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

*Mitchell E. Daniels, Jr.*
*Governor*

*Thomas W. Easterly*
*Commissioner*

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

TO: Interested Parties / Applicant

DATE: September 18, 2007

RE: Nickell Moulding Company, Inc. / 039-20391-00174

FROM: Nisha Sizemore
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, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) 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.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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:



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

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

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

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

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

Enclosures
FNTVOP.dot 03/23/06

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.in.gov/idem

# Part 70 Operating Permit Renewal
# OFFICE OF AIR QUALITY

## Nickell Moulding Company, Inc.
## 3015 Mobile Drive
## Elkhart, Indiana 46514

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

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

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

| Operation Permit No.: T 039-20391-00174 | |
|---|---|
| Issued by:<br>*Original document signed by*<br>Nisha Sizemore, Chief<br>Permits Branch<br>Office of Air Quality | Issuance Date: September 18, 2007<br><br>Expiration Date: September 18, 2012 |

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## SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a wood moulding manufacturing source.

| | |
|---|---|
| Source Address: | 3015 Mobile Drive, Elkhart, Indiana 46514 |
| Mailing Address: | P.O. Box 1502, Elkhart, Indiana 46515 |
| General Source Phone Number: | 574-264-3129 |
| SIC Code: | 2431 |
| County Location: | Elkhart |
| Source Location Status: | Nonattainment for 8-hour ozone standard<br>Attainment for all other criteria pollutants |
| Source Status: | Part 70 Operating Permit Program<br>Minor Source, under PSD Rules<br>Minor Source, under Emission Offset Rules<br>Major Source, Section 112 of the Clean Air Act<br>Not 1 of 28 Source Categories |

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

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

(a) One (1) woodworking operation, identified as WW1, equipped with a baghouse dust collector, identified as DC1, for particulate control, exhausted to Stack DC1S only when the outside ambient air temperature exceeds 85°F, installed in 1994, capacity: 5.2 tons of wood boards per hour.

(b) One (1) woodworking operation, identified as WW2, equipped with a baghouse dust collector, identified as DC2, exhausted to Stack DC2S only when the outside ambient air temperature exceeds 85°F, installed in 1995, capacity: 5.2 tons of wood boards per hour.

(c) One (1) woodworking operation, identified as WW3, equipped with a baghouse dust collector, identified as DC3, exhausted to Stack DC3S, installed in 2004, capacity: 29.7 tons of wood panels per hour.

(d) One (1) portable striper machine, identified as striper machine 1, equipped with a flow-coat applicator, installed in 1994, capacity: 7,500 board feet of wood per hour. Under NESHAP 40 CFR 63, Subparts JJ and QQQQ, this facility is considered part of an incidental wood furniture manufacturer and is a wood building products surface coating facility.

(e) One (1) striper machine, identified as striper machine 2, equipped with a flow-coat applicator, installed in 1995, capacity: 7,500 board feet of wood per hour. Under NESHAP 40 CFR 63, Subparts JJ and QQQQ, this facility is considered part of an incidental wood furniture manufacturer and is a wood building products surface coating facility.

(f) Four (4) high-volume low-pressure spraying machines, identified as spray machines 1, 2, 3 and 4, each equipped with dry filters for particulate control, exhausted to Stacks E6, E7, E8 and E9, respectively, spray machine 1 installed in 1995 and spray machines 2, 3 and 4

installed in 1994, capacity: 7,500 board feet of wood per hour, each. Under NESHAP 40 CFR 63, Subparts JJ and QQQQ, these facilities are considered part of an incidental wood furniture manufacturer and are wood building products surface coating facilities.

(g) One (1) flood coat vacuum coater machine, identified as stainer 1, exhausted to Stack E13, installed in 1994, capacity: 7,500 board feet of wood per hour. Under NESHAP 40 CFR 63, Subparts JJ and QQQQ, this facility is considered part of an incidental wood furniture manufacturer and is a wood building products surface coating facility.

(h) One (1) flood coat stainer machine, identified as stainer 2, exhausted to Stack E12, installed in 1994, capacity: 7,500 board feet of wood per hour. Under NESHAP 40 CFR 63, Subparts JJ and QQQQ, this facility is considered part of an incidental wood furniture manufacturer and is a wood building products surface coating facility.

(i) One (1) stain hand wiping area, identified as stain wipe 1, installed in 1994, capacity: 7,500 board feet of wood per hour. Under NESHAP 40 CFR 63, Subparts JJ and QQQQ, this facility is considered part of an incidental wood furniture manufacturer and is a wood building products surface coating facility.

(j) One (1) patina spray machine, identified as PSM1, with high-volume low-pressure spray applicators and dry filters for particulate control, exhausted to Stack E14, installed in 1995, capacity: 7,500 board feet of wood per hour. Under NESHAP 40 CFR 63, Subparts JJ and QQQQ, this facility is considered part of an incidental wood furniture manufacturer and is a wood building products surface coating facility.

(k) One (1) high-volume low-pressure spray repair booth, identified as spray booth 1, equipped with dry filters for particulate control, exhausted to Stack E14, installed in 1994, capacity: 7,500 board feet of wood per hour. Under NESHAP 40 CFR 63, Subparts JJ and QQQQ, this facility is considered part of an incidental wood furniture manufacturer and is a wood building products surface coating facility.

A.3 Specifically Regulated 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 which are specifically regulated, 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) Grinding and machining operations controller with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations including:

(1) Two (2) kerf machines, identified as K1 and K2, equipped with a portable dust collector, identified as DC4, capacity: 150 pounds of wood per hour total. [326 IAC 6-3-2]

(2) One (1) portable dust collector, identified as DC5, utilized as a vacuum cleaner in the woodworking operation, identified as WW1, capacity: 10,400 pounds of wood per hour. [326 IAC 6-3-2]

(3) Four (4) tool room grinders, identified as GR1 through GR4, equipped with a portable dust collector, identified as DC6, capacity: 250 pounds of wood per hour total. [326 IAC 6-3-2]

(4) One (1) scuff sander, identified as SS1, for the U-V coating line, equipped with a portable dust collector, identified as DC7, capacity: 1,040 pounds of wood per hour. [326 IAC 6-3-2]

(5) One (1) scuff sander, identified as SS2, for the spray machine 1, equipped with a portable dust collector, identified as DC8, capacity: 1,040 pounds of wood per hour. [326 IAC 6-3-2]

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

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

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

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

## SECTION B GENERAL CONDITIONS

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

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

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

(a) This permit, T 039-20391-00174, 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 of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal 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.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 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.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 the "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. One (1) certification may cover multiple forms in one (1) submittal.

(c) The "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. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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 maintain and implement Preventive Maintenance Plans (PMPs) 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.

(b) 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 PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1 (34).

(c) 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 and Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)

Facsimile Number: 317-233-6865
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877

(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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, 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 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] [326 IAC 2-7-10.5]

(a) All terms and conditions of permits established prior to T 039-20391-00174 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised under 326 IAC 2-7-10.5, or

(3) deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 Operating Permit.

B.14 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.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

(1) That this permit contains a material mistake.

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

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

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

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

B.17 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

(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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

(2) 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) 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.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12] [40 CFR 72]

(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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

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

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

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

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

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

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

(3) The changes do not result in emissions which exceed the limitations provided in 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b),(c), or (e). The Permittee shall make 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 emissions increases and decreases at 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.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 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.22 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.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

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

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

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

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

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

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

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than one hundred (100) pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed five hundred fifty-one thousandths (0.551) pounds per hour.

C.2 Opacity [326 IAC 5-1]

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

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

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

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

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

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

C.5 Fugitive Dust Emissions [326 IAC 6-4]

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

C.6 Stack Height [326 IAC 1-7]

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

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least two hundred sixty (260) linear feet on pipes or one hundred sixty (160) square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

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

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

C.8 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling

Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

**Compliance Requirements [326 IAC 2-1.1-11]**

C.9 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

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

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

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

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

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

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

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

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) initial inspection and evaluation

(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records;

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

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

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

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

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

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

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

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

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

(e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

**Stratospheric Ozone Protection**

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

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

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

## SECTION D.1 FACILITY OPERATION CONDITIONS

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

(a) One (1) woodworking operation, identified as WW1, equipped with a baghouse dust collector, identified as DC1, for particulate control, exhausted to Stack DC1S only when the outside ambient air temperature exceeds 85°F, installed in 1994, capacity: 5.2 tons of wood boards per hour.

(b) One (1) woodworking operation, identified as WW2, equipped with a baghouse dust collector, identified as DC2, exhausted to Stack DC2S only when the outside ambient air temperature exceeds 85°F, installed in 1995, capacity: 5.2 tons of wood boards per hour.

(c) One (1) woodworking operation, identified as WW3, equipped with a baghouse dust collector, identified as DC3, exhausted to Stack DC3S, installed in 2004, capacity: 29.7 tons of wood panels per hour.

(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 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the woodworking operation, identified as:

(a) WW1 shall not exceed twelve and four tenths (12.4) pounds per hour when operating at a process weight rate of five and two tenths (5.20) tons per hour.

(b) WW2 shall not exceed twelve and four tenths (12.4) pounds per hour when operating at a process weight rate of five and two tenths (5.20) tons per hour.

(c) WW3 shall not exceed thirty-nine and eight tenths (39.8) pounds per hour when operating at a process weight rate of twenty-nine and seven tenths (29.7) tons per hour.

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

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

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

D.1.2 PSD Minor PM and $PM_{10}$ Limits [326 IAC 2-2]

(a) The particulate (PM) emission rate from the woodworking operations, identified as WW1, WW2 and WW3, shall each be less than eleven and four tenths (11.4) pounds per hour, and

(b) The $PM_{10}$ emission rate from the woodworking operations, identified as WW1, WW2 and WW3, shall each be less than eleven and four tenths (11.4) pounds per hour.

(c) Compliance with these PM and $PM_{10}$ emission limits, in combination with the PM and $PM_{10}$ limits in Sections D.2 and D.3 of this permit shall render the requirements of 326 IAC 2-2 not applicable for the entire source.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

**Compliance Determination Requirements**

D.1.4 Particulate Control [326 IAC 2-7-6(6)]

(a) In order to comply with Conditions D.1.1 and D.1.2, the baghouse dust collectors for particulate control shall be in operation and control emissions from the woodworking operations, identified as WW1, WW2 and WW3 at all times that the respective woodworking operation is in operation.

(b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for 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.

**Compliance Assurance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)] [40 CFR 64]**

D.1.5 Visible Emissions Notations [40 CFR 64, Compliance Assurance Monitoring (CAM)]

(a) Visible emission notations of the woodworking operation stack exhausts DC1S and DC2S shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) Visible emission notations of the woodworking operation stack exhaust DC3S shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(c) 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 start-up or shut down time.

(d) 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.

(e) 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.

(f) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.6 Baghouse Inspections [40 CFR 64, Compliance Assurance Monitoring (CAM)]

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation. All defective bags shall be replaced.

D.1.7 Broken or Failed Bag Detection [40 CFR 64, Compliance Assurance Monitoring (CAM)]

(a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has 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).

(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. 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).

Bag failure can be indicated by a significant drop in the baghouse=s pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, or dust traces.

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

D.1.8 Record Keeping Requirements

(a) To document compliance with Condition D.1.5, the Permittee shall maintain a daily record of visible emission notations of the woodworking baghouse dust collector stack exhausts DC1S, DC2S and DC3S. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (e.g., the woodworking operation did not operate that day).

(b) To document compliance with Condition D.1.6, the Permittee shall maintain records of the results of the inspections required under Condition D.1.6.

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

**SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS**

**Emissions Unit Description: Surface Coating Operations**

(d) One (1) portable striper machine, identified as striper machine 1, equipped with a flow-coat applicator, installed in 1994, capacity: 7,500 board feet of wood per hour. Under NESHAP 40 CFR 63, Subparts JJ and QQQQ, this facility is considered part of an incidental wood furniture manufacturer and is a wood building products surface coating facility.

(e) One (1) striper machine, identified as striper machine 2, equipped with a flow-coat applicator, installed in 1995, capacity: 7,500 board feet of wood per hour. Under NESHAP 40 CFR 63, Subparts JJ and QQQQ, this facility is considered part of an incidental wood furniture manufacturer and is a wood building products surface coating facility.

(f) Four (4) high-volume low-pressure spraying machines, identified as spray machines 1, 2, 3 and 4, each equipped with dry filters for particulate control, exhausted to Stacks E6, E7, E8 and E9, respectively, spray machine 1 installed in 1995 and spray machines 2, 3 and 4 installed in 1994, capacity: 7,500 board feet of wood per hour, each. Under NESHAP 40 CFR 63, Subparts JJ and QQQQ, these facilities are considered part of an incidental wood furniture manufacturer and are wood building products surface coating facilities.

(g) One (1) flood coat vacuum coater machine, identified as stainer 1, exhausted to Stack E13, installed in 1994, capacity: 7,500 board feet of wood per hour. Under NESHAP 40 CFR 63, Subparts JJ and QQQQ, this facility is considered part of an incidental wood furniture manufacturer and is a wood building products surface coating facility.

(h) One (1) flood coat stainer machine, identified as stainer 2, exhausted to Stack E12, installed in 1994, capacity: 7,500 board feet of wood per hour. Under NESHAP 40 CFR 63, Subparts JJ and QQQQ, this facility is considered part of an incidental wood furniture manufacturer and is a wood building products surface coating facility.

(i) One (1) stain hand wiping area, identified as stain wipe 1, installed in 1994, capacity: 7,500 board feet of wood per hour. Under NESHAP 40 CFR 63, Subparts JJ and QQQQ, this facility is considered part of an incidental wood furniture manufacturer and is a wood building products surface coating facility.

(j) One (1) patina spray machine, identified as PSM1, with high-volume low-pressure spray applicators and dry filters for particulate control, exhausted to Stack E14, installed in 1995, capacity: 7,500 board feet of wood per hour. Under NESHAP 40 CFR 63, Subparts JJ and QQQQ, this facility is considered part of an incidental wood furniture manufacturer and is a wood building products surface coating facility.

(k) One (1) high-volume low-pressure spray repair booth, identified as spray booth 1, equipped with dry filters for particulate control, exhausted to Stack E14, installed in 1994, capacity: 7,500 board feet of wood per hour. Under NESHAP 40 CFR 63, Subparts JJ and QQQQ, this facility is considered part of an incidental wood furniture manufacturer and is a wood building products surface coating facility.

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

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

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

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

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

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

D.2.2 PM and $PM_{10}$ PSD Minor Limitations [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 not applicable, the Permittee shall comply with the following:

(a) The coatings applied in the six (6) spray coating processes consisting of four (4) high volume low pressure spraying machines, identified as spray machines 1, 2, 3 and 4, patina spray machine, identified as PSM1, and high volume low pressure spray repair booth, identified as spray booth 1, shall be limited such that PM and $PM_{10}$ emissions shall each be less than a total of 31.04 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The transfer efficiency of the six (6) spray coating processes consisting of four (4) high-volume low-pressure spraying machines, identified as spray machines 1, 2, 3 and 4, patina spray machine, identified as PSM1, and high volume low pressure spray repair booth, identified as spray booth 1, shall not be less than 75%.

(c) The control efficiency of the dry filters shall not be less than 50%.

Compliance with these limits in combination with the PM and $PM_{10}$ limits in Conditions D.1.2 and D.3.1 renders the requirements of 326 IAC 2-2 not applicable to the entire source.

D.2.3 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the four (4) high-volume low-pressure spraying machines, identified as spray machines 1, 2, 3 and 4, patina spray machine, identified as PSM1, and high volume low pressure spray repair booth, identified as spray booth 1, shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

**Compliance Determination Requirements**

D.2.5 Particulate Matter ($PM/PM_{10}$) Emissions Determination [326 IAC 2-2]

Compliance with Condition D.2.2 shall be determined by calculating the $PM/PM_{10}$ emissions associated with each coating applied in the six (6) spray coating processes consisting of four (4) high volume low pressure spraying machines, identified as spray machines 1, 2, 3 and 4, patina spray machine, identified as PSM1, and high volume low pressure spray repair booth, identified as spray booth 1, using the following equation:

$$PM/PM_{10} = CU \times D \times W\%S \times (1 - TE/100) \times (1 - CE/100) \times 1/2000$$

Where:

| | | |
|---|---|---|
| $PM/PM_{10}$ | = | The total $PM/PM_{10}$ emissions in tons per month for a given coating. |
| CU | = | The total coating use of a given coating (gallons of a coating per month). |
| D | = | Density of a given coating (pounds of coating per gallon of coating). |
| W%S | = | Weight percent solids of a given coating (pounds of solids per pound of coating). |
| TE | = | Transfer efficiency (%) of the spray applicators. This value shall equal 75%. |
| CE | = | Control efficiency (%) of the dry filters. This value shall equal 50%. |

The total $PM/PM_{10}$ emissions in tons per month from the six (6) spray coating processes consisting of four (4) high-volume low-pressure spraying machines, identified as spray machines 1, 2, 3 and 4, patina spray machine, identified as PSM1, and high volume low pressure spray repair booth, identified as spray booth 1, is equal to the sum of the $PM/PM_{10}$ emissions associated with each coating applied by those spray coating processes.

D.2.6 Testing Requirements [326 2-7-6(1), (6)] [326 IAC 2-1.1-11]

(a) The Permittee shall conduct performance tests (as described in (b) and (c) below) to verify the transfer efficiency and particulate matter control efficiency requirements in Conditions D.2.2(b) and D.2.2(c).

(b) No later than 180 days after issuance of T 039-20391-00174, the Permittee shall conduct transfer efficiency testing on one (1) of the six (6) spray coating processes subject to Condition D.2.2. The testing shall be done on a spray coating process that has not been tested in the past ten (10) years. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted using methods approved by the Commissioner and in accordance with 326 IAC 3-6-3 and Section C – Performance Testing.

(c) No later than 180 days after issuance of T 039-20391-00174, the Permittee shall conduct control efficiency testing on the dry filters used by one (1) of the six (6) spray coating processes subject to Condition D.2.2. The testing shall be done on filters that have not been tested in the past ten (10) years. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted using methods approved by the Commissioner and in accordance with 326 IAC 3-6-3 and Section C – Performance Testing.

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

D.2.7 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 stacks (E6, E7, E8, E9 and E14) while one or more of the spraying machines and/or spraying booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.2.8 Record Keeping Requirements

(a) To document compliance with Condition D.2.2(a), the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the $PM/PM_{10}$ emission limits established in Condition D.2.2(a).

(1) The amount of each coating material used as (as applied). Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(2) The density and weight percent solids of each coating material used (as applied).

(3) Calculations as determined by Condition D.2.5.

(b) To document compliance with Condition D.2.7, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.

(c) To document compliance that the source meets the definition of an incidental wood furniture manufacturer pursuant to Subpart JJ, 40 CFR 63.801, the Permittee shall maintain purchase or usage records.

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

D.2.9 Reporting Requirements

A quarterly summary of the monthly $PM/PM_{10}$ emissions from the spray coating processes covered by Condition D.2.2 and calculated in accordance with Condition D.2.5 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.

**National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]**

D.2.10 General Provisions Relating to NESHAP Subpart JJ [326 IAC 20-1] [40 CFR Part 63, Subpart A]

Pursuant to 40 CFR 63.800, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1 for the striper machines 1 and 2, spray machines 1, 2, 3 and 4, stainers 1 and 2, stain wipe 1, PSM1 and spray booth 1 as specified in Appendix A of 40 CFR Part 63, Subpart JJ in accordance with the schedule in 40 CFR 63, Subpart JJ.

D.2.11 NESHAP Subpart JJ Requirements [40 CFR Part 63, Subpart JJ] [326 IAC 20-14]

Pursuant to CFR Part 63, Subpart JJ, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart JJ, which are incorporated by reference as 326 IAC 20-14 for the striper machines 1 and 2, spray machines 1, 2, 3 and 4, stainers 1 and 2, stain wipe 1, PSM1 and spray booth 1 as specified as follows.

**§ 63.800 Applicability.**

(a) The affected source to which this subpart applies is each facility that is engaged, either in part or in whole, in the manufacture of wood furniture or wood furniture components and that is located at a plant site that is a major source as defined in 40 CFR part 63, subpart A, §63.2. The owner or operator of a source that meets the definition for an incidental wood furniture manufacturer shall maintain purchase or usage records demonstrating that the source meets the definition in §63.801 of this subpart, but the source shall not be subject to any other provisions of this subpart.

**§ 63.801 Definitions.**

(a) All terms used in this subpart that are not defined below have the meaning given to them in the CAA and in subpart A (General Provisions) of this part.

*Adhesive* means any chemical substance that is applied for the purpose of bonding two surfaces together other than by mechanical means. Under this subpart, adhesives shall not be considered coatings or finishing materials. Products used on humans and animals, adhesive tape, contact paper, or any other product with an adhesive incorporated onto or in an inert substrate shall not be considered adhesives under this subpart.

*Administrator* means the Administrator of the United States Environmental Protection Agency or his or her authorized representative.

*Aerosol adhesive* means an adhesive that is dispensed from a pressurized container as a suspension of fine solid or liquid particles in gas.

*Affected source* means a wood furniture manufacturing facility that is engaged, either in part or in whole, in the manufacture of wood furniture or wood furniture components and that is located at a plant site that is a major source as defined in 40 CFR part 63.2, excluding sources that meet the criteria established in §63.800(a), (b) and (c) of this subpart.

*Alternative method* means any method of sampling and analyzing for an air pollutant that is not a reference or equivalent method but has been demonstrated to the Administrator's satisfaction to, in specific cases, produce results adequate for a determination of compliance.

*As applied* means the HAP and solids content of the coating or contact adhesive that is actually used for coating or gluing the substrate. It includes the contribution of materials used for in-house dilution of the coating or contact adhesive.

*Basecoat* means a coat of colored material, usually opaque, that is applied before graining inks, glazing coats, or other opaque finishing materials, and is usually topcoated for protection.

*Baseline conditions* means the conditions that exist prior to an affected source implementing controls, such as a control system.

*Building enclosure* means a building housing a process that meets the requirements of a temporary total enclosure. The EPA Method 204E is used to identify all emission points from the building enclosure and to determine which emission points must be tested. For additional information see *Guidelines for Determining Capture Efficiency,* January 1994. Docket No. A–93–10, Item No. IV-B-1.

*Capture device* means a hood, enclosed room, floor sweep, or other means of collecting solvent emissions or other pollutants into a duct so that the pollutant can be directed to a pollution control

device such as an incinerator or carbon adsorber.
*Capture efficiency* means the fraction of all organic vapors generated by a process that are directed to a control device.
*Certified product data sheet (CPDS)* means documentation furnished by coating or adhesive suppliers or an outside laboratory that provides:
(1) The VHAP content of a finishing material, contact adhesive, or solvent, by percent weight, measured using the EPA Method 311 (as promulgated in this subpart), or an equivalent or alternative method (or formulation data if the coating meets the criteria specified in §63.805(a));
(2) The solids content of a finishing material or contact adhesive by percent weight, determined using data from the EPA Method 24, or an alternative or equivalent method (or formulation data if the coating meets the criteria specified in §63.805 (a)); and
(3) The density, measured by EPA Method 24 or an alternative or equivalent method. Therefore, the reportable VHAP content shall represent the maximum aggregate emissions potential of the finishing material, adhesive, or solvent in concentrations greater than or equal to 1.0 percent by weight or 0.1 percent for VHAP that are carcinogens, as defined by the Occupational Safety and Health Administration Hazard Communication Standard (29 CFR part 1910), as formulated. Only VHAP present in concentrations greater than or equal to 1.0 percent by weight, or 0.1 percent for VHAP that are carcinogens, must be reported on the CPDS. The purpose of the CPDS is to assist the affected source in demonstrating compliance with the emission limitations presented in §63.802.
Note: Because the optimum analytical conditions under EPA Method 311 vary by coating, the coating or adhesive supplier may also choose to include on the CPDS the optimum analytical conditions for analysis of the coating, adhesive, or solvent using EPA Method 311. Such information may include, but not be limited to, separation column, oven temperature, carrier gas, injection port temperature, extraction solvent, and internal standard.)
*Cleaning operations* means operations in which organic HAP solvent is used to remove coating materials or adhesives from equipment used in wood furniture manufacturing operations.
*Coating* means a protective, decorative, or functional film applied in a thin layer to a surface. Such materials include, but are not limited to, paints, topcoats, varnishes, sealers, stains, washcoats, basecoats, enamels, inks, and temporary protective coatings. Aerosol spray paints used for touch-up and repair are not considered coatings under this subpart.
*Coating application station* means the part of a coating operation where the coating is applied, e.g., a spray booth.
*Coating operation* means those activities in which a coating is applied to a substrate and is subsequently air-dried, cured in an oven, or cured by radiation.
*Coating solids (or solids)* means the part of the coating which remains after the coating is dried or cured; solids content is determined using data from the EPA Method 24, or an equivalent or alternative method.
*Compliant coating/contact adhesive* means a finishing material, contact adhesive, or strippable booth coating that meets the emission limits specified in Table 3 of this subpart.
*Contact adhesive* means an adhesive that is applied to two substrates, dried, and mated under only enough pressure to result in good contact. The bond is immediate and sufficiently strong to hold pieces together without further clamping, pressure, or airing.
*Continuous coater* means a finishing system that continuously applies finishing materials onto furniture parts moving along a conveyor. Finishing materials that are not transferred to the part are recycled to a reservoir. Several types of application methods can be used with a continuous coater including spraying, curtain coating, roll coating, dip coating, and flow coating.
*Continuous compliance* means that the affected source is meeting the emission limitations and other requirements of the rule at all times and is fulfilling all monitoring and recordkeeping provisions of the rule in order to demonstrate compliance.
*Control device* means any equipment that reduces the quantity of a pollutant that is emitted to the air. The device may destroy or secure the pollutant for subsequent recovery. Includes, but is not limited to, incinerators, carbon adsorbers, and condensers.
*Control device efficiency* means the ratio of the pollutant released by a control device and the pollutant introduced to the control device.
*Control system* means the combination of capture and control devices used to reduce emissions to

the atmosphere.

*Conventional air spray* means a spray coating method in which the coating is atomized by mixing it with compressed air and applied at an air pressure greater than 10 pounds per square inch (gauge) at the point of atomization. Airless and air assisted airless spray technologies are not conventional air spray because the coating is not atomized by mixing it with compressed air. Electrostatic spray technology is also not considered conventional air spray because an electrostatic charge is employed to attract the coating to the workpiece.

*Data quality objective (DQO) approach* means a set of approval criteria that must be met so that data from an alternative test method can be used in determining the capture efficiency of a control system. For additional information, see *Guidelines for Determining Capture Efficiency,* January 1994. (Docket No. A–93–10, Item No. IV-B-1).

*Day* means a period of 24 consecutive hours beginning at midnight local time, or beginning at a time consistent with a facility's operating schedule.

*Disposed offsite* means sending used organic HAP solvent or coatings outside of the facility boundaries for disposal.

*Emission* means the release or discharge, whether directly or indirectly, of HAP into the ambient air.

*Enamel* means a coat of colored material, usually opaque, that is applied as a protective topcoat over a basecoat, primer, or previously applied enamel coats. In some cases, another finishing material may be applied as a topcoat over the enamel.

*Equipment leak* means emissions of VHAP from pumps, valves, flanges, or other equipment used to transfer or apply coatings, adhesives, or organic HAP solvents.

*Equivalent method* means any method of sampling and analyzing for an air pollutant that has been demonstrated to the Administrator's satisfaction to have a consistent and quantitatively known relationship to the reference method, under specific conditions.

*Finishing material* means a coating used in the wood furniture industry. Such materials include, but are not limited to, stains, basecoats, washcoats, enamels, sealers, and topcoats.

*Finishing operation* means those operations in which a finishing material is applied to a substrate and is subsequently air-dried, cured in an oven, or cured by radiation.

*Foam adhesive* means a contact adhesive used for gluing foam to fabric, foam to foam, and fabric to wood.

*Gluing operation* means those operations in which adhesives are used to join components, for example, to apply a laminate to a wood substrate or foam to fabric.

*Incidental wood furniture manufacturer* means a major source that is primarily engaged in the manufacture of products other than wood furniture or wood furniture components and that uses no more than 100 gallons per month of finishing material or adhesives in the manufacture of wood furniture or wood furniture components.

*Incinerator* means, for the purposes of this industry, an enclosed combustion device that thermally oxidizes volatile organic compounds to CO and $CO_2$. This term does not include devices that burn municipal or hazardous waste material.

*Janitorial maintenance* means the upkeep of equipment or building structures that is not directly related to the manufacturing process, for example, cleaning of restroom facilities.

*Lower confidence limit (LCL) approach* means a set of approval criteria that must be met so that data from an alternative test method can be used in determining the capture efficiency of a control system. For additional information, see *Guidelines for Determining Capture Efficiency,* January 1994. (Docket No. A–93–10, Item No. IV-B-1).

*Material safety data sheet (MSDS)* means the documentation required for hazardous chemicals by the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard (29 CFR Part 1910) for a solvent, cleaning material, contact adhesive, coating, or other material that identifies select reportable hazardous ingredients of the material, safety and health considerations, and handling procedures.

*Noncompliant coating/contact adhesive* means a finishing material, contact adhesive, or strippable booth coating that has a VHAP content (VOC content for the strippable booth coating) greater than the emission limitation presented in Table 3 of this subpart.

*Nonporous substrate* means a surface that is impermeable to liquids. Examples include metal, rigid plastic, flexible vinyl, and rubber.

*Normally closed container* means a container that is closed unless an operator is actively engaged in activities such as emptying or filling the container.
*Operating parameter value* means a minimum or maximum value established for a control device or process parameter that, if achieved by itself or in combination with one or more other operating parameter values, determines that an owner or operator has complied with an applicable emission limit.
*Organic HAP solvent* means a HAP that is a volatile organic liquid used for dissolving or dispersing constituents in a coating or contact adhesive, adjusting the viscosity of a coating or contact adhesive, or cleaning equipment. When used in a coating or contact adhesive, the organic HAP solvent evaporates during drying and does not become a part of the dried film.
*Overall control efficiency* means the efficiency of a control system, calculated as the product of the capture and control device efficiencies, expressed as a percentage.
*Permanent total enclosure* means a permanently installed enclosure that completely surrounds a source of emissions such that all emissions are captured and contained for discharge through a control device. For additional information, see *Guidelines for Determining Capture Efficiency,* January 1994. (Docket No. A–93–10, Item No. IV-B-1).
*Recycled onsite* means the reuse of an organic HAP solvent in a process other than cleaning or washoff.
*Reference method* means any method of sampling and analyzing for an air pollutant that is published in Appendix A of 40 CFR part 60.
*Research or laboratory facility* means any stationary source whose primary purpose is to conduct research and development to develop new processes and products where such source is operated under the close supervision of technically trained personnel and is not engaged in the manufacture of products for commercial sale in commerce, except in a de minimis manner.
*Responsible official* has the meaning given to it in 40 CFR part 70, State Operating Permit Programs (Title V permits).
*Sealer* means a finishing material used to seal the pores of a wood substrate before additional coats of finishing material are applied. Special purpose finishing materials that are used in some finishing systems to optimize aesthetics are not sealers.
*Solvent* means a liquid used in a coating or contact adhesive to dissolve or disperse constituents and/or to adjust viscosity. It evaporates during drying and does not become a part of the dried film.
*Stain* means any color coat having a solids content by weight of no more than 8.0 percent that is applied in single or multiple coats directly to the substrate. It includes, but is not limited to, nongrain raising stains, equalizer stains, prestains, sap stains, body stains, no-wipe stains, penetrating stains, and toners.
*Storage containers* means vessels or tanks, including mix equipment, used to hold finishing, gluing, cleaning, or washoff materials.
*Strippable spray booth material* means a coating that:
(1) Is applied to a spray booth wall to provide a protective film to receive over spray during finishing operations;
(2) That is subsequently peeled off and disposed; and
(3) By achieving (1) and (2) of this definition reduces or eliminates the need to use organic HAP solvents to clean spray booth walls.
*Substrate* means the surface onto which a coating or contact adhesive is applied (or into which a coating or contact adhesive is impregnated).
*Temporary total enclosure* means an enclosure that meets the requirements of §63.805(e)(1) (i) through (iv) and is not permanent, but constructed only to measure the capture efficiency of pollutants emitted from a given source. Additionally, any exhaust point from the enclosure shall be at least four equivalent duct or hood diameters from each natural draft opening. For additional information, see *Guidelines for Determining Capture Efficiency,* January 1994. (Docket No. A–93–10, Item No. IV-B-1).
*Thinner* means a volatile liquid that is used to dilute coatings or contact adhesives (to reduce viscosity, color strength, and solids, or to modify drying conditions).
*Topcoat* means the last film-building finishing material that is applied in a finishing system.
*Touchup and repair* means the application of finishing materials to cover minor finishing imperfections.
*VHAP* means any volatile hazardous air pollutant listed in Table 2 to Subpart JJ.

*VHAP of potential concern* means any VHAP from the list in table 6 of this subpart.
*Volatile organic compound* (VOC) means any organic compound which participates in atmospheric photochemical reactions, that is, any organic compound other than those which the Administrator designates as having negligible photochemical reactivity. A VOC may be measured by a reference method, an equivalent method, an alternative method, or by procedures specified under any rule. A reference method, an equivalent method, or an alternative method, however, may also measure nonreactive organic compounds. In such cases, the owner or operator may exclude the nonreactive organic compounds when determining compliance with a standard. For a list of compounds that the Administrator has designated as having negligible photochemical reactivity, refer to 40 CFR part 51.10.
*Washcoat* means a transparent special purpose finishing material having a solids content by weight of 12.0 percent by weight or less. Washcoats are applied over initial stains to protect, to control color, and to stiffen the wood fibers in order to aid sanding.
*Washoff operations* means those operations in which organic HAP solvent is used to remove coating from wood furniture or a wood furniture component.
*Wood furniture* means any product made of wood, a wood product such as rattan or wicker, or an engineered wood product such as particleboard that is manufactured under any of the following standard industrial classification codes: 2434, 2511, 2512, 2517, 2519, 2521, 2531, 2541, 2599, or 5712.
*Wood furniture component* means any part that is used in the manufacture of wood furniture. Examples include, but are not limited to, drawer sides, cabinet doors, seat cushions, and laminated tops. However, foam seat cushions manufactured and fabricated at a facility that does not engage in any other wood furniture or wood furniture component manufacturing operation are excluded from this definition.
*Wood furniture manufacturing operations* means the finishing, gluing, cleaning, and washoff operations associated with the production of wood furniture or wood furniture components.

D.2.12 General Provisions Relating to NESHAP Subpart QQQQ [326 IAC 20-1] [40 CFR Part 63, Subpart A]

Pursuant to 40 CFR 63.4680, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1 for the striper machines 1 and 2, spray machines 1, 2, 3 and 4, stainers 1 and 2, stain wipe 1, PSM1 and spray booth 1 as specified in Appendix A of 40 CFR Part 63, Subpart QQQQ in accordance with the schedule in 40 CFR 63 Subpart QQQQ.

D.2.13 NESHAP Subpart QQQQ Requirements [40 CFR Part 63, Subpart QQQQ] [326 IAC 20-79]

Pursuant to CFR Part 63, Subpart QQQQ, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart QQQQ, which are incorporated by reference as 326 IAC 20-79 for the striper machines 1 and 2, spray machines 1, 2, 3 and 4, stainers 1 and 2, stain wipe 1, PSM1 and spray booth 1 as specified as follows.

**§ 63.4680 What is the purpose of this subpart?**

This subpart establishes national emission standards for hazardous air pollutants (NESHAP) for wood building products surface coating sources. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations.

**§ 63.4681 Am I subject to this subpart?**

(a) Except as provided in paragraphs (c) and (d) of this section, the source category to which this subpart applies is surface coating of wood building products, which means the application of coatings using, for example, roll coaters or curtain coaters in the finishing or laminating of any wood building product that contains more than 50 percent by weight wood or wood fiber excluding the weight of any glass components, and is used in the construction, either interior or exterior, of a residential, commercial, or institutional building. The wood building products source category includes the subcategories listed in paragraphs (a)(1) through (5) of this section.

(1) *Doors, windows, and miscellaneous.* The doors, windows, and miscellaneous subcategory includes doors, windows, finished doorskins, and door and window components such as millwork, moulding, or trim, and other miscellaneous wood building products including, but not limited to, all moulding and trim, shingles, and shutters.

(b) You are subject to this subpart if you own or operate a new, reconstructed, or existing affected source, as defined in §63.4682, that uses 4,170 liters (1,100 gallons) per year, or more, of coatings in the source category defined in paragraph (a) of this section and that is a major source, is located at a major source, or is part of a major source of emissions of hazardous air pollutants (HAP). A major source of HAP emissions is any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit any single HAP at a rate of 9.07 megagrams (Mg) (10 tons) or more per year or any combination of HAP at a rate of 22.68 Mg (25 tons) or more per year.

(c) This subpart does not apply to surface coating and other operations that meet the criteria of paragraphs (c)(1) through (5) of this section.

(1) Surface coating in the processes identified in paragraphs (c)(1)(i) through (xi) of this section that are part of plywood and composite wood product manufacturing and would be subject to subpart DDDD of this part when promulgated:

(i) Edge seals applied to a reconstituted wood product or plywood.

(ii) Anti-skid coatings applied to reconstituted wood products.

(iii) Primers applied to waferboard or oriented strand board (OSB) siding at the site of manufacture of the waferboard or OSB siding.

(iv) Surface coating that occurs during the manufacture of fiberboard, including application of clay slurry, titanium dioxide, or asphalt coatings to fiberboard.

(v) Painting of company logo information on plywood or reconstituted wood products.

(vi) Application of trademarks and grade stamp to reconstituted wood products or plywood.

(vii) Application of nail lines to reconstituted wood products.

(viii) Synthetic patches, wood patches, and wood putty applied to plywood.

(ix) Application of concrete forming and other drying or tempering oils to wood building products.

(x) Veneer composing.

(xi) Application of shelving edge fillers to reconstituted wood products.

(2) Surface coating of wood furniture subject to subpart JJ of this part, including finishing, gluing, cleaning, and washoff operations associated with the production of wood furniture or wood furniture components. The surface coating of millwork and trim associated with cabinet manufacturing is also subject to subpart JJ of this part and not to this subpart.

(3) Surface coating that occurs during the manufacture of prefabricated homes and mobile/modular homes.

(4) Surface coating that occurs at research or laboratory facilities; janitorial, building, and facility construction or maintenance operations; or hobby shops that are operated for personal rather than for commercial purposes. The source category also does not include non-commercial coating operations or coating applications using handheld nonrefillable aerosol containers.

(5) Wood treatment or fire retardant operations located at wood building products sources that involve impregnating the wood product with the wood treatment chemicals or fire retardant by using a retort or other pressure vessel.

(d) If you have an affected source with surface coating operations subject to the requirements of another subpart of this part that account for at least 95 percent of the total (annual) coating usage for the affected source, you may demonstrate compliance with the requirements, including all applicable emission limit(s), for that subpart for the entire affected source.

**§ 63.4682 What parts of my plant does this subpart cover?**

(a) This subpart applies to each new, reconstructed, and existing affected source.

(b) The affected source is the collection of all of the items listed in paragraphs (b)(1) through (4) of this section that are used for surface coating of wood building products:

(1) All coating operations as defined in §63.4781;

(2) All storage containers and mixing vessels in which coatings, thinners, and cleaning materials are stored or mixed;

(3) All manual and automated equipment and containers used for conveying coatings, thinners, and cleaning materials; and

(4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

(c) An affected source is a new affected source if its construction commenced after June 21, 2002, and the construction is of a completely new wood building products surface coating source where previously no wood building products surface coating source had existed.

(d) An affected source is reconstructed if you meet the criteria as defined in §63.2.

(e) An affected source is existing if it is not new or reconstructed.

**§ 63.4683 When do I have to comply with this subpart?**

The date by which you must comply with this subpart is called the compliance date. The compliance date for each type of affected source is specified in paragraphs (a) through (c) of this section. The compliance date begins the initial compliance period during which you conduct the initial compliance demonstration described in §§63.4740, 63.4750, and 63.4760.

(b) For an existing affected source, the compliance date is the date 3 years after May 28, 2003.

(d) You must meet the notification requirements in §63.4710 according to the dates specified in that section and in subpart A of this part. Some of the notifications must be submitted before the compliance dates described in paragraphs (a) through (c) of this section.

**Emission Limitations**

**§ 63.4690 What emission limits must I meet?**

(b) For an existing affected source, you must limit organic HAP emissions to the atmosphere to no more than the applicable emission limit(s) in Table 2 to this subpart, determined according to the requirements in §63.4741, §63.4751, or §63.4761.

**§ 63.4691 What are my options for meeting the emission limits?**

You must include all coatings, thinners, and cleaning materials used in the affected source when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in §63.4690. To make this determination, you must use at least one of the three compliance options listed in paragraphs (a) through (c) of this section. You may apply any of the compliance options to an individual coating operation or to multiple coating operations as a group or to the entire affected source. You may use different compliance options for different coating operations or at different times on the same coating operation. However, you may not use different compliance options at the same time on the same coating operation. If you switch between compliance options for any coating operation or group of coating operations, you must document this switch as required by §63.4730(c), and you must report it in the next semiannual compliance report required in §63.4720.

(a) *Compliant material option.* Demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable emission limit(s) in §63.4690, and that each thinner and each cleaning material used contains no organic HAP. You must meet all the requirements of §§63.4740, 63.4741, and 63.4742 to demonstrate compliance with the emission limit using this option.

(b) *Emission rate without add-on controls option.* Demonstrate that, based on the coatings, thinners, and cleaning materials used in the coating operation(s), the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit(s) in §63.4690, calculated as a rolling 12-month emission rate and determined on a monthly basis. You must meet all the requirements of §§63.4750, 63.4751, and 63.4752 to demonstrate compliance with the emission limit using this option.

**§ 63.4692 What operating limits must I meet?**

(a) For any coating operation(s) on which you use the compliant material option or the emission rate without add-on controls option, you are not required to meet any operating limits.

**§ 63.4693 What work practice standards must I meet?**

(a) For any coating operation(s) on which you use the compliant material option or the emission rate without add-on controls option, you are not required to meet any work practice standards.

**General Compliance Requirements**

**§ 63.4700 What are my general requirements for complying with this subpart?**

(a) You must be in compliance with the emission limitations in this subpart as specified in paragraphs (a)(1) and (2) of this section.

(1) Any coating operation(s) for which you use the compliant material option or the emission rate without add-on controls option, as specified in §63.4691(a) and (b), must be in compliance with the applicable emission limit in §63.4690 at all times.

(b) You must always operate and maintain your affected source, including all air pollution control and monitoring equipment you use for purposes of complying with this subpart, according to the provisions in §63.6(e)(1)(i).

**§ 63.4701 What parts of the General Provisions apply to me?**

Table 4 to this subpart indicates which parts of the General Provisions in §§63.1 through 63.15 apply to you.

Notifications, Reports, and Records

**§ 63.4710 What notifications must I submit?**

(a) *General.* You must submit the notifications in §§63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to you by the dates specified in those sections, except as provided in paragraphs (b) and (c) of this section.

(b) *Initial Notification.* You must submit the Initial Notification required by §63.9(b) for a new or reconstructed affected source no later than 120 days after initial startup or 120 days after May 28, 2003, whichever is later. For an existing affected source, you must submit the Initial Notification no later than 120 days after May 28, 2003.

(c) *Notification of Compliance Status.* You must submit the Notification of Compliance Status required by §63.9(h) no later than 30 calendar days following the end of the initial compliance period described in §63.4740, §63.4750, or §63.4760 that applies to your affected source. The Notification of Compliance Status must contain the information specified in paragraphs (c)(1) through (9) of this section and in §63.9(h).

(1) Company name and address.

(2) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

(3) Date of the report and beginning and ending dates of the reporting period. The reporting period is the initial compliance period described in §63.4740, §63.4750, or §63.4760 that applies to your affected source.

(4) Identification of the compliance option or options specified in §63.4691 that you used on each coating operation in the affected source during the initial compliance period.

(5) Statement of whether or not the affected source achieved the emission limitations for the initial compliance period.

(6) If you had a deviation, include the information in paragraphs (c)(6)(i) and (ii) of this section.

(i) A description and statement of the cause of the deviation.

(ii) If you failed to meet the applicable emission limit in §63.4690, include all the calculations you used to determine the grams organic HAP emitted per liter of coating solids used (pounds (lb) organic HAP emitted per gallon of coating solids used). You do not need to submit information provided by the materials suppliers or manufacturers, or test reports.

(7) For each of the data items listed in paragraphs (c)(7)(i) through (iv) of this section that is required by the compliance option(s) you used to demonstrate compliance with the emission limit, include an example of how you determined the value, including calculations and supporting data. Supporting data can include a copy of the information provided by the supplier or manufacturer of the example coating or material or a summary of the results of testing conducted according to §63.4741(a), (b), or (c). You do not need to submit copies of any test reports.

(i) Mass fraction of organic HAP for one coating, for one thinner, and for one cleaning material.

(ii) Volume fraction of coating solids for one coating.

(iii) Density for one coating, one thinner, and one cleaning material, except that if you use the compliant material option, only the example coating density is required.

(iv) The amount of waste materials and the mass of organic HAP contained in the waste materials for which you are claiming an allowance in Equation 1 of §63.4751.

(8) The calculation of grams organic HAP emitted per liter coating solids used (lb organic HAP emitted per gallon coating solids used) for the compliance option(s) you used, as specified in paragraphs (c)(8)(i) through (iii) of this section.

(i) For the compliant material option, provide an example calculation of the organic HAP content for one coating, using Equation 2 of §63.4741.

(ii) For the emission rate without add-on controls option, provide the calculation of the total mass of organic HAP emissions for each month; the calculation of the total volume of coating solids used each month; and the calculation of the 12-month organic HAP emission rate, using Equations 1 and 1A through 1C, 2, and 3, respectively, of §63.4751.

**§ 63.4720 What reports must I submit?**

(a) *Semiannual compliance reports.* You must submit semiannual compliance reports for each affected source according to the requirements of paragraphs (a)(1) through (7) of this section. The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in paragraph (a)(2) of this section.

(1) *Dates.* Unless the Administrator has approved a different schedule for submission of reports under §63.10(a), you must prepare and submit each semiannual compliance report according to the dates specified in paragraphs (a)(1)(i) through (iv) of this section. Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

(i) The first semiannual compliance report must cover the first semiannual reporting period which begins the day after the end of the initial compliance period described in §63.4740, §63.4750, or §63.4760 that applies to your affected source and ends on June 30 or December 31, whichever occurs first following the end of the initial compliance period.

(ii) Each subsequent semiannual compliance report must cover the subsequent semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

(iii) Each semiannual compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

(iv) For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 40 CFR part 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the date specified in paragraph (a)(1)(iii) of this section.

(2) *Inclusion with title V report.* Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 40 CFR part 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a semiannual compliance report pursuant to this section along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the semiannual compliance report includes all required information concerning deviations from any emission limitation in this subpart, its submission shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a semiannual compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.

(3) *General requirements.* The semiannual compliance report must contain the information specified in paragraphs (a)(3)(i) through (v) of this section, and the information specified in paragraphs (a)(4) through (7) and (c)(1) of this section that is applicable to your affected source.

(i) Company name and address.

(ii) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

(iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. Note that the information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

(iv) Identification of the compliance option or options specified in §63.4691 that you used on each coating operation during the reporting period. If you switched between compliance options during the reporting period, you must report the beginning and ending dates you used each option.

(v) If you used the emission rate without add-on controls or the emission rate with add-on controls compliance option (§63.4691(b) or (c)), the calculation results for each rolling 12-month organic HAP emission rate during the 6-month reporting period.

(4) *No deviations.* If there were no deviations from the emission limitations in §§63.4690, 63.4692, and 63.4693 that apply to you, the semiannual compliance report must include a statement that there were no deviations from the emission limitations during the reporting period.

(5) *Deviations: compliant material option.* If you used the compliant material option, and there was a deviation from the applicable emission limit in §63.4690, the semiannual compliance report must contain the information in paragraphs (a)(5)(i) through (iv) of this section.

(i) Identification of each coating used that deviated from the emission limit, each thinner and cleaning material used that contained organic HAP, and the dates and time periods each was used.

(ii) The calculation of the organic HAP content (using Equation 2 of §63.4741) for each coating identified in paragraph (a)(5)(i) of this section. You do not need to submit background data supporting this calculation (*e.g.,* information provided by coating suppliers or manufacturers, or test reports).

(iii) The determination of mass fraction of organic HAP for each coating, thinner, and cleaning material identified in paragraph (a)(5)(i) of this section. You do not need to submit background data supporting this calculation ( *e.g.,* information provided by material suppliers or manufacturers, or test reports).

(iv) A statement of the cause of each deviation.

(6) *Deviations: emission rate without add-on controls option.* If you used the emission rate without add-on controls option and there was a deviation from the applicable emission limit in §63.4690, the semiannual compliance report must contain the information in paragraphs (a)(6)(i) through (iii) of this section.

(i) The beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit in §63.4690.

(ii) The calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred. You must provide the calculations for Equations 1, 1A through 1C, 2, and 3 in §63.4751; and if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.4751(e)(4). You do not need to submit background data supporting these calculations (*e.g.,* information provided by materials suppliers or manufacturers, or test reports).

(iii) A statement of the cause of each deviation.

**§ 63.4730 What records must I keep?**

You must collect and keep records of the data and information specified in this section. Failure to collect and keep these records is a deviation from the applicable standard.

(a) A copy of each notification and report that you submitted to comply with this subpart, and the documentation supporting each notification and report.

(b) A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner, and cleaning material and the volume fraction of coating solids for each coating. If you conducted testing to determine mass fraction of organic HAP, density, or volume fraction of coating solids, you must keep a copy of the complete test report. If you use information provided to you by the manufacturer or supplier of the material that was based on testing, you must keep the summary sheet of results provided to you by the manufacturer or supplier. You are not required to obtain the test report or other supporting documentation from the manufacturer or supplier.

(c) For each compliance period, the records specified in paragraphs (c)(1) through (4) of this section.

(1) A record of the coating operations at which you used each compliance option and the time periods (beginning and ending dates and times) you used each option.

(2) For the compliant material option, a record of the calculation of the organic HAP content for each coating, using Equation 2 of §63.4741.

(3) For the emission rate without add-on controls option, a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners, and cleaning materials used each month, using Equations 1, 1A through 1C, and 2 of §63.4751; and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.4751(e)(4); the calculation of the total volume of coating solids used each month, using Equation 2 of §63.4751; and the calculation of each 12-month organic HAP emission rate, using Equation 3 of §63.4751.

(d) A record of the name and volume of each coating, thinner, and cleaning material used during each compliance period.

(e) A record of the mass fraction of organic HAP for each coating, thinner, and cleaning material used during each compliance period.

(f) A record of the volume fraction of coating solids for each coating used during each compliance period.

(g) A record of the density for each coating used during each compliance period; and, if you use either the emission rate without add-on controls or the emission rate with add-on controls compliance option, the density for each thinner and cleaning material used during each compliance period.

(h) If you use an allowance in Equation 1 of §63.4751 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to §63.4751(e)(4), you must keep records of the information specified in paragraphs (h)(1) through (3) of this section.

(1) The name and address of each TSDF to which you sent waste materials for which you use an allowance in Equation 1 of §63.4751; a statement of which subparts under 40 CFR parts 262, 264, 265, and 266 apply to the facility; and the date of each shipment.

(2) Identification of the coating operations producing waste materials included in each shipment and the month or months in which you used the allowance for these materials in Equation 1 of §63.4751.

(3) The methodology used in accordance with §63.4751(e)(4) to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF each month; and

the methodology to determine the mass of organic HAP contained in these waste materials. This must include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment.

(j) You must keep records of the date, time, and duration of each deviation.

**§ 63.4731 In what form and for how long must I keep my records?**

(a) Your records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database.

(b) As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(c) You must keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). You may keep the records off-site for the remaining 3 years.

**Compliance Requirements for the Compliant Material Option**

**§ 63.4740 By what date must I conduct the initial compliance demonstration?**

You must complete the initial compliance demonstration for the initial compliance period according to the requirements in §63.4741. The initial compliance period begins on the applicable compliance date specified in §63.4683 and ends on the last day of the 12th month following the compliance date. If the compliance date occurs on any day other than the first day of a month, then the initial compliance period extends through the end of that month plus the next 12 months. The initial compliance demonstration includes the calculations according to §63.4741 and supporting documentation showing that during the initial compliance period, you used no coating with an organic HAP content that exceeded the applicable emission limit in §63.4690, and that you used no thinners or cleaning materials that contained organic HAP.

**§ 63.4741 How do I demonstrate initial compliance with the emission limitations?**

You may use the compliant material option for any individual coating operation, for any group of coating operations in the affected source, or for all the coating operations in the affected source. You must use either the emission rate without add-on controls option or the emission rate with add-on controls option for any coating operation in the affected source for which you do not use this option. To demonstrate initial compliance using the compliant material option, the coating operation or group of coating operations must use no coating with an organic HAP content that exceeds the applicable emission limit in §63.4690 and must use no thinner or cleaning material that contains organic HAP as determined according to this section. Any coating operation for which you use the compliant material option is not required to meet the operating limits or work practice standards required in §§63.4692 and 63.4693, respectively. To demonstrate initial compliance with the emission limitations using the compliant material option, you must meet all the requirements of this section for the coating operation or group of coating operations using this option. Use the procedures in this section on each coating, thinner, and cleaning material in the condition it is in when it is received from its manufacturer or supplier and prior to any alteration. You do not need to redetermine the mass of organic HAP in coatings, thinners, or cleaning materials that have been reclaimed onsite and reused in the coating operation(s) for which you use the compliant material option, provided these materials in their condition as received were demonstrated to comply with the compliant material option. If the mass fraction of organic HAP of a coating equals zero, determined according to paragraph (a) of this section, and you use the compliant material option, you are not required to comply with paragraphs (b) and (c) of this section for that coating.

(a) *Determine the mass fraction of organic HAP for each material used.* You must determine the mass fraction of organic HAP for each coating, thinner, and cleaning material used during the compliance period by using one of the options in paragraphs (a)(1) through (5) of this section.

(1) *Method 311 (appendix A to 40 CFR part 63).* You may use Method 311 for determining the mass fraction of organic HAP. Use the procedures specified in paragraphs (a)(1)(i) and (ii) of this section when performing a Method 311 test. If these values cannot be determined using Method 311, the owner or operator shall submit an alternative technique for determining their values for approval by the Administrator.

(i) Count each organic HAP that is measured to be present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4), and at 1.0 percent by mass or more for other organic HAP compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent of the material by mass, you do not have to count it. Express the mass fraction of each organic HAP you count as a value truncated to four places after the decimal point ( *e.g.,* 0.379178412 truncates to 0.3791).

(ii) Calculate the total mass fraction of organic HAP in the test material by adding up the individual organic HAP mass fractions and truncating the result to three places after the decimal point ( *e.g.,* 0.763).

(2) *Method 24 (appendix A to 40 CFR part 60).* For coatings, you may use Method 24 to determine the mass fraction of nonaqueous volatile matter and use that value as a substitute for mass fraction of organic HAP. (Note: Method 24 is not appropriate for those coatings with a water content that would result in an effective detection limit greater than the applicable emission limit.)

(3) *Alternative method.* You may use an alternative test method for determining the mass fraction of organic HAP once the Administrator has approved it. You must follow the procedure in §63.7(f) to submit an alternative test method for approval.

(4) *Information from the supplier or manufacturer of the material.* You may rely on information other than that generated by the test methods specified in paragraphs (a)(1) through (3) of this section, such as manufacturer's formulation data, if it represents each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4), and at 1.0 percent by mass or more for other organic HAP compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, you do not have to count it. If there is a disagreement between such information and results of a test conducted according to paragraphs (a)(1) through (3) of this section, then the test method results will take precedence unless, after consultation, a regulated source could demonstrate to the satisfaction of the enforcement agency that the formulation data were correct.

(5) *Solvent blends.* Solvent blends may be listed as single components for some materials in data provided by manufacturers or suppliers. Solvent blends may contain organic HAP which must be counted toward the total organic HAP mass fraction of the materials. When test data and manufacturer's data for solvent blends are not available, you may use the default values for the mass fraction of organic HAP in these solvent blends listed in Table 5 or Table 6 to this subpart. If you use the tables, you must use the values in Table 5 for all solvent blends that match Table 5 entries, and you may only use Table 6 if the solvent blends in the materials you use do not match any of the solvent blends in Table 5 and you only know whether the blend is aliphatic or aromatic. However, if the results of a Method 311 (40 CFR part 63, appendix A) test indicate higher values than those listed on Table 5 or Table 6 to this subpart, the Method 311 results will take precedence.

(b) *Determine the volume fraction of coating solids for each coating.* You must determine the volume fraction of coating solids (liters of coating solids per liter of coating) for each coating used during the compliance period by one of the methods specified in paragraph (b)(1), (2), or (3) of this section.

(1) *ASTM Method D2697–86 (Reapproved 1998) or D6093–97.* You may use ASTM Method D2697–86 (Reapproved 1998), “Standard Test Method for Volume Nonvolatile Matter in Clear or Pigmented Coatings' (incorporated by reference, see §63.14), or D6093–97, “Standard Test Method for Percent

Volume Nonvolatile Matter in Clear or Pigmented Coatings Using a Helium Gas Pycnometer" (incorporated by reference, see §63.14), to determine the volume fraction of coating solids for each coating. Divide the nonvolatile volume percent obtained with the methods by 100 to calculate volume fraction of coating solids. If these values cannot be determined using these methods, the owner operator may submit an alternative technique for determining their values for approval by the Administrator.

(2) *Information from the supplier or manufacturer of the material.* You may obtain the volume fraction of coating solids for each coating from the supplier or manufacturer.

(3) *Calculation of volume fraction of coating solids.* If the volume fraction of coating solids cannot be determined using the options in paragraphs (b)(1) and (2) of this section, you must determine it using Equation 1 of this section:

$$V_s = 1 - \left( \frac{m_{volatiles}}{D_{avg}} \right) \qquad \text{(Eq. 1)}$$

Where:

$V_s$= Volume fraction of coating solids, liters coating solids per liter coating.

$m_{volatiles}$= Total volatile matter content of the coating, including HAP, volatile organic compounds (VOC), water, and exempt compounds, determined according to Method 24 in appendix A of 40 CFR part 60, grams volatile matter per liter coating.

$D_{avg}$= Average density of volatile matter in the coating, grams volatile matter per liter volatile matter, determined from test results using ASTM Method D1475–90 information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If there is disagreement between ASTM Method D1475–90 test results and other information sources, the test results will take precedence.

(c) *Determine the density of each coating.* Determine the density of each coating used during the compliance period from test results using ASTM Method D1475–90 or information from the supplier or manufacturer of the material. If there is disagreement between ASTM Method D1475–90 test results and the supplier's or manufacturer's information, the test results will take precedence.

(d) *Calculate the organic HAP content of each coating.* Calculate the organic HAP content, grams organic HAP per liter coating solids, of each coating used during the compliance period, using Equation 2 of this section:

$$H_c = \frac{(D_c)(W_c)}{V_s} \qquad \text{(Eq. 2)}$$

Where:

$H_c$= Organic HAP content of the coating, grams organic HAP per liter coating solids.

$D_c$= Density of coating, grams coating per liter coating, determined according to paragraph (c) of this section.

$W_c$= Mass fraction of organic HAP in the coating, grams organic HAP per gram coating, determined according to paragraph (a) of this section.

$V_s$= Volume fraction of coating solids, liter coating solids per liter coating, determined according to paragraph (b) of this section.

(e) *Compliance demonstration.* The organic HAP content for each coating used during the initial compliance period, determined using Equation 2 of this section, must be less than or equal to the applicable emission limit in §63.4690; and each thinner and cleaning material used during the initial compliance period must contain no organic HAP, determined according to paragraph (a) of this section. You must keep all records required by §§63.4730 and 63.4731. As part of the Notification of Compliance Status required in §63.4710, you must identify the coating operation(s) for which you used the compliant material option and submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the initial compliance period because you used no coatings for which the organic HAP content exceeded the applicable emission limit in §63.4690, and you used no thinners or cleaning materials that contained organic HAP, determined according to paragraph (a) of this section.

**§ 63.4742 How do I demonstrate continuous compliance with the emission limitations?**

(a) For each compliance period to demonstrate continuous compliance, you must use no coating for which the organic HAP content determined using Equation 2 of §63.4741 exceeds the applicable emission limit in §63.4690; and use no thinner or cleaning material that contains organic HAP, determined according to §63.4741(a). A compliance period consists of 12 months. Each month after the end of the initial compliance period described in §63.4740 is the end of a compliance period consisting of that month and the preceding 11 months.

(b) If you choose to comply with the emission limitations by using the compliant material option, the use of any coating, thinner, or cleaning material that does not meet the criteria specified in paragraph (a) of this section is a deviation from the emission limitations that must be reported as specified in §§63.4710(c)(6) and 63.4720(a)(5).

(c) As part of each semiannual compliance report required by §63.4720, you must identify the coating operation(s) for which you used the compliant material option. If there were no deviations from the emission limitations in §63.4690, submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because you used no coating for which the organic HAP content exceeded the applicable emission limit in §63.4690, and you used no thinner or cleaning material that contained organic HAP, determined according to §63.4741(a).

(d) You must maintain records as specified in §§63.4730 and 63.4731.

**Compliance Requirements for the Emission Rate Without Add-On Controls Option**

**§ 63.4750 By what date must I conduct the initial compliance demonstration?**

You must complete the initial compliance demonstration for the initial compliance period according to the requirements of §63.4751. The initial compliance period begins on the applicable compliance date specified in §63.4683 and ends on the last day of the 12th month following the compliance date. If the compliance date occurs on any day other than the first day of a month, then the initial compliance period extends through the end of that month plus the next 12 months. You must determine the mass of organic HAP emissions and volume of coating solids used each month and then calculate a 12-month organic HAP emission rate at the end of the initial 12-month compliance period. The initial compliance demonstration includes the calculations according to §63.4751 and supporting documentation showing that during the initial compliance period the organic HAP emission rate was equal to or less than the applicable emission limit in §63.4690.

**§ 63.4751 How do I demonstrate initial compliance with the emission limitations?**

You may use the emission rate without add-on controls option for any individual coating operation, for any group of coating operations in the affected source, or for all the coating operations in the affected source. You must use either the compliant material option or the emission rate with add-on controls option for any coating operation in the affected source for which you do not use this option. To demonstrate initial compliance using the emission rate without add-on controls option, the coating operation or group of coating operations must meet the applicable emission limit in §63.4690. Any coating operation for which

you use the emission rate without add-on controls option is not required to meet the operating limits or work practice standards required in §§63.4692 and 63.4693, respectively. You must meet all the requirements of this section to demonstrate initial compliance with the applicable emission limit in §63.4690 for the coating operation(s). When calculating the organic HAP emission rate according to this section, do not include any coatings, thinners, or cleaning materials used on coating operations for which you use the compliant material option or the emission rate with add-on controls option. You do not need to redetermine the mass of organic HAP in coatings, thinners, or cleaning materials that have been reclaimed onsite and reused in the coating operation(s) for which you use the emission rate without add-on controls option.

(a) *Determine the mass fraction of organic HAP for each material.* Determine the mass fraction of organic HAP for each coating, thinner, and cleaning material used during each month according to the requirements in §63.4741(a).

(b) *Determine the volume fraction of coating solids for each coating.* Determine the volume fraction of coating solids for each coating used during each month according to the requirements in §63.4741(b).

(c) *Determine the density of each material.* Determine the density of each coating, thinner, and cleaning material used during each month from test results using ASTM Method D1475–90, information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If there is disagreement between ASTM Method D1475–90 test results and such other information sources, the test results will take precedence.

(d) *Determine the volume of each material used.* Determine the volume (liters) of each coating, thinner, and cleaning material used during each month by measurement or usage records.

(e) *Calculate the mass of organic HAP emissions.* The mass of organic HAP emissions is the combined mass of organic HAP contained in all coatings, thinners, and cleaning materials used during each month minus the organic HAP in certain waste materials. Calculate it using Equation 1 of this section.

$$H_e = A + B + C - R_w \qquad \text{(Eq. 1)}$$

Where:

$H_e$= Total mass of organic HAP emissions during the month, grams.

A = Total mass of organic HAP in the coatings used during the month, grams, as calculated in Equation 1A of this section.

B = Total mass of organic HAP in the thinners used during the month, grams, as calculated in Equation 1B of this section.

C = Total mass of organic HAP in the cleaning materials used during the month, grams, as calculated in Equation 1C of this section.

$R_w$= Total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste TSDF for treatment or disposal during the month, grams, determined according to paragraph (e)(4) of this section. (You may assign a value of zero to $R_w$if you do not wish to use this allowance.)

(1) Calculate the mass of organic HAP in the coatings used during the month, using Equation 1A of this section:

$$A=\sum_{i=1}^{m}\left(Vol_{c,i}\right)\left(D_{c,i}\right)\left(W_{c,i}\right) \qquad \text{(Eq. 1A)}$$

Where:

A = Total mass of organic HAP in the coatings used during the month, grams.

$Vol_{c,i}$= Total volume of coating, i, used during the month, liters.

$D_{c,i}$= Density of coating, i, grams coating per liter coating.

$W_{c,i}$= Mass fraction of organic HAP in coating, i, grams organic HAP per gram coating.

m = Number of different coatings used during the month.

(2) Calculate the mass of organic HAP in the thinners used during the month, using Equation 1B of this section:

$$B=\sum_{j=1}^{n}(Vol_{t,j})(D_{t,j})(W_{t,j}) \qquad \text{(Eq. 1B)}$$

Where:

B = Total mass of organic HAP in the thinners used during the month, grams.

$Vol_{t,j}$= Total volume of thinner, j, used during the month, liters.

$D_{t,j}$= Density of thinner, j, grams per liter.

$W_{t,j}$= Mass fraction of organic HAP in thinner, j, grams organic HAP per gram thinner.

n = Number of different thinners used during the month.

(3) Calculate the mass of organic HAP in the cleaning materials used during the month using Equation 1C of this section:

$$C=\sum_{k=1}^{p}(Vol_{s,k})(D_{s,k})(W_{s,k}) \qquad \text{(Eq. 1C)}$$

Where:

C = Total mass of organic HAP in the cleaning materials used during the month, grams.

$Vol_{s,k}$= Total volume of cleaning material, k, used during the month, liters.

$D_{s,k}$= Density of cleaning material, k, grams per liter.

$W_{s,k}$= Mass fraction of organic HAP in cleaning material, k, grams organic HAP per gram material.

p = Number of different cleaning materials used during the month.

(4) If you choose to account for the mass of organic HAP contained in waste materials sent or designated for shipment to a hazardous waste TSDF in Equation 1 of this section, then you must determine it according to paragraphs (e)(4)(i) through (iv) of this section.

(i) You may include in the determination only waste materials that are generated by coating operations for which you use Equation 1 of this section and that will be treated or disposed of by a facility regulated as a TSDF under 40 CFR part 262, 264, 265, or 266. The TSDF may be either off-site or on-site. You may not include organic HAP contained in wastewater.

(ii) You must determine either the amount of the waste materials sent to a TSDF during the month or the amount collected and stored during the month and designated for future transport to a TSDF. Do not include in your determination any waste materials sent to a TSDF during a month if you have already included them in the amount collected and stored during that month or a previous month.

(iii) Determine the total mass of organic HAP contained in the waste materials specified in paragraph (e)(4)(ii) of this section.

(iv) You may use any reasonable methodology to determine the amount of waste materials and the total mass of organic HAP they contain, and you must document your methodology as required in §63.4730(h). To the extent that waste manifests include this information, they may be used as part of the documentation of the amount of waste materials and mass of organic HAP contained in them.

(f) *Calculate the total volume of coating solids used.* Determine the total volume of coating solids used which is the combined volume of coating solids for all the coatings used during each month, using Equation 2 of this section:

$$V_{st} = \sum_{i=1}^{m} (Vol_{c,i})(V_{s,i}) \qquad \text{(Eq. 2)}$$

Where:

$V_{st}$= Total volume of coating solids used during the month, liters.

$Vol_{c,i}$= Total volume of coating, i, used during the month, liters.

$V_{s,i}$= Volume fraction of coating solids for coating, i, liter solids per liter coating, determined according to §63.4741(b).

m = Number of coatings used during the month.

(g) *Calculate the organic HAP emission rate.* Calculate the organic HAP emission rate for the 12-month compliance period, grams organic HAP per liter coating solids used, using Equation 3 of this section:

$$H_{yr} = \frac{\sum_{y=1}^{12} H_e}{\sum_{y=1}^{12} V_{st}} \qquad \text{(Eq. 3)}$$

Where:

$H_{yr}$= Organic HAP emission rate for the 12-month compliance period, grams organic HAP per liter coating solids.

$H_e$= Total mass of organic HAP emissions, grams, from all materials used during month, y, as calculated by Equation 1 of this section.

$V_{st}$= Total volume of coating solids used during month, y, liters, as calculated by Equation 2 of this section.

y = Identifier for months.

(h) *Compliance demonstration.* The organic HAP emission rate for the initial 12-month compliance period, calculated using Equation 3 of this section, must be less than or equal to the applicable emission limit in §63.4690. You must keep all records as required by §§63.4730 and 63.4731. As part of the Notification of

Compliance Status required by §63.4710, you must identify the coating operation(s) for which you used the emission rate without add-on controls option and submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the initial compliance period because the organic HAP emission rate was less than or equal to the applicable emission limit in §63.4690, determined according to this section.

**§ 63.4752 How do I demonstrate continuous compliance with the emission limitations?**

(a) To demonstrate continuous compliance, the organic HAP emission rate for each compliance period, calculated using Equation 3 of §63.4751, must be less than or equal to the applicable emission limit in §63.4690. A compliance period consists of 12 months. Each month after the end of the initial compliance period described in §63.4750 is the end of a compliance period consisting of that month and the preceding 11 months. You must perform the calculations in §63.4751(a) through (g) on a monthly basis using data from the previous 12 months of operation.

(b) If the organic HAP emission rate for any 12-month compliance period exceeded the applicable emission limit in §63.4690, this is a deviation from the emission limitations for that compliance period and must be reported as specified in §§63.4710(c)(6) and 63.4720(a)(6).

(c) As part of each semiannual compliance report required by §63.4720, you must identify the coating operation(s) for which you used the emission rate without add-on controls option. If there were no deviations from the emission limitations, you must submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to the applicable emission limit in §63.4690, determined according to §63.4751(a) through (g).

(d) You must maintain records as specified in §§63.4730 and 63.4731.

**Other Requirements and Information**

**§ 63.4780 Who implements and enforces this subpart?**

(a) This subpart can be implemented and enforced by us, the EPA, or a delegated authority such as your State, local, or tribal agency. If the EPA Administrator has delegated authority to your State, local, or tribal agency, then that agency, in addition to the EPA, has the authority to implement and enforce this subpart. You should contact your EPA Regional Office to find out if implementation and enforcement of this subpart is delegated to your State, local, or tribal agency.

(b) In delegating implementation and enforcement authority of this subpart to a State, local, or tribal agency under 40 CFR part 63, subpart E, the authorities contained in paragraph (c) of this section are retained by the EPA Administrator and are not transferred to the State, local, or tribal agency.

(c) The authorities that will not be delegated to State, local, or tribal agencies are listed in paragraphs (c)(1) through (4) of this section:

(1) Approval of alternatives to the work practice standards under §63.4693.

(2) Approval of major alternatives to test methods under §63.7(e)(2)(ii) and (f) and as defined in §63.90.

(3) Approval of major alternatives to monitoring under §63.8(f) and as defined in §63.90.

(4) Approval of major changes to recordkeeping and reporting under §63.10(f) and as defined in §63.90.

**§ 63.4781 What definitions apply to this subpart?**

Terms used in this subpart are defined in the CAA, in 40 CFR 63.2, and in this section as follows:

*Add-on control* means an air pollution control device, such as a thermal oxidizer or carbon adsorber, that reduces pollution in an air stream by destruction or removal before discharge to the atmosphere.

*Adhesive* means any chemical substance that is applied for the purpose of bonding two surfaces together.

*Block average* is an average of data points collected over any specified, continuous 180-minute block of time ( *e.g.,* a 3-hour block could be noon to 3 p.m., with a subsequent total of eight 3-hour blocks within a 24-hour period).

*Capture device* means a hood, enclosure, room, floor sweep, or other means of containing or collecting emissions and directing those emissions into an add-on air pollution control device.

*Capture efficiency* or *capture system efficiency* means the portion (expressed as a percentage) of the pollutants from an emission source that is delivered to an add-on control device.

*Capture system* means one or more capture devices intended to collect emissions generated by a coating operation in the use of coatings or cleaning materials, both at the point of application and at subsequent points where emissions from the coatings or cleaning materials occur, such as flashoff, drying, or curing. As used in this subpart, multiple capture devices that collect emissions generated by a coating operation are considered a single capture system.

*Cleaning material* means a solvent used to remove contaminants and other materials, such as dirt, grease, oil, and dried or wet coating ( *e.g.,* depainting), from a substrate before or after coating application or from equipment associated with a coating operation, such as spray booths, spray guns, racks, tanks, and hangers. Thus, it includes any cleaning material used on substrates or equipment or both.

*Coating* means a material applied to a substrate for decorative, protective, or functional purposes. Such materials include, but are not limited to, paints, sealants, caulks, inks, adhesives, and maskants. Decorative, protective, or functional materials that consist only of protective oils for metal, acids, bases, or any combination of these substances are not considered coatings for the purposes of this subpart.

*Coating operation* means equipment used to apply cleaning materials to a substrate to prepare it for coating application or to remove dried coating (surface preparation), to apply coating to a substrate (coating application) and to dry or cure the coating after application, or to clean coating operation equipment (equipment cleaning). A single coating operation may include any combination of these types of equipment, but always includes at least the point at which a coating or cleaning material is applied and all subsequent points in the affected source where organic HAP emissions from that coating or cleaning material occur. There may be multiple coating operations in an affected source. Coating application with hand-held nonrefillable aerosol containers, touchup markers, or marking pens is not a coating operation for the purposes of this subpart.

*Coating solids* means the nonvolatile portion of the coating that makes up the dry film.

*Continuous parameter monitoring system (CPMS)* means the total equipment that may be required to meet the data acquisition and availability requirements of this subpart used to sample, condition (if applicable), analyze, and provide a record of coating operation, or capture system, or add-on control device parameters.

*Controlled coating operation* means a coating operation from which some or all of the organic HAP emissions are routed through an emission capture system and add-on control device.

*Deviation* means any instance in which an affected source subject to this subpart, or an owner or operator of such a source:

(1) Fails to meet any requirement or obligation established by this subpart including, but not limited to any emission limit, or operating limit, or work practice standard;

(2) Fails to meet any term or condition that is adopted to implement an applicable requirement in this subpart and that is included in the operating permit for any affected source required to obtain such a permit; or

(3) Fails to meet any emission limit, or operating limit, or work practice standard in this subpart during SSM, regardless of whether or not such failure is permitted by this subpart.

*Emission limitation* means an emission limit, operating limit, or work practice standard.

*Enclosure* means a structure that surrounds a source of emissions and captures and directs the emissions to an add-on control device.

*Exempt compound* means a specific compound that is not considered a VOC due to negligible photochemical reactivity. The exempt compounds are listed in 40 CFR 51.100(s).

*Finished wood product* means any wood building product to which a protective, decorative, or functional layer has been applied. Materials used include, but are not limited to, paints, stains, sealers, topcoats, basecoats, primers, enamels, inks, and adhesives.

*Laminated wood product* means any wood building product to which a protective, decorative, or functional layer has been bonded with an adhesive. Products that are produced by bonding layers to the substrate as a part of the substrate manufacturing process (prior to pressing) are not considered laminated products under this subpart.

*Manufacturer's formulation data* means data on a material (such as a coating) that are supplied by the material manufacturer based on knowledge of the ingredients used to manufacture that material, rather than based on testing of the material with the test methods specified in §63.4741. Manufacturer's formulation data may include, but are not limited to, information on density, organic HAP content, volatile organic matter content, and coating solids content.

*Mass fraction of organic HAP* means the ratio of the mass of organic HAP to the mass of a material in which it is contained, expressed as grams of organic HAP per gram of material.

*Millwork* means lumber that has been remanufactured into a wood building product or component such as door, window, and staircase part(s), or decorative trim.

*Month* means a calendar month or a pre-specified period of 28 days to 35 days to allow for flexibility in recordkeeping when data are based on a business accounting period.

*Organic HAP content* means the mass of organic HAP per volume of coating solids for a coating calculated using Equation 2 of §63.4741. The organic HAP content is determined for the coating in the condition it is in when received from its manufacturer or supplier and does not account for any alteration after receipt.

*Permanent total enclosure (PTE)* means a permanently installed enclosure that meets the criteria of Method 204 of appendix M, 40 CFR part 51, for a PTE and that directs all the exhaust gases from the enclosure to an add-on control device.

*Protective oil* means an organic material that is applied to metal for the purpose of providing lubrication or protection from corrosion without forming a solid film. This definition of protective oil includes, but is not limited to, lubricating oils, evaporative oils (including those that evaporate completely), and extrusion oils.

*Research or laboratory facility* means a facility whose primary purpose is for research and development of new processes and products, that is conducted under the close supervision of technically trained personnel, and is not engaged in the manufacture of final or intermediate products for commercial purposes, except in a de minimis manner.

*Responsible official* means responsible official as defined in 40 CFR 70.2.

*Startup, initial* means the first time equipment is brought online in a source.

*Surface preparation* means use of a cleaning material on a portion of or all of a substrate. This includes use of a cleaning material to remove dried coating, which is sometimes called “depainting.”

*Temporary total enclosure* means an enclosure constructed for the purpose of measuring the capture efficiency of pollutants emitted from a given source as defined in Method 204 of appendix M, 40 CFR part 51.

*Thinner* means an organic solvent that is added to a coating after the coating is received from the supplier.

*Tileboard* means hardboard that meets the specifications for Class I given by the standard ANSI/AHA A135.4–1995 as approved by the American National Standards Institute. The standard specifies requirements and test methods for water absorption, thickness swelling, modulus of rupture, tensile strength, surface finish, dimensions, squareness, edge straightness, and moisture content for five classes of hardboard. Tileboard is also known as Class I hardboard or tempered hardboard.

*Total volatile hydrocarbon (TVH)* means the total amount of nonaqueous volatile organic matter determined according to Methods 204 and 204A through 204F of appendix M to 40 CFR part 51 and substituting the term TVH each place in the methods where the term VOC is used. The TVH includes both VOC and non-VOC.

*Uncontrolled coating operation* means a coating operation from which none of the organic HAP emissions are routed through an emission capture system and add-on control device.

*Volatile organic compound (VOC)* means any compound defined as VOC in 40 CFR 51.100(s).

*Volume fraction of coating solids* means the ratio of the volume of coating solids (also known as volume of nonvolatiles) to the volume of coating; liters of coating solids per liter of coating.

*Wastewater* means water that is generated in a coating operation and is collected, stored, or treated prior to being discarded or discharged.

*Wood building product* means any product that contains more than 50 percent by weight wood or wood fiber, excluding the weight of any glass components, and is used in the construction, either interior or exterior, of a residential, commercial, or institutional building.

**Table 2 to Subpart QQQQ of Part 63—Emission Limits for Existing Affected Sources**

You must comply with the emission limits that apply to your affected source in the following table as required by §63.4690.

| If the affected source applies coating to products in the following subcategory. . . | Then, the organic HAP emission limit for the affected source, in grams HAP/liter solids (lb HAP/gal solids)[1,2] is: |
|---|---|
| 5. Doors, windows, and miscellaneous | 231 (1.93) |

[1]Determined as a rolling 12-month emission rate according to the requirements in §63.4741, §63.4751, or §63.4761, as applicable.

[2]If the affected source applies coatings to products in more than one of the subcategories listed in the table, then you must determine the applicable emission limit according to §63.4690(c).

**Table 4 to Subpart QQQQ of Part 63—Applicability of General Provisions to Subpart QQQQ of Part 63**

You must comply with the applicable General Provisions requirements according to the following table:

| Citation | Subject | Applicable to subpart QQQQ | Explanation |
|---|---|---|---|
| §63.1(a)(1)–(14) | General Applicability | Yes. | |
| §63.1(b)(1)–(3) | Initial Applicability Determination | Yes | Applicability to subpart QQQQ is also specified in §63.4681. |
| §63.1(c)(1) | Applicability After Standard Established | Yes. | |
| §63.1(c)(2)–(3) | Applicability of Permit Program for Area Sources | No | Area sources are not subject to subpart QQQQ. |
| §63.1(c)(4)–(5) | Extensions and Notifications | Yes. | |
| §63.1(e) | Applicability of Permit Program Before Relevant Standard is Set | Yes. | |
| §63.2 | Definitions | Yes | Additional definitions are specified in §63.4781. |
| §63.3(a)–(c) | Units and Abbreviations | Yes. | |
| §63.4(a)(1)–(5) | Prohibited Activities | Yes. | |
| §63.4(b)–(c) | Circumvention/Severability | Yes. | |
| §63.5(a) | Construction/Reconstruction | Yes. | |
| §63.5(b)(1)–(6) | Requirements for Existing, Newly Constructed, and Reconstructed Sources | Yes. | |
| §63.5(d) | Application for Approval of Construction/Reconstruction | Yes. | |
| §63.5(e) | Approval of Construction/Reconstruction | Yes. | |
| §63.5(f) | Approval of Construction/Reconstruction Based on Prior State Review | Yes. | |
| §63.6(a) | Compliance With Standards and Maintenance Requirements—Applicability | Yes | |
| §63.6(b)(1)–(7) | Compliance Dates for New and Reconstructed Sources | Yes | §63.4683 specifies the compliance dates. |
| §63.6(c)(1)–(5) | Compliance Dates for Existing Sources | Yes | §63.4683 specifies the compliance dates. |
| §63.6(e)(1)–(2) | Operation and Maintenance | Yes | |
| §63.6(e)(3) | SSMP | Yes | Only sources using an add-on control device to comply with the standard must complete SSMP. |
| §63.6(f)(1) | Compliance Except During SSM | Yes | Applies only to sources using an add-on control device to comply with the standard. |
| §63.6(f)(2)–(3) | Methods for Determining Compliance | Yes | |

| | | | |
|---|---|---|---|
| §63.6(g)(1)–(3) | Use of an Alternative Standard | Yes | |
| §63.6(h) | Compliance With Opacity/Visible Emission Standards | No | Subpart QQQQ does not establish opacity standards and does not require continuous opacity monitoring systems (COMS). |
| §63.6(i)(1)–(16) | Extension of Compliance | Yes | |
| §63.6(j) | Presidential Compliance Exemption | Yes | |
| §63.7(a)(1) | Performance Test Requirements—Applicability | Yes | Applies to all affected sources. Additional requirements for performance testing are specified in §§63.4764, 63.4765, and 63.4766. |
| §63.7(a)(2) | Performance Test Requirements—Dates | Yes | Applies only to performance tests for capture system and control device efficiency at sources using these to comply with the standard. §63.4760 specifies the schedule for performance test requirements that are earlier than those specified in §63.7(a)(2). |
| §63.7(a)(3) | Performance Tests Required By the Administrator | Yes. | |
| §63.7(b)–(e) | Performance Test Requirements—Notification, Quality Assurance, Facilities Necessary for Safe Testing, Conditions During Test | Yes | Applies only to performance tests for capture system and add-on control device efficiency at sources using these to comply with the standard. |
| §63.7(f) | Performance Test Requirements—Use of Alternative Test Method | Yes | Applies to all test methods except those used to determine capture system efficiency. |
| §63.7(g)–(h) | Performance Test Requirements—Data Analysis, Recordkeeping, Reporting, Waiver of Test | Yes | Applies only to performance tests for capture system and add-on control device efficiency at sources using these to comply with the standard. |
| §63.8(a)(1)–(3) | Monitoring Requirements—Applicability | Yes | Applies only to monitoring of capture system and add-on control device efficiency at sources using these to comply with the standard. Additional requirements for monitoring are specified in §63.4768. |
| §63.8(a)(4) | Additional Monitoring Requirements | No | Subpart QQQQ does not have monitoring requirements for flares. |
| §63.8(b) | Conduct of Monitoring | Yes. | |
| §63.8(c)(1)–(3) | Continuous Monitoring System (CMS) Operation and Maintenance | Yes | Applies only to monitoring of capture system and add-on control device efficiency at sources using these to comply with the standard. Additional requirements for CMS operations and maintenance are specified in §63.4768. |

| | | | |
|---|---|---|---|
| §63.8(c)(4) | CMSs | No | §63.4768 specifies the requirements for the operation of CMS for capture systems and add-on control devices at sources using these to comply. |
| §63.8(c)(5) | COMS | No | Subpart QQQQ does not have opacity for visible emission standards. |
| §63.8(c)(6) | CMS Requirements | No | §63.4768 specifies the requirements for monitoring systems for capture systems and add-on control devices at sources using these to comply. |
| §63.8(c)(7) | CMS Out-of-Control Periods | Yes. | |
| §63.8(c)(8) | CMS Out-of-Control Periods Reporting | No | §63.4720 requires reporting of CMS out-of-control periods. |
| §63.8(d)–(e) | Quality Control Program and CMS Performance Evaluation | No | Subpart QQQQ does not require the use of continuous emissions monitoring systems. |
| §63.8(f)(1)–(5) | Use of an Alternative Monitoring Method | Yes. | |
| §63.8(f)(6) | Alternative to Relative Accuracy Test | No | Subpart QQQQ does not require the use of continuous emissions monitoring systems. |
| §63.8(g)(1)–(5) | Data Reduction | No | §§63.4767 and 63.4768 specify monitoring data reduction. |
| §63.9(a)–(d) | Notification Requirements | Yes. | |
| §63.9(e) | Notification of Performance Test | Yes | Applies only to capture system and add-on control device performance tests at sources using these to comply with the standard. |
| §63.9(f) | Notification of Visible Emissions/Opacity Test | No | Subpart QQQQ does not have opacity or visible emission standards. |
| §63.9(g)(1)–(3) | Additional Notifications When Using CMS | No | Subpart QQQQ does require the use of continuous emissions monitoring systems. |
| §63.9(h) | Notification of Compliance Status | Yes | §63.4710 specifies the dates for submitting the notification of compliance status. |
| §63.9(i) | Adjustment of Submittal Deadlines | Yes. | |
| §63.9(j) | Change in Previous Information | Yes. | |
| §63.10(a) | Recordkeeping/Reporting—Applicability and General Information | Yes. | |
| §63.10(b)(1) | General Recordkeeping Requirements | Yes | Additional requirements are specified in §§63.4730 and 63.4731. |
| §63.10(b)(2)(i)–(v) | Recordkeeping Relevant to SSM Periods and CMS | Yes | Requirements for SSM records only apply to add-on control devices |

| | | | |
|---|---|---|---|
| | | | used to comply with the standard. |
| §63.10(b)(2)(vi)–(xi) | | Yes. | |
| §63.10(b)(2)(xii) | Records | Yes. | |
| §63.10(b)(2)(xiii) | | No | Subpart QQQQ does not require the use of continuous emissions monitoring systems. |
| §63.10(b)(2)(xiv) | | Yes. | |
| §63.10(b)(3) | Recordkeeping Requirements for Applicability Determinations | Yes. | |
| §63.10(c)(1)–(6) | Additional Recordkeeping Requirements for Sources with CMS | Yes. | |
| §63.10(c)(7)–(8) | | No | The same records are required in §63.4720(a) (7). |
| §63.10(c)(9)–(15) | | Yes. | |
| §63.10(d)(1) | General Reporting Requirements | Yes | Additional requirements are specified in §63.4720. |
| §63.10(d)(2) | Report of Performance Test Results | Yes | Additional requirements are specified in §63.4720(b). |
| §63.10(d)(3) | Reporting Opacity or Visible Emissions Observations | No | Subpart QQQQ does not require opacity or visible emissions observations. |
| §63.10(d)(4) | Progress Reports for Sources With Compliance Extensions | Yes. | |
| §63.10(d)(5) | SSM Reports | Yes | Applies only to add-on control devices at sources using these to comply with the standard. |
| §63.10(e)(1)–(2) | Additional CMS Reports | No | Subpart QQQQ does not require the use of continuous emissions monitoring systems. |
| §63.10(e)(3) | Excess Emissions/CMS Performance Reports | No | §63.4720(b) specifies the contents of periodic compliance reports. |
| §63.10(e)(4) | COMS Data Reports | No | Subpart QQQQ does not specify requirements for opacity or COMS. |
| §63.10(f) | Recordkeeping/Reporting Waiver | Yes. | |
| §63.11 | Control Device Requirements/Flares | No | Subpart QQQQ does not specify use of flares for compliance. |
| §63.12 | State Authority and Delegations | Yes. | |
| §63.13 | Addresses | Yes. | |
| §63.14 | Incorporation by Reference | Yes | Test Methods ANSI/ASME PTC 19.10–1981, Part 10, ASTM D2697–86 (Reapproved 1998), and ASTM D6093–97 (incorporated by reference, see §63.14). |
| §63.15 | Availability of Information/Confidentiality | Yes. | |

**Table 5 to Subpart QQQQ of Part 63—Default Organic HAP Mass Fraction for Solvents and Solvent Blends**

You may use the mass fraction values in the following table for solvent blends for which you do not have test data or manufacturer's formulation data.

| Solvent/solvent blend | CAS. No. | Average organic HAP mass fraction | Typical organic HAP, percent by mass |
|---|---|---|---|
| 1. Toluene | 108–88–3 | 1.0 | Toluene. |
| 2. Xylene(s) | 1330–20–7 | 1.0 | Xylenes, ethylbenzene. |
| 3. Hexane | 110–54–3 | 0.5 | n-hexane. |
| 4. n-Hexane | 110–54–3 | 1.0 | n-hexane. |
| 5. Ethylbenzene | 100–41–4 | 1.0 | Ethylbenzene. |
| 6. Aliphatic 140 | | 0 | None. |
| 7. Aromatic 100 | | 0.02 | 1% xylene, 1% cumene. |
| 8. Aromatic 150 | | 0.09 | Naphthalene. |
| 9. Aromatic naphtha | 64742–95–6 | 0.02 | 1% xylene, 1% cumene. |
| 10. Aromatic solvent | 64742–94–5 | 0.1 | Naphthalene. |
| 11. Exempt mineral spirits | 8032–32–4 | 0 | None. |
| 12. Ligroines (VM & P) | 8032–32–4 | 0 | None. |
| 13. Lactol spirits | 64742–89–6 | 0.15 | Toluene. |
| 14. Low aromatic white spirit | 64742–82–1 | 0 | None. |
| 15. Mineral spirits | 64742–88–7 | 0.01 | Xylenes. |
| 16. Hydrotreated naphtha | 64742–48–9 | 0 | None. |
| 17. Hydrotreated light distillate | 64742–47–8 | 0.001 | Toluene. |
| 18. Stoddard solvent | 8052–41–3 | 0.01 | Xylenes. |
| 19. Super high-flash naphtha | 64742–95–6 | 0.05 | Xylenes. |
| 20. Varsol®solvent | 8052–49–3 | 0.01 | 0.5% xylenes, 0.5% ethylbenzene. |
| 21. VM & P naphtha | 64742–89–8 | 0.06 | 3% toluene, 3% xylene. |
| 22. Petroleum distillate mixture | 68477–31–6 | 0.08 | 4% naphthalene, 4% biphenyl. |

**Table 6 to Subpart QQQQ of Part 63—Default Organic HAP Mass Fraction for Petroleum Solvent Groups[a]**

You may use the mass fraction values in the following table for solvent blends for which you do not have test data or manufacturer's formulation data.

| Solvent type | Average organic HAP mass fraction | Typical organic HAP, percent by mass |
|---|---|---|
| Aliphatic[b] | 0.03 | 1% xylene, 1% toluene, and 1% ethylbenzene. |
| Aromatic[c] | 0.06 | 4% xylene, 1% toluene, and 1% ethylbenzene. |

[a]Use this table only if the solvent blend does not match any of the solvent blends in Table 5 to this subpart and you only know whether the blend is aliphatic or aromatic.

[b] *E.g.,* Mineral Spirits 135, Mineral Spirits 150 EC, Naphtha, Mixed Hydrocarbon, Aliphatic Hydrocarbon, Aliphatic Naphtha, Naphthol Spirits, Petroleum Spirits, Petroleum Oil, Petroleum Naphtha, Solvent Naphtha, Solvent Blend.

[c] *E.g.,* Medium-flash Naphtha, High-flash Naphtha, Aromatic Naphtha, Light Aromatic Naphtha, Light Aromatic Hydrocarbons, Aromatic Hydrocarbons, Light Aromatic Solvent.

D.2.14 One Time Deadlines Relating to NESHAP Subpart QQQQ

The Permittee shall comply with the following requirements by the dates listed:

| Requirement | Rule Cite | Affected Facility | Deadline |
|---|---|---|---|
| **Intial Notification** | **40 CFR 63. 4710(b)** | **striper machines 1 and 2, spray machines 1, 2, 3 and 4, stainers 1 and 2, stain wipe 1, PSM1 and spray booth 1** | **May 28, 2003** |
| **Compliance Date** | **40 CFR 63.4683(b)** | **striper machines 1 and 2, spray machines 1, 2, 3 and 4, stainers 1 and 2, stain wipe 1, PSM1 and spray booth 1** | **May 28, 2006** |
| **Compliance Status** | **40 CFR 63.4710** | **striper machines 1 and 2, spray machines 1, 2, 3 and 4, stainers 1 and 2, stain wipe 1, PSM1 and spray booth 1** | **June 30, 2007** |
| **Semiannual Compliance Reports** | **40 CFR 63.4720(a)(1)(iii)** | **striper machines 1 and 2, spray machines 1, 2, 3 and 4, stainers 1 and 2, stain wipe 1, PSM1 and spray booth 1** | **Each semiannual compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.** |

## SECTION D.3 FACILITY OPERATION CONDITIONS

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

(b) Grinding and machining operations controller with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to three hundredths (0.03) grains per actual cubic foot and a gas flow rate less than or equal to four thousand (4,000) actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations including:

(1) Two (2) kerf machines, identified as K1 and K2, equipped with a portable dust collector, identified as DC4, capacity: 150 pounds of wood per hour total. [326 IAC 6-3-2]

(2) One (1) portable dust collector, identified as DC5, utilized as a vacuum cleaner in the woodworking operation, identified as WW1, capacity: 10,400 pounds of wood per hour. [326 IAC 6-3-2]

(3) Four (4) tool room grinders, identified as GR1 through GR4, equipped with a portable dust collector, identified as DC6, capacity: 250 pounds of wood per hour total. [326 IAC 6-3-2]

(4) One (1) scuff sander, identified as SS1, for the U-V coating line, equipped with a portable dust collector, identified as DC7, capacity: 1,040 pounds of wood per hour [326 IAC 6-3-2]

(5) One (1) scuff sander, identified as SS2, for the spray machine 1, equipped with a portable dust collector, identified as DC8, capacity: 1,040 pounds of wood per hour. [326 IAC 6-3-2]

(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 PM and $PM_{10}$ Limits [326 IAC 2-2]

(a) The particulate (PM) and $PM_{10}$ emission rate from the two (2) kerf machines, identified as K1 and K2, shall be less than a total of nine hundred forty-three thousandths (0.943) pounds per hour.

(b) The particulate (PM) and $PM_{10}$ emission rate from the portable dust collector, identified as DC5, shall be less than five hundred fifty-seven thousandths (0.557) pounds per hour.

(c) The particulate (PM) and $PM_{10}$ emission rate from the four (4) tool room grinders, identified as GR1 through GR4, shall be less than a total of nine hundred seventeen thousandths (0.917) pounds per hour.

(d) The particulate (PM) and $PM_{10}$ emission rate from the scuff sander, identified as SS1, shall be less than eight hundred fifty-seven thousandths (0.857) pounds per hour.

(e) The particulate (PM) and $PM_{10}$ emission rate from the scuff sander, identified as SS2, shall be less than eight hundred fifty-seven thousandths (0.857) pounds per hour.

(f) Compliance with these PM and $PM_{10}$ emission limits, in combination with the PM and $PM_{10}$ limits in Conditions D.1.2 and D.2.2 of this permit shall render the requirements of 326 IAC 2-2 not applicable for the entire source.

D.3.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the:

(a) Two (2) kerf machines, identified as K1 and K2, shall not exceed a total of seventy-two hundredths (0.72) pounds per hour when operating at a process weight rate of one hundred fifty (150) pounds per hour total.

(b) Portable dust collector, identified as DC5, shall not exceed twelve and four-tenths (12.4) pounds per hour when operating at a process weight rate of ten thousand four hundred (10,400) pounds per hour.

(c) Four (4) tool room grinders, identified as GR1 through GR4, shall not exceed a total of one and two hundredths (1.02) pounds per hour when operating at a process weight rate of two hundred fifty (250) pounds per hour total.

(d) Scuff sander, identified as SS1, shall not exceed two and sixty-five hundredths (2.65) pounds per hour when operating at a process weight rate of one thousand forty (1,040) pounds per hour.

(e) Scuff sander, identified as SS2, shall not exceed two and sixty-five hundredths (2.65) pounds per hour when operating at a process weight rate of one thousand forty (1,040) pounds per hour.

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

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

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

**Compliance Determination Requirements**

D.3.3 Particulate Control [326 IAC 2-7-6(6)]

(a) In order to comply with Condition D.3.2, the baghouse dust collectors, identified as DC4, DC6 DC7 and DC8 for particulate control shall be in operation and control emissions from the grinding and machining operations, identified as K1, K2, GR1 through GR4, SS1 and SS2 at all times that the respective machining operation(s) is/are in operation.

(b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for 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.

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

D.3.4 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the grinding and machining operations. All defective bags shall be replaced.

D.3.5 Broken or Failed Bag Detection

(a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has 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).

(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. 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).

Bag failure can be indicated by a significant drop in the baghouse=s pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, or dust traces.

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

D.3.6 Record Keeping Requirements

(a) To document compliance with Condition D.3.4, the Permittee shall maintain records of the results of the inspections required under Condition D.3.4 and the dates the vents are redirected.

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

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR QUALITY

## PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Nickell Moulding Company, Inc.
Source Address: 3015 Mobile Drive, Elkhart, Indiana 46514
Mailing Address: P.O. Box 1502, Elkhart, Indiana 46515
Part 70 Permit No.: T 039-20391-00174

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify) _____

☐ Report (specify) _____

☐ Notification (specify) _____

☐ Affidavit (specify) _____

☐ Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

| |
|---|
| Signature: |
| Printed Name: |
| Title/Position: |
| Phone: |
| Date: |

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR QUALITY

**COMPLIANCE BRANCH**
**100 North Senate Avenue**
**MC61-53 IGCN 1003**
**Indianapolis, Indiana 46204-2251**
**Phone: 317-233-0178**
**Fax: 317-233-6865**

## PART 70 OPERATING PERMIT
## EMERGENCY OCCURRENCE REPORT

Source Name: Nickell Moulding Company, Inc.
Source Address: 3015 Mobile Drive, Elkhart, Indiana 46514
Mailing Address: P.O. Box 1502, Elkhart, Indiana 46515
Part 70 Permit No.: T 039-20391-00174

**This form consists of 2 pages** **Page 1 of 2**

| | |
|---|---|
| ☐ | This is an emergency as defined in 326 IAC 2-7-1(12) |
| X | The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and |
| X | The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16. |

If any of the following are not applicable, mark N/A

| |
|---|
| Facility/Equipment/Operation: |
| Control Equipment: |
| Permit Condition or Operation Limitation in Permit: |
| Description of the Emergency: |
| Describe the cause of the Emergency: |

If any of the following are not applicable, mark N/A **Page 2 of 2**

| |
|---|
| Date/Time Emergency started: |
| Date/Time Emergency was corrected: |
| Was the facility being properly operated at the time of the emergency? Y N<br>Describe: |
| Type of Pollutants Emitted: TSP, PM-10, $SO_2$, VOC, $NO_X$, CO, Pb, other: |
| Estimated amount of pollutant(s) emitted during emergency: |
| Describe the steps taken to mitigate the problem: |
| Describe the corrective actions/response steps taken: |
| Describe the measures taken to minimize emissions: |
| If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value: |

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

### Part 70 Quarterly Report

Source Name: Nickell Moulding Company, Inc.
Source Address: 3015 Mobile Drive, Elkhart, Indiana 46514
Mailing Address: P.O. Box 1502, Elkhart, Indiana 46515
Part 70 Permit No.: T 039-20391-00174
Facilities: Four (4) Spray Machines 1, 2, 3 & 4, Patina Spray Machine and Spray Booth 1
Parameter: $PM/PM_{10}$ Emissions
Limit: Less than a total of 31.04 tons per twelve (12) consecutive month period with compliance determined at the end of each month (as calculated by Condition D.2.5)

YEAR: _____

| Month | $PM/PM_{10}$ Emissions (tons) | $PM/PM_{10}$ Emissions (tons) | $PM/PM_{10}$ Emissions (tons) |
|---|---|---|---|
| | This Month | Previous 11 Months | 12 Month Total |
| | | | |
| | | | |
| | | | |

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: _____

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

### PART 70 OPERATING PERMIT
### QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Nickell Moulding Company, Inc.
Source Address: 3015 Mobile Drive, Elkhart, Indiana 46514
Mailing Address: P.O. Box 1502, Elkhart, Indiana 46515
Part 70 Permit No.: T 039-20391-00174

**Months:** _____ **to** _____ **Year:** _____



This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

| | |
|---|---|
| **Permit Requirement** (specify permit condition #) | |
| **Date of Deviation:** | **Duration of Deviation:** |
| **Number of Deviations:** | |
| **Probable Cause of Deviation:** | |
| **Response Steps Taken:** | |

| | |
|---|---|
| **Permit Requirement** (specify permit condition #) | |
| **Date of Deviation:** | **Duration of Deviation:** |
| **Number of Deviations:** | |
| **Probable Cause of Deviation:** | |
| **Response Steps Taken:** | |

| | |
|---|---|
| **Permit Requirement** (specify permit condition #) | |
| **Date of Deviation:** | **Duration of Deviation:** |
| **Number of Deviations:** | |
| **Probable Cause of Deviation:** | |
| **Response Steps Taken:** | |
| **Permit Requirement** (specify permit condition #) | |
| **Date of Deviation:** | **Duration of Deviation:** |
| **Number of Deviations:** | |
| **Probable Cause of Deviation:** | |
| **Response Steps Taken:** | |
| **Permit Requirement** (specify permit condition #) | |
| **Date of Deviation:** | **Duration of Deviation:** |
| **Number of Deviations:** | |
| **Probable Cause of Deviation:** | |
| **Response Steps Taken:** | |

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

# Indiana Department of Environmental Management
Office of Air Quality

# Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

## Source Background and Description

| | |
|---|---|
| **Source Name:** | **Nickell Moulding Company, Inc.** |
| **Source Location:** | **3015 Mobile Drive, Elkhart, Indiana 46514** |
| **County:** | **Elkhart** |
| **SIC Code:** | **2431** |
| **Permit Renewal No.:** | **T 039-20391-00174** |
| **Permit Reviewer:** | **Frank P. Castelli/MES** |

The Office of Air Quality (OAQ) has reviewed an operating permit renewal application from Nickell Moulding Company, Inc., formerly Nickell Moulding Company, Inc. and Benchmark, relating to the operation of the following emission units and pollution control devices at a wood moulding manufacturing source. The wood mouldings manufactured are wood picture frame mouldings, wood mouldings used for office products, such as chalk and bulletin boards, wood trim and mouldings used in housing construction, such as door and window moulding, and wood trim and moulding used in the construction of recreational vehicles.

## Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) woodworking operation, identified as WW1, equipped with a baghouse dust collector, identified as DC1, for particulate control, exhausted to Stack DC1S only when the outside ambient air temperature exceeds 85°F, installed in 1994, capacity: 5.2 tons of wood boards per hour.

(b) One (1) woodworking operation, identified as WW2, equipped with a baghouse dust collector, identified as DC2, exhausted to Stack DC2S only when the outside ambient air temperature exceeds 85°F, installed in 1995, capacity: 5.2 tons of wood boards per hour.

(c) One (1) woodworking operation, identified as WW3, equipped with a baghouse dust collector, identified as DC3, exhausted to Stack DC3S, installed in 2004, capacity: 29.7 tons of wood panels per hour.

(d) One (1) portable striper machine, identified as striper machine 1, equipped with a flow-coat applicator, installed in 1994, capacity: 7,500 board feet of wood per hour. Under NESHAP 40 CFR 63, Subparts JJ and QQQQ, this facility is considered part of an incidental wood furniture manufacturer and is a wood building products surface coating facility.

(e) One (1) striper machine, identified as striper machine 2, equipped with a flow-coat applicator, installed in 1995, capacity: 7,500 board feet of wood per hour. Under NESHAP 40 CFR 63, Subparts JJ and QQQQ, this facility is considered part of an incidental wood furniture manufacturer and is a wood building products surface coating facility.

(f) Four (4) high-volume low-pressure spraying machines, identified as spray machines 1, 2, 3 and 4, each equipped with dry filters for particulate control, exhausted to Stacks E6, E7, E8 and E9, respectively, spray machine 1 installed in 1995 and spray machines 2, 3 and 4 installed in 1994, capacity: 7,500 board feet of wood per hour, each. Under NESHAP

40 CFR 63, Subparts JJ and QQQQ, these facilities are considered part of an incidental wood furniture manufacturer and are wood building products surface coating facilities.

(g) One (1) flood coat vacuum coater machine, identified as stainer 1, exhausted to Stack E13, installed in 1994, capacity: 7,500 board feet of wood per hour. Under NESHAP 40 CFR 63, Subparts JJ and QQQQ, this facility is considered part of an incidental wood furniture manufacturer and is a wood building products surface coating facility.

(h) One (1) flood coat stainer machine, identified as stainer 2, exhausted to Stack E12, installed in 1994, capacity: 7,500 board feet of wood per hour. Under NESHAP 40 CFR 63, Subparts JJ and QQQQ, this facility is considered part of an incidental wood furniture manufacturer and is a wood building products surface coating facility.

(i) One (1) stain hand wiping area, identified as stain wipe 1, installed in 1994, capacity: 7,500 board feet of wood per hour. Under NESHAP 40 CFR 63, Subparts JJ and QQQQ, this facility is considered part of an incidental wood furniture manufacturer and is a wood building products surface coating facility.

(j) One (1) patina spray machine, identified as PSM1, with high-volume low-pressure spray applicators and dry filters for particulate control, exhausted to Stack E14, installed in 1995, capacity: 7,500 board feet of wood per hour. Under NESHAP 40 CFR 63, Subparts JJ and QQQQ, this facility is considered part of an incidental wood furniture manufacturer and is a wood building products surface coating facility.

(k) One (1) high-volume low-pressure spray repair booth, identified as spray booth 1, equipped with dry filters for particulate control, exhausted to Stack E14, installed in 1994, capacity: 7,500 board feet of wood per hour. Under NESHAP 40 CFR 63, Subparts JJ and QQQQ, this facility is considered part of an incidental wood furniture manufacturer and is a wood building products surface coating facility.

**Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit**

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

**Emission Units and Pollution Control Equipment Removed from Service**

The following permitted emission units and control equipment have been removed from this source:

(a) Two (2) surface coating machines, identified as spray machines #1 and #2, each equipped with airless spray applicators and dry filters for particulate control, installed in 1995, capacity: 7,500 board feet of wood per hour, each.

(b) One (1) high volume low pressure spraying machine, equipped with dry filters for particulate control, capacity: 7,500 board feet of wood per hour.

**Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour with no boilers and a total rating of nine and five hundred eighty-eight hundredths (9.588) million British thermal units per hour.

(b) Combustion source flame safety purging on startup.

(c) Machining where an aqueous cutting coolant continuously floods the machining interface.

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

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

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

(g) Grinding and machining operations controller with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to three tenths (0.03) grains per actual cubic foot and a gas flow rate less than or equal to four thousand (4,000) actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations including:

(1) Two (2) kerf machines, identified as K1 and K2, equipped with a portable dust collector, identified as DC4, capacity: 150 pounds of wood per hour total. [326 IAC 6-3-2]

(2) One (1) portable dust collector, identified as DC5, utilized as a vacuum cleaner in the woodworking operation, identified as WW1, capacity: 10,400 pounds of wood per hour. [326 IAC 6-3-2]

(3) Four (4) tool room grinders, identified as GR1 through GR4, equipped with a portable dust collector, identified as DC6, capacity: 250 pounds of wood per hour total. [326 IAC 6-3-2]

(4) One (1) scuff sander, identified as SS1, for the U-V coating line, equipped with a portable dust collector, identified as DC7, capacity: 1,040 pounds of wood per hour [326 IAC 6-3-2]

(5) One (1) scuff sander, identified as SS2, for the spray machine 1, equipped with a portable dust collector, identified as DC8, capacity: 1,040 pounds of wood per hour. [326 IAC 6-3-2]

(h) Bag dumping of Sorbond of five (5.0) pounds per hour (PM = 0.007 pounds per hour and 0.163 pounds per day)

(i) Two (2) embosser machines, identified as Embosser 1 and Embosser 2, one (1) installed October, 1999, one (1) installed in March, 1994.

(j) UV coater machine, seven thousand five hundred (7,500) board feet per hour, or two (2) gallons per hour.

(k) Two (2) Moulding Compo Machines, identified as COMP01, and COMP02, each exhausting through Stack E16, installed in 1999, capacity: 55.25 pounds of synthetic wood paste, known as Compo, per hour each, and 3,300 feet of wood moulding per hour (55 feet of wood moulding per minute), each.

(l) Three (3) laminating wrappers, identified as L1 through L3, installed in 2004, capacity: 75.0 pounds of polyurethane adhesive per hour, total.

(m) Two (2) foil laminating wrappers, identified as L4 and L5, installed in 2004, not applying adhesive.

**History**

On January 14, 2005, Nickell Moulding Company, Inc. submitted an application to the OAQ requesting to renew its operating permit. Nickell Moulding Company, Inc. (formerly Nickell Moulding Company, Inc. and Benchmark) was issued a Part 70 Operating Permit, T 039-12118-00174, on November 13, 2000.

**Existing Approvals**

Since the issuance of the Part 70 Operating Permit T 039-12118-00174 on November 13, 2000, the source has constructed or has been operating under the following approvals as well:

(a) Significant Source Modification No. 039-18161-00174, issued on January 26, 2004,

(b) Significant Permit Modification, SPM 039-18269-00174, issued on February 11, 2004, and

(c) Administrative Amendment No. 039-18738-00174, issued on April 27, 2004.

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

**Enforcement Issue**

There are no enforcement actions pending.

**Stack Summary**

| Stack ID | Operation | Height (feet) | Diameter (feet) | Flow Rate (acfm) | Temperature ($^0$F) |
|---|---|---|---|---|---|
| DC1S | Woodworking WW1 | 15 | 2.2 | 28,700 | ambient |
| DC2S | Woodworking WW2 | 15 | 5.0 | 30,180 | ambient |
| DC3S | Woodworking WW3 | 35 | 3.8 | 35,910 | ambient |
| E6 | Spray Machine 1 | 27 | 1.5 | 1,719 | ambient |
| E7 | Spray Machine 2 | 27 | 1.5 | 2,355 | ambient |
| E8 | Spray Machine 3 | 26 | 1.5 | 2,355 | ambient |
| E9 | Spray Machine 4 | 18 | 1.5 | 2,355 | ambient |
| E12 | Flood Coat Stainer Machine Stainer 2 | 28 | 1.3 | 2,221 | ambient |
| E13 | Flood Coat Vacuum Coater Machine Stainer 1 | 28 | 1.3 | 2,221 | ambient |
| E14 | Spray Booth 1 & Patina Spray Machine | 28 | 1.3 | 2,221 | ambient |
| E16 | Moulding Compo Machines COMPO1 & COMPO2 | 1.0 | 2.5 | 9.775 | ambient |

## Emission Calculations

See pages 1 through 13 of Appendix A of this document for detailed emission calculations. The two (2) Moulding Compo Machines, identified as COMPO1 & COMPO2, utilize roll coating and therefore produce no PM/$PM_{10}$ emissions. The coating material is a solid putty thinned with acetone and does not contain VOCs or HAPs.

## County Attainment Status

The source is located in Elkhart County.

| Pollutant | Status |
|---|---|
| $PM_{10}$ | Attainment |
| $PM_{2.5}$ | Attainment |
| $SO_2$ | Attainment |
| $NO_X$ | Attainment |
| 8-hour Ozone | Basic Nonattainment |
| CO | Attainment |
| Lead | Attainment |

(a) Elkhart County has been classified as unclassifiable or attainment for $PM_{2.5}$. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for $PM_{2.5}$ emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for $PM_{2.5}$ emissions, it has directed states to regulate $PM_{10}$ emissions as a surrogate for $PM_{2.5}$ emissions.

(b) Volatile organic compounds (VOC) and nitrogen oxides ($NO_X$) 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 $NO_X$ emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and $NO_X$ emissions were reviewed pursuant to the requirements of 326 IAC 2-3, Emission Offset.

(c) Elkhart County has been classified as attainment or unclassifiable in Indiana for remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

(d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

(e) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD or Emission Offset applicability.

**Unrestricted Potential Emissions**

This table reflects the unrestricted potential emissions of the source.

| Pollutant | tons/year |
|---|---|
| PM | 1,635 |
| $PM_{10}$ | 1,636 |
| $SO_2$ | 0.025 |
| VOC | 51.3 |
| CO | 3.53 |
| $NO_X$ | 4.20 |

| HAPs | tons/year |
|---|---|
| Glycol Ethers | 25.3 |
| Benzene | 0.00009 |
| Dichlorobenzene | 0.00005 |
| Formaldehyde | 0.003 |
| Hexane | 0.076 |
| Toluene | 0.0001 |
| Lead Compounds | 0.00002 |
| Cadmium Compounds | 0.00005 |
| Chromium Compounds | 0.00006 |
| Maganese Compounds | 0.00002 |
| Nickel Compounds | 0.00009 |
| MDI | 0.06 |
| Total | 25.4 |

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of $PM_{10}$ is equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than one hundred (100) tons per year.

(c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1 (29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(d) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted towards the determination of Part 70 applicability.

**Actual Emissions**

The following table shows the actual emissions from the source. This information reflects the 2003 OAQ emission data.

| Pollutant | Actual Emissions (tons/year) |
|---|---|
| $PM_{2.5}$ | 0 |
| $PM_{10}$ | 1 |
| $SO_2$ | Not reported |
| VOC | 25 |
| CO | Not reported |
| $NO_X$ | Not reported |
| HAP | Not reported |

**Part 70 Permit Conditions**

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

**Potential to Emit After Issuance**

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 permit renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

| | Potential to Emit (tons/year) | | | | | | |
|---|---|---|---|---|---|---|---|
| **Process/Emission Unit** | **PM** | **$PM_{10}$** | **$SO_2$** | **VOC** | **CO** | **$NO_X$** | **HAPs Other than Pb, Be, Hg, etc.** |
| Woodworking (WW1) | < 50 | < 50 | - | - | - | - | - |
| Woodworking (WW2) | < 50 | < 50 | - | - | - | - | - |
| Woodworking (WW3) | < 50 | < 50 | - | - | - | - | - |
| Striper Machines 1 & 2 | - | - | - | 9.25 | - | - | 4.60 total |
| Spraying Machines 1 - 4 | < 20.7 | < 20.7 | - | 18.5 | - | - | 9.20 total |
| Flood Coat Vacuum Coater/Stainer Machines (Stainers 1 and 2) | - | - | - | 9.25 | - | - | 4.60 |
| Stain Hand Wiping Area (Stain Wipe 1) | - | - | - | 4.63 | - | - | 2.30 |
| Patina Spray Machine (PSM1) | < 5.17 | < 5.17 | - | 4.63 | - | - | 2.30 |
| Spray Repair Booth (Spray Booth 1) | < 5.17 | < 5.17 | - | 4.63 | - | - | 2.30 |
| **Insignificant Activities** | | | | | | | |
| Natural Gas Combustion | 0.080 | 0.319 | 0.025 | 0.231 | 3.53 | 4.20 | 0.079 |
| Grinding & Machining | < 18.1 | < 18.1 | - | - | - | - | - |
| Sorbond | 0.030 | 0.030 | - | - | - | - | - |
| UV Coater | - | - | - | - | - | - | - |
| Moulding Compo Machines COMPO1 and COMPO2 | - | - | - | - | - | - | - |
| Foil Laminating Wrapper Machines L1 - L5 | - | - | - | 0.06 | - | - | 0.06 |
| **Total** | < 199.25 | < 199.49 | 0.025 | 51.3 | 3.53 | 4.20 | 25.4 |
| **Major Source Threshold** | **250** | **250** | **250** | **100** | **250** | **100** | **-** |

(a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.

(b) This existing stationary source is not major for Emission Offset because the emissions of the nonattainment pollutants, volatile organic compounds and nitrogen oxides, are less than one hundred (<100) tons per year.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

**Federal Rule Applicability**

The following federal rules are applicable to the source:

(a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to existing emission units that involve a pollutant-specific emission unit and meet the following criteria:

(1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;

(2) is subject to an emission limitation or standard for that pollutant; and

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

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each existing emission unit involved:

| Emission Unit / Pollutant | Control Device Used | Emission Limitation (Y/N) | Uncontrolled PTE (tons/year) | Controlled /Limited PTE (tons/year) | Major Source Threshold (tons/year) | CAM Applicable (Y/N) | Large Unit (Y/N) |
|---|---|---|---|---|---|---|---|
| Woodworking WW1 - $PM/PM_{10}$ | Baghouse | Y | 471 | < 50 | 100 | Y | N |
| Woodworking WW2 - $PM/PM_{10}$ | Baghouse | Y | 495 | < 50 | 100 | Y | N |
| Woodworking WW3 - $PM/PM_{10}$ | Baghouse | Y | 589 | < 50 | 100 | Y | N |
| Striper Machine 1 - VOC | N | N | 4.63 | 4.63 | 100 | N | N |
| Striper Machine 2 - VOC | N | N | 4.63 | 4.63 | 100 | N | N |
| Spraying Machine 1 - VOC | N | N | 4.63 | 4.63 | 100 | N | N |
| Spraying Machine 1 - $PM/PM_{10}$ | Dry Filters | N | 10.3 | < 5.17 | 100 | N | N |
| Spraying Machine 2 - VOC | N | N | 4.63 | 4.63 | 100 | N | N |
| Spraying Machine 2 - $PM/PM_{10}$ | Dry Filters | N | 10.3 | < 5.17 | 100 | N | N |
| Spraying Machine 3 - VOC | N | N | 4.63 | 4.63 | 100 | N | N |
| Spraying Machine 3 - $PM/PM_{10}$ | Dry Filters | N | 10.3 | < 5.17 | 100 | N | N |
| Spraying Machine 4 - VOC | N | N | 4.63 | 4.63 | 100 | N | N |
| Spraying Machine 4 - $PM/PM_{10}$ | Dry Filters | N | 10.3 | < 5.17 | 100 | N | N |
| Stainer 1 - VOC | N | N | 4.63 | 4.63 | 100 | N | N |
| Stainer 2 - VOC | N | N | 4.63 | 4.63 | 100 | N | N |

| Emission Unit / Pollutant | Control Device Used | Emission Limitation (Y/N) | Uncontrolled PTE (tons/year) | Controlled /Limited PTE (tons/year) | Major Source Threshold (tons/year) | CAM Applicable (Y/N) | Large Unit (Y/N) |
|---|---|---|---|---|---|---|---|
| Stain Wipe 1 - VOC | N | N | 4.63 | 4.63 | 100 | N | N |
| Patina Spray Machine PSM1 - PM/$PM_{10}$ | Dry Filters | N | 10.3 | < 5.17 | 100 | N | N |
| Patina Spray Machine PSM1 - VOC | N | N | 4.63 | 4.63 | 100 | N | N |
| Spray Repair Booth 1 - PM/$PM_{10}$ | Dry Filters | N | 10.3 | < 5.17 | 100 | N | N |
| Spray Repair Booth 1 - VOC | N | N | 4.63 | 4.63 | 100 | N | N |
| Moulding Compo Machine COMPO1 - VOC | N | N | 0 | 0 | 100 | N | N |
| Moulding Compo Machine COMPO2 - VOC | N | N | 0 | 0 | 100 | N | N |
| Foil Laminating Wrapper L1 - VOC | N | N | 0 | 0 | 100 | N | N |
| Foil Laminating Wrapper L2 - VOC | N | N | 0 | 0 | 100 | N | N |
| Foil Laminating Wrapper L3 - VOC | N | N | 0 | 0 | 100 | N | N |

In addition, none of the surface coating facilities utilize a control device that controls HAPs emissions. As shown in the Potential to Emit After Issuance table, all of the individual facilities have a potential to emit a single HAP of less than ten (10) tons per year and potential to emit a combination of HAPs of less than twenty-five (25) tons per year and therefore have a potential to emit of less than the major source thresholds of ten (10) tons per year for a single HAP and twenty-five (25) tons per year for the combination of HAPs.

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are applicable upon issuance of the Title V Renewal to woodworking operations, identified as WW1, WW2 and WW3, because they each have the potential to emit more than one hundred (100) tons per year of $PM_{10}$, are subject to an emission limitation or standard for PM, where PM is the surrogate for $PM_{10}$, and use a control device to comply with 326 IAC 6-3-2. A CAM plan will be incorporated into this Part 70 permit renewal.

(b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Wood Furniture Manufacturing Operations, Subpart JJ which is incorporated by reference as 326 IAC 20-14 are included for this source since this source is an incidental furniture manufacturing source pursuant 40 CFR 63.801 which utilizes less than one hundred (100) gallons per month of coatings for the purpose of manufacturing wood furniture components. Pursuant to 40 CFR 63.800(a) the Permittee of a source that meets the definition for an incidental wood furniture manufacturer shall maintain

purchase or usage records demonstrating that the source meets the definition in 40 CFR 63.801, but the source shall not be subject to any other provisions of this subpart. Therefore the following facilities are subject to the NESHAP Subpart JJ.

(1) One (1) portable striper machine, identified as striper machine 1, equipped with a flow-coat applicator, installed in 1994, capacity: 7,500 board feet of wood per hour. Under NESHAP 40 CFR 63, Subparts JJ and QQQQ, this facility is considered part of an incidental wood furniture manufacturer and is a wood building products surface coating facility.

(2) One (1) striper machine, identified as striper machine 2, equipped with a flow-coat applicator, installed in 1995, capacity: 7,500 board feet of wood per hour. Under NESHAP 40 CFR 63, Subparts JJ and QQQQ, this facility is considered part of an incidental wood furniture manufacturer and is a wood building products surface coating facility.

(3) Four (4) high volume low pressure spraying machines, identified as spray machines 1, 2, 3 and 4, each equipped with dry filters for particulate control, exhausted to Stacks E6, E7, E8 and E9, respectively, spray machine 1 installed in 1995 and spray machines 2, 3 and 4 installed in 1994, capacity: 7,500 board feet of wood per hour, each. Under NESHAP 40 CFR 63, Subparts JJ and QQQQ, these facilities are considered part of an incidental wood furniture manufacturer and are wood building products surface coating facilities.

(4) One (1) flood coat vacuum coater machine, identified as stainer 1, exhausted to Stack E13, installed in 1994, capacity: 7,500 board feet of wood per hour. Under NESHAP 40 CFR 63, Subparts JJ and QQQQ, this facility is considered part of an incidental wood furniture manufacturer and is a wood building products surface coating facility.

(5) One (1) flood coat stainer machine, identified as stainer 2, exhausted to Stack E12, installed in 1994, capacity: 7,500 board feet of wood per hour. Under NESHAP 40 CFR 63, Subparts JJ and QQQQ, this facility is considered part of an incidental wood furniture manufacturer and is a wood building products surface coating facility.

(6) One (1) stain hand wiping area, identified as stain wipe 1, installed in 1994, capacity: 7,500 board feet of wood per hour. Under NESHAP 40 CFR 63, Subparts JJ and QQQQ, this facility is considered part of an incidental wood furniture manufacturer and is a wood building products surface coating facility.

(7) One (1) patina spray machine, identified as PSM1, with high-volume low-pressure spray applicators and dry filters for particulate control, exhausted to Stack E14, installed in 1995, capacity: 7,500 board feet of wood per hour. Under NESHAP 40 CFR 63, Subparts JJ and QQQQ, this facility is considered part of an incidental wood furniture manufacturer and is a wood building products surface coating facility.

(8) One (1) high-volume low-pressure spray repair booth, identified as spray booth 1, equipped with dry filters for particulate control, exhausted to Stack E14, installed in 1994, capacity: 7,500 board feet of wood per hour. Under NESHAP 40 CFR 63, Subparts JJ and QQQQ, this facility is considered part of an incidental wood furniture manufacturer and is a wood building products surface coating facility.

Nonapplicable portions of the NESHAP will not be included in the permit. This source is subject to the following portions of Subpart JJ.

(1) 40 CFR 63.800(a)

(2) 40 CFR 63.801(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) The requirements of National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Wood Building Products Surface Coating, Subpart QQQQ which is incorporated by reference as 326 IAC 20-79 are included in this permit because the source does coat doors, windows, and miscellaneous products that are defined in 40 CFR 63.4681(a)(1). The surface coating units at this source are capable of coating doors, windows, and miscellaneous products and therefore the following facilities are subject to the NESHAP Subpart QQQQ.

(1) One (1) portable striper machine, identified as striper machine 1, equipped with a flow-coat applicator, installed in 1994, capacity: 7,500 board feet of wood per hour. Under NESHAP 40 CFR 63, Subparts JJ and QQQQ, this facility is considered part of an incidental wood furniture manufacturer and is a wood building products surface coating facility.

(2) One (1) striper machine, identified as striper machine 2, equipped with a flow-coat applicator, installed in 1995, capacity: 7,500 board feet of wood per hour. Under NESHAP 40 CFR 63, Subparts JJ and QQQQ, this facility is considered part of an incidental wood furniture manufacturer and is a wood building products surface coating facility.

(3) Four (4) high-volume low-pressure spraying machines, identified as spray machines 1, 2, 3 and 4, each equipped with dry filters for particulate control, exhausted to Stacks E6, E7, E8 and E9, respectively, spray machine 1 installed in 1995 and spray machines 2, 3 and 4 installed in 1994, capacity: 7,500 board feet of wood per hour, each. Under NESHAP 40 CFR 63, Subparts JJ and QQQQ, these facilities are considered part of an incidental wood furniture manufacturer and are wood building products surface coating facilities.

(4) One (1) flood coat vacuum coater machine, identified as stainer 1, exhausted to Stack E13, installed in 1994, capacity: 7,500 board feet of wood per hour. Under NESHAP 40 CFR 63, Subparts JJ and QQQQ, this facility is considered part of an incidental wood furniture manufacturer and is a wood building products surface coating facility.

(5) One (1) flood coat stainer machine, identified as stainer 2, exhausted to Stack E12, installed in 1994, capacity: 7,500 board feet of wood per hour. Under NESHAP 40 CFR 63, Subparts JJ and QQQQ, this facility is considered part of an incidental wood furniture manufacturer and is a wood building products surface coating facility.

(6) One (1) stain hand wiping area, identified as stain wipe 1, installed in 1994, capacity: 7,500 board feet of wood per hour. Under NESHAP 40 CFR 63, Subparts JJ and QQQQ, this facility is considered part of an incidental wood furniture manufacturer and is a wood building products surface coating facility.

(7) One (1) patina spray machine, identified as PSM1, with high-volume low-pressure spray applicators and dry filters for particulate control, exhausted to Stack E14, installed in 1995, capacity: 7,500 board feet of wood per hour. Under NESHAP 40 CFR 63, Subparts JJ and QQQQ, this facility is considered part of an incidental wood furniture manufacturer and is a wood building products surface coating facility.

(8) One (1) high volume low pressure spray repair booth, identified as spray booth 1, equipped with dry filters for particulate control, exhausted to Stack E14, installed in 1994, capacity: 7,500 board feet of wood per hour. Under NESHAP 40 CFR 63, Subparts JJ and QQQQ, this facility is considered part of an incidental wood furniture manufacturer and is a wood building products surface coating facility.

Nonapplicable portions of the NESHAP will not be included in the permit. This source is subject to the following portions of Subpart QQQQ.

(1) 40 CFR 63.4680

(2) 40 CFR 63.4681(a)(1), (b),(c) and (d)

(3) 40 CFR 63.4682

(4) 40 CFR 63.4683(b) and (d)

(5) 40 CFR 63.4690(b)

(6) 40 CFR 63.4691(a) and (b)

(7) 40 CFR 63.4692(a)

(8) 40 CFR 63.4693(a)

(9) 40 CFR 63.4700(a)(1) and (b)

(10) 40 CFR 63.4701

(11) 40 CFR 63.4710(a)(b)(c)(1 through 7)(c)(8)(i) and (ii)

(12) 40 CFR 63.4720(a)(1 through 3)(a)(4) (first part)(5) and (6)

(13) 40 CFR 63.4730(a)(b)(c)(1 through 3)(d through h and j)

(14) 40 CFR 63.4731

(15) 40 CFR 63.4740

(16) 40 CFR 63.4741

(17) 40 CFR 63.4742

(18) 40 CFR 63.4750

(19) 40 CFR 63.4751

(20) 40 CFR 63.4752

(21) 40 CFR 63.4780

(22) 40 CFR 63.4781

(23) Table 2 item 5

(24) Table 4

(25) Table 5

(26) Table 6

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 QQQQ.

(e) The requirements of National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Plywood and Composite Wood Products, Subpart DDDD are not included in this permit because the source does not manufacture plywood or composite wood products.

(f) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 20 and 40 CFR Parts 61 and 63) included in the permit for this source.

**State Rule Applicability - Entire Source**

326 IAC 1-5-2 (Emergency Reduction Plans)

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission), the Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

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

This source, constructed after the PSD applicability date of August 7, 1977, has unrestricted potential to emit of $SO_2$ and CO of less than two hundred fifty (250) tons per year each. The potential to emit PM and $PM_{10}$ after controls is also less than two hundred fifty (250) tons per year each. However, the potential to emit PM and $PM_{10}$ before controls exceeds the PSD threshold of two hundred fifty (250) tons per year for PM and $PM_{10}$. PM and $PM_{10}$ emission limits have been incorporated into the Part 70 Operating Permit renewal for the woodworking operations, identified as WW1, WW2 and WW3, the surface coating operations consisting of four (4) high volume low pressure spraying machines, identified as spray machines 1, 2, 3 and 4, patina spray machine, identified as PSM1, and high volume low pressure spray repair booth, identified as spray booth 1, and the insignificant grinding and machining operations so the source retains its minor PSD status for PM and $PM_{10}$.

The woodworking operations, identified as WW1, WW2 and WW3, shall each be limited to less than eleven and four tenths (11.4) pounds per hour of PM and eleven and four tenths (11.4) pounds per hour of $PM_{10}$, equivalent to less than a total of one hundred fifty (150) tons of PM and $PM_{10}$ per year.

The spray coating operations consisting of four (4) high volume low pressure spraying machines, identified as spray machines 1, 2, 3 and 4, patina spray machine, identified as PSM1, and high volume low pressure spray repair booth, identified as spray booth 1, shall be limited such that PM and $PM_{10}$ emissions shall each be less than a total of thirty-one and four hundredths (31.04) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the PM and $PM_{10}$ emission limitations for the spray coating operations shall be determined by calculating the PM and $PM_{10}$ emissions associated with each coating applied in the spray machines 1 - 4, patina spray machine and spray booth 1, using the following equation:

$$PM/PM_{10} = CU \times D \times W\%S \times (1 - TE/100) \times (1 - CE/100) \times 1/2000$$

Where:

$PM/PM_{10}$ = The total $PM/PM_{10}$ emissions for a given coating (tons per month).

CU = The total coating use of a given coating (gallons of a coating per month).

| | | |
|---|---|---|
| D | = | Density of a given coating (pounds of coating per gallon of coating). |
| W%S | = | Weight percent solids of a given coating (pounds of solids per pound of coating). |
| TE | = | Transfer efficiency (%) of the spray applicators. This value shall equal 75%. |
| CE | = | Control efficiency (%) of the dry filters. This value shall equal 50%. |

The total $PM/PM_{10}$ emissions in tons per month from the six (6) spray coating processes is equal to the sum of the $PM/PM_{10}$ emissions associated with each coating applied by those spraying processes.

The $PM/PM_{10}$ emissions from the insignificant grinding and machining operations shall be limited to less than a total of nine hundred forty-three thousandths (0.943) pounds per hour for the two (2) kerf machines, identified as K1 and K2 controlled by DC4, to less than five hundred fifty-seven thousandths (0.557) pounds per hour for the portable dust colector, identified as DC5, to less than a total of nine hundred seventeen thousandths (0.917) pounds per hour for the tool room grinders, identified as GR1 through GR4, controlled by DC6 and to less than eight hundred fifty-seven thousandths (0.857) pounds per hour each for scuff sanders, identified at SS1 and SS2, controlled by DC7 and DC8, respectively, equivalent to a total of less than eighteen and one-tenth (18.1) tons per year.

Compliance with these PM and $PM_{10}$ emission limits coupled with the unrestricted potential to emit PM and $PM_{10}$ from sorbond usage and the natural gas combustion limits the entire source to less than two hundred fifty (250) tons per year.

326 IAC 2-3 (Emission Offset)

This source, constructed after the Emission Offset applicability date of August 7, 1977, has unrestricted potential to emit VOC and $NO_X$ of less than one hundred (100) tons per year each. Therefore, this source is minor with respect to Emission Offset pursuant to 326 IAC 2-3.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit pursuant to 326 IAC 2-7, Part 70. In accordance with 326 IAC 2-6-3(b)(1), the Permittee shall submit triennially by July 1 an emission statement covering the previous calendar year because the potential to emit VOC is less than two hundred fifty (250) tons per year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(a) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(b) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32).

326 IAC 5-1 (Opacity Limitations)

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

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

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

**State Rule Applicability – Individual Facilities**

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

(a) The operation of two (2) Moulding Compo Machines, identified as COMP01, and COMP02, installed in 1999, will emit less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, the requirements of 326 IAC 2-4.1 do not apply.

(b) The operation of three (3) foil laminating wrappers, identified as L1 through L3, installed in 2004, will emit less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, the requirements of 326 IAC 2-4.1 do not apply.

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

(a) Pursuant to 326 IAC 6-3-2(d), the dry filters for particulate control shall be operation in accordance with manufacturer's specifications and control emissions from the four (4) high volume low pressure spraying machines, identified as spray machines 1, 2, 3 and 4, the patina spray machine, identified as PSM1, and high-volume low-pressure spray repair booth, identified as spray booth 1, at all times when these spraying facilities are in operation.

(b) Pursuant to 326 IAC 6-3-1(b)(7), the two (2) striper machines, identified as striper machine 1 and 2, flood coat vacuum coater machine, identified as stainer 1, flood coat stainer machine, identified as stainer 2, and stain hand wiping area, identified as stain wipe 1, are exempt from the requirements of 326 IAC 6-3-2 because these facilities use a flow coating application process.

(c) Pursuant to 326 IAC 6-3-1(b)(14), the two (2) Moulding Compo Machines, identified as COMP01, and COMP02, and the five (5) foil laminating wrappers, identified as L1 through L5, are exempt from the requirements of 326 IAC 6-3-2 because these facilities each have a potential to emit PM of less than 0.551 pounds per hour.

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

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the woodworking operations, identified as WW1, WW2 and WW3, shall not exceed twelve and four-tenths (12.4), twelve and four-tenths (12.4) and thirty-nine and eight-tenths (39.8) pounds per hour when operating at a process weight rate of five and two-tenths (5.20), five and two-tenths (5.20) and twenty-nine and seven tenths (29.7) tons of wood per hour, respectively.

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

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

The limited PM emission rates after the baghouse dust collector controls for WW1, WW2 and WW3 are eleven and four tenths (11.4) pounds per hour, each. Therefore, each of the woodworking operations can comply with this rule.

The baghouse dust collectors shall be in operation at all times each of the woodworking operations, identified as WW1, WW2 and WWW3, are in operation, in order to comply with these limits.

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

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

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

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

The surface coating facilities at this source are either equipped with high volume low pressure (HVLP) spray applicators, or are considered brush or wipe application methods (hand wipe and flow coating with one hundred percent ((100%) transfer efficiencies). Therefore, all surface coating operations comply with this rule.

**State Rule Applicability – Insignificant Facilities**

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

(a) Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the two (2) kerf machines, identified as K1 and K2, portable dust collector, four (4) tool room grinders, identified as GR1 through GR4, scuff sander, identified as SS1, and scuff sander, identified as SS2, shall not exceed the pounds per hour rates when operating at the specified process weight rates shown in the following table:

| Facility (Dust Collector) | Identification | Process Rate Weight (pounds/hour) | Allowable PM Emission Rate (pounds/hour) | Potential to Emit After Controls (pounds/hour) |
|---|---|---|---|---|
| Two (2) kerf machines (DC4) | K1 and K2 | 150 total | 0.72 total | 0.009 total |
| Portable dust collector/vacuum (DC5) | - | 10,400 | 12.4 | 0.006 |
| Four (4) tool room grinders (DC6) | GR1 through GR4 | 250 total | 1.02 total | 0.009 total |
| Scuff sander (DC7) | SS1 | 1,040 | 2.65 | 0.009 |
| Scuff sander (DC8) | SS2 | 1,040 | 2.65 | 0.009 |

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

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

As shown preceding table, each of these insignificant activities can comply with this rule.

The dust collectors, identified as DC4, DC6, DC7 and DC8 shall be in operation at all times these insignificant activities, identified as K1, K2, GR1 through GR4, SS1 and SS2 are in operation, in order to comply with these limits.

(b) Pursuant to 326 IAC 6-3-1(b)(14), the bag dumping of Sorbond is exempt from the requirements of 326 IAC 6-3-2 because this facility has a potential to emit PM of less than five hundred fifty-one thousandths (0.551) pounds per hour.

**Testing Requirements**

Since the source has not tested the transfer and control efficiencies of any of the of the six (6) spray coating processes, the Permittee shall conduct performance tests (as described in (a) and (b) below) to verify the transfer efficiency and particulate matter control efficiency requirements to render the requirements of 326 IAC 2-2 not applicable.

(a) No later than 180 days after issuance of T 039-20391-00174, the Permittee shall conduct transfer efficiency testing on one (1) of the six (6) spray coating processes subject to Condition D.2.2. The testing shall be done on a spray coating process that has not been tested in the past ten (10) years. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted using methods approved by the Commissioner and in accordance with 326 IAC 3-6-3 and Section C – Performance Testing.

(b) No later than 180 days after issuance of T 039-20391-00174, the Permittee shall conduct control efficiency testing on the dry filters used by one (1) of the six (6) spray coating processes subject to Condition D.2.2. The testing shall be done on filters that have not been tested in the past ten (10) years. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted using methods approved by the Commissioner and in accordance with 326 IAC 3-6-3 and Section C – Performance Testing.

**Compliance Determination and Monitoring Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a 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 Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in 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 enforce-

ment 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.

(a) The compliance determination requirements applicable to this source are as follows:

The woodworking has applicable compliance determination conditions as specified below:

(1) The baghouse dust collectors, identified as DC1, DC2 and DC3 for particulate control shall be in operation and control emissions from the woodworking operations, identified as WW1, WW2 and WW3 at all times that the respective woodworking operation is in operation.

(2) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for 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) The Compliance Assurance Monitoring requirements (40 CFR 64) and compliance monitoring requirements applicable to this source are as follows:

(1) The woodworking has applicable compliance monitoring conditions as specified below:

| Control | Parameter | Frequency | Range | Excursions and Exceedances |
|---|---|---|---|---|
| Baghouse dust collectors (DC1, DC2 and DC3) | Visible Emissions | Daily | Normal-Abnormal | Response Steps |
| | Bag Inspections | Quarterly | Defective or Not Detective | Replace Defective Bags |

These monitoring conditions are necessary because the baghouse dust collectors for the woodworking operations must operate properly to ensure compliance with 326 IAC 5-1, 326 IAC 6-3 and 326 IAC 2-7.

(2) The four (4) high volume low pressure spraying machines, identified as spray machines 1, 2, 3 and 4, the patina spray machine, identified as PSM1, and high volume low pressure spray repair booth, identified as spray booth 1, have applicable compliance monitoring conditions as specified below:

| Control | Parameter | Frequency | Range | Excursions and Exceedances |
|---|---|---|---|---|
| Dry Filters | Inspection | Daily | Placement, Integrity, & Particle Loading | Response Steps |
| | Observations | Weekly | Stack Overspray | Response Steps |
| | Observations | Monthly | Rooftop & Ground | Response Steps |

These monitoring conditions are necessary because the dry filters for the spraying operations must operate properly to ensure compliance with 326 IAC 5-1, 326 IAC 6-3 and 326 IAC 2-7.

**Recommendation**

The staff recommends to the Commissioner that the Part 70 Operating Permit 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 14, 2005. Additional information was received on May 4 and 8, 2007.

**Conclusion**

The operation of this a wood moulding manufacturing source shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. T 039-20391-00174.

**Appendix A: Emissions Calculations**
**Summary Emissions**

**Company Name:** Nickell Moulding Company, Inc.
**Address City IN Zip:** 3015 Mobile Drive, Elkhart, Indiana 46515
**Part 70 Renewal Permit:** T 039-20391-00174
**Reviewer:** Frank P. Castelli/MES
**Date:** May 23, 2007

**Potential to Emit Before Controls**

| Emission Units | PM (tons/yr) | PM10 (tons/yr) | SO2 (tons/yr) | NOx (tons/yr) | VOC (tons/yr) | CO (tons/yr) | * Highest Single HAP (tons/yr) | Combined HAP (tons/yr) |
|---|---|---|---|---|---|---|---|---|
| Natural Gas Combustion (Insignificant Activity)including Embossers 1 & 2 | 0.080 | 0.319 | 0.025 | 4.20 | 0.231 | 3.53 | 0.076 | 0.079 |
| Sorbond Usage (Insignificant Activity) | 0.0298 | 0.0298 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 |
| Woodworking (WW1, WW2 & WW3) | 1,555 | 1,555 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 |
| Insignificant Activities w/DC-4 to DC-8 | 18.1 | 18.1 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 |
| Striper Machines (1 & 2) | 0.000 | 0.000 | 0.000 | 0.000 | 9.25 | 0.000 | 4.60 | 4.60 |
| Spray Machines 1 Through 4 | 41.4 | 41.4 | 0.000 | 0.000 | 18.5 | 0.000 | 9.20 | 9.20 |
| Flood Coat Vacuum Coater/Stainer (Stainer Machines 1 & 2) | 0.000 | 0.000 | 0.000 | 0.000 | 9.25 | 0.000 | 4.60 | 4.60 |
| Stain Hand Wiping Area (Stain Wipe 1) | 0.000 | 0.000 | 0.000 | 0.000 | 4.63 | 0.000 | 2.30 | 2.30 |
| Repair Spray Booth (Spray Booth 1) | 10.35 | 10.35 | 0.000 | 0.000 | 4.63 | 0.000 | 2.30 | 2.30 |
| Patina Spray Machine (PSM1) | 10.35 | 10.35 | 0.000 | 0.000 | 4.63 | 0.000 | 2.30 | 2.30 |
| UV Coating Machine (Insignificant Activity) | 0.00 | 0.00 | 0.000 | 0.000 | 0.151 | 0.000 | 0.000 | 0.000 |
| Laminating Wrappers (L1 - L3) (Insignificant Activity) | 0.00 | 0.00 | 0.000 | 0.000 | 0.060 | 0.000 | 0.060 | 0.060 |
| Laminating Wrappers (L4 & L5) (Insignificant Activity) | 0.00 | 0.00 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 |
| **Total** | **1,635** | **1,636** | **0.025** | **4.20** | **51.3** | **3.53** | **25.3** | **25.4** |

***Glycol Ethers as Determined Below**

**Potential to Emit Before & After Controls**

| Emission Units | Glycol Ethers (tons/yr) | Hexane (tons/yr) | Combined HAPs (tons/yr) |
|---|---|---|---|
| Natural Gas Combustion (Insignificant Activity)including Embossers 1 & 2 | 0.000 | 0.080 | 0.080 |
| Sorbond Usage (Insignificant Activity) | 0.000 | 0.000 | 0.000 |
| Woodworking (WW1, WW2 & WW3) | 0.000 | 0.000 | 0.000 |
| Insignificant Activities w/DC-4 to DC-8 | 0.000 | 0.000 | 0.000 |
| Striper Machines (1 & 2) | 4.60 | 0.000 | 4.60 |
| Spray Machines 1 Through 4 | 9.20 | 0.000 | 9.20 |
| Flood Coat Vacuum Coater/Stainer (Stainer Machines 1 & 2) | 4.60 | 0.000 | 4.60 |
| Stain Hand Wiping Area (Stain Wipe 1) | 2.30 | 0.000 | 2.30 |
| Repair Spray Booth (Spray Booth 1) | 2.30 | 0.000 | 2.30 |
| Patina Spray Machine (PSM1) | 2.30 | 0.000 | 2.30 |
| UV Coating Machine (Insignificant Activity) | 0.000 | 0.000 | 0.000 |
| Laminating Wrappers (L1 - L3) (Insignificant Activity) | 0.000 | 0.000 | 0.060 |
| Laminating Wrappers (L4 & L5) (Insignificant Activity) | 0.000 | 0.000 | 0.000 |
| **Total** | **25.3** | **0.080** | **25.4** |

Not all Hazardous Air Pollutants from Natural Gas Combustion are Listed; Only Hexane from Natural Gas Combustion is Listed Here

**Potential to Emit After Controls**

| Emission Units | PM (tons/yr) | PM10 (tons/yr) | SO2 (tons/yr) | NOx (tons/yr) | VOC (tons/yr) | CO (tons/yr) | * Highest Single HAP (tons/yr) | Combined HAP (tons/yr) |
|---|---|---|---|---|---|---|---|---|
| Natural Gas Combustion (Insignificant Activity)including Embossers 1 & 2 | 0.080 | 0.319 | 0.025 | 4.20 | 0.231 | 3.53 | 0.076 | 0.079 |
| Sorbond Usage (Insignificant Activity) | 0.030 | 0.030 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 |
| Woodworking (WW1, WW2 & WW3) | 15.55 | 15.55 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 |
| Insignificant Activities w/DC-4 to DC-8 | 0.181 | 0.181 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 |
| Striper Machines (1 & 2) | 0.000 | 0.000 | 0.000 | 0.000 | 9.25 | 0.000 | 4.60 | 4.60 |
| Spray Machines 1 Through 4 | 4.14 | 4.14 | 0.000 | 0.000 | 18.5 | 0.000 | 9.20 | 9.20 |
| Flood Coat Vacuum Coater/Stainer (Stainer Machines 1 & 2) | 0.000 | 0.000 | 0.000 | 0.000 | 9.25 | 0.000 | 4.60 | 4.60 |
| Stain Hand Wiping Area (Stain Wipe 1) | 0.000 | 0.000 | 0.000 | 0.000 | 4.63 | 0.000 | 2.30 | 2.30 |
| Repair Spray Booth (Spray Booth 1) | 1.03 | 1.03 | 0.000 | 0.000 | 4.63 | 0.000 | 2.30 | 2.30 |
| Patina Spray Machine (PSM1) | 1.03 | 1.03 | 0.000 | 0.000 | 4.63 | 0.000 | 2.30 | 2.30 |
| UV Coating Machine (Insignificant Activity) | 0.000 | 0.000 | 0.000 | 0.000 | 0.151 | 0.000 | 0.000 | 0.000 |
| Laminating Wrappers (L1 - L3) (Insignificant Activity) | 0.000 | 0.000 | 0.000 | 0.000 | 0.060 | 0.000 | 0.060 | 0.060 |
| Laminating Wrappers (L4 & L5) (Insignificant Activity) | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 |
| **Total** | **22.05** | **22.29** | **0.025** | **4.20** | **51.3** | **3.53** | **25.3** | **25.4** |

**Appendix A: Process Particulate Emissions**
**Woodworking Operations (WW1, WW2, and WW3)**

**Company Name:** Nickell Moulding Company, Inc.
**Address City IN Zip:** 3015 Mobile Drive, Elkhart, Indiana 46515
**Part 70 Renewal Permit:** T 039-20391-00174
**Reviewer:** Frank P. Castelli/ MES
**Date:** May 23, 2007

**Uncontrolled Potential Emissions (tons/year)**

| Process - Id (Dust Collector Id.) | No. of Units | Airflow (acfm) | Grain Loading per Actual Cubic Foot of Outlet Air | Control Efficiency | PM/PM10 (tons/yr) |
|---|---|---|---|---|---|
| Woodworking - WW1 (DC1) | 1 | 28,700 | 0.00437 | 99.00% | 470.9 |
| Woodworking - WW2 (DC2) | 1 | 30,180 | 0.00437 | 99.00% | 495.1 |
| Woodworking - WW3 (DC3) | 1 | 35,910 | 0.00437 | 99.00% | 589.1 |
| | | | | | |
| Total Emissions Based on 8,760 Hours/Year (tons/year) | | | | | **1,555.1** |
| Total Emissions Based on Rated Capacity (lb/hr) | | | | | **355.1** |

**Controlled Potential Emissions (tons/year)**

| Process - Id (Dust Collector Id.) | No. of Units | Airflow (acfm) | Grain Loading per Actual Cubic Foot of Outlet Air | | PM/PM10 (tons/yr) |
|---|---|---|---|---|---|
| Woodworking - WW1 (DC1) | 1 | 28,700 | 0.00437 | | 4.71 |
| Woodworking - WW2 (DC2) | 1 | 30,180 | 0.00437 | | 4.95 |
| Woodworking - WW3 (DC3) | 1 | 35,910 | 0.00437 | | 5.89 |
| | | | | | |
| Total Emissions Based on 8,760 Hours/Year and controls (tons/year) | | | | | **15.6** |
| Total Emissions Based on 8,760 Hours/Year and controls (lb/hr) | | | | | **3.55** |

**Allowable PM Emission Rates Pursuant to 326 IAC 6-3-2**

| | Woodworking - WW1 (DC1) | Woodworking - WW2 (DC2) | Woodworking - WW3 (DC3) |
|---|---|---|---|
| Allowable Emission (lb/hr) = 4.10 x [Process Weight Rate ] $^{0.67}$ = | 12.4 | 12.4 | 39.8 |
| Material Input Rate (lb/hr) = | 10,400 | 10,400 | 59,400 |
| Material Input Rate (ton/hr) = | 5.20 | 5.20 | 29.7 |
| Potential PM Emissions After Controls (lbs/hr) | 1.08 | 1.13 | 1.35 |

**Methodology:**

Potential Emission (uncontrolled):

Potential Emission(tons/yr) = [No. Units * Loading (grains/acf) * Flow Rate (acfm) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)]

Potential Emission (controlled):

Potential Emission (tons/yr) = [No. Units * Loading (grains/acf) * Flow Rate (acfm) ** 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs]

Potential PM Emissions After Controls (lbs/hr) = Potential Emissions After Controls (tons/yr) x 2,000 lbs/ton x 1 year/8,760 hrs

**Appendix A: Emissions Calculations**
**VOC and Particulate**
**From Surface Coating Operations**
**Two (2) Striper Machines (Striper Machine 1 and Striper Machine 2)**

**Company Name:** Nickell Moulding Company, Inc.
**Address City IN Zip:** 3015 Mobile Drive, Elkhart, Indiana 46515
**Part 70 Renewal Permit:** T 039-20391-00174
**Reviewer:** Frank P. Castelli/ MES
**Date:** May 23, 2007

**CRITERIA POLLUTANTS**

| Process | Manufacturer | Product Number | Use | Description | Density (Lb/Gal) | Weight % Volatile (H20 & Organics) | Weight % Water & Exempt | Weight % Organics | Volume % Water & Exempt | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (unit/hour) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | Particulate Potential (ton/yr) | lb VOC/gal solids | Transfer Efficiency (See Notes Below) | Substrate |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Striper Machines 1 and 2 | Crenova | ATW | Stain | Aqua Chem Titanium White | 17.51 | 10.05% | 0.00% | 10.05% | 0.00% | 76.53% | 0.00008 | 15,000 | 1.76 | 1.76 | 2.11 | 50.69 | 9.25 | 0.00 | 2.30 | 100% | Wood |
| Striper Machines 1 and 2 | N/A | N/A | Cleanup | Water | 8.34 | 100.00% | 100.00% | 0.00% | 100.00% | 0.00% | 0.00005 | 15,000 | N/A | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | N/A | 100% | Wood |
| **Potential to Emit** | | | | | | | | | | | | | | | **2.11** | **50.69** | **9.25** | **0.00** | | | |

**Transfer Efficiency - Flow Coating and Hand/Manual Application = 100%**

**METHODOLOGY**
Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

**HAZARDOUS AIR POLLUTANTS**

| Material | Density (lbs/gal) | Gallons of Material (gal/unit) | Maximum Throughput (units/hr) | Weight % Glycol Ethers | PTE Glycol Ethers (tons/yr) | Total PTE HAPs (tons/yr) |
|---|---|---|---|---|---|---|
| Chem Titanium | 17.51 | 0.00008 | 15,000 | 5.00% | 4.60 | 4.60 |
| Water | 8.34 | 0.00005 | 15,000 | 0.00% | 0.00 | 0.00 |
| **Potential to Emit** | | | | | **4.60** | **4.60** |

**METHODOLOGY**
PTE HAPs (tons/yr) = Density (lbs/gal) * Gal of Material (gal/unit) * Maximum Throughput (units/hr) * Weight % HAP * 8,760 hrs/yr * 1 ton/2,000 lbs

**Appendix A: Emissions Calculations**
**VOC and Particulate**
**From Surface Coating Operations**
**Four (4) Spray Machines (Spray Machines 1 through 4)**

**Company Name:** Nickell Moulding Company, Inc.
**Address City IN Zip:** 3015 Mobile Drive, Elkhart, Indiana 46515
**Part 70 Renewal Permit:** T 039-20391-00174
**Reviewer:** Frank P. Castel;li/ MES
**Date:** May 23, 2007

| Process | Manufacturer | Product Number | Use | Description | Density (Lb/Gal) | Weight % Volatile (H20 & Organics) | Weight % Water & Exempt | Weight % Organics | Volume % Water & Exempt | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (unit/hour) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | Particulate Potential (ton/yr) | lb VOC/gal solids | Transfer Efficiency (See Notes Below) | Substrate |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Spray Machines 1 to 4 | Crenova | ATW | Stain | Aqua Chem Titanium White | 17.51 | 10.05% | 0.00% | 10.05% | 0.00% | 76.53% | 0.00008 | 30,000 | 1.76 | 1.76 | 4.22 | 101.38 | 18.50 | 41.39 | 2.30 | 75% | Wood |
| **or** | | | | | | | | | | | | | | | | | | | | | |
| Spray Machines 1 to 4 | Mid America | S-1529 | Topcoat | Hi Build SG Topcoat | 8.55 | 66.67% | 58.07% | 8.60% | 59.52% | 29.63% | 0.00008 | 30,000 | 1.82 | 0.74 | 1.76 | 42.34 | 7.73 | 7.49 | 2.48 | 75% | Wood |
| **and** | | | | | | | | | | | | | | | | | | | | | |
| Spray Machines 1 to 4 | N/A | N/A | Cleanup | Water | 8.34 | 100.00% | 100.00% | 0.00% | 100.00% | 0.00% | 0.00005 | 30,000 | N/A | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | N/A | 100% | Wood |
| **Potential to Emit (add worst case coating to all solvents)** | | | | | | | | | | | | | | | **4.22** | **101.4** | **18.5** | **41.4** | | | |
| | | | | | | | | | | | | | **After Controls** | | **4.22** | **101.4** | **18.5** | **4.14** | | | |

PM Control Eff. **90.0%**
VOC Control Eff. **0.0%**

**Transfer Efficiency - HVLP Application = 75% and Hand/Manual Application = 100%**

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Potential to Emit = Worst Case Coating + Cleanup Solvent

**HAZARDOUS AIR POLLUTANTS**

| Material | Density (lbs/gal) | Gallons of Material (gal/unit) | Maximum Throughput (units/hr) | Weight % Glycol Ethers | PTE Glycol Ethers (tons/yr) | Total PTE HAPs (tons/yr) |
|---|---|---|---|---|---|---|
| Aqua Chem Titanium White | 17.51 | 0.00008 | 30,000.00 | 5.00% | 9.20 | 9.20 |
| **or** | | | | | | |
| Hi Build SG Topcoat | 8.55 | 0.00008 | 30,000.00 | 0.00% | 0.00 | 0.00 |
| **and** | | | | | | |
| Water | 8.34 | 0.00005 | 30,000.00 | 0.00% | 0.00 | 0.00 |
| **Potential to Emit** | | | | | **9.20** | **9.20** |

**METHODOLOGY**

PTE HAPs (tons/yr) = Density (lbs/gal) * Gal of Material (gal/unit) * Maximum Throughput (units/hr) * Weight % HAP * 8,760 hrs/yr * 1 ton/2,000 lbs
Potential to Emit = Worst Case Coating + Cleanup Solvent

# Appendix A: Emissions Calculations
## VOC and Particulate
## From Surface Coating Operations
## Two (2) Flood Coat Vacuum Coater/Stainer Machines (Stainer 1 and Stainer 2)

**Company Name:** Nickell Moulding Company, Inc.
**Address City IN Zip:** 3015 Mobile Drive, Elkhart, Indiana 46515
**Part 70 Renewal Permit:** T 039-20391-00174
**Reviewer:** Frank P. Castelli/MES
**Date:** May 23, 2007

**CRITERIA POLLUTANTS**

| Process | Manufacturer | Product Number | Use | Description | Density (Lb/Gal) | Weight % Volatile (H20 & Organics) | Weight % Water & Exempt | Weight % Organics | Volume % Water & Exempt | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (unit/hour) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | Particulate Potential (ton/yr) | lb VOC/gal solids | Transfer Efficiency (See Notes Below) | Substrate |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Stainer 1 and 2 | Crenova | ATW | Stain | Aqua Chem Titanium White | 17.51 | 10.05% | 0.00% | 10.05% | 0.00% | 76.53% | 0.00008 | 15,000 | 1.76 | 1.76 | 2.11 | 50.69 | 9.25 | 0.00 | 2.30 | 100% | Wood |
| Stainer 1 and 2 | N/A | N/A | Cleanup | Water | 8.34 | 100.00% | 100.00% | 0.00% | 100.00% | 0.00% | 0.00005 | 15,000 | N/A | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | N/A | 100% | Wood |
| **Potential to Emit** | | | | | | | | | | | | | | | **2.11** | **50.69** | **9.25** | **0.00** | | | |

**Transfer Efficiency - Flood Coat and Hand/Manual Application = 100%**

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

**HAZARDOUS AIR POLLUTANTS**

| Material | Density (lbs/gal) | Gallons of Material (gal/unit) | Maximum Throughput (units/hr) | Weight % Glycol Ethers | PTE Glycol Ethers (tons/yr) | Total PTE HAPs (tons/yr) |
|---|---|---|---|---|---|---|
| qua Chem Titanium Whi | 17.51 | 0.00008 | 15,000.00 | 5.00% | 4.60 | 4.60 |
| Water | 8.34 | 0.00005 | 15,000.00 | 0.00% | 0.00 | 0.00 |
| **Total** | | | | | **4.60** | **4.60** |

**METHODOLOGY**

PTE HAPs (tons/yr) = Density (lbs/gal) * Gal of Material (gal/unit) * Maximum Throughput (units/hr) * Weight % HAP * 8,760 hrs/yr * 1 ton/2,000 lbs

**Appendix A: Emissions Calculations**
**VOC and Particulate**
**From Surface Coating Operations**
**One (1) Stain Hand Wiping Area (Stain Wipe 1)**

**Company Name:** Nickell Moulding Company, Inc.
**Address City IN Zip:** 3015 Mobile Drive, Elkhart, Indiana 46515
**Part 70 Renewal Permit:** T 039-20391-00174
**Reviewer:** Frank P. Castelli/MES
**Date:** May 23, 2007

**CRITERIA POLLUTANTS**

| Process | Manufacturer | Product Number | Use | Description | Density (Lb/Gal) | Weight % Volatile (H20 & Organics) | Weight % Water & Exempt | Weight % Organics | Volume % Water & Exempt | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (unit/hour) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | Particulate Potential (ton/yr) | lb VOC/gal solids | Transfer Efficiency (See Notes Below) | Substrate |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Stain Wipe 1 | Crenova | ATW | Stain | Aqua Chem Titanium White | 17.51 | 10.05% | 0.00% | 10.05% | 0.00% | 76.53% | 0.00008 | 7,500.00 | 1.76 | 1.76 | 1.06 | 25.34 | 4.63 | 0.00 | 2.30 | 100% | Wood |
| Stain Wipe 1 | NA | NA | Cleanup | Water | 8.34 | 100.00% | 100.00% | 0.00% | 100.00% | 0.00% | 0.00005 | 7,500.00 | N/A | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | N/A | 100% | Wood |
| **Potential to Emit** | | | | | | | | | | | | | | | **1.06** | **25.34** | **4.63** | **0.00** | | | |

**Transfer Efficiency - Hand/Manual Application = 100%**

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

**HAZARDOUS AIR POLLUTANTS**

| Material | Density (lbs/gal) | Gallons of Material (gal/unit) | Maximum Throughput (units/hr) | Weight % Glycol Ethers | PTE Glycol Ethers (tons/yr) | Total PTE HAPs (tons/yr) |
|---|---|---|---|---|---|---|
| Aqua Chem Titanium White | 17.51 | 0.00008 | 7,500.00 | 5.00% | 2.30 | 2.30 |
| Water | 8.34 | 0.00005 | 7,500.00 | 0.00% | 0.00 | 0.00 |
| **Potential to Emit** | | | | | **2.30** | **2.30** |

**METHODOLOGY**

PTE HAPs (tons/yr) = Density (lbs/gal) * Gal of Material (gal/unit) * Maximum Throughput (units/hr) * Weight % HAP * 8,760 hrs/yr * 1 ton/2,000 lbs

**Appendix A: Emissions Calculations**
**VOC and Particulate**
**From Surface Coating Operations**
**One (1) Patina Spray Machine (PSM1)**

**Company Name:** Nickell Moulding Company, Inc.
**Address City IN Zip:** 3015 Mobile Drive, Elkhart, Indiana 46515
**Part 70 Renewal Permit:** T 039-20391-00174
**Reviewer:** Frank P. Castelli/MES
**Date:** May 23, 2007

| Process | Manufacturer | Product Number | Use | Description | Density (Lb/Gal) | Weight % Volatile (H20 & Organics) | Weight % Water & Exempt | Weight % Organics | Volume % Water & Exempt | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (unit/hour) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | Particulate Potential (ton/yr) | lb VOC/gal solids | Transfer Efficiency (See Notes Below) | Substrate |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Patina Spray Machine | Crenova | ATW | Stain | Aqua Chem Titanium White | 17.51 | 10.05% | 0.00% | 10.05% | 0.00% | 76.53% | 0.00008 | 7,500.00 | 1.76 | 1.76 | 1.06 | 25.34 | 4.63 | 10.35 | 2.30 | 75% | Wood |
| **or** | | | | | | | | | | | | | | | | | | | | | |
| Patina Spray Machine | Mid America | S-1529 | Topcoat | Hi Build SG Topcoat | 8.55 | 66.67% | 58.07% | 8.60% | 59.52% | 29.63% | 0.00008 | 7,500.00 | 1.82 | 0.74 | 0.44 | 10.58 | 1.93 | 1.87 | 2.48 | 75% | Wood |
| **and** | | | | | | | | | | | | | | | | | | | | | |
| Patina Spray Machine | NA | NA | Cleanup | Water | 8.34 | 100.00% | 100.00% | 0.00% | 100.00% | 0.00% | 0.00005 | 7,500.00 | N/A | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | N/A | 100% | Wood |
| **Potential to Emit (add worst case coating to all solvents)** | | | | | | | | | | | | | | | **1.06** | **25.3** | **4.63** | **10.3** | | | |
| | | | | | | | | | | | | | **After Controls** | | **1.06** | **25.3** | **4.63** | **1.03** | | | |

**Transfer Efficiency - HVLP Application = 75% and Hand/Manual Application = 100%**

PM Control Eff. **90.0%**
VOC Control Eff. **0.0%**

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Potential to Emit = Worst Case Coating + Cleanup Solvent

**HAZARDOUS AIR POLLUTANTS**

| Material | Density (lbs/gal) | Gallons of Material (gal/unit) | Maximum Throughput (units/hr) | Weight % Glycol Ethers | PTE Glycol Ethers (tons/yr) | Total PTE HAPs (tons/yr) |
|---|---|---|---|---|---|---|
| Aqua Chem Titanium White | 17.51 | 0.00008 | 7,500.00 | 5.00% | 2.30 | 2.30 |
| **or** | | | | | | |
| Hi Build SG Topcoat | 8.55 | 0.00008 | 7,500.00 | 0.00% | 0.00 | 0.00 |
| **and** | | | | | | |
| Water | 8.34 | 0.00005 | 7,500.00 | 0.00% | 0.00 | 0.00 |
| **Potential to Emit (add worst case coating to all solvents)** | | | | | **2.30** | **2.30** |

**METHODOLOGY**

PTE HAPs (tons/yr) = Density (lbs/gal) * Gal of Material (gal/unit) * Maximum Throughput (units/hr) * Weight % HAP * 8,760 hrs/yr * 1 ton/2,000 lbs
Potential to Emit = Worst Case Coating + Cleanup Solvent

**Appendix A: Emissions Calculations**
**VOC and Particulate**
**From Surface Coating Operations**
**One (1) Spray Repair Booth (Spray Booth 1)**

**Company Name:** Nickell Moulding Company, Inc.
**Address City IN Zip:** 3015 Mobile Drive, Elkhart, Indiana 46515
**Part 70 Renewal Permit:** T 039-20391-00174
**Reviewer:** Frank P. Castelli/ MES
**Date:** May 23, 2007

| Process | Manufacturer | Product Number | Use | Description | Density (Lb/Gal) | Weight % Volatile (H20 & Organics) | Weight % Water & Exempt | Weight % Organics | Volume % Water & Exempt | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (unit/hour) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | Particulate Potential (ton/yr) | lb VOC/gal solids | Transfer Efficiency (See Notes Below) | Substrate |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Spray Booth 1 | Crenova | ATW | Stain | Aqua Chem Titanium White | 17.51 | 10.05% | 0.00% | 10.05% | 0.00% | 76.53% | 0.00008 | 7,500.00 | 1.76 | 1.76 | 1.06 | 25.34 | 4.63 | 10.35 | 2.30 | 75% | Wood |
| **or** | | | | | | | | | | | | | | | | | | | | | |
| Spray Booth 1 | Mid America | S-1529 | Topcoat | Hi Build SG Topcoat | 8.55 | 66.67% | 58.07% | 8.60% | 59.52% | 29.63% | 0.00008 | 7,500.00 | 1.82 | 0.74 | 0.44 | 10.58 | 1.93 | 1.87 | 2.48 | 75% | Wood |
| **and** | | | | | | | | | | | | | | | | | | | | | |
| Spray Booth 1 | NA | NA | Cleanup | Water | 8.34 | 100.00% | 100.00% | 0.00% | 100.00% | 0.00% | 0.00005 | 7,500.00 | N/A | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | N/A | 100% | Wood |
| **Potential to Emit (add worst case coating to all solvents)** | | | | | | | | | | | | | | | **1.06** | **25.3** | **4.63** | **10.3** | | | |
| | | | | | | | | | | | | | **After Controls** | | **1.06** | **25.3** | **4.63** | **1.03** | | | |

**Transfer Efficiency - HVLP Application = 75% and Hand/Manual Application = 100%**

PM Control Eff. **90.0%**
VOC Control Eff. **0.0%**

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Potential to Emit = Worst Case Coating + Cleanup Solvent

**HAZARDOUS AIR POLLUTANTS**

| Material | Density (lbs/gal) | Gallons of Material (gal/unit) | Maximum Throughput (units/hr) | Weight % Glycol Ethers | PTE Glycol Ethers (tons/yr) | Total PTE HAPs (tons/yr) |
|---|---|---|---|---|---|---|
| Aqua Chem Titanium White | 17.51 | 0.00008 | 7,500.00 | 5.00% | 2.30 | 2.30 |
| **or** | | | | | | |
| Hi Build SG Topcoat | 8.55 | 0.00008 | 7,500.00 | 0.00% | 0.00 | 0.00 |
| **and** | | | | | | |
| Water | 8.34 | 0.00005 | 7,500.00 | 0.00% | 0.00 | 0.00 |
| **Potential to Emit (add worst case coating to all solvents)** | | | | | **2.30** | **2.30** |

**METHODOLOGY**

PTE HAPs (tons/yr) = Density (lbs/gal) * Gal of Material (gal/unit) * Maximum Throughput (units/hr) * Weight % HAP * 8,760 hrs/yr * 1 ton/2,000 lbs
Potential to Emit = Worst Case Coating + Cleanup Solvent

**Appendix A: Emission Calculations**
**Insignificant Natural Gas Combustion**

**Company Name:** Nickell Moulding Company, Inc.
**Address City IN Zip:** 3015 Mobile Drive, Elkhart, Indiana 46515
**Part 70 Renewal Permit:** T 039-20391-00174
**Reviewer:** Frank P. Castelli/MES
**Date:** May 23, 2007

Total Heat Input Capacity (MMBtu/hr) 9.588 Potential Throughput (MMCF/yr) 83.99

| | Pollutant | | | | | |
|---|---|---|---|---|---|---|
| | **PM*** | **PM10** | **$SO_2$** | **NOx** | **VOC** | **CO** |
| Emission Factor (lb/MMCF) | 1.90 | 7.60 | 0.60 | 100.00 | 5.50 | 84.00 |
| Potential To Emit (tons/year) | 0.080 | 0.319 | 0.025 | 4.20 | 0.231 | 3.53 |

* PM Factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**METHODOLOGY**

PTE (tons/year) = Potential Throughput (MMCF/yr) * Emission Factor (lb/MMCF) / 2000 lbs/ton
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) * 8760 hrs/yr * 1 MMCF/ 1000 Btu
Emission Factors from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02 and 1-03-006-03

**HAPs Emissions**

| | Organic HAPs | | | | | |
|---|---|---|---|---|---|---|
| | **Benzene** | **Dichlorobenzene** | **Formaldehyde** | **Hexane** | **Toluene** | |
| Emission Factor (lb/MMCF) | 0.0021 | 0.0012 | 0.0750 | 1.8000 | 0.0034 | |
| Potential To Emit (tons/year) | 0.00009 | 0.00005 | 0.0031 | 0.0756 | 0.0001 | |

| | Inorganic HAPs | | | | | |
|---|---|---|---|---|---|---|
| | **Lead** | **Cadmium** | **Chromium** | **Manganese** | **Nickel** | **Total** |
| Emission Factor (lb/MMCF) | 0.0005 | 0.0011 | 0.0014 | 0.0004 | 0.0021 | |
| Potential To Emit (tons/year) | 0.00002 | 0.00005 | 0.00006 | 0.00002 | 0.00009 | 0.079 |

**METHODOLOGY**

PTE (tons/year) = Potential Throughput (MMCF/yr) * Emission Factor (lb/MMCF) / 2000 lbs/ton

**Appendix A: Process Particulate Emissions**
**Grionding and Machining Insignificant Activities**

**Company Name:** Nickell Moulding Company, Inc.
**Address City IN Zip:** 3015 Mobile Drive, Elkhart, Indiana 46515
**Part 70 Renewal Permit:** T 039-20391-00174
**Reviewer:** Frank P. Castelli/ MES
**Date:** May 23, 2007

**Grinding and Machining Insignifficant Activities**

| | | | Uncontrolled Potential Emissions (tons/year) | | |
|---|---|---|---|---|---|
| Process - Id (Dust Collector Id.) | No. of Units | Airflow (acfm) | Grain Loading per Actual Cubic Foot of Outlet Air | Control Efficiency | Total (tons/yr) |
| 2 Kerf Machines, K1 & K2 (DC4) | 1 | 1,100 | 0.001 | 99.00% | 4.13 |
| Portable Dust Collector (DC5) | 1 | 650 | 0.001 | 99.00% | 2.44 |
| Tool Rm Grinders GR1 - GR4 (DC6) | 1 | 1,070 | 0.001 | 99.00% | 4.02 |
| Scuff Sander SS1 (DC7) | 1 | 1,000 | 0.001 | 99.00% | 3.75 |
| Scuff Sander SS2 (DC8) | 1 | 1,000 | 0.001 | 99.00% | 3.75 |
| | | | | | |
| Total Emissions Based on Rated Capacity at 8,760 Hours/Year (tons/year) | | | | | **18.1** |
| Total Emissions Based on Rated Capacity (lb/hr) | | | | | **4.13** |

| | | | Controlled Potential Emissions (tons/year) | | |
|---|---|---|---|---|---|
| Process - Id (Dust Collector Id.) | No. of Units | Airflow (acfm) | Grain Loading per Actual Cubic Foot of Outlet Air | Control Efficiency | Total (tons/yr) |
| 2 Kerf Machines, K1 & K2 (DC4) | 1 | 1,100 | 0.001 | 99.00% | 0.041 |
| Portable Dust Collector (DC5) | 1 | 650 | 0.001 | 99.00% | 0.024 |
| Tool Rm Grinders GR1 - GR4 (DC6) | 1 | 1,070 | 0.001 | 99.00% | 0.040 |
| Scuff Sander SS1 (DC7) | 1 | 1,000 | 0.001 | 99.00% | 0.038 |
| Scuff Sander SS2 (DC8) | 1 | 1,000 | 0.001 | 99.00% | 0.038 |
| | | | | | |
| Total Emissions Based on 8,760 Hours/Year and controls (tons/year) | | | | | **0.181** |
| Total Emissions Based on 8,760 Hours/Year and controls (lb/hr) | | | | | **0.041** |

**Allowable PM Emission Rates**

| | | 2 Kerf Machines, K1 & K2 (DC4) | Portable Dust Collector (DC5) | Tool Rm Grinders GR1 - GR4 (DC6) | Scuff Sander SS1 (DC7) | Scuff Sander SS2 (DC8) |
|---|---|---|---|---|---|---|
| Allowable Emission (lb/hr) = | 4.10 x [Process Weight Rate ] $^{0.67}$ = | 0.72 | 12.37 | 1.02 | 2.65 | 2.65 |
| Material Input Rate (lb/hr) = | | 150.0 | 10,400.00 | 250.00 | 1,040.00 | 1,040.00 |
| Potential PM Emissions After Controls (lbs/hr) | | 0.009 | 0.006 | 0.009 | 0.009 | 0.009 |

**Methodology:**

Potential Emission (uncontrolled):

Potential Emission(tons/yr) = [No. Units * Loading (grains/acf) * Flow Rate (acfm) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)]

Potential Emission (controlled):

Potential Emission (tons/yr) = [No. Units * Loading (grains/acf) * Flow Rate (acfm) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs]

Potential PM Emissions After Controls (lbs/hr) = Potential Emissions After Controls (tons/yr) x 2,000 lbs/ton x 1 year/8,760 hrs

## Appendix A: Process Particulate Emissions
## Bag Dumping of Sorbond for Waste Paint Processing

**Company Name:** Nickell Moulding Company, Inc.
**Address City IN Zip:** 3015 Mobile Drive, Elkhart, Indiana 46515
**Part 70 Renewal Permit:** T 039-20391-00174
**Reviewer:** Frank P. Castelli/MES
**Date:** May 23, 2007

**Insignificant Activity**

**Uncontrolled Potential Emissions (tons/year)**

| Material | Material Usage (lb/hr) | Emission Factor (lb/ton) SCC 3-05-011-09 | PM/PM10 Emissions (lb/hr) | PM/PM10 Emissions (lb/day) | PM/PM10 Emissions (tons/year) |
|---|---|---|---|---|---|
| Sorbond Bentonite | 25.0 | 0.544 | 0.00680 | 0.163 | 0.0298 |

**Methodology:**

**Potential Emission (uncontrolled):**

Potential Emissions (lb/hr) = Material Usage (lb/hr) x 1/2,000 (lb/ton) x Emission Factor (lb/ton)

Potential Emissions (lb/day) = Potential Emissions (lb/hr) x 24 (hr/day)

Potential Emission(tons/yr) = Potential Emissions (lb/hr) x 8760 hr/yr x 1 ton/2,000 lbs

Emission Factor from AP-42, Chapter 11.12, Table 11.12-2 for Cement Mixer Loading, SCC 3-05-011-09

**Appendix A: Emissions Calculations**
**VOC and Particulate**
**From Surface Coating Operations**
**One (1) UV Coating Machine**

**Company Name:** Nickell Moulding Company, Inc.
**Address City IN Zip:** 3015 Mobile Drive, Elkhart, Indiana 46515
**Part 70 Renewal Permit:** T 039-20391-00174
**Reviewer:** Frank P. Castelli/MES
**Date:** May 23, 2007

Insignificant Activity

| Process | Manufacturer | Product Number | Use | Description | Density (Lb/Gal) | Weight % Volatile (H20 & Organics) | Weight % Water & Exempt | Weight % Organics | Volume % Water & Exempt | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (unit/hour) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | Particulate Potential (ton/yr) | lb VOC/gal solids | Transfer Efficiency (See Notes Below) | Substrate |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| UV Coater | Mid America | UV-1012 | Topcoat | 10 Sheen Clear UV Topcoat | 9.74 | 0.17% | 0.00% | 0.17% | 0.00% | 98.05% | 0.00027 | 7,500.00 | 0.017 | 0.017 | 0.034 | 0.826 | 0.151 | 0.00 | 0.02 | 100% | Wood |
| UV Coater | N/A | N/A | Cleanup | Water | 8.34 | 100.00% | 100.00% | 0.00% | 100.00% | 0.00% | 0.00005 | 7,500.00 | N/A | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | N/A | 100% | Wood |
| **Potential to Emit** | | | | | | | | | | | | | | | **0.034** | **0.826** | **0.151** | **0.000** | | | |

**Transfer Efficiency - Flood Coat and Hand/Manual Application = 100%**

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

**HAZARDOUS AIR POLLUTANTS**

There are no hazardous air pollutants in the coating.

**Appendix A: Emissions Calculations**
**VOC/MDI**

**Laminating Wrappers L1 - L3**

**Company Name:** **Nickell Moulding Company, Inc.**
**Address City IN Zip:** **3015 Mobile Drive, Elkhart, Indiana 46515**
**Part 70 Renewal Permit:** **T 039-20391-00174**
**Reviewer:** **Frank P. Castelli/MES**
**Date:** **June 18, 2007**

The three (3) laminating wrappers, identified as L1 through L3, installed in 2004 with a total capacity of seventy-five (75.0) pounds of polyurethane adhesive per hour and seven thousand five hundred (7,500) square feet per hour coated, use a material that contains the HAP, MDI. The potential to emit MDI, a VOC from the three (3) foil laminatingwrappers has been calculated with the equation provided by the Society of the Plastic=s Industry=s Polyurethane Division under the provisions of the Emergency Planning and Community Right-to-Know Act (EPCRA) as shown below:

The two (2) laminating wrappers, identified as L4 and L5, also installed in 2004, do not use adhesives and therefore, there are no emissions from these facilities.

**Maximum Potential Emissions**

**Formula**

$$W(MDI) = 25.4 \times \frac{(Pt' \cdot Mt)}{T} \times u^{0.78} \times A$$

From Society of the Plastic's Industry's Polyurethane Division under the provisions of Section 313 of the Emergency Planning and Community Right-to-Know Act (EPCRA)

| | Liquid Vapor Pressure | Molecular Weight | Temperature | Air Flow Rate | Area | |
|---|---|---|---|---|---|---|
| **Units of Measure** | **Pt'** | **Mt** | **T** | **u** | **A** | |
| mm Hg | 0.00125 | | | | | |
| Atmospheres | 0.0000016 | | | | | |
| gram Molecular Weight | | 250 | | | | |
| Fahrenheit | | | 285.00 | | | |
| Celsius | | | 140.56 | | | |
| Kelvin | | | 413.56 | | | |
| Feet/Minute | | | | 10 | | |
| Meters/Sec | | | | 0.0508 | | |
| Units per Hour | | | | | 900.00 | Total |
| Square Feet per Unit | | | | | 8.33 | |
| Square Feet Coated per Hour | | | | | 7,500.00 | Total |
| Square Meters | | | | | 697.03 | Total |
| | Input Data | | | | | |
| | Units of Calculation | | | | | |

**Emissions Estimate**

| | | | |
|---|---|---|---|
| **W =** | 0.0017 | grams/second | |
| **W =** | 6.20 | grams/hour | |
| **W =** | 0.0137 | pounds/hour | |
| Operating Hours per Year | 8,760 | hours/year | |
| **W =** | 119.8 | pounds/year | |
| **Potential MDI/VOC =** | 0.060 | tons/year | Total |

Pressure (atmospheres) = Pressure (mm Hg) x 1 atmosphere / 760 mm Hg
Temperature (Kelvin) =(Temperature (Fahrenheit) - 32)* 5/9 +100
meters/second = feet/minute x 1 meter / 3.281 feet x 1 minute / 60 seconds
square meters = units/hour x square feet/unit x (1 meter / 3.281 feet)$^2$
tons/year = grams / second x 3,600 seconds/ hour x 1 pound / 453.5 grams x 8,760 hours/year x 1 ton / 2,000 pounds