units per hour, each with particulate emissions controlled by a dry filter and VOC emissions controlled by a natural gas-fired regenerative thermal oxidizer with a heat input rate of 7.9 million British thermal units per hour (MMBtu/hr), constructed in 2003;

(4) Two (2) topcoat spray booths using electrostatic spray applicators, identified as TCB-9 and TCB-10, both constructed in 1985, each with a maximum capacity of 766 units per hour, with particulate emissions controlled by a dry filter and VOC emissions controlled by a natural gas-fired regenerative thermal oxidizer with a heat input rate of 7.9 million British thermal units per hour (MMBtu/hr), constructed in 2003;

(5) One (1) sealer touchup spray booth, identified as SB-6, constructed in 1989, with particulate emissions controlled by a dry filter, and exhausting through stack S3;

(6) One (1) topcoat touchup spray booth, identified as TCB-18, constructed in 1993, with particulate emissions controlled by a dry filter, and exhausting through stack TC3; and

(7) One (1) natural gas-fired curing oven, identified as Ou-11, constructed prior to 1985, with a maximum capacity of 2 million British thermal units per hour (MMBtu/hr), and exhausting to stacks O2 and O3.

(c) Woodworking equipment controlled by baghouses, including:

(1) One (1) woodworking cell, identified as MC-2, constructed in 1968, controlled by a 61,000 cubic feet per minute baghouse, identified as BH2, and exhausting either internally or to stack BHK-2;

(2) One (1) woodworking cell, identified as MC-3, constructed in 1998, controlled by a 61,000 cubic feet per minute baghouse, identified as BH3, and exhausting either internally or to stack BHK-3;

(3) One (1) woodworking cell, identified as MC-5, constructed in 1997, controlled by a 61,000 cubic feet per minute baghouse, identified as BH5, and exhausting either internally or to stack BHK-5;

(4) One (1) woodworking cell, identified as MC-6, constructed in 1986, controlled by a 61,000 cubic feet per minute baghouse, identified as BH6, and exhausting either internally or to stack BHK-6; and

(5) One (1) woodworking cell, identified as MC-7, constructed in 1986, controlled by a 48,000 cubic feet per minute baghouse, identified as BH7, and exhausting either internally or to stack BHK-7.

(d) Woodworking equipment controlled by baghouses including:

(1) One (1) woodworking cell, identified as MC-1, constructed in 1968, controlled by a 61,000 cubic feet per minute baghouse, identified as BH1, and exhausting either internally or to stack BHK-1; and

(2) One (1) woodworking cell, identified as MC-4, constructed in 1968, controlled by a 35,000 cubic feet per minute baghouse, identified as BH-4, and exhausting either internally or to stack BHK-4.

(e) One (1) finishing line, identified as Line A, to be constructed in 2005, consisting of the following facilities:

(1) Two (2) toner spray booths, identified as SB-40 and SB-41, equipped with spray application equipment as described in Condition D.3.6, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOK-1.

(2) Two (2) stain spray booths, identified as SB-44 and SB-45, equipped with spray application equipment as described in Condition D.3.6, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOK-1.

(3) Two (2) sealer booths, identified as SB-48 and SB-50, equipped with spray application equipment as described in Condition D.3.6, using UV curable coatings and dry filters for particulate control, and exhausting through stacks SBK-48 and SBK-50, respectively.

(4) Two (2) topcoat booths, identified as SB-49 and SB-51, equipped with spray application equipment as described in Condition D.3.6, using UV curable coatings and dry filters for particulate control, and exhausting through stacks SBK-49 and SBK-51, respectively.

(5) Two (2) sanding operations, controlled by a baghouse BH-8, and exhausting 22,500 cubic feet per minute through stack BHK-8A and 22,500 cubic feet per minute through stack BHK-8B.

(f) One (1) finishing line, identified as Line B, to be constructed in 2005, consisting of the following facilities:

(1) Two (2) toner spray booths, identified as SB-42 and SB-43, equipped with spray application equipment as described in Condition D.3.6, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOK-1.

(2) Two (2) stain spray booths, identified as SB-46 and SB-47, equipped with spray application equipment as described in Condition D.3.6, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOK-1.

(3) Two (2) sealer booths, identified as SB-52 and SB-54, equipped with spray application equipment as described in Condition D.3.6, using UV curable coatings and dry filters for particulate control, and exhausting through stacks SBK-52 and SBK-54, respectively.

(4) Two (2) topcoat booths, identified as SB-53 and SB-55, equipped with spray application equipment as described in Condition D.3.6, using UV curable coatings and dry filters for particulate control, and exhausting through stacks SBK-53 and SBK-55, respectively.

(5) Two (2) sanding operations, controlled by a baghouse BH-8, and exhausting 22,500 cubic feet per minute through stack BHK-8A and 22,500 cubic feet per minute through stack BHK-8B.

(g) One (1) woodworking cell, identified as MC-9, to be constructed in 2005, controlled by a 61,000 cubic feet per minute baghouse, identified as BH-9, and exhausting either internally or to stack BHK-9.

(h) One (1) woodworking cell, identified as MC-10, to be constructed in 2005, controlled by a 35,000 cubic feet per minute baghouse, identified as baghouse BH-10, and exhausting either internally or to stack BHK-10.

A.4 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) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].

(b) Emission units with PM and PM10 emissions less than five (5) tons per year, SO_2, NOx, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and a half (2.5) tons per year:

(1) One (1) natural gas-fired oven, identified as Ou23, with a maximum heat input capacity of 1 MMBtu per hour, and exhausting at stack O4. [326 IAC 6-1-2]

(2) One (1) topcoat storage tank with a capacity of 3,000 gallons; and

(3) One (1) sealer storage tank with a capacity of 3,000 gallons.

(c) Activities associated with the treatment of wastewater streams with a oil and grease content less than or equal to 1% by volume.

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

(e) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(f) Two (2) spray booths, identified as STB-19 and STB-20, each constructed in 2003, each with particulate emissions controlled by a dry filter, and exhausting through stacks ST5 and ST6. [326 IAC 6-1-2]

(g) Two (2) end coat booths, identified as ECB-1 and ECB-2, each constructed in 1994, each with particulate emissions controlled by a dry filter, and exhausting through stacks EC1 and EC2, respectively [326 IAC 6-1-2].

(h) One (1) UV Stickline, identified as UVC-31, constructed in 1999, and exhausting internally;

(i) One (1) UV Flatline, identified as UVC-30, constructed in 1994, and exhausting internally;

(j) One (1) UV Stickline, identified as UVC-29, constructed in 1994, and exhausting internally;

(k) One (1) UV cured vacuum coater booth to coat wood molding with a capacity of 300 wood moldings per hour, identified as UVC-26, constructed in 1994, exhausting to stack UV6/7;

A.5 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 issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.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 Provide Information [326 IAC 2-7-5(6)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "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.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 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.9 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 1 of each year to:

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

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.10 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
Indianapolis, Indiana 46204

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.

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

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 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;

IDEM, OAQ
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

Southwest Regional Office
Telephone Number: 1-888-672-8323 or 812-436-2570
Facsimile Number: 812-436-2572

(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
Indianapolis, Indiana 46204

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)(9) 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.

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

B.12 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) 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.

(c) 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.

(d) 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.

(e) 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).

(f) 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)]

(g) 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)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs

approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

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

B.14 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
Indianapolis, Indiana 46204

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 "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(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.16 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
Indianapolis, Indiana 46204

(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.17 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
Indianapolis, Indiana 46204

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)]

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 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) 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.19 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
Indianapolis, Indiana 46204

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)(1), (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.20 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13–17-3-2]

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, OAQ, 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) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 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
Indianapolis, Indiana 46204

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

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

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

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

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]

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

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Conventional Surface Coating Line and Electrostatic Finishing Line

(a) One (1) conventional surface coating line, constructed in 1973, comprised of the following surface coating facilities:

(1) One (1) toner booth, identified as TB-12, with a maximum capacity of 225 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stack T4;

(2) One (1) stain booth, identified as STB-13, with a maximum capacity of 225 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stack ST4;

(3) One (1) sealer booth, identified as SB-14, with a maximum capacity of 225 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stacks S3 and S4;

(4) One (1) top coat booth, identified as TCB-15, with a maximum capacity of 225 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stacks TC4 and TC5; and

(5) Two (2) parts booths, identified as PB-16 and PB-17, with a maximum capacity of 225 units per hour, each with particulate emissions controlled by a dry filter, and exhausting through stacks P1, P2, and P3.

(6) One (1) natural gas-fired oven identified as Ou-5, constructed in 1973, with a maximum heat input capacity of 1 Million British Thermal Units per hour (MMBtu), and exhausting to stack O1.

(b) One (1) electrostatic finishing line, comprised of the following facilities:

(1) One (1) toner spray booth, identified as TB-2, constructed in 1985, with a maximum capacity of 766 units per hour, with particulate emissions controlled by a dry filter, and exhausting through stacks T1 and T2;

(2) Two (2) stain spray booths using electrostatic spray applicators, identified as STB-3 and STB-4, both constructed in 1985, each with a maximum capacity of 766 units per hour, each with particulate emissions controlled by a dry filter and VOC emissions controlled by a natural gas-fired regenerative thermal oxidizer with a heat input rate of 7.9 million British thermal units per hour (MMBtu/hr), constructed in 2003;

(3) Two (2) sealer spray booths using electrostatic spray applicators, identified as SB-7 and SB-8, both constructed in 1985, each with a maximum capacity of 766 units per hour, each with particulate emissions controlled by a dry filter and VOC emissions controlled by a natural gas-fired regenerative thermal oxidizer with a heat input rate of 7.9 million British thermal units per hour (MMBtu/hr), constructed in 2003;

(4) Two (2) topcoat spray booths using electrostatic spray applicators, identified as TCB-9 and TCB-10, both constructed in 1985, each with a maximum capacity of 766 units per hour, with particulate emissions controlled by a dry filter and VOC emissions controlled by a natural gas-fired regenerative thermal oxidizer with a heat input rate of 7.9 million British thermal units per hour (MMBtu/hr), constructed in 2003;

(5) One (1) sealer touchup spray booth, identified as SB-6, constructed in 1989, with particulate emissions controlled by a dry filter, and exhausting through stack S3;

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

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Conventional Surface Coating Line and Electrostatic Finishing Line (Continued)

(6) One (1) topcoat touchup spray booth, identified as TCB-18, constructed in 1993, with particulate emissions controlled by a dry filter, and exhausting through stack TC3; and

(7) One (1) natural gas-fired curing oven, identified as Ou-11, constructed prior to 1985, with a maximum capacity of 2 million British thermal units per hour (MMBtu/hr), and exhausting to stacks O2 and O3.

(c) One (1) natural gas-fired oven, identified as Ou23, with a maximum heat input capacity of 1 MMBtu units per hour, and exhausting at stack 04.

Insignificant Activities:

(d) Emission units with PM and PM10 emissions less than five (5) tons per year, SO_2, NOx, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and a half (2.5) tons per year:

(1) One (1) topcoat storage tank with a capacity of 3,000 gallons; and

(2) One (1) sealer storage tank with a capacity of 3,000 gallons.

(e) Two (2) spray booths, identified as STB-19 and STB-20, each constructed in 2003, each with particulate emissions controlled by a dry filter, and exhausting through stacks ST5 and ST6. [326 IAC 6-1-2]

(f) Two (2) end coat booths, identified as ECB-1 and ECB-2, each constructed in 1994, each with particulate emissions controlled by a dry filter, and exhausting through stacks EC1 and EC2, respectively.

(g) One (1) UV Stickline, identified as UVC-31, constructed in 1999, and exhausting internally;

(h) One (1) UV Flatline, identified as UVC-30, constructed in 1994, and exhausting internally;

(i) One (1) UV Stickline, identified as UVC-29, constructed in 1994, and exhausting internally;

(j) One (1) UV cured vacuum coater booth to coat wood molding with a capacity of 300 wood moldings per hour, identified as UVC-26, constructed in 1994, exhausting to stack UV6/7;

(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.1.1 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply, to the conventional surface coating line, the electrostatic finishing line, the end coat booths (ECB-1 and ECB-2), the UV Sticklines (WC-31) and UVC-29), the UV Flatline (UVC-30), and the UV cured vacuum coater booth (UVC-26), except when otherwise specified in 40 CFR 63, Subpart JJ.

D.1.2 Wood Furniture Manufacturing Operations NESHAP [326 IAC 20-14-1] [40 CFR Part 63, Subpart JJ]

(a) The wood furniture coating operations are subject to 40 CFR Part 63, Subpart JJ, which is incorporated by reference as 326 IAC 20-14-1, with a compliance date of November 21, 1997.

(b) Pursuant to 40 CFR 63, 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 one (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 of 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. All other thinners have a ten percent (10.0%) 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 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 other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) 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.

(c) If the Permittee elects to comply using 40 CFR 63.804(d)(3) or 63.804(e)(2), monitoring shall be conducted in accordance with 40 CFR 63.804(g)(4)(i),(ii)(A), and (iv) and 63.804(g)(6)(i), (ii)(A), and (iv).

D.1.3 Work Practice Standards [326 IAC 20] [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 sixty (60) calendar days after the compliance date. 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:

(a) Operator training course.
(b) Leak inspection and maintenance plan.
(c) Cleaning and washoff solvent accounting system.

(d) Chemical composition of cleaning and washoff solvents.
(e) Spray booth cleaning.
(f) Storage requirements.
(g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
(h) Line cleaning.
(i) Gun cleaning.
(j) Washoff operations.
(k) Formulation assessment plan for finishing operations.

D.1.4 Best Available Control Technology (BACT) [326 IAC 2-2-3] [326 IAC 8-1-6]

(a) Pursuant to SSM037-13893-00051, issued February 3, 2003, 326 IAC 2-2-2 (Prevention of Significant Deterioration) and 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), the Permittee shall install and operate a regenerative thermal oxidizer (RTO) to control the VOC emissions from the stain booths (STB-3 and STB-4), sealer booths (SB-7 and SB-8), and topcoat booths (TCB-9 and TCB-10).

(b) Pursuant to SSM037-13893-00051, issued February 3, 2003, 326 IAC 2-2-2 (Prevention of Significant Deterioration) and 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), the input VOC shall be limited as follows:

(1) Stain Booths (STB-3 and STB-4), Sealer Booths (SB-7 and SB-8), and Topcoat Booths (TCB-9 and TCB-10)

The input of VOC shall be limited such that, in conjunction with the use of the regenerative thermal oxidizer, the VOC emissions shall not exceed two hundred (200) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(2) Toner Booth (TB-2) and Touchup Booths (SB-6 and TCB-18)

The input of VOC shall not exceed one hundred nineteen (119) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

D.1.5 Transition Period BACT [326 IAC 2-2-3] [40 CFR 52.21] [326 IAC 8-1-6]

(a) Pursuant to SSM037-13893-00051, issued February 3, 2002, during the time period from the date of commencement of operation of the RTO, October 31, 2003, up to twelve (12) months of operation, the input of VOC to the stain (STB-3 and STB-4), sealer (SB-7 and SB-8), and topcoat (TCB-9 and TCB-10) booths shall be limited, such that in conjunction with the operation of the RTO, the VOC emissions shall not exceed two hundred (200) tons per year. This limit shall be implemented as follows:

(1) For the period of the first quarter (period of three (3) calendar months) from the date of commencement of operation of the RTO, October 31, 2003 to January 31, 2004, the input of VOC to the stain (STB-3 and STB-4), sealer (SB-7 and SB-8), and topcoat (TCB-9 and TCB-10) booths shall be limited such that, in conjunction with the operation of the RTO, the VOC emissions shall not exceed fifty (50) tons per quarter.

(2) For the subsequent months up to October 31, 2004, the input of VOCs to the stain (STB-3 and STB-4), sealer (SB-7 and SB-8), and topcoat (TCB-9 and TCB-10) booths shall be limited such that, in conjunction with the operation of the RTO, the total VOC emissions divided by the accumulated months of operation from the date of commencement of operation of the RTO shall not exceed 16.67 tons per month.

D.1.6 Particulate Matter Emission Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Limitations; Particulate Emission Limitations), the particulate matter emissions from the conventional surface coating line (TB-12, STB-13, SB-14, TCB-15, PB-16, and PB-17), the electrostatic finishing line (TB-2, STB-3, STB-4, SB-7, SB-8, TCB-9, TCB-10, SB-6, and TCB-18), the end coat booths (ECB-1 and ECB-2), the UV Sticklines (UVC-31 and UVC-29), the UV Flatline (UVC-30), the cured vacuum coater booth (UVC-26), spray booths (STB-19 and STB-20), and the three (3) natural gas fired ovens (Ou5, Ou11, and Ou23), shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

D.1.7 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to SSM 037-13893-00051 and 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets by the electrostatic finishing line (TB-2, STB-3, STB-4, SB-7, SB-8, TCB-9, TCB-10, SB-6, and TCB-18) 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.1.8 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 any control devices.

Compliance Determination Requirements

D.1.9 Regenerative Thermal Oxidizer (RTO) [326 IAC 2-2-3] [326 IAC 8-1-6]

Pursuant to SSM037-13893-00051, issued February 3, 2003, 326 IAC 2-2-3 (Prevention of Significant Deterioration) and 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), the Permittee shall comply with the following requirements:

(a) The Permittee shall install and commence operation of a natural gas-fired regenerative thermal oxidizer (RTO) with a maximum heat input capacity of 7.9 million British thermal units per hour (MMBtu/hr) to control VOC emissions from the stain (STB-3 and STB-4), sealer (SB-7 and SB-8), and topcoat (TCB-9 and TCB-10) booths of the electrostatic finishing line, no later than October 31, 2003.

(b) The RTO shall operate at all times that the electrostatic finishing line is in operation to control VOC emission in order to comply with Conditions D.1.4 and D.1.5 and Condition D.1.2 if compliance is based on the use of add on control.

(c) The RTO shall operate with a capture efficiency of no less than fifty percent (50%) and a destruction efficiency of no less than ninety-five percent (95%).

(d) After the results of the performance test become available, as required by Condition D.1.11(a), the compliance demonstrations shall use the actual measured capture and control efficiencies.

D.1.10 Particulate Control

In order to comply with Condition D.1.6, the dry filters for particulate control shall be in operation and control emissions from the conventional surface coating line, the electrostatic finishing line, the end coat booths (ECB-1 and ECB-2) and the two spray booths (STB-19 and STB-20) at all times that these lines are in operation.

D.1.11 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [326 IAC 20] [40 CFR 63, Subpart JJ]

(a) Pursuant to SSM037-13893-00051, issued February 3, 2003, within 60 sixty of achieving maximum production rate, but no later than 180 days after the installation of the regenerative thermal oxidizer, the Permittee shall perform VOC capture and destruction efficiency testing utilizing methods as approved by the Commissioner in order to demonstrate compliance with Conditions D.1.4 and D.1.9. Testing shall be conducted in accordance with Section C - Performance Testing.

(b) Pursuant to SSM037-13893-00051, issued February 3, 2003, the Permittee shall determine the hourly average temperature, minimum operating temperature, and duct pressure or fan amperage for the RTO from the most recent valid stack test that demonstrates compliance with the limits and efficiencies in Conditions D.1.4 and D.1.9 as approved by IDEM.

(c) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.

D.1.12 Volatile Organic Compounds (VOC)

Pursuant to SSM037-13893-00051, issued February 3, 2003, compliance with Conditions D.1.4 and D.1.5 shall be based on the total organic compound emitted for the previous month and adding it to the previous 11 months total VOC emitted so as to arrive at the VOC emissions for 12 consecutive months period. The VOC emissions for a month, as required by Conditions D.1.4 and D.1.5, can be arrived at using the following equation for VOC usage:

VOC (tons) emitted = [(VOC (tons) input) x (100-% control efficiency of the RTO)]
+ [uncontrolled VOC (tons) input]

Where VOC input is based on the 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. Control efficiency of the RTO can be calculated by multiplying the capture efficiency by the destruction efficiency.

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

D.1.13 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the conventional surface coating booth stacks and the electrostatic finishing line stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a

condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.1.14 Regenerative Thermal Oxidizer (RTO)

Pursuant to SSM037-13893-00051, issued February 3, 2003, the Permittee shall comply with the following requirements:

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the RTO for measuring operating temperature when the electrostatic finishing line is in operation. The output of this system shall be recorded as continuous and hourly average readings. From the date of commencement of the RTO until the approved stack test results are available, the Permittee shall operate the RTO at or above the hourly average temperature of 1350 degrees Fahrenheit (^{o}F).

(b) The Permittee shall determine the hourly average temperature, minimum operating temperature, and duct pressure/fan amperage for the RTO from the most recent valid stack test that demonstrates compliance with limits and efficiencies in Condition D.1.4 and D.1.9, as approved by IDEM.

(c) On and after the date the approved stack test results are available, the Permittee shall maintain:

(1) The hourly average temperature at or above the hourly average temperature as observed during the most recent compliant stack test.

(2) the continuous operating temperature at or above the minimum operating temperature as observed during the most recent compliant stack test.

(d) The duct pressure/fan amperage shall be observed at least once per day when the RTO is on operation. On and after the date of the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in the most recent compliant stack test.

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

D.1.15 Record Keeping Requirements

(a) To document compliance with Condition D.1.2, 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.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

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

(2) The HAP 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 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.

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

(c) To document compliance with Conditions D.1.4 and D.1.5, the Permittee shall maintain records in accordance with (1) through (8) below. Records maintained for (1) through (8) 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 Conditions D.1.4 and D.1.5.

(1) The VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on daily basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

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

(4) The cleanup solvent usage for each month;

(5) The total VOC usage for each month;

(6) The weight of VOCs emitted for each compliance period;

(7) The continuous records of hourly average and minimum operating temperature for the RTO and the temperature used to demonstrate compliance during the most recent compliant stack test; and

(8) Daily records of the duct pressure or fan amperage.

(d) To document compliance with Condition D.1.13, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.

(e) To document compliance with Condition D.1.8, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

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

D.1.16 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Conditions D.1.4 and D.1.5 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.1.2 and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported.

(1) For the first year following the compliance date, the six (6) month period shall begin on the first day of the month after which the operation commences.

(2) Following the first year of reporting, the semi-annual Continuous Compliance Report shall be submitted on a calendar year basis with the reporting periods ending June 30 and December 31.

(c) If the RTO is used to demonstrate compliance with 40 CFR 63, Subpart JJ, the excess emissions and continuous monitoring system performance report and summary report shall be submitted as required in 40 CFR 63.807(d). This report is not necessary if the RTO is not used to demonstrate compliance.

(d) The reports required in (b) and (c) of this condition shall be submitted to:

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

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)]:

(c) Woodworking equipment controlled by baghouses including:

(1) One (1) woodworking cell, identified as MC-2, constructed in 1968, controlled by a 61,000 cubic feet per minute baghouse, identified as BH2, and exhausting either internally or to stack BHK-2;

(2) One (1) woodworking cell, identified as MC-3, constructed in 1998, controlled by a 61,000 cubic feet per minute baghouse, identified as BH3, and exhausting either internally or to stack BHK-3;

(3) One (1) woodworking cell, identified as MC-5, constructed in 1997, controlled by a 61,000 cubic feet per minute baghouse, identified as BH5, and exhausting either internally or to stack BHK-5;

(4) One (1) woodworking cell, identified as MC-6, constructed in 1986, controlled by a 61,000 cubic feet per minute baghouse, identified as BH6, and exhausting either internally or to stack BHK-6; and

(5) One (1) woodworking cell, identified as MC-7, constructed in 1986, controlled by a 48,000 cubic feet per minute baghouse, identified as BH7, and exhausting either internally or to stack BHK-7.

(d) Woodworking equipment controlled by baghouses including:

(1) One (1) woodworking cell, identified as MC-1, constructed in 1968, controlled by a 33,000 cubic feet per minute baghouse, identified as BH1, and exhausting either internally or to stack BHK-1; and

(2) One (1) woodworking cell, identified as MC-4, constructed in 1968, controlled by a 35,000 cubic feet per minute baghouse, identified as BH-4, and exhausting either internally or to stack BHK-4.

(g) One (1) woodworking cell, identified as MC-9, to be constructed in 2005, controlled by a 61,000 cubic feet per minute baghouse, identified as BH-9, and exhausting either internally or to stack BHK-9.

(h) One (1) woodworking cell, identified as MC-10, to be constructed in 2005, controlled by a 35,000 cubic feet per minute baghouse, identified as baghouse BH-10, and exhausting either internally or to stack BHK-10.

Insignificant Activities*:*

(a) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].

(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.2.1 PSD Minor Limit [326 IAC 2-2]

(a) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), the particulate matter emissions from the woodworking cells MC-3, MC-5, MC-6, and MC-7 shall not exceed the following pound per hour limitations:

Facility	PM limit (lb/hr)	PM-10 limit (lb/hr)
MC-3	5.68	3.40
MC-5	5.68	3.40
MC-6 and MC-7	5.68	--

This emission limit is required to limit the potential to emit of PM to less than 25 tons and the potential to emit of PM-10 to less than 15 tons per twelve (12) consecutive month period and is a condition of operation of this facility. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

(b) In order to make the requirements of 326 IAC 2-2 (PSD) not applicable, the Permittee shall comply with the following emission limitations for woodworking cells MC-9 and MC-10:

Process	Baghouse ID	PM Emission Limit (lbs/hr)	PM10 Emission Limit (lbs/hr)
Woodworking Cell MC-9	BH-9	2.00	1.20
Woodworking Cell MC-10	BH-10	1.00	0.70

Combined with the emissions from the emission units listed in Section D.3, the PM/PM10 emissions from the modification project in 2005 are limited to less than 15 tons/yr for PM10 and less than 25 tons/yr for PM. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.

D.2.2 Particulate Matter Emission Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Limitations; Particulate Emission Limitations), the particulate matter emissions from the woodworking operations (MC-1, MC-2, MC-3, MC-4, MC-5, MC-6, MC-7, MC-9, and MC-10) shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

D.2.3 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 the baghouses controlling woodworking cells and woodworking cells MC-2, MC-3, MC-5, MC-6, MC-7, MC-9, and MC-10.

Compliance Determination Requirements

D.2.4 Particulate Matter (PM)

In order to comply with Conditions D.2.1 and D.2.2, the baghouses for PM and PM10 control shall be in operation and control emissions from the woodworking facilities (MC-3, MC-5, MC-6, MC-7, MC-9, and MC-10) at all times that the woodworking facilities are in operation.

D.2.5 Testing Requirements [326 IAC 2-1.1-11] [326 IAC 2-2]

In order to demonstrate compliance with Condition D.2.1(b), the Permittee shall perform PM and

PM10 emission testing for baghouses BH-9 and BH-10 controlling the woodworking cells MC-9 and MC-10, within 60 days after achieving the maximum production, but not later than 180 days after initial startup, utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

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

D.2.6 Baghouse Inspections [40 CFR 64]

An inspection shall be performed each calender quarter of all bags controlling the woodworking operations (MC-3, MC-5, MC-6, MC-7, MC-9, and MC-10) 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. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be repaired or replaced.

D.2.7 Visible Emissions Notations [40 CFR 64]

(a) Daily visible emission notations of the woodworking stack exhausts (BHK-3, BHK-5, BHK-6, BHK-7, BHK-9, and BHK-10) 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 deviation from this permit.

D.2.8 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. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.2.9 Record Keeping Requirements

(a) To document compliance with Conditions D.2.1, D.2.2, and D.2.7, the Permittee shall maintain records of daily visible emission notations of the baghouse exhausts when venting to the atmosphere.

(b) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6 and the dates the vents are redirected.

(c) To document compliance with Condition D.2.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

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

SECTION D.3 FACILITY OPERATION CONDITIONS

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

(e) One (1) finishing line, identified as Line A, to be constructed in 2005, consisting of the following facilities:

(1) Two (2) toner spray booths, identified as SB-40 and SB-41, equipped with spray application equipment as described in Condition D.3.6, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOK-1.

(2) Two (2) stain spray booths, identified as SB-44 and SB-45, equipped with spray application equipment as described in Condition D.3.6, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOK-1.

(3) Two (2) sealer booths, identified as SB-48 and SB-50, equipped with spray application equipment as described in Condition D.3.6, using UV curable coatings and dry filters for particulate control, and exhausting through stacks SBK-48 and SBK-50, respectively.

(4) Two (2) topcoat booths, identified as SB-49 and SB-51, equipped with spray application equipment as described in Condition D.3.6, using UV curable coatings and dry filters for particulate control, and exhausting through stacks SBK-49 and SBK-51, respectively.

(5) Two (2) sanding operations, controlled by a baghouse BH-8, and exhausting 22,500 cubic feet per minute through stack BHK-8A and 22,500 cubic feet per minute through stack BHK-8B.

(f) One (1) finishing line, identified as Line B, to be constructed in 2005, consisting of the following facilities:

(1) Two (2) toner spray booths, identified as SB-42 and SB-43, equipped with spray application equipment as described in Condition D.3.6, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOK-1.

(2) Two (2) stain spray booths, identified as SB-46 and SB-47, equipped with spray application equipment as described in Condition D.3.6, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOK-1.

(3) Two (2) sealer booths, identified as SB-52 and SB-54, equipped with spray application equipment as described in Condition D.3.6, using UV curable coatings and dry filters for particulate control, and exhausting through stacks SBK-52 and SBK-54, respectively.

(4) Two (2) topcoat booths, identified as SB-53 and SB-55, equipped with spray application equipment as described in Condition D.3.6, using UV curable coatings and dry filters for particulate control, and exhausting through stacks SBK-53 and SBK-55, respectively.

SECTION D.3 FACILITY OPERATION CONDITIONS (Continued)

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

(5) Two (2) sanding operations, controlled by a baghouse BH-8, and exhausting 22,500 cubic feet per minute through stack BHK-8A and 22,500 cubic feet per minute through stack BHK-8B.

(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 PSD Minor Limits [326 IAC 2-2]

In order to make the requirements of 326 IAC 2-2 (PSD) not applicable, the Permittee shall comply with the following:

(a) The emissions from spray booths SB-40 through SB-47 shall be controlled by a RTO with a destruction efficiency of at least 95%.

(b) The VOC emission increase from the proposed modification project in 2005 shall be limited to less than 40 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This condition becomes effective after the operation of finishing lines A or B. The VOC emissions from this project shall be calculated as follows:

$$\text{VOC Emission Increase (tons/yr)} = (1 - 0.95 \times \text{Ecap}) \sum_{i=1}^{12} X + \sum_{i=1}^{12} Y + \sum_{i=1}^{12} Z - K$$

Where:
- Ecap = Averaged Capture Efficiency for Spray Booths SB-40 through SB-47, which will be determined Condition D.3.9.
- i = Month.
- X = Total monthly VOC Input to Spray Booths SB-40 through SB-47.
- Y = Total monthly VOC Input to Spray Booths SB-48 through SB-55.
- Z = Total monthly VOC emissions from existing electrostatic finishing line as determined in Condition D.1.4(b).
- K = Baseline actual VOC emissions for the existing the electrostatic finishing line (= 291 tons/yr).

(c) The PM/PM10 emissions from spray booths SB-40 through SB-55 shall not exceed 2.43 tons/yr.

(d) The PM emissions from baghouse BH-8 shall not exceed 1.0 lbs/hr.

(e) The PM10 emissions from baghouse BH-8 shall not exceed 0.9 lbs/hr.

(f) The electrostatic finishing line in Section D.1 shall be removed before initial startup of finishing Line A or Line B, whichever is later.

Combined with the PM/PM10 emissions from the new woodworking cells MC-9 and MC-10 in Section D.2, the potential to emit of the modification project in 2005 is limited to less than 40 tons/year for VOC, less than 25 tons/year for PM, and less than 15 tons/year for PM10. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable to the modification project in 2005.

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

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart JJ.

D.3.3 Wood Furniture Manufacturing Operations NESHAP [326 IAC 20-14-1] [40 CFR Part 63, Subpart JJ]

(a) The wood furniture manufacturing operations are subject to 40 CFR Part 63, Subpart JJ, which is incorporated by reference as 326 IAC 20-14-1. Spray booths SB-40 through SB-55 shall comply with the requirements under this subpart upon startup of these units.

(b) Pursuant to 40 CFR 63, 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 one (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 of 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. All other thinners have a ten percent (10.0%) 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 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 other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) 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.

D.3.4 Work Practice Standards [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 sixty (60) calendar days after the compliance date. 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:

(a) Operator training course.

(b) Leak inspection and maintenance plan.
(c) Cleaning and washoff solvent accounting system.
(d) Chemical composition of cleaning and washoff solvents.
(e) Spray booth cleaning.
(f) Storage requirements.
(g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
(h) Line cleaning.
(i) Gun cleaning.
(j) Washoff operations.
(k) Formulation assessment plan for finishing operations.

D.3.5 Particulate Matter Emission Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Limitations; Particulate Emission Limitations), the particulate matter emissions from each of the spray booths SB-40 through SB-55 and the sanding operations shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

D.3.6 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), spray booths SB-40 through SB-55 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.3.7 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 any control devices.

Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]

D.3.8 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC usage and HAP content limitations contained in Conditions D.3.1(b) and D.3.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.3.9 Testing Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)] [40 CFR 63]

(a) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 40 CFR 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.

(b) In order to demonstrate compliance with Condition D.3.1, the Permittee shall perform VOC destruction efficiency test for the existing RTO within 180 days after initial startup of Line A or Line B, whichever is later, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

(c) In order to demonstrate compliance with Condition D.3.1, the Permittee shall perform VOC capture efficiency testing for spray booths SB-40 through SB-47, within 180 days after initial startup of Line A or Line B, whichever is later, utilizing methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C - Performance Testing.

(d) In order to demonstrate compliance with Conditions D.3.1(d) and (e), the Permittee shall perform PM and PM10 emission testing for baghouse BH-8 controlling the sanding operations, within 60 days after achieving the maximum production, but not later than 180 days after initial startup, utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.3.10 VOC Control

In order to comply with Conditions D.3.1 and D.3.3, the existing thermal oxidizer shall be in operation and control emissions from the spray booths SB-40 through SB-47 at all times that these units are in operation.

D.3.11 PM and PM10 Control

(a) In order to comply with Conditions D.3.1(c) and D.3.5, dry filters shall be in operation and control emissions from the spray booths SB-40 through SB-55 at all times that these units are in operation.

(b) In order to comply with Conditions D.3.1(d), D.3.1(e), and D.3.5, baghouse BH-8 shall be in operation and control particulate emissions from the sanding operations at all times that these units are in operation.

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

D.3.12 Thermal Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer (RTO) for measuring operating temperature. For the purpose of this condition, continuous means no less than once per minute. The output of this system shall be recorded as a 3-hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature of 1,400EF.

(b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Condition D.3.1(a), as approved by IDEM.

(c) On and after the date the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature as observed during the compliant stack test.

D.3.13 Parametric Monitoring

(a) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with limits in Condition D.3.1(a), as approved by IDEM.

(b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.

D.3.14 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks SBK-48 through SBK-55 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

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

D.3.15 Visible Emissions Notations [40 CFR 64]

(a) Daily visible emission notations of the baghouse stack exhausts (stacks BHK-8A and BHK-8B) shall be performed during normal daylight operations. 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 deviation from this permit.

D.3.16 Baghouse Inspections [40 CFR 64]

An inspection shall be performed each calender quarter of the baghouse controlling the exhausts from the sanding operations. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.3.17 Broken or Failed Bag Detection [40 CFR 64]

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.3.18 Record Keeping Requirements

(a) To document compliance with Condition D.3.1(b), the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limitations established Condition D.3.1(b)

(1) The VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The total monthly VOC usage for spray booths SB-40 through SB-47.

(4) The total monthly VOC usage for spray booths SB-48 through SB-55.

(5) The total monthly VOC emissions from the existing electrostatic finishing line as determined in Condition D.1.4 (b).

(6) The date which the existing electrostatic finishing line is shutdown and removed.

(b) To document compliance with Condition D.3.1(f), the Permittee shall maintain records of the following dates:

(1) The date when the finishing line A starts operation.

(2) The date when the finishing line B starts operation.

(3) The date when the existing electrostatic finishing line is shutdown and removed.

(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 HAP 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 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.3.4, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.

(e) To document compliance with Condition D.3.12, the Permittee shall maintain continuous temperature records for the thermal oxidizer and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.

(f) To document compliance with Condition D.3.13, the Permittee shall maintain daily records of the duct pressure or fan amperage for the thermal oxidizer.

(g) To document compliance with Condition D.3.14, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(h) To document compliance with Condition D.3.15, the Permittee shall maintain daily records of visible emission notations of the stacks BHK-8A and BHK-8B.

(i) To document compliance with Condition D.3.16, the Permittee shall maintain records of the results of the inspections required under Condition D.3.16.

(j) To document compliance with Condition D.3.7, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.

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

D.3.19 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Condition D.3.1(b) 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) Within thirty (30) days after the existing electrostatic finishing line is removed, the Permittee shall notify IDEM, OAQ the dates required under Condition D.3.18(b).

D.3.20 Reporting Requirements

(a) An Initial Compliance Report to document compliance with Condition D.3.4 and the Certification form, shall be submitted within sixty (60) days following the startup. The Initial Compliance Report must include data from the entire month that the compliance date falls.

(b) A semi-annual Continuous Compliance Report to document compliance with Condition D.3.4 and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported.

For the first year following the compliance date, the six (6) month period shall begin on the first day of the month after which the operation commences.

(c) If the RTO is used to demonstrate compliance with 40 CFR 63, Subpart JJ, the excess emissions and continuous monitoring system performance report and summary report shall be submitted as required in 40 CFR 63.807(d). This report is not necessary if the RTO is not used to demonstrate compliance.

(d) Following the first year of reporting, the semi-annual Continuous Compliance Report shall be submitted on a calendar year basis with the reporting periods ending June 30 and December 31.

(e) The reports required in (a), (b) and (c) of this condition shall be submitted to:

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

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

D.3.21 Reporting Requirements [326 IAC 2-2]

In order to demonstrate compliance with Condition D.3.1(f), within thirty (30) days after shutting down the existing electrostatic finishing line, the Permittee shall notify IDEM, OAQ the date when the existing electrostatic finishing line is shutdown and removed.

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

Part 70 Quarterly Report

Source Name: MasterBrand Cabinets, Inc. - Ferdinand Operations
Source Address: 614 West Third Street, Ferdinand, Indiana 47532

Mailing Address: One MasterBrand Cabinets Drive, P.O. Box 420, Jasper, Indiana 47546
Part 70 Permit No.: T037-5930-00051
Facility: Spray Booths SB-40 through SB-55
Parameter: VOC emissions from the modification project in 2005.
Limit: The VOC emission increase from the proposed modification project shall be limited to less than 40 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The VOC emission increase from this project shall be calculated as follows:

$$\text{VOC Emission Increase (tons/yr)} = (1 - 0.95 \times \text{Ecap}) \sum_{i=1}^{12} X + \sum_{i=1}^{12} Y + \sum_{i=1}^{12} Z - K$$

Where:
Ecap = Averaged Capture Efficiency for Spray Booths SB-40 through SB-47, which will be determined Condition D.3.9.
i = Month
X = Total monthly VOC Input to Spray Booths SB-40 through SB-47.
Y = Total monthly VOC Input to Spray Booths SB-48 through SB-55.
Z = Total monthly VOC emissions from existing electrostatic finishing line as determined in Condition D.1.4(b).
K = Baseline actual VOC emissions for the existing the electrostatic finishing line (= 291 tons/yr).

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

Technical Support Document (TSD) for a Part 70 Significant Source Modification and a Part 70 Significant Permit Modification

Source Background and Description

Source Name:	MasterBrand Cabinets, Inc. - Ferdinand Operations
Source Location:	614 West Third Street, Ferdinand, Indiana 47532
County:	Dubois
SIC Code:	2434
Operation Permit No.:	T037-5930-00051
Operation Permit Issuance Date:	February 20, 2004
Significant Source Modification No.:	037-20223-00051
Significant Permit Modification No.:	037-20407-00051
Permit Reviewer:	ERG/YC

The Office of Air Quality (OAQ) has reviewed a modification application from MasterBrand Cabinets, Inc. relating to the construction and operation of the following emission units:

(e) One (1) finishing line, identified as Line A, to be constructed in 2005, consisting of the following facilities:

(1) Two (2) toner spray booths, identified as SB-40 and SB-41, equipped with spray application equipment as described in 326 IAC 8-2-12, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOK-1.

(2) Two (2) stain spray booths, identified as SB-44 and SB-45, equipped with spray application equipment as described in 326 IAC 8-2-12, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOK-1.

(3) Two (2) sealer booths, identified as SB-48 and SB-50, equipped with spray application equipment as described in 326 IAC 8-2-12, using UV curable coatings and dry filters for particulate control, and exhausting through stacks SBK-48 and SBK-50, respectively.

(4) Two (2) topcoat booths, identified as SB-49 and SB-51, equipped with spray application equipment as described in 326 IAC 8-2-12, using UV curable coatings and dry filters for particulate control, and exhausting through stacks SBK-49 and SBK-51, respectively.

(5) Two (2) sanding operations, controlled by a baghouse BH-8, and exhausting 22,500 cubic feet per minute through stack BHK-8A and 22,500 cubic feet per minute through stack BHK-8B.

(f) One (1) finishing line, identified as Line B, to be constructed in 2005, consisting of the following facilities:

(1) Two (2) toner spray booths, identified as SB-42 and SB-43, equipped with spray application equipment as described in 326 IAC 8-2-12, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOK-1.

(2) Two (2) stain spray booths, identified as SB-46 and SB-47, equipped with spray application equipment as described in 326 IAC 8-2-12, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOK-1.

(3) Two (2) sealer booths, identified as SB-52 and SB-54, equipped with spray application equipment as described in 326 IAC 8-2-12, using UV curable coatings and dry filters for particulate control, and exhausting through stacks SBK-52 and SBK-54, respectively.

(4) Two (2) topcoat booths, identified as SB-53 and SB-55, equipped with spray application equipment as described in 326 IAC 8-2-12, using UV curable coatings and dry filters for particulate control, and exhausting through stacks SBK-53 and SBK-55, respectively.

(5) Two (2) sanding operations, controlled by a baghouse BH-8, and exhausting 22,500 cubic feet per minute through stack BHK-8A and 22,500 cubic feet per minute through stack BHK-8B.

(g) One (1) woodworking cell, identified as MC-9, to be constructed in 2005, controlled by a 61,000 cubic feet per minute baghouse, identified as BH-9, and exhausting either internally or to stack BHK-9.

(h) One (1) woodworking cell, identified as MC-10, to be constructed in 2005, controlled by a 35,000 cubic feet per minute baghouse, identified as baghouse BH-10, and exhausting either internally or to stack BHK-10.

Insignificant Activities

(a) Eight (8) infrared ovens, identified as OV-22, OV-24, OV-26, OV-28, OV-31, OV-33, OV-35, and OV-37, to be constructed in 2005.

(b) One (1) halogen oven, identified as OV-20, equipped in conjunction with Line A, controlled by the existing RTO, and exhausting through stack RTOK-1.

(c) Four (4) UV ovens, identified as OV-23, OV-25, OV 27, and OV-30, equipped in conjunction with Line A.

(d) One (1) halogen oven, identified as OV-29, equipped in conjunction with Line A.

(e) One (1) halogen oven, identified as OV-21, equipped in conjunction with Line B, controlled by the existing RTO, and exhausting through stack RTOK-1.

(f) Four (4) UV ovens, identified as OV-32, OV-34, OV 36, and OV-39, equipped in conjunction with Line B.

(g) One (1) halogen oven, identified as OV-38, equipped in conjunction with Line B.

[Note: There are no specific requirements applicable to the infrared ovens. Therefore, these units will not be listed in the revised Part 70 permit and are documented in this technical support document only.]

History

MasterBrand Cabinets, Inc. - Ferdinand Operations is an existing wood cabinet manufacturing plant and is an existing PSD major source. A Part 70 permit (T037-5930-00051) was issued to this source on February 20, 2004. On January 10, 2005, the Permittee submitted an application to the OAQ requesting to replace the existing electrostatic finishing line with two (2) new finishing lines and to add two (2) additional woodworking cells with two (2) baghouses. The VOC emissions from the existing electrostatic finishing line are currently limited to less than 319 tons per year.

The proposed two (2) finishing lines consist of sixteen (16) spray booths and four (4) sanding operations. Eight (8) of the proposed spray booths will be controlled by the existing regenerative thermal oxidizer (RTO) and the rest of the spray booths will be controlled by dry filters. The proposed four (4) sanding operations will be controlled by one (1) new baghouse.

The Permittee stated that the new finishing lines will apply coatings to new products made at other sources, and none of the existing woodworking equipment will be used to manufacture the new products. Therefore, this modification project will not increase utilization of the existing units at this source. The source proposed to limit the emissions from the proposed project, which includes the installation of two (2) new finishing lines and the removal of the existing electrostatic finishing line, to less than 40 tons/yr for VOC, 25 tons/yr for PM, and 15 tons/yr for PM10. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.

The Permittee requested that the description of the existing electrostatic finishing line and the associated requirements remain in the revised permit because this line will still be in operation before they finish construction of the proposed new lines. A condition addressing the emission limits during the transition period will be added to the revised permit. The Permittee stated that they will submit an application to remove the description of the existing electrostatic finishing line from their TV permit once the construction of the new lines is finished.

In an e-mail received from the source on May 24, 2005, the Permittee stated that insignificant emission units end coat booth ECB-3 and UV coating line UVC27 have been removed from the source. Therefore, these insignificant units have been removed from the revised permit.

Upon further review, IDEM, OAQ made the following changes:

(a) In accordance with the credible evidence rule (62 Fed. Reg. 8314, Feb 24, 1997); Section 113(a) of the Clean Air Act, 42 U.S. C. § 7413 (a); and a letter from the United States Environmental Protection Agency (USEPA) to IDEM, OAQ dated May 18, 2004, all permits must address the use of credible evidence; otherwise, U.S. EPA will object to the permits. A new condition - B.24 has been incorporated into the revised permit to address credible evidence.

(b) The mailing address for IDEM, OAQ has been changed as follows:

100 North Senate Avenue~~, P.O. Box 6015~~
Indianapolis, Indiana 4620**4**~~6-6015~~

This change has been made throughout the whole permit.

Source Definition

This woodworking and surface coating company consists of two (2) plants:

(a) Plant 4 is located at 614 West Third Street, Ferdinand, Indiana 47532; and

(b) Plant 22 is located at 624 West Third Street, Ferdinand, Indiana 47532.

Since the two (2) plants are located on contiguous and adjacent properties, have the same SIC codes, and are under common ownership and control, they will be considered one (1) source. This determination was made during the review of the Permittee's Part 70 permit (T037-5930-00051, issued on February 20, 2004), and still applies to this modification.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
RTOK-1	RTO	Unknown	1.5	30,000	220
SBK-48	Spray Booth	Unknown	1.25	1,500	ambient
SBK-49	Spray Booth	Unknown	1.25	1,500	ambient
SBK-50	Spray Booth	Unknown	1.25	1,500	ambient
SBK-51	Spray Booth	Unknown	2.33	7,063	ambient
SBK-52	Spray Booth	Unknown	1.25	1,500	ambient
SBK-53	Spray Booth	Unknown	1.25	1,500	ambient
SBK-54	Spray Booth	Unknown	1.25	1,500	ambient
SBK-55	Spray Booth	Unknown	2.33	1,500	ambient
BHK-8A	Baghouse BH8	Unknown	1.00	22,500	ambient
BHK-8B	Baghouse BH8	Unknown	1.00	22,500	ambient
BHK-9	Baghouse BH9	Unknown	1.00	60,000	ambient
BHK-10	Baghouse BH10	Unknown	1.00	30,000	ambient

Recommendation

The staff recommends to the Commissioner that the Part 70 Significant Source Modification and the Part 70 Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on January 10, 2005. Additional information was received on January 18, 2005, February 22, 2005, April 6, 2005, April 18, 2005, May 16, 2005, May 17, 2005, and May 27, 2005.

Emission Calculations

See Appendix A of this document for detailed PM/PM10 emissions calculations for the sanding operation, woodworking cells, and spray booths (pages 1 and 2). The Permittee did not provide the potential to emit VOC and HAP calculations for all the proposed spray booths because the VOC usage at these spray booths will be limited and this source is a major source for HAPs. The Permittee will be required to keep records of the actual VOC inputs to the proposed spray booths. For rule applicability purposes, the potential to emit VOC of this modification is assumed to be greater than 250 tons/yr and the potential to emit HAPs of this modification is assumed to be greater than 10 tons/yr for a single HAP, and greater than 25 tons/yr for total HAPs.

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a

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

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	Greater than 250
PM-10	Greater than 250
SO_2	--
VOC	Greater than 250
CO	--
NO_x	--

HAP's	Potential To Emit (tons/year)
A Single HAP	Greater than 10.0
TOTAL	Greater than 25.0

Justification for Modification

This modification is being performed through a Part 70 Significant Source Modification because (1) the potential to emit PM, PM10, and VOC is each greater than 25 tons per year, pursuant to 326 IAC 2-7-10.5(f)(4); and (2) the potential to emit HAPs is greater than 10 tons per year for a single HAP and greater than 25 tons per year for total HAPs, pursuant to 326 IAC 2-7-10.5(f)(6) . The permit modification is being performed through a Significant Permit Modification pursuant to 326 IAC 2-7-12(d) because this is a modification under provisions of the Title I of CAA.

County Attainment Status

The source is located in Dubois County.

Pollutant	Status
PM-10	Attainment
PM-2.5	Nonattainment
SO_2	Attainment
NO_2	Attainment
1- hour Ozone	Attainment
8- hour Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Dubois County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD) and 326 IAC 2-2.

(b) Dubois County has been classified as nonattainment for PM 2.5 in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM 2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM 2.5 emissions pursuant to the Non-attainment New Source Review requirements.

(c) Dubois County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(d) Fugitive Emissions
Since this type of operation is not in one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD applicability.

Source Status

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

Pollutant	Emissions (tons/year)
PM	52.0
PM-10	52.0
SO_2	0.00
VOC	484
CO	0.00
NOx	0.00

(a) This existing source is a PSD major stationary source because an attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

(b) This existing source is a Nonattainment NSR minor stationary source because none of the nonattainment regulated pollutants is emitted at a rate of 100 tons per year or more.

(c) These emissions are from the 2001 Emission Inventory for MasterBrand Cabinets, Inc. - Ferdinand Operations (Plant ID# 037-00051).

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Spray Booths SB-40 through SB-47*	Less than 0.03	Less than 0.03	-	Less than 330	-	-	Greater than 10 for a single HAP and greater than 25 for total HAPs
Spray Booths SB-48 through SB-55	Less than 2.40	Less than 2.40	-		-	-	
Sanding Operations	Less than 8.76	Less than 3.94	-	-	-	-	-
New Woodworking Cells MC-9 and MC-10	Less than 13.1	Less than 8.32	-	-	-	-	-

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Total Increase of This Project	Less than 24.3	Less than 14.7	-	Less than 330	-	-	Greater than 10 for a single HAP and greater than 25 for total HAPs
Total Decrease of This Project**	-0.99	-0.99	-	-291	-	-	Unknown
PTE of This Project	Less than 23.3	Less than 13.7	-	Less than 39.0	-	-	Greater than 10 for a single HAP and greater than 25 for total HAPs
PSD Significant Thresholds	25	15	40	40	100	40	NA

Note: (*) These booths will be controlled by an existing RTO.
(**) This decrease is caused by the removal of the existing electrostatic finishing line and is based on the actual emission data during the time period of November 2002 through October 2004.

This modification to an existing PSD major source is not major because the potential to emit from this project is less than the PSD significant levels. Therefore, the requirements of 326 IAC 2-2 (PSD) do not apply.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.

(b) The potential to emit HAPs of this existing wood cabinet manufacturing plant is greater than 10 tons/yr for a single HAP and greater than 25 tons/yr for total HAPs. Therefore, the existing source is subject to the National Emission Standards for Wood Furniture Manufacturing Operations (40 CFR 63.800 - 63.819, Subpart JJ, 326 IAC 20). The Permittee stated that the cost for the proposed new lines is $7.3 million and the cost to replace the entire source is $60.4 million. Therefore, this modification did not qualify for a reconstruction of the existing source as defined in 40 CFR 63.2. Therefore, the proposed spray booths SB-40 through SB-55 shall comply with the requirements for the existing affected sources in this NESHAP upon startup of these units.

Pursuant to 40 CFR 63, Subpart JJ, the proposed spray booths SB-40 through SB-55 shall comply with the following requirements for the existing affected sources under this Subpart:

Emission Limitations

(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 of 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. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or

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

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

(2) Limit VHAP emissions contact adhesives as follows:

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

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

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

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

(4) The owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. 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:

(A) Operator training course.
(B) Leak inspection and maintenance plan.
(C) Cleaning and washoff solvent accounting system.
(D) Chemical composition of cleaning and washoff solvents.
(E) Spray booth cleaning.
(F) Storage requirements.
(G) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
(H) Line cleaning.
(I) Gun cleaning.
(J) Washoff operations.
(K) Formulation assessment plan for finishing operations.

Compliance Determination

If the Permittee elects to demonstrate compliance using 40 CFR 63.804(a)(3) or 40 CFR 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.

Recordkeeping and Reporting Requirements

(1) The Permittee shall maintain records in accordance with (A) through (E) below. Records maintained for (A) through (E) shall be complete and sufficient to establish compliance with the VHAP usage limits.

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

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

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

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

(E) 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.

(2) The Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.

(3) A semi-annual Continuous Compliance Report and the Certification form shall be submitted within thirty (30) days after the end of the six (6) months being reported.

(A) For the first year following the compliance date, the six (6) month period shall begin on the first day of the month after which the operation commences.

(B) Following the first year of reporting, the semi-annual Continuous Compliance Report shall be submitted on a calendar year basis with the reporting periods ending June 30 and December 31.

(c) This modification does involve a pollutant-specific emissions unit:

(1) With the potential to emit before controls equal to or greater than the major source threshold;

(2) That is subject to an emission limitation or standard; and

(3) Uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

Therefore, the requirements of 40 CFR 64 (Compliance Assurance Monitoring) are applicable to this modification. However, since the proposed spray booths are subject to the requirements of NESHAP, Subpart JJ, the coating booths are exempt from CAM requirements, pursuant to 40 CFR 64.2(b)(1).

The proposed sanding and woodworking cells MC-9 and MC-10 are also subject to the requirements of 40 CFR 64(CAM) and will be controlled by baghouses BH-8 through BH-10. The CAM requirements for these baghouses have been determined to be daily visible emission notations and quarterly inspections for baghouses.

State Rule Applicability - Entire Source

326 IAC 2-3 Emission Offset

Dubois County has been designated as non-attainment for PM2.5 in 70 FR 943 dated January 5, 2005. According to the April 5, 2005 EPA memo titled "Implementation of New Source Review Requirements in PM2.5 Nonattainment Areas" authored by Steve Page, Director of OAQPS, until EPA promulgates the PM2.5 major NSR regulations, states should assume that a major

stationary source's PM10 emissions represent PM2.5 emissions. IDEM will use the PM-10 nonattainment major NSR program as a surrogate to address the requirements of nonattainment major NSR for the PM2.5 NAAQS. A significant emissions increase would be a net emissions increase or the potential of 15 tpy or greater of PM10. MasterBrand Cabinets, Inc. has limited the potential to emit of PM10 from the modification to less than 15 tpy. Therefore, assuming that PM10 emissions represent PM2.5 emissions, 326 IAC 2-3 does not apply.

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

This source was constructed in 1973, and modified in 1985, 1989, 1993, 1996, and 2005 (this modification). This existing source is a PSD major source. The potential to emit of this modification is greater than 40 tons/yr for VOC, greater than 25 tons/yr for PM, and greater than 15 tons/yr for PM10. In order to make this modification minor under PSD review, the Permittee has accepted the following limitations:

(a) The emissions from spray booths SB-40 through SB-47 shall be controlled by a RTO with a destruction efficiency at least 95%.

(b) The VOC emission increase from the proposed modification project in 2005 shall be limited to less than 40 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This condition becomes effective after the operation of finishing lines A or B. The VOC emissions from this project shall be calculated as follows:

$$\text{VOC Emission Increase (tons/yr)} = (1 - 0.95 \times \text{Ecap}) \sum_{i=1}^{12} X + \sum_{i=1}^{12} Y + \sum_{i=1}^{12} Z - K$$

Where:
- Ecap = Averaged Capture Efficiency for Spray Booths SB-40 through SB-47, which will be determined by stack testing.
- i = Month.
- X = Total monthly VOC Input to Spray Booths SB-40 through SB-47.
- Y = Total monthly VOC Input to Spray Booths SB-48 through SB-55.
- Z = Total monthly VOC emissions from existing electrostatic finishing line as determined in Condition D.1.4(b) of T037-5930-00051, issued on February 20, 2004.
- K = Baseline actual VOC emissions for the existing the electrostatic finishing line (= 291 tons/yr).

(c) The PM/PM10 emissions from spray booths SB-40 through SB-55 shall not exceed 2.43 tons/yr. The Permittee will show compliance with this limit by using dry filters for all these booths and vent the emissions from booths SB-40 through SB-47 to the existing RTO.

(d) The PM emissions from each of the baghouses BH-8, BH-9, and BH-10 shall not exceed the emission limits listed in the table below:

Process	Baghouse ID	PM Limit (lbs/hr)
Sanding Operations	BH-8	2.0
Woodworking Cell MC-9	BH-9	2.0
Woodworking Cell MC-10	BH-10	1.0

This is equivalent to 21.9 tons/yr of PM emissions. The Permittee will perform stack testing to demonstrate compliance with these limits.

(e) The PM10 emissions from each of the baghouses BH-8, BH-9, and BH-10 shall not

exceed the emission limits listed in the table below:

Process	Baghouse ID	PM10 Limit (lbs/hr)
Sanding Operations	BH-8	0.90
Woodworking Cell MC-9	BH-9	1.20
Woodworking Cell MC-10	BH-10	0.70

This is equivalent to 12.3 tons/yr of PM10 emissions. The Permittee will perform stack testing to demonstrate compliance with these limits.

With the emission limits listed above, the potential to emit of this project is limited to less than 40 tons/yr for VOC, 25 tons/yr for PM, and 15 tons/yr for PM10. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable to the modification project in 2005.

326 IAC 2-4.1 (New Source Toxic Control)

The potential to emit HAP from this modification is greater than 10 tons per year for a single HAP and greater than 25 tons per year for any combination of HAPs. However, this modification is subject to 40 CFR 63, Subpart JJ (NESHAP for Wood Furniture Manufacturing Operations). Therefore, the requirements of 326 IAC 2-4.1 (MACT) are not applicable to this modification.

326 IAC 5-1 (Opacity Limitations)

This source is located in Dubois County, but it is not located in Bainbridge Township. Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in the permit:

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

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

State Rule Applicability - Spray Booths (SB-40 through SB-55)

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

The potential to emit VOC from each of the new coating booths (SB-40 through SB-55) is greater than 15 pounds per day. Pursuant to 326 IAC 8-2-12, the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

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

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

use HVLP spray guns in these coating booths. Therefore, these booths will be in compliance with the requirement of 326 IAC 8-2-12.

326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)

Since the proposed spray coating booths (SB-40 through SB-55) are subject to the requirements of 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the requirements of 326 IAC 8-1-6 (BACT) are not applicable.

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

This source is located in Dubois County and is not specifically listed in Sections 326 IAC 6-1-8.1 through 326 IAC 6-1-18. The potential to emit from this source is greater than 100 tons/yr, therefore, this source is subject to 326 IAC 6-1-2. Pursuant to 326 IAC 6-1-2(a), particulate matter (PM) from each of the spray coating booths (SB-40 through SB-55) shall not exceed 0.03 grain per dry standard cubic foot (gr/dscf) of exhaust air. The use of dry filters ensures compliance with this limit.

State Rule Applicability - Four (4) Sanding Operations

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

This source is located in Dubois County and is not specifically listed in Sections 326 IAC 6-1-8.1 through 326 IAC 6-1-18. The potential to emit from this source is greater than 100 tons/yr, therefore, this source is subject to 326 IAC 6-1-2. Pursuant to 326 IAC 6-1-2(a), particulate matter (PM) from each of the proposed four (4) sanding operations shall not exceed 0.03 grain per dry standard cubic foot (gr/dscf) of exhaust air. The use of baghouse BH-8 ensures compliance with this limit.

State Rule Applicability - Two (2) Woodworking Cells

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

This source is located in Dubois County and is not specifically listed in Sections 326 IAC 6-1-8.1 through 326 IAC 6-1-18. The potential to emit from this source is greater than 100 tons/yr, therefore, this source is subject to 326 IAC 6-1-2. Pursuant to 326 IAC 6-1-2(a), particulate matter (PM) from each of the proposed two (2) woodworking cells MC-9 and MC-10 shall not exceed 0.03 grain per dry standard cubic foot (gr/dscf) of exhaust air. The use of baghouses BH-9 and BH-10 ensures compliance with this limit.

State Rule Applicability - Ovens

The ovens included in this modification will be powered by electricity. Therefore, no specific state rules are applicable to these ovens.

Testing Requirements

In order to comply with the PSD minor limits (326 IAC 2-2), the Permittee shall perform the following tests:

(a) Within 180 days after initial startup of Line A or Line B, whichever is later, the Permittee shall perform the VOC destruction efficiency test for the existing RTO. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration.

The source performed a VOC destruction efficiency test for the existing RTO on November 18 and 19, 2003 and the results show that the destruction efficiency of the existing RTO is 99%.

(b) Within 180 days after initial startup of Line A or Line B, whichever is later, the Permittee shall perform the capture efficiency tests for spray booths SB-40 through SB-47, in order to determine the averaged VOC capture efficiency for these booths.

(c) Within 60 days after achieving the maximum production, but not later than 180 days after initial startup, the Permittee shall perform testing for PM10 and PM10 emissions from baghouse BH-8 controlling the sanding operations. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration.

(d) Within 60 days after achieving the maximum production, but not later than 180 days after initial startup, the Permittee shall perform testing for PM10 and PM10 emissions from each of the baghouses BH-9 and BH-10 controlling the new woodworking cells MC-9 and MC-10. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration.

Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 40 CFR 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.

Compliance Requirements

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

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

The compliance monitoring requirements applicable to this modification are as below:

1. The spray booths SB-40 through SB-47, which will be controlled by the existing thermal oxidizer, have applicable compliance monitoring conditions as specified below:

   (a) A continuous temperature monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. For purposes of this condition, continuous means no less than once per minute. The output of this system shall be recorded as a 3-hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the 3-hour average temperature of the thermal oxidizer is below 1,400EF. A 3-hour average temperature that is below 1,400EF 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 deviation from this permit.

(b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in this permit, as approved by IDEM.

(c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the 3-hour average temperature of the thermal oxidizer is below the 3-hour average temperature as observed during the compliant stack test.

(d) The Permittee shall determine fan amperage or duct pressure from the most recent valid stack test that demonstrates compliance with limits in this permit, as approved by IDEM.

(e) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C -Compliance Response Plan - Preparation, Implementation, Records, and Reports. A reading that is outside the range as established in the most recent compliant stack test 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 deviation from this permit.

These monitoring conditions are necessary because the thermal oxidizer must operate properly at all times the spray booths SB-40 through SB-47 are in operation to ensure compliance with 326 IAC 2-2 (PSD) and 40 CFR 63, Subpart JJ.

2. The proposed spray booths SB-48 through SB-55, which will be controlled by dry filters, have applicable compliance monitoring conditions as specified below:

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (stacks SBK-48 through SBK-55) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

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

These monitoring conditions are necessary because these spray booths SB-48 through SB-55 must operate properly to ensure compliance with 326 IAC 2-2 (PSD) and 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations).

3. The proposed sanding and woodworking cells, which will be controlled by baghouses BH-8 through BH-10, have applicable compliance monitoring conditions as specified below:

   (a) Visible emissions notations of the baghouse stack exhaust from stacks BHK-8A, BHK-8B, BHK-9, and BHK-10 shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee will record whether emissions are normal or abnormal. 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. 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. 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. 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 deviation from this permit.

   (b) An inspection shall be performed each calendar quarter of all bags controlling the sanding and woodworking operations 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 indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced. In the event that bag failure has been observed:

      (1) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. If operations continue after bag failure is observed and it will be ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

      (2) For single compartment baghouses, 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.

   These monitoring conditions are necessary because the baghouses used to control particulate emissions from the sanding and woodworking cells must operate properly to

ensure compliance with 326 IAC 2-2 (PSD), 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), and 40 CFR 64 (CAM).

Proposed Changes

Bold language has been added, language with a line through it has been deleted.

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 woodworking and surface coating operation manufacturing kitchen and bath cabinets.

Responsible Official:	Vice President Stock Operations
Source Address:	614 West Third Street, Ferdinand, Indiana 47532
Mailing Address:	One MasterBrand Cabinets Drive, P.O. Box 420, Jasper, Indiana 47546
General Source Phone Number:	(812) 482-2527
SIC Code:	2434
County Location:	Dubois
Source Location Status:	**Nonattainment for PM 2.5** Attainment for all **other** criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD**; Minor Source under Nonattainment NSR** Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.3 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:

. . . .

(e) One (1) finishing line, identified as Line A, to be constructed in 2005, consisting of the following facilities:

(1) Two (2) toner spray booths, identified as SB-40 and SB-41, equipped with spray application equipment as described in Condition D.3.7, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOK-1.

(2) Two (2) stain spray booths, identified as SB-44 and SB-45, equipped with spray application equipment as described in Condition D.3.7, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOK-1.

(3) Two (2) sealer booths, identified as SB-48 and SB-50, equipped with spray application equipment as described in Condition D.3.7, using UV curable coatings and dry filters for particulate control, and exhausting through stacks SBK-48 and SBK-50, respectively.

(4) Two (2) topcoat booths, identified as SB-49 and SB-51, equipped with spray application equipment as described in Condition D.3.7, using UV curable coatings and dry filters for particulate control, and exhausting through stacks SBK-49 and SBK-51, respectively.

(5) Two (2) sanding operations, controlled by a baghouse BH-8, and exhausting 22,500 cubic feet per minute through stack BHK-8A and 22,500 cubic feet per minute through stack BHK-8B.

(f) One (1) finishing line, identified as Line B, to be constructed in 2005, consisting of the following facilities:

(1) Two (2) toner spray booths, identified as SB-42 and SB-43, equipped with spray application equipment as described in Condition D.3.7, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOK-1.

(2) Two (2) stain spray booths, identified as SB-46 and SB-47, equipped with spray application equipment as described in Condition D.3.7, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOK-1.

(3) Two (2) sealer booths, identified as SB-52 and SB-54, equipped with spray application equipment as described in Condition D.3.7, using UV curable coatings and dry filters for particulate control, and exhausting through stacks SBK-52 and SBK-54, respectively.

(4) Two (2) topcoat booths, identified as SB-53 and SB-55, equipped with spray application equipment as described in Condition D.3.7, using UV curable coatings and dry filters for particulate control, and exhausting through stacks SBK-53 and SBK-55, respectively.

(5) Two (2) sanding operations, controlled by a baghouse BH-8, and exhausting 22,500 cubic feet per minute through stack BHK-8A and 22,500 cubic feet per minute through stack BHK-8B.

(g) One (1) woodworking cell, identified as MC-9, to be constructed in 2005, controlled by a 61,000 cubic feet per minute baghouse, identified as BH-9, and exhausting either internally or to stack BHK-9.

(h) One (1) woodworking cell, identified as MC-10, to be constructed in 2005, controlled by a 35,000 cubic feet per minute baghouse, identified as baghouse BH-10, and exhausting either internally or to stack BHK-10.

A.4 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):

...

(g) ~~Three (3)~~ **Two (2)** end coat booths, identified as ECB-1, ~~,~~ **and** ECB-2, ~~and ECB-3~~, each constructed in 1994, each with particulate emissions controlled by a dry filter, and exhausting through stacks EC1, ~~,~~ **and** EC2, ~~and EC3~~, respectively [326 IAC 6-1-2].

...

~~(l) One (1) UV coating line, identified as UVC27 and constructed in 2003, with a maximum operating capacity of 2,170 square feet per hour, using a UV spray coating application method.~~

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or

information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Conventional Surface Coating Line and Electrostatic Finishing Line

...

Insignificant Activities:

...

(f) ~~Three (3)~~ **Two (2)** end coat booths, identified as ECB-1~~,~~ **and** ECB-2~~, and ECB-3~~, each constructed in 1994, each with particulate emissions controlled by a dry filter, and exhausting through stacks EC1~~,~~ **and** EC2, ~~and EC3~~, respectively [326 IAC 6-1-2].

...

~~(k) One (1) UV coating line, identified as UVC27 and constructed in 2003, with a maximum operating capacity of 2,170 square feet per hour, using a UV spray coating application method.~~

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

D.1.1 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply, to the conventional surface coating line, the electrostatic finishing line, the end coat booths (ECB-1~~,~~ **and** ECB-2~~, ECB-3~~), the UV Sticklines (WC-31) and UVC-29), the UV Flatline (UVC-30), **and** the UV cured vacuum coater booth (UVC-26)~~, and the UV coating line (UVC-27)~~, except when otherwise specified in 40 CFR 63, Subpart JJ.

D.1.6 Particulate Matter Emission Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Limitations; Particulate Emission Limitations), the particulate matter emissions from the conventional surface coating line (TB-12, STB-13, SB-14, TCB-15, PB-16, and PB-17), the electrostatic finishing line (TB-2, STB-3, STB-4, SB-7, SB-8, TCB-9, TCB-10, SB-6, and TCB-18), the end coat booths (ECB-1~~,~~ **and** ECB-2, ~~and ECB3~~), the UV Sticklines (UVC-31 and UVC-29), the UV Flatline (UVC-30), the cured vacuum coater booth (UVC-26), ~~the UV coating line (UVC-27),~~ spray booths (STB-19 and STB-20), and the three (3) natural gas fired ovens (Ou5, Ou11, and Ou23), shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

D.1.10 Particulate Control

In order to comply with Condition D.1.6, the dry filters for particulate control shall be in operation and control emissions from the conventional surface coating line, the electrostatic finishing line, the end coat booths (ECB-1~~,~~ **and** ECB-2, ~~and ECB3~~) and the two spray booths (STB-19 and STB-20) at all times that these lines are in operation.

D.1.16 Reporting Requirements

...

(d) The reports required in (b) and (c) 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 4620**4**~~6-6015~~

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)]:

...

(g) One (1) woodworking cell, identified as MC-9, to be constructed in 2005, controlled by a 61,000 cubic feet per minute baghouse, identified as BH-9, and exhausting either internally or to stack BHK-9.

(h) One (1) woodworking cell, identified as MC-10, to be constructed in 2005, controlled by a 35,000 cubic feet per minute baghouse, identified as baghouse BH-10, and exhausting either internally or to stack BHK-10.

Insignificant Activities*:*

(a) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].

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

D.2.1 PSD Minor Limit [326 IAC 2-2]

...

(b) In order to make the requirements of 326 IAC 2-2 (PSD) not applicable, the Permittee shall comply with the following emission limitations for woodworking cells MC-9 and MC-10:

Process	Baghouse ID	PM Emission Limit (lbs/hr)	PM10 Emission Limit (lbs/hr)
Woodworking Cell MC-9	BH-9	2.00	1.20
Woodworking Cell MC-10	BH-10	1.00	0.70

Combined with the emissions from the emission units listed in Section D.3, the PM/PM10 emissions from the modification project in 2005 are limited to less than 15 tons/yr for PM10 and less than 25 tons/yr for PM. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.

D.2.2 Particulate Matter Emission Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Limitations; Particulate Emission Limitations), the particulate matter emissions from the woodworking operations (MC-1, MC-2, MC-3, MC-4, MC-5, MC-6, ~~and~~ MC-7**, MC-9, and MC-10**) shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

D.2.3 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 the baghouses controlling woodworking cells MC-2, MC-3, MC-5, MC-6, ~~and~~ MC-7**, MC-9, and MC-10**.

D.2.4 Particulate Matter (PM)

In order to comply with Conditions D.2.1 and D.2.2, the baghouses for PM and PM10 control shall be in operation and control emissions from the woodworking facilities (MC-3, MC-5, MC-6, ~~and~~ MC-7**, MC-9, and MC-10**) at all times that the woodworking facilities are in operation.

D.2.5 Testing Requirements [326 IAC 2-1.1-11] [326 IAC 2-2]

In order to demonstrate compliance with Condition D.2.1(b), the Permittee shall perform PM and PM10 emission testing for baghouses BH-9 and BH-10 controlling the woodworking cells MC-9 and MC-10, within 60 days after achieving the maximum production, but not later than 180 days after initial startup, utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.2.5~~6~~ Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the woodworking operation**s** (MC-3, MC-5, MC-6, ~~and~~ MC-7**, MC-9, and MC-10**) 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. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be repaired or replaced.

D.2.6~~7~~ Visible Emissions Notations

(a) Daily visible emission notations of the woodworking stack exhaust**s** (~~MC-3, MC-5, MC-6, and MC-7~~ **stacks BHK-3, BHK-5, BHK-6, BHK-7, BHK-9, and BHK-10**) shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

...

D.2.7~~8~~ Broken or Failed Bag Detection

...

D.2.8~~9~~ Record Keeping Requirements

(a) To document compliance with Conditions D.2.1, D.2.2 and D.2.6~~7~~, the Permittee shall maintain records of daily visible emission notations of the baghouse exhausts when venting to the atmosphere.

(b) To document compliance with Condition D.2.5~~6~~, the Permittee shall maintain records of the results of the inspections required under Condition D.2.5~~6~~ and the dates the vents are redirected.

...

SECTION D.3 FACILITY OPERATION CONDITIONS

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

(e) One (1) finishing line, identified as Line A, to be constructed in 2005, consisting of the following facilities:

(1) Two (2) toner spray booths, identified as SB-40 and SB-41, equipped with spray application equipment as described in Condition D.3.7, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOK-1.

(2) Two (2) stain spray booths, identified as SB-44 and SB-45, equipped with spray application equipment as described in Condition D.3.7, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOK-1.

(3) Two (2) sealer booths, identified as SB-48 and SB-50, equipped with spray application equipment as described in Condition D.3.7, using UV curable coatings and dry filters for particulate control, and exhausting through stacks SBK-48 and SBK-50, respectively.

(4) Two (2) topcoat booths, identified as SB-49 and SB-51, equipped with spray application equipment as described in Condition D.3.7, using UV curable coatings and dry filters for particulate control, and exhausting through stacks SBK-49 and SBK-51, respectively.

(5) Two (2) sanding operations, controlled by a baghouse BH-8, and exhausting 22,500 cubic feet per minute through stack BHK-8A and 22,500 cubic feet per minute through stack BHK-8B.

(f) One (1) finishing line, identified as Line B, to be constructed in 2005, consisting of the following facilities:

(1) Two (2) toner spray booths, identified as SB-42 and SB-43, equipped with spray application equipment as described in Condition D.3.7, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOK-1.

(2) Two (2) stain spray booths, identified as SB-46 and SB-47, equipped with spray application equipment as described in Condition D.3.7, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOK-1.

(3) Two (2) sealer booths, identified as SB-52 and SB-54, equipped with spray application equipment as described in Condition D.3.7, using UV curable coatings and dry filters for particulate control, and exhausting through stacks SBK-52 and SBK-54, respectively.

(4) Two (2) topcoat booths, identified as SB-53 and SB-55, equipped with spray application equipment as described in Condition D.3.7, using UV curable coatings and dry filters for particulate control, and exhausting through stacks SBK-53 and SBK-55, respectively.

(5) Two (2) sanding operations, controlled by a baghouse BH-8, and exhausting 22,500 cubic feet per minute through stack BHK-8A and 22,500 cubic feet per minute through stack BHK-8B.

(**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 PSD Minor Limits [326 IAC 2-2]

In order to make the requirements of 326 IAC 2-2 (PSD) not applicable, the Permittee shall comply with the following:

(a) The emissions from spray booths SB-40 through SB-47 shall be controlled by a RTO with a destruction efficiency of at least 95%.

(b) The VOC emission increase from the proposed modification project in 2005 shall be limited to less than 40 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This condition becomes effective after the operation of finishing lines A or B. The VOC emissions from this project shall be calculated as follows:

VOC Emission Increase (tons/yr) = (1 - 0.95 x Ecap) $\sum_{i=1}^{12} X + \sum_{i=1}^{12} Y + \sum_{i=1}^{12} Z - K$

Where:

Ecap = Averaged Capture Efficiency for Spray Booths SB-40 through SB-47, which will be determined Condition D.3.9.
i = Month.
X = Total monthly VOC Input to Spray Booths SB-40 through SB-47.
Y = Total monthly VOC Input to Spray Booths SB-48 through SB-55.
Z = Total monthly VOC emissions from existing electrostatic finishing line as determined in Condition D.1.4(b).
K = Baseline actual VOC emissions for the existing the electrostatic finishing line (= 291 tons/yr).

(c) The PM/PM10 emissions from spray booths SB-40 through SB-55 shall not exceed 2.43 tons/yr.

(d) The PM emissions from baghouse BH-8 shall not exceed 1.0 lbs/hr.

(e) The PM10 emissions from baghouse BH-8 shall not exceed 0.9 lbs/hr.

(f) The electrostatic finishing line in Section D.1 shall be removed before initial startup of finishing Line A or Line B, whichever is later.

Combined with the PM/PM10 emissions from the new woodworking cells MC-9 and MC-10 in Section D.2, the potential to emit of the modification project in 2005 is limited to less than 40 tons/year for VOC, less than 25 tons/year for PM, and less than 15 tons/year for PM10. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable to the modification project in 2005.

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

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart JJ.

D.3.3 Wood Furniture Manufacturing Operations NESHAP [326 IAC 20-14-1] [40 CFR Part 63, Subpart JJ]

(a) The wood furniture manufacturing operations are subject to 40 CFR Part 63, Subpart JJ, which is incorporated by reference as 326 IAC 20-14-1. Spray booths

SB-40 through SB-55 shall comply with the requirements under this subpart upon startup of these units.

(b) Pursuant to 40 CFR 63, 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 one (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 of 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. All other thinners have a ten percent (10.0%) 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 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 other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) 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.

D.3.4 Work Practice Standards [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 sixty (60) calendar days after the compliance date. 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:

(a) Operator training course.
(b) Leak inspection and maintenance plan.
(c) Cleaning and washoff solvent accounting system.
(d) Chemical composition of cleaning and washoff solvents.
(e) Spray booth cleaning.
(f) Storage requirements.

(g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
(h) Line cleaning.
(i) Gun cleaning.
(j) Washoff operations.
(k) Formulation assessment plan for finishing operations.

D.3.5 Particulate Matter Emission Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Limitations; Particulate Emission Limitations), the particulate matter emissions from each of the spray booths SB-40 through SB-55 and the sanding operations shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

D.3.6 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), spray booths SB-40 through SB-55 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.3.7 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 any control devices.

Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]

D.3.8 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC usage and HAP content limitations contained in Conditions D.3.1(b) and D.3.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.3.9 Testing Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)] [40 CFR 63]

(a) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 40 CFR 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.

(b) In order to demonstrate compliance with Condition D.3.1, the Permittee shall perform VOC destruction efficiency test for the existing RTO within 180 days after initial startup of Line A or Line B, whichever is later, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years

from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

(c) In order to demonstrate compliance with Condition D.3.1, the Permittee shall perform VOC capture efficiency testing for spray booths SB-40 through SB-47, within 180 days after initial startup of Line A or Line B, whichever is later, utilizing methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C - Performance Testing.

(d) In order to demonstrate compliance with Conditions D.3.1(d) and (e), the Permittee shall perform PM and PM10 emission testing for baghouse BH-8 controlling the sanding operations, within 60 days after achieving the maximum production, but not later than 180 days after initial startup, utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.3.10 VOC Control

In order to comply with Conditions D.3.1 and D.3.3, the existing thermal oxidizer shall be in operation and control emissions from the spray booths SB-40 through SB-47 at all times that these units are in operation.

D.3.11 PM and PM10 Control

(a) In order to comply with Conditions D.3.1(c) and D.3.5, dry filters shall be in operation and control emissions from the spray booths SB-40 through SB-55 at all times that these units are in operation.

(b) In order to comply with Conditions D.3.1(d), D.3.1(e), and D.3.5, baghouse BH-8 shall be in operation and control particulate emissions from the sanding operations at all times that these units are in operation.

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

D.3.12 Thermal Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer (RTO) for measuring operating temperature. For the purpose of this condition, continuous means no less than once per minute. The output of this system shall be recorded as a 3-hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature of 1,400EF.

(b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Condition D.3.1(a), as approved by IDEM.

(c) On and after the date the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature as observed during the compliant stack test.

D.3.13 Parametric Monitoring

(a) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with limits in Condition D.3.1(a), as approved by IDEM.

(b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the approved stack test

results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.

D.3.14 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks SBK-48 through SBK-55 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

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

D.3.15 Visible Emissions Notations [40 CFR 64]

(a) Daily visible emission notations of the baghouse stack exhausts (stacks BHK-8A and BHK-8B) shall be performed during normal daylight operations. 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 deviation from this permit.

D.3.16 Baghouse Inspections [40 CFR 64]

An inspection shall be performed each calender quarter of the baghouse controlling the exhausts from the sanding operations. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.3.17 Broken or Failed Bag Detection [40 CFR 64]

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.3.18 Record Keeping Requirements

(a) To document compliance with Condition D.3.1(b), the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limitations established Condition D.3.1(b)

(1) The VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The total monthly VOC usage for spray booths SB-40 through SB-47.

(4) The total monthly VOC usage for spray booths SB-48 through SB-55.

(5) The total monthly VOC emissions from the existing electrostatic finishing line as determined in Condition D.1.4 (b).

(6) The date which the existing electrostatic finishing line is shutdown and removed.

(b) To document compliance with Condition D.3.1(f), the Permittee shall maintain records of the following dates:

(1) The date when the finishing line A starts operation.

(2) The date when the finishing line B starts operation.

(3) The date when the existing electrostatic finishing line is shutdown and removed.

(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 HAP 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 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.3.4, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.

(e) To document compliance with Condition D.3.12, the Permittee shall maintain continuous temperature records for the thermal oxidizer and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.

(f) To document compliance with Condition D.3.13, the Permittee shall maintain daily records of the duct pressure or fan amperage for the thermal oxidizer.

(g) To document compliance with Condition D.3.14, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(h) To document compliance with Condition D.3.15, the Permittee shall maintain daily records of visible emission notations of the stacks BHK-8A and BHK-8B.

(i) To document compliance with Condition D.3.16, the Permittee shall maintain records of the results of the inspections required under Condition D.3.16.

(j) To document compliance with Condition D.3.7, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance

Plan.

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

D.3.19 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Condition D.3.1(b) 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) Within thirty (30) days after the existing electrostatic finishing line is removed, the Permittee shall notify IDEM, OAQ the dates required under Condition D.3.18(b).

D.3.20 Reporting Requirements

(a) An Initial Compliance Report to document compliance with Condition D.3.4 and the Certification form, shall be submitted within sixty (60) days following the startup. The Initial Compliance Report must include data from the entire month that the compliance date falls.

(b) A semi-annual Continuous Compliance Report to document compliance with Condition D.3.4 and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported.

For the first year following the compliance date, the six (6) month period shall begin on the first day of the month after which the operation commences.

(c) If the RTO is used to demonstrate compliance with 40 CFR 63, Subpart JJ, the excess emissions and continuous monitoring system performance report and summary report shall be submitted as required in 40 CFR 63.807(d). This report is not necessary if the RTO is not used to demonstrate compliance.

(d) Following the first year of reporting, the semi-annual Continuous Compliance Report shall be submitted on a calendar year basis with the reporting periods ending June 30 and December 31.

(e) The reports required in (a), (b) and (c) of this condition shall be submitted to:

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

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

D.3.21 Reporting Requirements [326 IAC 2-2]

In order to demonstrate compliance with Condition D.3.1(f), within thirty (30) days after shutting down the existing electrostatic finishing line, the Permittee shall notify IDEM, OAQ the date when the existing electrostatic finishing line is shutdown and removed.

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

Part 70 Quarterly Report

Source Name: MasterBrand Cabinets, Inc. - Ferdinand Operations
Source Address: 614 West Third Street, Ferdinand, Indiana 47532
Mailing Address: One MasterBrand Cabinets Drive, P.O. Box 420, Jasper, Indiana 47546
Part 70 Permit No.: T037-5930-00051
Facility: Spray Booths SB-40 through SB-55
Parameter: VOC emissions from the modification project in 2005.
Limit: The VOC emission increase from the proposed modification project shall be limited to less than 40 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The VOC emission increase from this project shall be calculated as follows:

$$\text{VOC Emission Increase (tons/yr)} = (1 - 0.95 \times Ecap) \sum_{i=1}^{12} X + \sum_{i=1}^{12} Y + \sum_{i=1}^{12} Z - K$$

Where:
- **Ecap =** Averaged Capture Efficiency for Spray Booths SB-40 through SB-47, which will be determined Condition D.3.9.
- **i =** Month
- **X =** Total monthly VOC Input to Spray Booths SB-40 through SB-47.
- **Y =** Total monthly VOC Input to Spray Booths SB-48 through SB-55.
- **Z =** Total monthly VOC emissions from existing electrostatic finishing line as determined in Condition D.1.4(b).
- **K =** Baseline actual VOC emissions for the existing the electrostatic finishing line (= 291 tons/yr).

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.
9 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.

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 037-20223-00051. The operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 037-20407-00051.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to Technical Support Document (TSD) for a Part 70 Significant Source Modification and a Part 70 Significant Permit Modification

Source Background and Description

Source Name:	MasterBrand Cabinets, Inc. - Ferdinand Operations
Source Location:	614 West Third Street, Ferdinand, Indiana 47532
County:	Dubois
SIC Code:	2434
Operation Permit No.:	T037-5930-00051
Operation Permit Issuance Date:	February 20, 2004
Significant Source Modification No.:	037-20223-00051
Significant Permit Modification No.:	037-20407-00051
Permit Reviewer:	ERG/YC

On July 14, 2005, the Office of Air Quality (OAQ) had a notice published in the Herald, Jasper, Indiana, stating that MasterBrand Cabinets, Inc. - Ferdinand Operations had applied for a Part 70 Significant Source Modification and a Part 70 Significant Permit Modification to replace the existing electrostatic finishing line with two (2) new finishing lines with control. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On July 29, 2005, MasterBrand Cabinets, Inc. - Ferdinand Operations submitted comments on the proposed Significant Source Modification and Significant Permit Modification. The summary of the comments is as follows (bolded language has been added, the language with a line through it has been deleted):

Comment 1:

The facility descriptions for the proposed Finishing Lines A and B found in Sections A.3 and D.3 identify the spray booth and state that it is equipped with "spray application equipment as described in Condition D.3.7...". The listed condition is incorrect and should reference Condition D.3.6. Additionally, the descriptions found in the Technical Support Document state that the booths are "equipped with spray application equipment as described in 326 IAC 8-2-12". These descriptions should also be revised to reference Condition D.3.6.

Response to Comment 1:

Condition D.3.6 specifies the application methods that the Permittee is allowed to use under 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating). Therefore, the unit description for the spray booths in Conditions A.3 (e) and (f), and Section D.3 have been corrected as follows:

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

. . .

(e) One (1) finishing line, identified as Line A, to be constructed in 2005, consisting of the following facilities:

(1) Two (2) toner spray booths, identified as SB-40 and SB-41, equipped with spray application equipment as described in Condition D.3.~~7~~**6**, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOK-1.

(2) Two (2) stain spray booths, identified as SB-44 and SB-45, equipped with spray application equipment as described in Condition D.3.~~7~~**6**, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOK-1.

(3) Two (2) sealer booths, identified as SB-48 and SB-50, equipped with spray application equipment as described in Condition D.3.~~7~~**6**, using UV curable coatings and dry filters for particulate control, and exhausting through stacks SBK-48 and SBK-50, respectively.

(4) Two (2) topcoat booths, identified as SB-49 and SB-51, equipped with spray application equipment as described in Condition D.3.~~7~~**6**, using UV curable coatings and dry filters for particulate control, and exhausting through stacks SBK-49 and SBK-51, respectively.

. . .

(f) One (1) finishing line, identified as Line B, to be constructed in 2005, consisting of the following facilities:

(1) Two (2) toner spray booths, identified as SB-42 and SB-43, equipped with spray application equipment as described in Condition D.3.~~7~~**6**, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOK-1.

(2) Two (2) stain spray booths, identified as SB-46 and SB-47, equipped with spray application equipment as described in Condition D.3.~~7~~**6**, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOK-1.

(3) Two (2) sealer booths, identified as SB-52 and SB-54, equipped with spray application equipment as described in Condition D.3.~~7~~**6**, using UV curable coatings and dry filters for particulate control, and exhausting through stacks SBK-52 and SBK-54, respectively.

(4) Two (2) topcoat booths, identified as SB-53 and SB-55, equipped with spray application equipment as described in Condition D.3.~~7~~**6**, using UV curable coatings and dry filters for particulate control, and exhausting through stacks SBK-53 and SBK-55, respectively.

. . .

SECTION D.3 FACILITY OPERATION CONDITIONS

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

(e) One (1) finishing line, identified as Line A, to be constructed in 2005, consisting of the following facilities:

(1) Two (2) toner spray booths, identified as SB-40 and SB-41, equipped with spray application equipment as described in Condition D.3.~~7~~**6**, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOK-1.

(2) Two (2) stain spray booths, identified as SB-44 and SB-45, equipped with spray application equipment as described in Condition D.3.~~7~~**6**, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOK-1.

(3) Two (2) sealer booths, identified as SB-48 and SB-50, equipped with spray application equipment as described in Condition D.3.~~7~~**6**, using UV curable coatings and dry filters for particulate control, and exhausting through stacks SBK-48 and SBK-50, respectively.

(4) Two (2) topcoat booths, identified as SB-49 and SB-51, equipped with spray application equipment as described in Condition D.3.~~7~~**6**, using UV curable coatings and dry filters for particulate control, and exhausting through stacks SBK-49 and SBK-51, respectively.

(5) Two (2) sanding operations, controlled by a baghouse BH-8, and exhausting 22,500 cubic feet per minute through stack BHK-8A and 22,500 cubic feet per minute through stack BHK-8B.

(f) One (1) finishing line, identified as Line B, to be constructed in 2005, consisting of the following facilities:

(1) Two (2) toner spray booths, identified as SB-42 and SB-43, equipped with spray application equipment as described in Condition D.3.~~7~~**6**, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOK-1.

(2) Two (2) stain spray booths, identified as SB-46 and SB-47, equipped with spray application equipment as described in Condition D.3.~~7~~**6**, using dry filters for particulate control and using the existing RTO for VOC control, and exhausting through stack RTOK-1.

(3) Two (2) sealer booths, identified as SB-52 and SB-54, equipped with spray application equipment as described in Condition D.3.~~7~~**6**, using UV curable coatings and dry filters for particulate control, and exhausting through stacks SBK-52 and SBK-54, respectively.

(4) Two (2) topcoat booths, identified as SB-53 and SB-55, equipped with spray application equipment as described in Condition D.3.~~7~~**6**, using UV curable coatings and dry filters for particulate control, and exhausting through stacks SBK-53 and SBK-55, respectively.

(5) Two (2) sanding operations, controlled by a baghouse BH-8, and exhausting 22,500 cubic feet per minute through stack BHK-8A and 22,500 cubic feet per minute through stack BHK-8B.

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

No changes have been made to the TSD because the OAQ prefers that the Technical Support

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

Comment 2:

The Permittee stated that IDEM has had established guidance for preventive maintenance and compliance monitoring requirements in place since the start of issuing the 1990 CAA permits in Indiana. This guidance does not consider compliance monitoring requirements necessary if the allowable emissions of PM/PM10 are less than 10 lbs/hour when using a control device. As described in the permit, the allowable PM/PM10 emissions for baghouses BH-8 through BH-10 and spray booths SB40 through SB55 are listed in the table below:

Baghouse ID	Permit Condition	PM Emission Limit (lbs/hr)	PM10 Emission Limit (lbs/hr)
BH-9	D.2.1	2.0	1.2
BH-10	D.2.1	1.0	0.7
BH-8	D.3.1	1.0	0.9
Spray Booths SB40-SB55	D.3.1	0.55	0.55

The Permittee stated that the allowable PM emissions are less than 10 lbs/hour for each of these units. Therefore, the corresponding compliance monitoring conditions (Conditions D.2.6 (Baghouse Inspections), D.2.7 (Visible Emission Notations), D.3.14 (Monitoring), D.3.15 (Visible Emissions Notations), and D.3.16 (Baghouse Inspections)) for the above units should be removed from the permit.

Response to Comment 2:

The guidance for preventive maintenance and compliance monitoring requirements developed by IDEM is a reference when designing permit conditions. This guidance does not function as state rules. Compliance monitoring conditions for the spray booths SB40 through SB55, such as visible notations and inspections, are required in order to demonstrate continuous compliance with the permit requirements, pursuant to 326 IAC 2-7-5(3). Visible emission notations are used to indicate compliance with 326 IAC 5-1 (Opacity Limitations) and 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations). Since process upsets can occur suddenly and without warning, possibly causing a violation of 326 IAC 5-1 or 326 IAC 6-1-2(a), the OAQ believes that once per shift notations would be necessary for the Permittee to certify continuous compliance for these spray booths.

As stated in the Technical Support Document, the proposed sanding and woodworking cells MC-9 and MC-10 are considered pollutant-specific emissions units and are subject to the requirements of 40 CFR 64(CAM). In the CAM form received on August 23, 2005, the Permittee proposed to perform daily visible emission notations and quarterly inspections for baghouses BH-8 through BH-10 as the CAM plan for the proposed sanding and woodworking cells MC-9 and MC-10. Therefore, the visible emission notation requirements in Conditions D.2.6 and D.3.15 and the baghouse inspection requirements in Conditions D.2.7 and D.3.16 are retained. For clarification purposes, Conditions D.2.6 and D.2.7 have been revised as follows to indicate that these conditions are required pursuant to 40 CFR 64 (CAM):

D.2.6 Baghouse Inspections **[40 CFR 64]**

...

D.2.7 Visible Emissions Notations **[40 CFR 64]**

...

Appendix A: Emission Calculations
PM10 and PM10 Emissions
From the Sanding Operations and the Woodworking Operations

Company Name: MasterBrand Cabinets, Inc. - Ferdinand Operations
Address : 614 West Third St., Ferdinand, IN 47532
SSM: 037-20223-00051
Reviewer: ERG/YC
Date: June 3, 2005

Process	Control Device ID	Control Device	Outlet Grain Loading (gr/dscf)*	Maximum Air Flow Rate (scfm)	Control Efficiency (%)	PTE of PM/PM10 after Control (lbs/hr)	PTE of PM/PM10 after Control (tons/yr)	PTE of PM/PM10 before Control (lbs/hr)	PTE of PM/PM10 before Control (tons/yr)
Sanding Operations	BH-8	Baghouse	0.002161	45,000	99.0%	0.83	3.65	83.4	365
Woodworking Cell MC-9	BH-9	Baghouse	0.002161	61,000	99.0%	1.13	4.95	113	495
Woodworking Cell MC-10	BH-10	Baghouse	0.002161	35,000	99.0%	0.65	2.84	64.8	284
Total							**11.4**		**1,144**

Assume all PM emissions equal PM10 emissions.

* These are the grin loading limits proposed by the Permittee, which are based on the test results for similar units.

Methodology

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

Appendix A: Emission Calculations
PM/PM10 Emissions
From Spray Booths SB-40 through SB-55

Company Name: MasterBrand Cabinets, Inc. - Ferdinand Operations
Address : 614 West Third St., Ferdinand, IN 47532
SSM: 037-20223-00051
Reviewer: ERG/YC
Date: June 3, 2005

Type of Booths	Booth ID	Number of Booths	Max. Coating Usage (gal/hr/booth)	Coating Solid Content (lbs/gal)	Transfer Efficiency* (%)	PTE of PM/PM10 before Control (tons/yr)	Control Device	Control Efficiency* (%)	PTE of PM/PM10 after Control (tons/yr)
Toner Booths	SB-40, 41, 42, 43,	4	5.87	0.074	60.0%	3.04	Dry Filters & RTO	99.5%	0.02
Stain Booths	SB-44, 45, 46, 47	4	4.94	0.038	60.0%	1.31	Dry Filters & RTO	99.5%	0.01
Sealer Booths	SB-48, 50, 52, 54	4	0.58	9.170	95.0%	4.68	Dry Filters	95.0%	0.23
Topcoat-Back Booths	SB-49, 53	2	0.84	9.170	95.0%	3.37	Dry Filters	95.0%	0.17
Topcoat-Front Booths	SB-51, 55	2	4.10	3.730	70.0%	40.2	Dry Filters	95.0%	2.01
Total						**52.6**			**2.43**

* This information was provided by the source based on the manufacturer's specifications. Booths SB-40 through SB-47 are spary booths.
Booths SB-48 through SB-55 are UV coaters which use high solid content coatings and have high transfer and control efficiencies.

METHODOLOGY

PTE of PM/PM10 before Control (tons/yr) = Number of Booths x Max. Coating Usage (gal/hr/booth) x Coating Solid Content (lbs/gal) x (1-Transfer Efficiency) x 8760 hrs/yr x 1 ton/2000 lbs

PTE of PM/PM10 after Control (tons/yr) = PTE of PM/PM10 before Control (tons/yr) x (1-Control Efficiency)