



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: November 15, 2005
RE: SMART, LLC. / 039-21403-00177
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

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

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

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



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

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

Mr. Tim Butler
Smart, LLC
67742 CR 23
New Paris, IN 46553

November 15, 2005

Re: **039-21403-00177**
First Significant Permit Modification to:
Part 70 permit No.: **T039-7716-00177**

Dear Mr. Butler:

Smart, LLC was issued a permit on March 30, 1998 for a wood office furniture manufacturing operation. A letter requesting changes to this permit was received on June 10, 2005. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the:

- (a) removal of three of the nine existing spray booths,
- (b) removal of veneer press EU-12, and
- (c) addition of a new flat line finish system, identified as EU-16, utilizing an airless spray application system, with dry filters for control of particulate matter overspray, with all emissions exhausted through Stack ID No. 15, and

revising all applicable permit conditions.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Scott Fulton, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46204, or call at (800) 451-6027, and ask for Scott Fulton or extension (3-5691), or dial (317) 233-5691.

Sincerely,

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

SDF

cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector - Tony Pelath
Compliance Data Section
Administrative and Development
Smart, LLC, Plant Manager, 67742 CR 23, New Paris, IN 46553



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

**PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY**

**SMART, LLC
67742 CR 23
New Paris, Indiana 46553**

(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.: T039-7716-00177	
Issued by: Felicia R. George, Assistant Commissioner, Office of Air Quality	Date Issued: March 30, 1998 Expiration Date: March 30, 2003

First Administrative Amendment No.: 039-10754-00177 April 5, 1999
Second Administrative Amendment No.: 039-19463-00177 September 17, 2004

First Significant Permit Modification No.: 039-21403-00177	Affected Pages: 2-6, 27 – 30, with 30a – 30y added
Issued by: Original signed by Paul Dubenetzky, Chief, Permits Branch, Office of Air Quality	November 15, 2005

A SOURCE SUMMARY 9

- A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
- A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)]
- A.4 Part 70 Permit Applicability [326 IAC 2-7-2]
- A.5 Prior Permit Conditions Superseded [326 IAC 2]

B GENERAL CONDITIONS 13

- B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]
- B.2 Definitions [326 IAC 2-7-1]
- B.3 Permit Term [326 IAC 2-7-5(2)]
- B.4 Enforceability [326 IAC 2-7-7(a)]
- B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]
- B.6 Severability [326 IAC 2-7-5(5)]
- B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
- B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]
- B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]
- B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]
- B.11 Preventive Maintenance Plan [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6-3]
- B.12 Emergency Provisions [326 IAC 2-7-16]
- B.13 Permit Shield [326 IAC 2-7-15]
- B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]
- B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]
- B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
- B.17 Permit Renewal [326 IAC 2-7-4]
- B.18 Administrative Permit Amendment [326 IAC 2-7-11]
- B.19 Minor Permit Modification [326 IAC 2-7-2]
- B.20 Significant Permit Modification [326 IAC 2-7-12(d)]
- B.21 Permit Revision Under Economic Incentives and Other Programs
- B.22 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]
- B.23 Operational Flexibility [326 IAC 2-7-20]
- B.24 Construction Permit Requirement [326 IAC 2]
- B.25 Inspection and Entry [326 IAC 2-7-6(2)]
- B.26 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]
- B.27 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

C SOURCE OPERATION CONDITIONS 26

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

- C.1 Emission Offset Minor Source Status [326 IAC 2-3]
- C.2 Opacity [326 IAC 5-1]
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
- C.7 Stack Height [326 IAC 1-7]
- C.8 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18]

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

- C.9 Performance Testing [326 IAC 3-2.1]

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

- C.10 Compliance Schedule [326 IAC 2-7-6(3)]
- C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.12 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]
- C.13 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]
- C.14 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61.140]

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

- C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.17 Compliance Monitoring Plan – Failure to Take Corrective Action [326 IAC 2-7-5(3)]
- C.18 Actions Related to Noncompliance Demonstrated by a Stack Test

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

- C.19 Emission Statement [326 IAC 2-7-5(3)] [326 IAC 2-6] [326 IAC 2-7-19]
- C.20 Monitoring Data Availability
- C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)(B)]
- C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

Stratospheric Ozone Protection

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

D.1 FACILITY OPERATION CONDITIONS – Surface Coating Operations

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

- D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]
- D.1.2 Emission Offset Minor Limit [326 IAC 2-3]
- D.1.3 Particulate Matter (PM) [326 IAC 6-3-2] [40 CFR 52 Subpart P]
- D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.1.5 Volatile Organic Compounds (VOC)
- D.1.6 Particulate Matter (PM) [326 IAC 6-3-2]

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

- D.1.7 Monitoring

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

- D.1.8 Record Keeping Requirements
- D.1.9 Reporting Requirements

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

- D.1.10 General Provisions Relating to NESHAP JJ [326 IAC 20-1] [40 CFR Part 63, Subpart A]
- D.1.11 NESHAP JJ Requirements [40 CFR Part 63, Subpart (JJ)]

D.2 FACILITY OPERATION CONDITIONS – Woodworking Operations

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

- D.2.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]
- D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.2.3 Testing Requirements [326 IAC 2-7-6(1)]

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

- D.2.4 Visible Emissions Notation
- D.2.5 Baghouse Inspections
- D.2.6 Broken Bag or Failure Detection

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

- D.2.7 Record Keeping Requirements

D.3 FACILITY OPERATION CONDITIONS – Surface Coating Operations

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

- D.3.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Compliance Determination Requirements

- D.3.2 Testing Requirements [326 IAC 2-7-6(1)]

Certification.....	34
Emergency Occurrence Report.....	35
Compliance Report Form.....	37
Quarterly Report.....	38
Semi-Annual Report Form.....	39

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), and presented in the permit application.

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

The Permittee owns and operates a stationary wood office furniture manufacturing plant.

Responsible Official:	Plant Manager
Source Address:	67742 CR 23, New Paris, Indiana 46553
Mailing Address:	67742 CR 23, New Paris, Indiana 46553
SIC Code:	2431,2521
County Location:	Elkhart
Source Location Status:	Nonattainment for ozone under the 8-hour standard Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules Major Source, Section 112 of the Clean Air Act

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

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

- (a) Six (6) spray booths, identified as EU-03 through EU-8, each utilizing an airless spray application system, with dry filters for control of particulate matter overspray, and exhausting to Stack ID Nos. 3 through 8, respectively.
- (b) One (1) flat line finish system, identified as EU-16, to be constructed in 2005, utilizing an airless spray application system, with dry filters for control of particulate matter overspray, with all emissions exhausted through Stack ID No. 15.
- (c) Woodworking equipment, identified as EU-13, with one (1) baghouse (CE-1) for particulate matter control, exhausting to Stack ID No. 12 or returned to the building as make-up air. The collected sawdust is routed to one (1) storage silo (S-2) via one (1) cyclone (No. 42).
- (d) Woodworking equipment, identified as EU-14, with one (1) baghouse (CE-2) for particulate matter control, exhausting to Stack ID No. 13 or returned to the building as make-up air. The collected saw dust is routed to one (1) storage silo (S-2) via one (1) cyclone (No. 42).
- (e) Woodworking equipment, identified as EU-15, with one (1) baghouse (CE-3) for particulate matter control, and exhausting to Stack ID No. 14 or returned to the building as make-up air.

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) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, an woodworking operations.

- (c) One (1) storage silo, identified as S-2, collecting sawdust from two (2) baghouses (CE-1 and CE-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).

A.5 Prior Permit Conditions Superseded [326 IAC 2]

The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source, and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of the issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) Six (6) spray booths, identified as EU-03 through EU-8, each utilizing an airless spray application system, with dry filters for control of particulate matter overspray, and exhausting to Stack ID Nos. 3 through 8, respectively.
- (b) One (1) flat line finish system, identified as EU-16, to be constructed in 2005, utilizing an airless spray application system, with dry filters for control of particulate matter overspray, with all emissions exhausted through Stack ID No. 15.

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

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

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair, 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 (HVLV) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLV spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.2 Emission Offset Minor Limit [326 IAC 2-3]

Pursuant to CP 039-2974-000177, issued December 13, 1994, these facilities shall use no more than ninety-nine (99) tons of VOC, including coatings, dilution solvents and cleaning solvents, per twelve (12) consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than 99 tons per year. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2] [40 CFR 52 Subpart P]

- (a) Pursuant to 326 IAC 6-3-2, the PM from the six (6) spray booths (EU-3 through EU-8) and flat line finish system (EU-16) shall not exceed the pound per hour emission rate established as E in the following formula:

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

- (b) Pursuant to 326 IAC 6-3-2(d), the particulate matter (PM) overspray emissions from the six (6) spray booths (EU-3 – EU-8) and finish line EU-16, shall be controlled by a dry particulate filter, waterwash, or an equivalent control device. Said control device shall be operated according to the manufacturer's specifications.

D.1.4 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 any control devices.

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitation contained in Conditions D.1.2, shall be determined pursuant to 326 IAC 8-1-4(a)(3) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.6 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to CP-039-2974-00177, issued on December 13, 1994, and Significant Permit Modification 039-21403-00177, in order to achieve compliance with the requirements of Condition D.1.3, the dry filters for PM control shall be in operation at all times when the six (6) spray booths (EU-03 through EU-8) and finish line EU-16 are in operation.

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

D.1.7 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, daily observations shall be made of the overspray while one or more of the booths are in operation.
- (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Preventative Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.1.2.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and

- (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit.

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements of this permit, using the reporting form located at the end of this permit, or its 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.1.10 General Provisions Relating to NESHAP JJ [326 IAC 20-1] [40 CFR Part 63, Subpart A]

Pursuant to 40 CFR 63.5925, 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, and as specified in Table 1 of 40 CFR Part 63, Subpart JJ, in accordance with the schedule in 40 CFR 63 Subpart JJ.

D.1.11 NESHAP JJ Requirements [40 CFR Part 63, Subpart JJ]

Pursuant to CFR Part 63, Subpart JJ, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart JJ, 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 63.2. The owner or operator of a source that meets the criteria for an incidental furniture manufacturer shall maintain purchase or usage records demonstrating the source meets the criteria specified in Sec. 63.801 of this subpart, but the source shall not be subject to any other provisions of this subpart.
- (b) A source that complies with the limits and criteria specified in paragraphs (b)(1), (b)(2), or (b)(3) of this section is an area source for the purposes of this subpart and is not subject to any other provision of this rule, provided that: In the case of paragraphs (b)(1) and (b)(2), finishing materials, adhesives, cleaning solvents and washoff solvents account for at least 90 percent of annual HAP emissions at the plant site, and if the plant site has HAP emissions that do not originate from the listed materials, the owner or operator keeps any records necessary to demonstrate that the 90 percent criterion is met. A source that initially relies on the limits and criteria specified in paragraphs (b)(1), (b)(2), and (b)(3) to become an area source, but subsequently exceeds the relevant limit (without first obtaining and complying with other limits that keep its potential to emit hazardous air pollutants below major source levels), becomes a major source and must comply thereafter with all applicable provisions of this subpart starting on the applicable compliance date in Sec. 63.800. Nothing in this paragraph (b) is intended to preclude a source from limiting its potential to emit through other appropriate mechanisms that may be available through the permitting authority.

- (1) The owner or operator of the source uses no more than 250 gallons per month, for every month, of coating, gluing, cleaning, and washoff materials at the source, including materials used for source categories other than wood furniture (surface coating), but excluding materials used in routine janitorial or facility grounds maintenance, personal uses by employees or other persons, the use of products for the purpose of maintaining motor vehicles operated by the facility, or the use of toxic chemicals contained in intake water (used for processing or noncontact cooling) or intake air (used either as compressed air or for combustion). The owner or operator shall maintain records of the total gallons of coating, gluing, cleaning, and washoff materials used each month, and upon request submit such records to the Administrator. These records shall be maintained for five years.
 - (2) The owner or operator of the source uses no more than 3,000 gallons per rolling 12-month period, for every 12-month period, of coating, gluing, cleaning, and washoff materials at the source, including materials used for source categories other than wood furniture (surface coating), but excluding materials used in routine janitorial or facility grounds maintenance, personal uses by employees or other persons, the use of products for the purpose of maintaining motor vehicles operated by the facility, or the use of toxic chemicals contained in intake water (used for processing or noncontact cooling) or intake air (used either as compressed air or for combustion). A rolling 12-month period includes the previous 12 months of operation. The owner or operator of the source shall maintain records of the total gallons of coating, gluing, cleaning, and washoff materials used each month and the total gallons used each previous month, and upon request submit such records to the Administrator. Because records are needed over the previous set of 12 months, the owner or operator shall keep monthly records beginning no less than one year before the compliance date specified in Sec. 63.800(e). Records shall be maintained for five years.
 - (3) The source uses materials containing no more than 4.5 Mg (5 tons) of any one HAP per rolling 12-month period or no more than 11.4 Mg (12.5 tons) of any combination of HAP per rolling 12-month period, including materials from source categories other than wood furniture; and at least 90 percent of the plantwide emissions per rolling 12-month period are associated with the manufacture of wood furniture or wood furniture components. The owner or operator shall maintain records that demonstrate that annual emissions do not exceed these levels, including monthly usage records for all finishing, gluing, cleaning, and washoff materials; certified product data sheets for these materials; and any other records necessary to document emissions from source categories other than wood furniture and upon request submit such records to the Administrator. These records shall be maintained for five years.
- (c) This subpart does not apply to research or laboratory facilities as defined in Sec. 63.801.
 - (d) Owners or operators of affected sources shall also comply with the requirements of subpart A of this part (General Provisions), according to the applicability of subpart A to such sources, as identified in Table 1 of this subpart.
 - (e) The compliance date for existing affected sources that emit less than 50 tons per year of HAP in 1996 is December 7, 1998. The compliance date for existing affected sources that emit 50 tons or more of hazardous air pollutants in 1996 is November 21, 1997. The owner or operator of an existing area source that increases its emissions of (or its potential to emit) HAP such that the source becomes a major source that is subject to this subpart shall comply with this subpart one year after becoming a major source.
 - (f) New affected sources must comply with the provisions of this standard immediately upon startup or by December 7, 1995, whichever is later. New area sources that become major sources shall comply with the provisions of this standard immediately upon becoming a major source.

- (g) Reconstructed affected sources are subject to the requirements for new affected sources. The costs associated with the purchase and installation of air pollution control equipment (e.g., incinerators, carbon adsorbers, etc.) are not considered in determining whether the facility has been reconstructed, unless the control equipment is required as part of the process (e.g., product recovery). Additionally, the costs of retrofitting and replacement of equipment that is installed specifically to comply with this subpart are not considered reconstruction costs. For example, an affected source may convert to waterborne coatings to meet the requirements of this subpart. At most facilities, this conversion will require the replacement of existing storage tanks, mix equipment, and transfer lines. The cost of replacing the equipment is not considered in determining whether the facility has been reconstructed.

§ 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 Sec. 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 the HAP 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 Sec. 63.805(a)); 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 Sec. 63.805(a)); and the density, measured by EPA Method 24 or an alternative or equivalent method. Therefore, the reportable HAP content should 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 HAP that are carcinogens, as defined by the Occupational Safety and Health Administration Hazard Communication Standard (29 CFR part 1910), as formulated. The purpose of the CPDS is to assist the affected source in demonstrating compliance with the emission limitations presented in Sec. 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 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.

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 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 volatile hazardous air pollutants from pumps, valves, flanges, or other equipment used to transfer or apply coatings, adhesives, or organic 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 CO₂. 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 solvent means a volatile organic liquid that is 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 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 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 overspray during finishing operations;
- (2) That is subsequently peeled off and disposed; and
- (3) By achieving (1) and (2), reduces or eliminates the need to use organic 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 Sec. 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 nonthreshold, high concern, or unrankable list in Table b 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 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.

Wood furniture manufacturing operations means the finishing, gluing, cleaning, and washoff operations associated with the production of wood furniture or wood furniture components.

(b) The nomenclature used in this subpart has the following meaning:

- (1) **A_k** = the area of each natural draft opening (k) in a total enclosure, in square meters.
- (2) **C_c** = the VHAP content of a finishing material (c), in kilograms of volatile hazardous air pollutants per kilogram of coating solids (kg VHAP/kg solids), as supplied. Also given in pounds of volatile hazardous air pollutants per pound of coating solids (lb VHAP/lb solids).
- (3) **C_{aj}** = the concentration of VHAP in gas stream (j) exiting the control device, in parts per million by volume.
- (4) **C_{bi}** = the concentration of VHAP in gas stream (i) entering the control device, in parts per million by volume.
- (5) **C_{di}** = the concentration of VHAP in gas stream (i) entering the control device from the affected source, in parts per million by volume.
- (6) **C_{fk}** = the concentration of VHAP in uncontrolled gas stream (k) emitted directly to the atmosphere from the affected source, in parts per million by volume.
- (7) **E** = the emission limit achieved by an emission point or a set of emission points, in kg VHAP/kg solids (lb VHAP/lb solids).
- (8) **F** = the control device efficiency, expressed as a fraction.
- (9) **FV** = the average inward face velocity across all natural draft openings in a total enclosure, in meters per hour.

- (10) **G** = the VHAP content of a contact adhesive, in kg VHAP/kg solids (lb VHAP/lb solids), as applied.
- (11) **M** = the mass of solids in finishing material used monthly, kg solids/month (lb solids/month).
- (12) **N** = the capture efficiency, expressed as a fraction.
- (13) **Q_{aj}** = the volumetric flow rate of gas stream (j) exiting the control device, in dry standard cubic meters per hour.
- (14) **Q_{bi}** = the volumetric flow rate of gas stream (i) entering the control device, in dry standard cubic meters per hour.
- (15) **Q_{di}** = the volumetric flow rate of gas stream (i) entering the control device from the emission point, in dry standard cubic meters per hour.
- (16) **Q_{fk}** = the volumetric flow rate of uncontrolled gas stream (k) emitted directly to the atmosphere from the emission point, in dry standard cubic meters per hour.
- (17) **Q_{ini}** = the volumetric flow rate of gas stream (i) entering the total enclosure through a forced makeup air duct, in standard cubic meters per hour (wet basis).
- (18) **Q_{outj}** = the volumetric flow rate of gas stream (j) exiting the total enclosure through an exhaust duct or hood, in standard cubic meters per hour (wet basis).
- (19) **R** = the overall efficiency of the control system, expressed as a percentage.
- (20) **S** = the VHAP content of a solvent, expressed as a weight fraction, added to finishing materials.
- (21) **W** = the amount of solvent, in kilograms (pounds), added to finishing materials during the monthly averaging period.
- (22) **ac** = after the control system is installed and operated.
- (23) **bc** = before control.

§ 63.802 Emission Limits

- (a) Each owner or operator of an existing affected source subject to this subpart shall:
 - (1) Limit VHAP emissions from finishing operations by meeting the emission limitations for existing sources presented in Table 3 of this subpart, using any of the compliance methods in Sec. 63.804(a). To determine VHAP emissions from a finishing material containing formaldehyde or styrene, the owner or operator of the affected source shall use the methods presented in Sec. 63.803(l)(2) for determining styrene and formaldehyde usage.
 - (3) Limit HAP emissions from strippable spray booth coatings by using coatings that contain no more than 0.8 kg VOC/kg solids (0.8 lb VOC/lb solids), as applied.
- (b) Each owner or operator of a new affected source subject to this subpart shall:

- (1) Limit VHAP emissions from finishing operations by meeting the emission limitations for new sources presented in Table 3 of this subpart using any of the compliance methods in Sec. 63.804(d). To determine VHAP emissions from a finishing material containing formaldehyde or styrene, the owner or operator of the affected source shall use the methods presented in Sec. 63.803(l)(2) for determining styrene and formaldehyde usage.
- (3) Limit HAP emissions from strippable spray booth coatings by using coatings that contain no more than 0.8 kg VOC/kg solids (0.8 lb VOC/lb solids), as applied.

§ 63.803 Work Practice Standards

- (a) Work practice implementation plan. Each owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan that defines environmentally desirable work practices for each wood furniture manufacturing operation and addresses each of the work practice standards presented in paragraphs (b) through (l) of this section. The plan shall be developed no more than 60 days after the compliance date. The written work practice implementation plan shall be available for inspection by the Administrator upon request. If the Administrator determines that the work practice implementation plan does not adequately address each of the topics specified in paragraphs (b) through (l) of this section or that the plan does not include sufficient mechanisms for ensuring that the work practice standards are being implemented, the Administrator may require the affected source to modify the plan. Revisions or modifications to the plan do not require a revision of the source's Title V permit.
- (b) Operator training course. Each owner or operator of an affected source shall train all new and existing personnel, including contract personnel, who are involved in finishing, gluing, cleaning, and washoff operations, use of manufacturing equipment, or implementation of the requirements of this subpart. All new personnel, those hired after the compliance date of the standard, shall be trained upon hiring. All existing personnel, those hired before the compliance date of the standard, shall be trained within six months of the compliance date of the standard. All personnel shall be given refresher training annually. The affected source shall maintain a copy of the training program with the work practice implementation plan. The training program shall include, at a minimum, the following:
 - (1) A list of all current personnel by name and job description that are required to be trained;
 - (2) An outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;
 - (3) Lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and
 - (4) A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.
- (c) Inspection and maintenance plan. Each owner or operator of an affected source shall prepare and maintain with the work practice implementation plan a written leak inspection and maintenance plan that specifies:
 - (1) A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or organic solvents;
 - (2) An inspection schedule;

- (3) Methods for documenting the date and results of each inspection and any repairs that were made;
- (4) The timeframe between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:
 - (i) A first attempt at repair (e.g., tightening of packing glands) shall be made no later than five calendar days after the leak is detected; and
 - (ii) Final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three months.
- (d) Cleaning and washoff solvent accounting system. Each owner or operator of an affected source shall develop an organic solvent accounting form to record:
 - (1) The quantity and type of organic solvent used each month for washoff and cleaning, as defined in Sec. 63.801 of this subpart;
 - (2) The number of pieces washed off, and the reason for the washoff; and
 - (3) The quantity of spent solvent generated from each washoff and cleaning operation each month, and whether it is recycled onsite or disposed offsite.
- (e) Chemical composition of cleaning and washoff solvents. Each owner or operator of an affected source shall not use cleaning or washoff solvents that contain any of the pollutants listed in Table 4 to this subpart, in concentrations subject to MSDS reporting as required by OSHA.
- (f) Spray booth cleaning. Each owner or operator of an affected source shall not use compounds containing more than 8.0 percent by weight of VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, unless the spray booth is being refurbished. If the spray booth is being refurbished, that is the spray booth coating or other protective material used to cover the booth is being replaced, the affected source shall use no more than 1.0 gallon of organic solvent per booth to prepare the surface of the booth prior to applying the booth coating.
- (g) Storage requirements. Each owner or operator of an affected source shall use normally closed containers for storing finishing, gluing, cleaning, and washoff materials.
- (h) Application equipment requirements. Each owner or operator of an affected source shall use conventional air spray guns to apply finishing materials only under any of the following circumstances:
 - (1) To apply finishing materials that have a VOC content no greater than 1.0 lb VOC/lb solids, as applied;
 - (2) For touchup and repair under the following conditions:
 - (i) The touchup and repair occurs after completion of the finishing operation; or
 - (ii) The touchup and repair occurs after the application of stain and before the application of any other type of finishing material, and the materials used for touchup and repair are applied from a container that has a volume of no more than 2.0 gallons.
 - (3) When spray is automated, that is, the spray gun is aimed and triggered automatically, not manually;

- (4) When emissions from the finishing application station are directed to a control device;
 - (5) The conventional air gun is used to apply finishing materials and the cumulative total usage of that finishing material is no more than 5.0 percent of the total gallons of finishing material used during that semiannual period; or
 - (6) The conventional air gun is used to apply stain on a part for which it is technically or economically infeasible to use any other spray application technology. The affected source shall demonstrate technical or economic infeasibility by submitting to the Administrator a videotape, a technical report, or other documentation that supports the affected source's claim of technical or economic infeasibility. The following criteria shall be used, either independently or in combination, to support the affected source's claim of technical or economic infeasibility:
 - (i) The production speed is too high or the part shape is too complex for one operator to coat the part and the application station is not large enough to accommodate an additional operator; or
 - (ii) The excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain.
- (i) Line cleaning. Each owner or operator of an affected source shall pump or drain all organic solvent used for line cleaning into a normally closed container.
 - (j) Gun cleaning. Each owner or operator of an affected source shall collect all organic solvent used to clean spray guns into a normally closed container.
 - (k) Washoff operations. Each owner or operator of an affected source shall control emissions from washoff operations by:
 - (1) Using normally closed tanks for washoff; and
 - (2) Minimizing dripping by tilting or rotating the part to drain as much solvent as possible.
 - (l) Formulation assessment plan for finishing operations. Each owner or operator of an affected source shall prepare and maintain with the work practice implementation plan a formulation assessment plan that:
 - (1) Identifies VHAP from the list presented in Table 5 of this subpart that are being used in finishing operations by the affected source;
 - (2) Establishes a baseline level of usage by the affected source, for each VHAP identified in paragraph (l)(1) of this section. The baseline usage level shall be the highest annual usage from 1994, 1995, or 1996, for each VHAP identified in paragraph (l)(1) of this section. For formaldehyde, the baseline level of usage shall be based on the amount of free formaldehyde present in the finishing material when it is applied. For styrene, the baseline level of usage shall be an estimate of unreacted styrene, which shall be calculated by multiplying the amount of styrene monomer in the finishing material, when it is applied, by a factor of 0.16. Sources using a control device to reduce emissions may adjust their usage based on the overall control efficiency of the control system, which is determined using the equation in Sec. 63.805 (d) or (e).
 - (3) Tracks the annual usage of each VHAP identified in (l)(1) by the affected source that is present in amounts subject to MSDS reporting as required by OSHA.

- (4) If, after November 1998, the annual usage of the VHAP identified in paragraph (l)(1) exceeds its baseline level, then the owner or operator of the affected source shall provide a written notification to the permitting authority that describes the amount of the increase and explains the reasons for exceedance of the baseline level. The following explanations would relieve the owner or operator from further action, unless the affected source is not in compliance with any State regulations or requirements for that VHAP:
- (i) The exceedance is no more than 15.0 percent above the baseline level;
 - (ii) Usage of the VHAP is below the de minimis level presented in Table 5 of this subpart for that VHAP (sources using a control device to reduce emissions may adjust their usage based on the overall control efficiency of the control system, which is determined using the procedures in Sec. 63.805 (d) or (e);
 - (iii) The affected source is in compliance with its State's air toxic regulations or guidelines for the VHAP; or
 - (iv) The source of the pollutant is a finishing material with a VOC content of no more than 1.0 kg VOC/kg solids (1.0 lb VOC/lb solids), as applied.
- (5) If none of the above explanations are the reason for the increase, the owner or operator shall confer with the permitting authority to discuss the reason for the increase and whether there are practical and reasonable technology-based solutions for reducing the usage. The evaluation of whether a technology is reasonable and practical shall be based on cost, quality, and marketability of the product, whether the technology is being used successfully by other wood furniture manufacturing operations, or other criteria mutually agreed upon by the permitting authority and owner or operator. If there are no practical and reasonable solutions, the facility need take no further action. If there are solutions, the owner or operator shall develop a plan to reduce usage of the pollutant to the extent feasible. The plan shall address the approach to be used to reduce emissions, a timetable for implementing the plan, and a schedule for submitting notification of progress.
- (6) If after November 1998, an affected source uses a VHAP of potential concern for which a baseline level has not been previously established, then the baseline level shall be established as the de minimis level, based on 70 year exposure levels and data provided in the proposed rulemaking pursuant to Section 112(g) of the CAA, for that pollutant. A list of VHAP of potential concern is provided in Table 6 of this subpart. If usage of the VHAP of potential concern exceeds the de minimis level, then the affected source shall provide an explanation to the permitting authority that documents the reason for exceedance of the de minimis level. If the explanation is not one of those listed in paragraphs (l)(4)(i) through (l)(4)(iv), the affected source shall follow the procedures established in (l)(5).

§ 63.804 Compliance Procedures and Monitoring Requirements

- (a) The owner or operator of an existing affected source subject to Sec. 63.802(a)(1) shall comply with those provisions using any of the methods presented in Sec. 63.804 (a)(1) through (a)(4).
- (1) Calculate the average VHAP content for all finishing materials used at the facility using Equation 1, and maintain a value of E no greater than 1.0;

$$E = \frac{M_{c1}C_{c1} + M_{c2}C_{c2} + \dots + M_{cn}C_{cn} + S_1W_1 + S_2W_2 + \dots + S_nW_n}{M_{c1} + M_{c2} + \dots + M_{cn}} \quad \text{Equation 1}$$

- (2) Use compliant finishing materials according to the following criteria:

- (i) Demonstrate that each stain, sealer, and topcoat has a VHAP content of no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight by maintaining certified product data sheets for each coating and thinner;
 - (ii) Demonstrate that each washcoat, basecoat, and enamel that is purchased pre-made, that is, it is not formulated onsite by thinning another finishing material, has a VHAP content of no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight by maintaining certified product data sheets for each coating and thinner; and
 - (iii) Demonstrate that each washcoat, basecoat, and enamel that is formulated at the affected source is formulated using a finishing material containing no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids) and a thinner containing no more than 3.0 percent VHAP by weight.
- (4) Use any combination of an averaging approach, as described in paragraph (a)(1) of this section, compliant finishing materials, as described in paragraph (a)(2) of this section, and a control system, as described in paragraph (a)(3) of this section.

$$R = [(G_{bc} - G_{ac}) / G_{bc}] \quad (100) \quad \text{Equation 3}$$

- (d) The owner or operator of a new affected source subject to Sec. 63.802(b)(1) may comply with those provisions by using any of the following methods:
- (1) Calculate the average VHAP content across all finishing materials used at the facility using Equation 1, and maintain a value of E no greater than 0.8;
 - (2) Use compliant finishing materials according to the following criteria:
 - (i) Demonstrate that each sealer and topcoat has a VHAP content of no more than 0.8 kg VHAP/kg solids (0.8 lb VHAP/lb solids), as applied, each stain has a VHAP content of no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight;
 - (ii) Demonstrate that each washcoat, basecoat, and enamel that is purchased pre-made, that is, it is not formulated onsite by thinning another finishing material, has a VHAP content of no more than 0.8 kg VHAP/kg solids (0.8 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight; and
 - (iii) Demonstrate that each washcoat, basecoat, and enamel that is formulated onsite is formulated using a finishing material containing no more than 0.8 kg VHAP/kg solids (0.8 lb VHAP/lb solids) and a thinner containing no more than 3.0 percent HAP by weight.
 - (4) Use any combination of an averaging approach, as described in (d)(1), compliant finishing materials, as described in (d)(2), and a control system, as described in (d)(3).
- (f) Initial compliance.
- (1) Owners or operators of an affected source subject to the provisions of Sec. 63.802 (a)(1) or (b)(1) that comply through the procedures established in Sec. 63.804 (a)(1) or (d)(1) shall submit the results of the averaging calculation (Equation 1) for the first month with the initial compliance status report required by Sec. 63.807(b). The first month's calculation shall include data for the entire month in which the compliance date falls. For example, if the source's compliance date is November 21, 1997, the averaging calculation shall include data from November 1, 1997 to November 30, 1997.

- (2) Owners or operators of an affected source subject to the provisions of Sec. 63.802 (a)(1) or (b)(1) that comply through the procedures established in Sec. 63.804 (a)(2) or (d)(2) shall submit an initial compliance status report, as required by Sec. 63.807(b), stating that compliant stains, washcoats, sealers, topcoats, basecoats, enamels, and thinners, as applicable, are being used by the affected source.
 - (3) Owners or operators of an affected source subject to the provisions of Sec. 63.802 (a)(1) or (b)(1) that are complying through the procedures established in Sec. 63.804 (a)(2) or (d)(2) and are applying coatings using continuous coaters shall demonstrate initial compliance by:
 - (i) Submitting an initial compliance status report, as required by Sec. 63.807(b), stating that compliant coatings, as determined by the VHAP content of the coating in the reservoir and the VHAP content as calculated from records, and compliant thinners are being used; or
 - (ii) Submitting an initial compliance status report, as required by Sec. 63.807(b), stating that compliant coatings, as determined by the VHAP content of the coating in the reservoir, are being used; the viscosity of the coating in the reservoir is being monitored; and compliant thinners are being used. The affected source shall also submit data that demonstrate that viscosity is an appropriate parameter for demonstrating compliance.
 - (7) Owners or operators of an affected source subject to the provisions of Sec. 63.802 (a)(3) or (b)(3) shall submit an initial compliance status report, as required by Sec. 63.807(b), stating that compliant strippable spray booth coatings are being used by the affected source.
 - (8) Owners or operators of an affected source subject to the work practice standards in Sec. 63.803 shall submit an initial compliance status report, as required by Sec. 63.807(b), stating that the work practice implementation plan has been developed and procedures have been established for implementing the provisions of the plan.
- (g) Continuous compliance demonstrations.
- (1) Owners or operators of an affected source subject to the provisions of Sec. 63.802 (a)(1) or (b)(1) that comply through the procedures established in Sec. 63.804 (a)(1) or (d)(1) shall demonstrate continuous compliance by submitting the results of the averaging calculation (Equation 1) for each month within that semiannual period and submitting a compliance certification with the semiannual report required by Sec. 63.807(c).
 - (i) The compliance certification shall state that the value of (E), as calculated by Equation 1, is no greater than 1.0 for existing sources or 0.8 for new sources. An affected source is in violation of the standard if E is greater than 1.0 for existing sources or 0.8 for new sources for any month. A violation of the monthly average is a separate violation of the standard for each day of operation during the month, unless the affected source can demonstrate through records that the violation of the monthly average can be attributed to a particular day or days during the period.
 - (ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.
 - (2) Owners or operators of an affected source subject to the provisions of Sec. 63.802 (a)(1) or (b)(1) that comply through the procedures established in Sec. 63.804 (a)(2) or (d)(2) shall demonstrate continuous compliance by using compliant coatings and thinners, maintaining records that demonstrate the coatings and thinners are compliant, and submitting a compliance certification with the semiannual report required by Sec. 63.807(c).

- (i) The compliance certification shall state that compliant stains, washcoats, sealers, topcoats, basecoats, enamels, and thinners, as applicable, have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance. An affected source is in violation of the standard whenever a noncompliant coating, as demonstrated by records or by a sample of the coating, is used.
 - (ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.
- (3) Owners or operators of an affected source subject to the provisions of Sec. 63.802 (a)(1) or (b)(1) that are complying through the procedures established in Sec. 63.804 (a)(2) or (d)(2) and are applying coatings using continuous coaters shall demonstrate continuous compliance by following the procedures in paragraph (g)(3) (i) or (ii) of this section.
 - (i) Using compliant coatings, as determined by the VHAP content of the coating in the reservoir and the VHAP content as calculated from records, using compliant thinners, and submitting a compliance certification with the semiannual report required by Sec. 63.807(c).
 - (A) The compliance certification shall state that compliant coatings have been used each day in the semiannual reporting period, or should otherwise identify the days of noncompliance and the reasons for noncompliance. An affected source is in violation of the standard whenever a noncompliant coating, as determined by records or by a sample of the coating, is used. Use of a noncompliant coating is a separate violation for each day the noncompliant coating is used.
 - (B) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.
 - (ii) Using compliant coatings, as determined by the VHAP content of the coating in the reservoir, using compliant thinners, maintaining a viscosity of the coating in the reservoir that is no less than the viscosity of the initial coating by monitoring the viscosity with a viscosity meter or by testing the viscosity of the initial coating and retesting the coating in the reservoir each time solvent is added, maintaining records of solvent additions, and submitting a compliance certification with the semiannual report required by Sec. 63.807(c).
 - (A) The compliance certification shall state that compliant coatings, as determined by the VHAP content of the coating in the reservoir, have been used each day in the semiannual reporting period. Additionally, the certification shall state that the viscosity of the coating in the reservoir has not been less than the viscosity of the initial coating, that is, the coating that is initially mixed and placed in the reservoir, for any day in the semiannual reporting period.
 - (B) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.
 - (C) An affected source is in violation of the standard when a sample of the as-applied coating exceeds the applicable limit established in Sec. 63.804 (a)(2) or (d)(2), as determined using EPA Method 311, or the viscosity of the coating in the reservoir is less than the viscosity of the initial coating.
- (7) Owners or operators of an affected source subject to the provisions of Sec. 63.802 (a)(3) or (b)(3) shall submit a compliance certification with the semiannual report required by Sec. 63.807(c).

- (i) The compliance certification shall state that compliant strippable spray booth coatings have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant materials were used. Each day a noncompliant strippable booth coating is used is a single violation of the standard.
 - (ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.
- (8) Owners or operators of an affected source subject to the work practice standards in Sec. 63.803 shall submit a compliance certification with the semiannual report required by Sec. 63.807(c).
- (i) The compliance certification shall state that the work practice implementation plan is being followed, or should otherwise identify the provisions of the plan that have not been implemented and each day the provisions were not implemented. During any period of time that an owner or operator is required to implement the provisions of the plan, each failure to implement an obligation under the plan during any particular day is a violation.
 - (ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

§ 63.805 Performance Test Methods

- (a) The EPA Method 311 of Appendix A of part 63 shall be used in conjunction with formulation data to determine the VHAP content of the liquid coating. Formulation data shall be used to identify VHAP present in the coating. The EPA Method 311 shall then be used to quantify those VHAP identified through formulation data. The EPA Method 311 shall not be used to quantify HAP such as styrene and formaldehyde that are emitted during the cure. The EPA Method 24 (40 CFR part 60, Appendix A) shall be used to determine the solids content by weight and the density of coatings. If it is demonstrated to the satisfaction of the Administrator that a coating does not release VOC or HAP byproducts during the cure, for example, all VOC and HAP present in the coating is solvent, then batch formulation information shall be accepted. The owner or operator of an affected source may request approval from the Administrator to use an alternative method for determining the VHAP content of the coating. In the event of any inconsistency between the EPA Method 24 or Method 311 test data and a facility's formulation data, that is, if the EPA Method 24/311 value is higher, the EPA Method 24/311 test shall govern unless after consultation, a regulated source could demonstrate to the satisfaction of the enforcement agency that the formulation data were correct. Sampling procedures shall follow the guidelines presented in "Standard Procedures for Collection of Coating and Ink Samples for VOC Content Analysis by Reference Method 24 and Reference Method 24A," EPA-340/1-91-010. (Docket No. A-93-10, Item No. IV-A-1).

§ 63.806 Recordkeeping Requirements

- (a) The owner or operator of an affected source subject to this subpart shall fulfill all recordkeeping requirements of Sec. 63.10 of subpart A, according to the applicability criteria in Sec. 63.800(d) of this subpart.
- (b) The owner or operator of an affected source subject to the emission limits in Sec. 63.802 of this subpart shall maintain records of the following:
- (1) A certified product data sheet for each finishing material, thinner, contact adhesive, and strippable spray booth coating subject to the emission limits in Sec. 63.802; and
 - (2) The VHAP content, in kg VHAP/kg solids (lb VHAP/lb solids), as applied, of each finishing material and contact adhesive subject to the emission limits in Sec. 63.802; and

- (3) The VOC content, in kg VOC/kg solids (lb VOC/lb solids), as applied, of each strippable booth coating subject to the emission limits in Sec. 63.802 (a)(3) or (b)(3).
- (c) The owner or operator of an affected source following the compliance method in Sec. 63.804 (a)(1) or (d)(1) shall maintain copies of the averaging calculation for each month following the compliance date, as well as the data on the quantity of coatings and thinners used that is necessary to support the calculation of E in Equation 1.
- (d) The owner or operator of an affected source following the compliance procedures of Sec. 63.804 (f)(3)(ii) and (g)(3)(ii) shall maintain the records required by Sec. 63.806(b) as well as records of the following:
 - (1) Solvent and coating additions to the continuous coater reservoir;
 - (2) Viscosity measurements; and
 - (3) Data demonstrating that viscosity is an appropriate parameter for demonstrating compliance.
- (e) The owner or operator of an affected source subject to the work practice standards in Sec. 63.803 of this subpart shall maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including, but not limited to:
 - (1) Records demonstrating that the operator training program required by Sec. 63.803(b) is in place;
 - (2) Records collected in accordance with the inspection and maintenance plan required by Sec. 63.803(c);
 - (3) Records associated with the cleaning solvent accounting system required by Sec. 63.803(d);
 - (4) Records associated with the limitation on the use of conventional air spray guns showing total finishing material usage and the percentage of finishing materials applied with conventional air spray guns for each semiannual period as required by Sec. 63.803(h)(5).
 - (5) Records associated with the formulation assessment plan required by Sec. 63.803(l); and
 - (6) Copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.
- (h) The owner or operator of an affected source subject to the emission limits in Sec. 63.802 and following the compliance provisions of Sec. 63.804(f) (1), (2), (3), (5), (7) and (8) and Sec. 63.804(g) (1), (2), (3), (5), (7), and (8) shall maintain records of the compliance certifications submitted in accordance with Sec. 63.807(c) for each semiannual period following the compliance date.
- (i) The owner or operator of an affected source shall maintain records of all other information submitted with the compliance status report required by Sec. 63.9(h) and Sec. 63.807(b) and the semiannual reports required by Sec. 63.807(c).
- (j) The owner or operator of an affected source shall maintain all records in accordance with the requirements of Sec. 63.10(b)(1).

§ 63.807 Reporting Requirements

- (a) The owner or operator of an affected source subject to this subpart shall fulfill all reporting requirements of Sec. 63.7 through Sec. 63.10 of subpart A (General Provisions) according to the applicability criteria in Sec. 63.800(d) of this subpart.

- (b) The owner or operator of an affected source demonstrating compliance in accordance with Sec. 63.804(f) (1), (2), (3), (5), (7) and (8) shall submit the compliance status report required by Sec. 63.9(h) of subpart A (General Provisions) no later than 60 days after the compliance date. The report shall include the information required by Sec. 63.804(f) (1), (2), (3), (5), (7), and (8) of this subpart.
- (c) The owner or operator of an affected source demonstrating compliance in accordance with Sec. 63.804(g) (1), (2), (3), (5), (7), and (8) shall submit a report covering the previous 6 months of wood furniture manufacturing operations:
 - (1) The first report shall be submitted 30 calendar days after the end of the first 6-month period following the compliance date.
 - (2) Subsequent reports shall be submitted 30 calendar days after the end of each 6-month period following the first report.
 - (3) The semiannual reports shall include the information required by Sec. 63.804(g) (1), (2), (3), (5), (7), and (8), a statement of whether the affected source was in compliance or noncompliance, and, if the affected source was in noncompliance, the measures taken to bring the affected source into compliance.
 - (4) The frequency of the reports required by paragraph (c) of this section shall not be reduced from semiannually regardless of the history of the owner's or operator's compliance status.
- (e) The owner or operator of an affected source required to provide a written notification under Sec. 63.803(1)(4) shall include in the notification one or more statements that explains the reasons for the usage increase. The notification shall be submitted no later than 30 calendar days after the end of the annual period in which the usage increase occurred.

§ 63.808 Delegation of Authority

- (a) In delegating implementation and enforcement authority to a State under Sec. 112(d) of the Clean Air Act, the authorities contained in paragraph (b) of this section shall be retained by the Administrator and not transferred to a State.
- (b) The authority conferred in Sec. 63.804(f)(4)(iv) (D) and (E), Sec. 63.804(g)(4)(iii)(C), Sec. 63.804(g)(4)(vi), Sec. 63.804(g)(6)(vi), Sec. 63.805(a), Sec. 63.805(d)(2)(V), and Sec. 63.805(e)(1) shall not be delegated to any State.

- (b) The owner or operator of an affected source demonstrating compliance in accordance with Sec. 63.804(f) (1), (2), (3), (5), (7) and (8) shall submit the compliance status report required by Sec. 63.9(h) of subpart A (General Provisions) no later than 60 days after the compliance date. The report shall include the information required by Sec. 63.804(f) (1), (2), (3), (5), (7), and (8) of this subpart.
- (c) The owner or operator of an affected source demonstrating compliance in accordance with Sec. 63.804(g) (1), (2), (3), (5), (7), and (8) shall submit a report covering the previous 6 months of wood furniture manufacturing operations:
 - (1) The first report shall be submitted 30 calendar days after the end of the first 6-month period following the compliance date.
 - (2) Subsequent reports shall be submitted 30 calendar days after the end of each 6-month period following the first report.
 - (3) The semiannual reports shall include the information required by Sec. 63.804(g) (1), (2), (3), (5), (7), and (8), a statement of whether the affected source was in compliance or noncompliance, and, if the affected source was in noncompliance, the measures taken to bring the affected source into compliance.
 - (4) The frequency of the reports required by paragraph (c) of this section shall not be reduced from semiannually regardless of the history of the owner's or operator's compliance status.
- (e) The owner or operator of an affected source required to provide a written notification under Sec. 63.803(1)(4) shall include in the notification one or more statements that explains the reasons for the usage increase. The notification shall be submitted no later than 30 calendar days after the end of the annual period in which the usage increase occurred.

§ 63.808 Delegation of Authority

- (a) In delegating implementation and enforcement authority to a State under Sec. 112(d) of the Clean Air Act, the authorities contained in paragraph (b) of this section shall be retained by the Administrator and not transferred to a State.
- (b) The authority conferred in Sec. 63.804(f)(4)(iv) (D) and (E), Sec. 63.804(g)(4)(iii)(C), Sec. 63.804(g)(4)(vi), Sec. 63.804(g)(6)(vi), Sec. 63.805(a), Sec. 63.805(d)(2)(V), and Sec. 63.805(e)(1) shall not be delegated to any State.

TABLE 1.—GENERAL PROVISIONS APPLICABILITY TO SUBPART JJ

Reference	Applies to subpart JJ	Comment
63.1(a)	Yes	
63.1(b)(1)	No	Subpart JJ specifies applicability.
63.1(b)(2)	Yes	
63.1(b)(3)	Yes	
63.1(c)(1)	No	Subpart JJ specifies applicability.
63.1(c)(2)	No	Area sources are not subject to subpart JJ.
63.1(c)(4)	Yes	
63.1(c)(5)	Yes	
63.1(e)	Yes	
63.2	Yes	Additional terms are defined in 63.801(a) of subpart JJ. When overlap between subparts A and JJ occurs, subpart JJ takes precedence.
63.3	Yes	Other units used in subpart JJ are defined in 63.801(b).
63.4	Yes	
63.5	Yes	
63.6(a)	Yes	
63.6(b)(1)	Yes	
63.6(b)(2)	Yes	
63.6(b)(3)	Yes	
63.6(b)(4)	No	May apply when standards are proposed under Section 112(f) of the CAA.
63.6(b)(5)	Yes	
63.6(b)(7)	Yes	
63.6(c)(1)	Yes	
63.6(c)(2)	No	
63.6(c)(5)	Yes	
63.6(e)(1)	Yes	
63.6(e)(2)	Yes	
63.6(e)(3)	Yes	Applies only to affected sources using a control device to comply with the rule.
63.6(f)(1)	No	Affected sources complying through the procedures specified in 63.804 (a)(1), (a)(2), (b), (c)(1), (d)(1), (d)(2), (e)(1), and (e)(2) are subject to the emission standards at all times, including periods of startup, shutdown, and malfunction.
63.6(f)(2)	Yes	
63.6(f)(3)	Yes	
63.6(g)	Yes	
63.6(h)	No.	
63.6 (i)(1)–(i)(3)	Yes	
63.6(i)(4)(i)	Yes	

TABLE 1.—GENERAL PROVISIONS APPLICABILITY TO SUBPART JJ - Continued

Reference	Applies to subpart JJ	Comment
63.6(i)(4)(ii)	No.	
63.6 (i)(5)–(i)(14)	Yes	
63.6(i)(16)	Yes	
63.6(j)	Yes	
63.7	Yes	Applies only to affected sources using a control device to comply with the rule.
63.8	Yes	Applies only to affected sources using a control device to comply with the rule.
63.9(a)	Yes	
63.9(b)	Yes	Existing sources are required to submit initial notification report within 270 days of the effective date.
63.9(c)	Yes	
63.9(d)	Yes	
63.9(e)	Yes	Applies only to affected sources using a control device to comply with the rule.
63.9(f)	No	
63.9(g)	Yes	Applies only to affected sources using a control device to comply with the rule.
63.9(h)	Yes	63.9(h)(2)(ii) applies only to affected sources using a control device to comply with the rule.
63.9(i)	Yes	
63.9(j)	Yes	
63.10(a)	Yes	
63.10(b)(1)	Yes	
63.10(b)(2)	Yes	Applies only to affected sources using a control device to comply with the rule.
63.10(b)(3)	Yes	
63.10(c)	Yes	
63.10(d)(1)	Yes	
63.10(d)(2)	Yes	Applies only to affected sources using a control device to comply with the rule.
63.10(d)(3)	No	
63.10(d)(4)	Yes	
63.10(d)(5)	Yes	Applies only to affected sources using a control device to comply with the rule.
63.10(e)	Yes	Applies only to affected sources using a control device to comply with the rule.
63.10(f)	Yes	
63.11	No	
63.12–63.15	Yes	

TABLE 2.—LIST OF VOLATILE HAZARDOUS AIR POLLUTANTS

Chemical name	CAS No.	Chemical name	CAS No.
Acetaldehyde.....	75070	Diazomethane.....	334883
Acetamide.....	60355	Dibenzofuran.....	132649
Acetonitrile.....	75058	1,2-Dibromo-3-Chloropropane.....	96128
Acetophenone.....	98862	Dibutylphthalate.....	84742
2-Acetylaminofluorine.....	53963	1,4-Dichlorobenzene.....	106467
Acrolein.....	107028	3,3'-Dichlorobenzidine.....	91941
Acrylamide.....	79061	Dichloroethyl ether (Bis (2-chloroethyl) ether).....	111444
Acrylic acid.....	79107	1,3-Dichloropropene.....	542756
Acrylonitrile.....	107131	Diethanolamine.....	111422
Allyl chloride.....	107051	N,N-Dimethylaniline.....	121697
4-Aminobiphenyl.....	92671	Diethyl sulfate.....	64675
Aniline.....	62533	3,3'-Dimethoxybenzidine.....	119904
o-Anisidine.....	90040	4-Dimethylaminoazobenzene.....	60117
Benzene.....	71432	3,3'-Dimethylbenzidine.....	119937
Benzidine.....	92875	Dimethylcarbamoyl chloride.....	79447
Benzotrichloride.....	98077	N,N-Dimethylformamide.....	68122
Benzyl chloride.....	100447	1,1-Dimethylhydrazine.....	57147
Biphenyl.....	92524	Dimethylphthalate.....	131113
Bis(2-ethylhexyl) Phthalate (DEHP). Bis(chloromethyl) ether.....	117817 542881	Dimethyl Sulfate.....	77781
Bromoform.....	75252	4,6-Dinitro-o-cresol, and salts.....
1,3-Butadiene.....	106990	2,4-Dinitrophenol.....	51285
Caprolactam.....	105602	2,4-Dinitrotoluene.....	121142
Carbon disulfide.....	75150	1,4-Dioxane (1,4-Diethyleneoxide).....	123911
Carbon tetrachloride.....	56235	1,2-Diphenylhydrazine.....	122667
Carbonyl sulfide.....	463581	Epichlorohydrin (1-Chloro-2,3-epoxypropane).....	106898
Catechol.....	120809	1,2-Epoxybutane.....	106887
Chloroacetic acid.....	79118	Ethyl acrylate.....	140885
2-Chloroacetophenone.....	532274	Ethylbenzene.....	100414
Chlorobenzene.....	1089073	Ethyl carbamate (Urethane).....	51796
Cresols (isomers and mixture).....	131977	Ethyl chloride (Chloroethane).....	75003
o-Cresol.....	95487	Ethylene dibromide (Dibromoethane).....	106934
m-Cresol.....	108394	Ethylene dichloride (1,2-Dichloroethane).....	107062
p-Cresol.....	106445	Ethylene glycol.....	107211
Cumene.....	98828	Ethylene oxide.....	75218
2,4-D (2,4-Dichlorophenoxyacetic acid, including salts and esters) DDE (1,1-Dichloro-2,2-bis (pchlorophenyl) ethylene).....	94757 72559	Ethylenethiourea.....	96457
		Ethylidene dichloride (1,1-Dichloroethane).....	75343
		Formaldehyde.....	50000
		Glycol ethers.....	0

TABLE 2.—LIST OF VOLATILE HAZARDOUS AIR POLLUTANTS - Continued

Chemical name	CAS No.	Chemical name	CAS No.
Hexachlorobenzene.....	118741	Polychlorinated biphenyls (Aroclors).....	1336363
Hexachloro-1,3-butadiene.....	87683	Polycyclic Organic Matter b	0
Hexachloroethane.....	67721	1,3-Propane sultone	112071
Hexamethylene-1,6-diisocyanate....	822060	beta-Propiolactone	57578
Hexamethylphosphoramide.....	680319	Propionaldehyde	123386
Hexane.....	110543	Propoxur (Baygon)	114261
Hydrazine.....	302012	Propylene dichloride (1,2-	
Hydroquinone.....	123319	Dichloropropane).....	78875
Isophorone.....	78591	Propylene oxide	75569
Maleic anhydride.....	108316	1,2-Propylenimine (2-Methyl aziridine)....	75558
Methanol.....	67561	Quinone	106514
Methyl bromide (Bromomethane)	74839	Styrene	100425
Methyl chloride (Chloromethane)	74873	Styrene oxide	96093
Methyl chloroform (1,1,1-		2,3,7,8-Tetrachlorodibenzo-pdioxin.....	1746016
Trichloroethane).....	71556	1,1,2,2-Tetrachloroethane	79345
Methyl ethyl ketone (2-Butanone)....	78933	Tetrachloroethylene (Perchloroethylene)	127184
Methylhydrazine	60344	Toluene	108883
Methyl iodide (Iodomethane)	74884	2,4-Toluenediamine	95807
Methyl isobutyl ketone (Hexone)	108101	Toluene-2,4-diisocyanate	584849
Methyl isocyanate	624839	o-Toluidine	95534
Methyl methacrylate	80626	1,2,4-Trichlorobenzene	120821
Methyl tert-butyl ether	1634044	1,1,2-Trichloroethane	79005
4,4'-Methylenebis (2-chloroaniline)..	101144	Trichloroethylene	79016
Methylene chloride		2,4,5-Trichlorophenol	95954
(Dichloromethane).....	75092	2,4,6-Trichlorophenol	88062
4,4'-Methylenediphenyl		Triethylamine	121448
diisocyanate (MDI)	101688	Trifluralin	1582098
4,4'-Methylenedianiline	101779	2,2,4-Trimethylpentane	540841
Naphthalene	91203	Vinyl acetate	108054
Nitrobenzene	98953	Vinyl bromide	593602
4-Nitrobiphenyl	92933	Vinyl chloride	75014
4-Nitrophenol	100027	Vinylidene chloride (1,1-	
2-Nitropropane	79469	Dichloroethylene).....	75354
N-Nitroso-N-methylurea	684935	Xylenes (isomers and mixture)	1330207
N-Nitrosodimethylamine	62759	o-Xylene	95476
N-Nitrosomorpholine.....	59892	m-Xylene	108383
Phenol.....	108952	p-Xylene	106423
p-Phenylenediamine.....	106503		
Phosgene.....	75445		
Phthalic anhydride.....	85449		

^a Includes mono- and di-ethers of ethylene glycol, diethylene glycols and triethylene glycol; R-(OCH₂CH₂)_nRR-OR where: n = 1, 2, or 3, R = alkyl or aryl groups, R₀ = R, H, or groups which, when removed, yield glycol ethers with the structure: R-(OCH₂CH₂)_n-OH. Polymers are excluded from the glycol category.

^b Includes organic compounds with more than one benzene ring, and which have a boiling point greater than or equal to 100°C.

TABLE 3.—SUMMARY OF EMISSION LIMITS

Emission point	Existing source	New source
Finishing Operations:		
(a) Achieve a weighted average VHAP content across all coatings (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied).....	a 1.0	a 0.8
(b) Use compliant finishing materials (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied):		
—stains.....	a 1.0	a 1.0
—washcoats.....	a,b 1.0	a,b 0.8
—sealers.....	a 1.0	a 0.8
—topcoats.....	a 1.0	a 0.8
—basecoats.....	a,b 1.0	a,b 0.8
—enamels.....	a,b 1.0	a,b 0.8
—thinners (maximum % HAP allowable); or.....	10.0	10.0
(c) As an alternative, use control device; or	c 1.0	c 0.8
(d) Use any combination of (a), (b), and (c)	1.0	0.8
Cleaning Operations:		
Strippable spray booth material (maximum VOC content, kg VOC/kg solids [lb VOC/lb solids]).....	0.8	0.8
Contact Adhesives:		
(a) Use compliant contact adhesives (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied) based on following criteria:		
i. For aerosol adhesives, and for contact adhesives applied to nonporous substrates.....	d NA	d NA
ii. For foam adhesives used in products that meet flammability requirements.....	1.8	0.2
iii. For all other contact adhesives (including foam adhesives used in products that do not meet flammability requirements); or.....	1.0	0.2
(b) Use a control device	e 1.0	e 0.2

^a The limits refer to the VHAP content of the coating, as applied.

^b Washcoats, basecoats, and enamels must comply with the limits presented in this table if they are purchased premade, that is, if they are not formulated onsite by thinning other finishing materials. If they are formulated onsite, they must be formulated using compliant finishing materials, i.e., those that meet the limits specified in this table, and thinners containing no more than 3.0 percent HAP by weight.

^c The control device must operate at an efficiency that is equivalent to no greater than 1.0 kilogram (or 0.8 kilogram) of VHAP being emitted from the affected emission source per kilogram of solids used.

^d There is no limit on the VHAP content of these adhesives.

^e The control device must operate at an efficiency that is equivalent to no greater than 1.0 kilogram (or 0.2 kilogram) of VHAP being emitted from the affected emission source per kilogram of solids used.

TABLE 4.—POLLUTANTS EXCLUDED FROM USE IN CLEANING AND WASHOFF SOLVENTS

Chemical Name	CAS No.	Chemical Name	CAS No.
4-Aminobiphenyl	92671	Ethylene dibromide(1,2-Dibromoethane).....	106934
Styrene oxide	96093	DDE (1,1-p-chlorophenyl 1-	72559
Diethyl sulfate	64675	2dichloroethylene) Clorobenzilate.....	510156
N-Nitrosomorpholine	59892	Dichlorvos.....	62737
Dimethyl formamide	68122	Vinyl chloride.....	75014
Hexamethylphosphoramide	680319	Coke Oven Emissions	99999908
Acetamide	60355	Ethylene oxide	75218
4,4'-Methylenedianiline	101779	Ethylene thiourea	96457
o-Anisidine	90040	Vinyl bromide (bromoethene)	593602
2,3,7,8-Tetrachlorodibenzo-pdioxin.....	1746016	Selenium sulfide (mono and di)	7488564
Beryllium salts		Chloroform	67663
Benzidine	92875	Pentachlorophenol	87865
N-Nitroso-N-methylurea	684935	Ethyl carbamate (Urethane)	51796
Bis(chloromethyl)ether	542881	Ethylene dichloride (1,2-Dichloroethane).....	107062
Dimethyl carbamoyl chloride	79447	Propylene dichloride (1,2-Dichloropropane)..	78875
Chromium compounds (hexavalent).....		Carbon tetrachloride	56235
1,2-Propylenimine (2-Methylaziridine).....	75558	Benzene	71432
Arsenic and inorganic arsenic compounds.....	99999904	Methyl hydrazine	60344
Hydrazine	302012	Ethyl acrylate	140885
1,1-Dimethyl hydrazine	57147	Propylene oxide	75569
Beryllium compounds	7440417	Aniline	62533
1,2-Dibromo-3-chloropropane	96128	1,4-Dichlorobenzene(p)	106467
N-Nitrosodimethylamine	62759	2,4,6-Trichlorophenol	88062
Cadmium compounds		Bis(2-ethylhexyl)phthalate (DEHP)	117817
Benzo (a) pyrene	50328	o-Toluidine	95534
Polychlorinated biphenyls (Aroclors).....	1336363	Propoxur	114261
Heptachlor	76448	Trichloroethylene	79016
3,3'-Dimethyl benzidine	119937	1,4-Dioxane (1,4-Diethyleneoxide)	123911
Nickel subsulfide	12035722	Acetaldehyde	75070
Acrylamide	79061	Bromoform	75252
Hexachlorobenzene	118741	Captan	133062
Chlordane	57749	Epichlorohydrin	106898
1,3-Propane sultone	1120714	Methylene chloride (Dichloromethane).....	75092
1,3-Butadiene	106990	Tetrachloroethylene (Perchloroethylene).....	127184
Nickel refinery dust		Dibenz (ah) anthracene	53703
2-Acetylaminoflourine	53963	Chrysene	218019
3,3'-Dichlorobenzidine	53963	Dimethyl aminoazobenzene	60117
Lindane (hexachlorocyclohexane, gamma).....	58899	Benzo (a) anthracene	56553
2,4-Toluene diamine	95807	Benzo (b) fluoranthene	205992
Dichloroethyl ether (Bis(2-chloroethyl)ether)...	111444	Antimony trioxide	1309644
1,2-Diphenylhydrazine	122667	2-Nitropropane	79469
Toxaphene (chlorinated camphene).....	8001352	1,3-Dichloropropene	542756
2,4-Dinitrotoluene	121142	7, 12-Dimethylbenz(a)anthracene	57976
3,3'-Dimethoxybenzidine	119904	Benz(c)acridine	225514
Formaldehyde	50000	Indeno(1,2,3-cd)pyrene	193395
4,4'-Methylene bis(2-chloroaniline).....	101144	1,2:7,8-Dibenzopyrene	189559
Acrylonitrile	107131		

TABLE 5.—LIST OF VHAP OF POTENTIAL CONCERN IDENTIFIED BY INDUSTRY

Chemical	CAS No.	EPA de minimis, tons/yr
Dimethyl formamide	68122	1.0
Formaldehyde	50000	0.2
Methylene chloride	75092	4.0
2-Nitropropane	79469	1.0
Isophorone	78591	0.7
Styrene monomer	1000425	1.0
Phenol	108952	0.1
Diethanolamine	11422	5.0
2-Methoxyethanol	109864	10.0
2-Ethoxyethyl acetate.....	111159	5.0

TABLE 6.—VHAP OF POTENTIAL CONCERN

Chemical Name	CAS No.	Chemical Name	CAS No.
“Nonthreshold” Pollutants		4,4'-Methylene bis(2-chloroaniline)	101144
4-Aminobiphenyl	92671	Acrylonitrile	107131
Styrene oxide	96093	Ethylene dibromide(1,2-Dibromoethane)	106934
Diethyl sulfate	64675	DDE(1,1-p-chlorophenyl 1-2 dichloroethylene)	72559
N-Nitrosomorpholine	59892	Chlorobenzilate	510156
Dimethyl formamide	68122	Dichlorvos	62737
Hexamethylphosphoramide	80319	Vinyl chloride	75014
Acetamide	60355	Ethylene oxide	75218
4,4'-Methylenedianiline	101779	Ethylene thiourea	96457
o-Anisidine	90040	Vinyl bromide (bromoethene)	593602
2,3,7,8-Tetrachlorodibenzo-pdioxin	1746016	Chloroform	67663
Benzidine	92875	Pentachlorophenol	87865
N-Nitroso-N-methylurea	684935	Ethyl carbamate (Urethane)	51796
Bis(chloromethyl)ether	542881	Ethylene dichloride (1,2-Dichloroethane).....	107062
Dimethyl carbamoyl chloride	79447	Propylene dichloride (1,2-Dichloropropane)...	78875
1,2-Propylenimine (2-Methyl aziridine).....	75558	Carbon tetrachloride.....	56235
1,1-Dimethyl hydrazine	57147	Benzene.....	71432
1,2-Dibromo-3-chloropropane	96128	Ethyl acrylate	140885
N-Nitrosodimethylamine	62759	Propylene oxide	75569
Benzo (a) pyrene	50328	Aniline.....	62533
Polychlorinated biphenyls (Aroclors)	1336363	1,4-Dichlorobenzene(p)	106467
Heptachlor	76448	2,4,6-Trichlorophenol	88062
3,3'-Dimethylbenzidine	119937	Bis(2-ethylhexyl)phthalate (DEHP)	117817
Acrylamide	79061	o-Toluidine.....	95534
Hexachlorobenzene	118741	Propoxur.....	114261
Chlordane	57749	Trichloroethylene	79016
1,3-Propane sultone	1120714	1,4-Dioxane (1,4-Diethyleneoxide)	123911
1,3-Butadiene	106990	Acetaldehyde	75070
2-Acetylaminoflourine	53963	Bromoform	75252
3,3'-Dichlorobenzidine.....	53963	Captan	133062
Lindane (hexachlorocyclohexane, gamma)....	58899	Epichlorohydrin	106898
2,4-Toluene diamine	95807	Methylene chloride (Dichloromethane)	75092
Dichloroethyl ether (Bis(2-chloroethyl) ether)	111444	Tetrachloroethylene (Perchloroethylene)	127184
1,2-Diphenylhydrazine	122667	Dibenz (ah) anthracene	53703
Toxaphene (chlorinated camphene)	8001352	Chrysene	218019
2,4-Dinitrotoluene	121142	Dimethyl aminoazobenzene	60117
3,3'-Dimethoxybenzidine	119904	Benzo (a) anthracene	56553
Formaldehyde	50000	Benzo (b) fluoranthene	205992

TABLE 6.—VHAP OF POTENTIAL CONCERN—Continued

Chemical Name	CAS No.	Chemical Name	CAS No.
2-Nitropropane	79469	Acrolein	107028
1,3-Dichloropropene	542756	2,4 - Toluene diisocyanate	584849
7, 12-Dimethylbenz(a)anthracene	57976	Tetramethyl lead	75741
Benz(c)acridine	225514	Tetraethyl lead	78002
Indeno(1,2,3-cd)pyrene	193395	Methylcyclopentadienyl manganese	12108133
1,2:7,8-Dibenzopyrene	189559	Methyl isocyanate	624839
1,1,2,2-Tetrachloroethane	79345	Hexachlorocyclopentadiene	77474
Quinoline	91225	Fluomine	62207765
Vinylidene chloride (1,1-Dichloroethylene)	75354	Cobalt carbonyl	10210681
Hexachlorobutadiene	87683	Chloroacetic acid	79118
Pentachloronitrobenzene (Quintobenzene).....	82688	4,6-Dinitro-o-cresol, and salts	534521
Isophorone	78591	Methylene diphenyl diisocyanate	101688
1,1,2-Trichloroethane	79005	Phenol	108952
Methyl chloride (Chloromethane)	74873	Mercury, (acetato-o) phenyl	62384
Hexachloroethane	67721	Acetophenone	98862
Trifluralin	1582098	Maleic anhydride	108316
Cresols/Cresylic acid (isomers and mixture)	1319773	2-Chloroacetophenone	532274
m-Cresol	108394	2,4-Dinitrophenol	51285
Ethylidene dichloride (1,1-Dichloroethane)	75343	2-Methoxy ethanol	108864
o-Cresol	95487	Nitrobenzene	98953
p-Cresol	106445	Methyl bromide (Bromomethane)	74839
Methyl iodide (Iodomethane)	74884	Carbon disulfide	75150
Styrene a	100425	N,N-Dimethylaniline	121697
Allyl chloride.....	107051	“Unrankable” Pollutants	
Diazomethane	334883	Quinone	106514
2,4,5 – Trichlorophenol	95954	Propionaldehyde	123386
Chloramben	133904	Catechol	120809
1,2 - Epoxybutane	106887	Phthalic anhydride.....	85449
Vinyl acetate	108054	Carbonyl sulfide	463581
Chloroprene	126998	Dibenzofurans	132649
Hydroquinone	123319	4-Nitrophenol	100027
4-Nitrobiphenyl	92933	2,2,4-Trimethylpentane	540841
“High-Concern” Pollutants		Diethanolamine	11422
Parathion	56382	Hexamethylene-1,6-diisocyanate Glycol	
Nickel Carbonyl	13463393	ethers ^b	822060
Methyl hydrazine	60344	Polycyclic organic matter ^c	
Ethylene oxide	75218		
Ethylene imine	151564		
Dimethyl sulfate	77781		
Chloromethyl methyl ether	107302		
beta-Propiolactone	57578		
Benzyl chloride	100447		
Benzotrichloride	98077		

* = Currently an EPA weight of evidence classification is under review.

a The EPA does not currently have an official weight-of-evidence classification for styrene.

For purposes of this rule, styrene is treated as a “nonthreshold” pollutant. (See data report form in appendix A of the hazard ranking technical background document.)

b Except for 2-ethoxy ethanol, ethylene glycol monobutyl ether, and 2-methoxy ethanol.

c Except for benzo(b)fluoranthene, benzo(a)anthracene, benzo(a)pyrene, 7,12-dimethylbenz(a)anthracene, benz(c)acridine, chrysene, dibenz(ah) anthracene, 1,2:7,8-dibenzopyrene, indeno(1,2,3-cd)pyrene, but including dioxins and furans.

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

Addendum to the Technical Support Document

Source Name:	Smart, LLC
Source Location:	67742 CR 23, New Paris, Indiana 46553
County:	Elkhart
SIC Code:	2434
Operation Permit No.:	T039-7716-00177
Date Issued:	March 30, 1998
Significant Source Modification No.:	039-21392-00177
Significant Permit Modification No.:	039-21403-00177
Permit Reviewer:	SDF

On August 8, 2005, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Smart, LLC had applied for a Significant Source Modification and Significant Permit Modification to remove three of the nine existing spray booths, remove veneer press EU-12, and add a new flat line finish system, identified as EU-16, to be constructed in 2005, utilizing an airless spray application system, with dry filters for control of particulate matter overspray, with all emissions exhausted through Stack ID No. 15. The notice also stated that OAQ proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On August 31, Ethan Chatfield of EPA submitted comments on the proposed changes. The summary of the comments and corresponding responses is as follows:

Comment 1:

Condition D.1.9 (now Condition D.1.5): The "VOC formulation data supplied by the coating manufacturer" should conform to a specified EPA test methodology (i.e. Method 24).

Response 1:

The IDEM, OAQ has verified that the information supplied by the manufacturers is based on Method 24. Therefore, the IDEM, OAQ has determined that it is not necessary to require the source to do initial or routine EPA Method 24 tests for the materials used. However, the IDEM, OAQ, has included a statement that Method 24 testing can and will be required if deemed necessary. Thus, no changes to the affected requirements are necessary.

Comment 2:

Condition D.1.10: Please provide an origin and authority for this permit requirement.

Response 2:

Condition D.1.10 (now Condition D.1.6) shall be changed as follows to include the applicable citation (326 IAC 6-3-2) and reference the affected condition (Condition D.1.3):

D.1.6 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to CP-039-2974-00177, issued on December 13, 1994, and Significant Permit Modification 039-21403-00177, **in order to achieve compliance with the requirements of Condition D.1.3**, the dry filters for PM control shall be in operation at all times when the six (6) spray booths (EU-03 through EU-8) and finish line EU-16 are in operation.

Comment 3:

- (a) The compliance procedures in 63.804 appear to be missing from the permit please explain. In addition, Condition D.1.7(a) references 63.804(e)(2), but it is not clear that this facility uses contact adhesives?
- (b) Condition D.1.13: I was unable to locate all of the compliance recordkeeping, and reporting procedures contained in 63.804(f) and (g), 63.806, and 63.807 in the permit. There does not appear to be any Part 63 recordkeeping or reporting requirements for these units since no Part 63 authority is cited. Please explain.
- (c) I was unable to locate any general Part 63 requirements.

Response 3:

The 40 CFR 63, Subpart JJ requirements were revised based on the language established in the original Part 70 permit. Some of the applicable NESHAP requirements were referenced and some were not, and the original language did not include the general NESHAP requirements of 40 CFR 63, Subpart A.

In order to ensure that all of the applicable 40 CFR 63, Subpart JJ requirements are included in the permit, the existing Subpart JJ requirements will be removed and replaced by the applicable verbatim requirements, including the definitions and applicable tables, as follows:

Upon review of 40 CFR 63, Subpart JJ, it is determined that the following sections apply:

**63.800,
63.801,
63.802(a)(1) and (3),
63.802(b)(1) and (3),
63.803,
63.804(a)(1), (2), and (4),
63.804(d)(1), (2), and (4),
63.804(f)(1), (2), (3), (7), and (8),
63.804(g)(1), (2), (3), (7), and (8),
63.805(a),
63.806(a), (b), (c), (d), (e), (h), (i), and (j),
63.807(a), (b), (c), and (e), and
63.808**

Conditions D.1.4, D.1.5, D.1.7, and D.1.8 shall be removed as follows to allow the incorporation of the applicable verbatim 40 CFR 63, Subpart JJ requirements:

~~D.1.4 Wood Furniture NESHAP [40 CFR Part 63, Subpart JJ]~~

- ~~(a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) 326 IAC 20-14, (40 CFR Part 63, Subpart JJ), with compliance dates of December 7, 1998 for spray booths EU-3 through EU-8, and the date of startup for finish line EU-16.~~

~~(b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:~~

~~(1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from spray booths EU-3 through EU-8 as follows:~~

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

~~(B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight;~~

~~(2) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finish line EU-16 as follows:~~

~~(A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of eight-tenths (0.8) pound VHAP per pound solids; or~~

~~(B) use compliant finishing materials in which all stains have a maximum VHAP content of one (1.0) pound VHAP per pound solids, as applied, and all washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of eight tenths (0.8) pound VHAP per pound solids, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3%) maximum VHAP content by weight. All other thinners have a ten percent (10%) maximum VHAP content by weight;~~

~~(3) Limit VHAP emissions contact adhesives as follows:~~

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

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

A copy of this rule is enclosed.

D.1.5 Work Practice Standards [40 CFR 63.803] [326 IAC 20]

The owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the applicable compliance dates specified in Condition D.1.4. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

~~(a) Operator training course.~~

~~(b) Leak inspection and maintenance plan.~~

~~(c) Cleaning and washoff solvent accounting system.~~

~~(d) Chemical composition of cleaning and washoff solvents.~~

~~(e) Spray booth cleaning.~~

~~(f) Storage requirements.~~

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

- ~~(h) Line cleaning.~~
- ~~(i) Gun cleaning.~~
- ~~(j) Washoff operations.~~
- ~~(k) Formulation assessment plan for finishing operations.~~

~~D.1.7 Testing Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)] [40 CFR 63]~~

- ~~(a) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-2.1.~~
- ~~(b) However, if the OAQ requests, compliance with the PM limit specified in Condition D.1.3 shall be determined by a performance test conducted in accordance with Section C- Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5, 326 IAC 2-7-6.~~

~~D.1.8 HAP Content~~

~~Pursuant to 40 CFR 63, Subpart JJ, an Initial Compliance Report must be submitted within sixty (60) calendar days following the applicable compliance schedule dates specified in Condition D.1.4. and a Continuous Compliance Demonstration Report must be submitted within thirty (30) days following every six month period, thereafter.~~

~~D.1.128 Record Keeping Requirements~~

- ~~(a) To document compliance with Conditions D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.1.2.~~
 - ~~(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~
 - ~~(2) A log of the dates of use;~~
 - ~~(3) The cleanup solvent usage for each month;~~
 - ~~(4) The total VOC usage for each month; and~~
 - ~~(5) The weight of VOCs emitted for each compliance period.~~
- ~~(b) To document compliance with Condition D.1.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.1.4.~~
 - ~~(1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.~~
 - ~~(2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.~~
 - ~~(3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.~~
 - ~~(4) The VHAP content in weight percent of each thinner used.~~
 - ~~(5) Copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.~~
- ~~(c) To document compliance with Condition D.1.5, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.~~

- (db) To document compliance with Condition D.1.447, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (ec) All records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit.

D.1.139 Reporting Requirements

- ~~(a) An Initial Compliance Report to document compliance with Conditions D.1.4 and the Certification form, shall be submitted to the address listed in Section C – General Reporting Requirements, of this permit, within sixty (60) calendar days following the applicable compliance dates specified in Condition D.1.4. The initial compliance report must include data from the entire month that the compliance date falls.~~
- ~~(b) A semi-annual Continuous Compliance Report to document compliance with Condition D.1.4 and the Certification form, shall be submitted to the address listed in Section C – General Reporting Requirements of this permit, within thirty (30) days after the end of the six (6) months being reported.~~

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

- ~~(1) January 1 through June 30.~~
- ~~(2) July 1 through December 31.~~
- (e) A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements of this permit, using the reporting form located at the end of this permit, or its equivalent, within thirty (30) days after the end of the quarter being reported.

New Condition D.1.10 shall be added as follows to include the NESHAP general requirements of 40 CFR 62, Subpart A:

D.1.10 General Provisions Relating to NESHAP JJ [326 IAC 20-1] [40 CFR Part 63, Subpart A]

Pursuant to 40 CFR 63.5925, 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, and as specified in Table 1 of 40 CFR Part 63, Subpart JJ, in accordance with the schedule in 40 CFR 63 Subpart JJ.

New Condition D.1.11 shall be added as follows to include the specific applicable 40 CFR 63, Subpart JJ requirements.

D.1.11 NESHAP JJ Requirements [40 CFR Part 63, Subpart JJ]

Pursuant to CFR Part 63, Subpart JJ, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart JJ, 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 63.2. The owner or operator of a source that meets the criteria for an incidental furniture manufacturer shall maintain purchase or usage records demonstrating the source meets the criteria specified in Sec. 63.801 of this subpart, but the source shall not be subject to any other provisions of this subpart.**
- (b) **A source that complies with the limits and criteria specified in paragraphs (b)(1), (b)(2), or (b)(3) of this section is an area source for the purposes of this subpart and is not subject to any other provision of this rule, provided that: In the case of paragraphs (b)(1) and (b)(2), finishing materials, adhesives, cleaning solvents and washoff solvents account for at least 90 percent of annual HAP emissions at the plant site, and if the plant site has HAP emissions that do not originate from the listed materials, the owner or operator keeps any records necessary to demonstrate that the 90 percent criterion is met. A source that initially relies on the limits and criteria specified in paragraphs (b)(1), (b)(2), and (b)(3) to become an area source, but subsequently exceeds the relevant limit (without first obtaining and complying with other limits that keep its potential to emit hazardous air pollutants below major source levels), becomes a major source and must comply thereafter with all applicable provisions of this subpart starting on the applicable compliance date in Sec. 63.800. Nothing in this paragraph (b) is intended to preclude a source from limiting its potential to emit through other appropriate mechanisms that may be available through the permitting authority.**
- (1) **The owner or operator of the source uses no more than 250 gallons per month, for every month, of coating, gluing, cleaning, and washoff materials at the source, including materials used for source categories other than wood furniture (surface coating), but excluding materials used in routine janitorial or facility grounds maintenance, personal uses by employees or other persons, the use of products for the purpose of maintaining motor vehicles operated by the facility, or the use of toxic chemicals contained in intake water (used for processing or noncontact cooling) or intake air (used either as compressed air or for combustion). The owner or operator shall maintain records of the total gallons of coating, gluing, cleaning, and washoff materials used each month, and upon request submit such records to the Administrator. These records shall be maintained for five years.**

- (2) The owner or operator of the source uses no more than 3,000 gallons per rolling 12-month period, for every 12-month period, of coating, gluing, cleaning, and washoff materials at the source, including materials used for source categories other than wood furniture (surface coating), but excluding materials used in routine janitorial or facility grounds maintenance, personal uses by employees or other persons, the use of products for the purpose of maintaining motor vehicles operated by the facility, or the use of toxic chemicals contained in intake water (used for processing or noncontact cooling) or intake air (used either as compressed air or for combustion). A rolling 12-month period includes the previous 12 months of operation. The owner or operator of the source shall maintain records of the total gallons of coating, gluing, cleaning, and washoff materials used each month and the total gallons used each previous month, and upon request submit such records to the Administrator. Because records are needed over the previous set of 12 months, the owner or operator shall keep monthly records beginning no less than one year before the compliance date specified in Sec. 63.800(e). Records shall be maintained for five years.
- (3) The source uses materials containing no more than 4.5 Mg (5 tons) of any one HAP per rolling 12-month period or no more than 11.4 Mg (12.5 tons) of any combination of HAP per rolling 12-month period, including materials from source categories other than wood furniture; and at least 90 percent of the plantwide emissions per rolling 12-month period are associated with the manufacture of wood furniture or wood furniture components. The owner or operator shall maintain records that demonstrate that annual emissions do not exceed these levels, including monthly usage records for all finishing, gluing, cleaning, and washoff materials; certified product data sheets for these materials; and any other records necessary to document emissions from source categories other than wood furniture and upon request submit such records to the Administrator. These records shall be maintained for five years.
- (c) This subpart does not apply to research or laboratory facilities as defined in Sec. 63.801.
- (d) Owners or operators of affected sources shall also comply with the requirements of subpart A of this part (General Provisions), according to the applicability of subpart A to such sources, as identified in Table 1 of this subpart.
- (e) The compliance date for existing affected sources that emit less than 50 tons per year of HAP in 1996 is December 7, 1998. The compliance date for existing affected sources that emit 50 tons or more of hazardous air pollutants in 1996 is November 21, 1997. The owner or operator of an existing area source that increases its emissions of (or its potential to emit) HAP such that the source becomes a major source that is subject to this subpart shall comply with this subpart one year after becoming a major source.
- (f) New affected sources must comply with the provisions of this standard immediately upon startup or by December 7, 1995, whichever is later. New area sources that become major sources shall comply with the provisions of this standard immediately upon becoming a major source.

- (g) Reconstructed affected sources are subject to the requirements for new affected sources. The costs associated with the purchase and installation of air pollution control equipment (e.g., incinerators, carbon adsorbers, etc.) are not considered in determining whether the facility has been reconstructed, unless the control equipment is required as part of the process (e.g., product recovery). Additionally, the costs of retrofitting and replacement of equipment that is installed specifically to comply with this subpart are not considered reconstruction costs. For example, an affected source may convert to waterborne coatings to meet the requirements of this subpart. At most facilities, this conversion will require the replacement of existing storage tanks, mix equipment, and transfer lines. The cost of replacing the equipment is not considered in determining whether the facility has been reconstructed.**

§ 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 Sec. 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 the HAP 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 Sec. 63.805(a)); 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 Sec. 63.805(a)); and the density, measured by EPA Method 24 or an alternative or equivalent method. Therefore, the reportable HAP content should 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 HAP that are carcinogens, as defined by the Occupational Safety and Health Administration Hazard Communication Standard (29 CFR part 1910), as formulated. The purpose of the CPDS is to assist the affected source in demonstrating compliance with the emission limitations presented in Sec. 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 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.

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 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 volatile hazardous air pollutants from pumps, valves, flanges, or other equipment used to transfer or apply coatings, adhesives, or organic 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 CO₂. 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 solvent means a volatile organic liquid that is 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 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 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 overspray during finishing operations;**
- (2) That is subsequently peeled off and disposed; and**

- (3) By achieving (1) and (2), reduces or eliminates the need to use organic 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 Sec. 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 nonthreshold, high concern, or unrankable list in Table b 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 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.

Wood furniture manufacturing operations means the finishing, gluing, cleaning, and washoff operations associated with the production of wood furniture or wood furniture components.

(b) The nomenclature used in this subpart has the following meaning:

- (1) A_k = the area of each natural draft opening (k) in a total enclosure, in square meters.**
- (2) C_c = the VHAP content of a finishing material (c), in kilograms of volatile hazardous air pollutants per kilogram of coating solids (kg VHAP/kg solids), as supplied. Also given in pounds of volatile hazardous air pollutants per pound of coating solids (lb VHAP/lb solids).**
- (3) C_{aj} = the concentration of VHAP in gas stream (j) exiting the control device, in parts per million by volume.**
- (4) C_{bi} = the concentration of VHAP in gas stream (i) entering the control device, in parts per million by volume.**
- (5) C_{di} = the concentration of VHAP in gas stream (i) entering the control device from the affected source, in parts per million by volume.**
- (6) C_{fk} = the concentration of VHAP in uncontrolled gas stream (k) emitted directly to the atmosphere from the affected source, in parts per million by volume.**
- (7) E = the emission limit achieved by an emission point or a set of emission points, in kg VHAP/kg solids (lb VHAP/lb solids).**
- (8) F = the control device efficiency, expressed as a fraction.**
- (9) FV = the average inward face velocity across all natural draft openings in a total enclosure, in meters per hour.**
- (10) G = the VHAP content of a contact adhesive, in kg VHAP/kg solids (lb VHAP/lb solids), as applied.**
- (11) M = the mass of solids in finishing material used monthly, kg solids/month (lb solids/month).**
- (12) N = the capture efficiency, expressed as a fraction.**
- (13) Q_{aj} = the volumetric flow rate of gas stream (j) exiting the control device, in dry standard cubic meters per hour.**
- (14) Q_{bi} = the volumetric flow rate of gas stream (i) entering the control device, in dry standard cubic meters per hour.**
- (15) Q_{di} = the volumetric flow rate of gas stream (i) entering the control device from the emission point, in dry standard cubic meters per hour.**
- (16) Q_{fk} = the volumetric flow rate of uncontrolled gas stream (k) emitted directly to the atmosphere from the emission point, in dry standard cubic meters per hour.**

- (17) Q_{ini} = the volumetric flow rate of gas stream (i) entering the total enclosure through a forced makeup air duct, in standard cubic meters per hour (wet basis).
- (18) Q_{outj} = the volumetric flow rate of gas stream (j) exiting the total enclosure through an exhaust duct or hood, in standard cubic meters per hour (wet basis).
- (19) R = the overall efficiency of the control system, expressed as a percentage.
- (20) S = the VHAP content of a solvent, expressed as a weight fraction, added to finishing materials.
- (21) W = the amount of solvent, in kilograms (pounds), added to finishing materials during the monthly averaging period.
- (22) ac = after the control system is installed and operated.
- (23) bc = before control.

§ 63.802 Emission Limits

- (a) Each owner or operator of an existing affected source subject to this subpart shall:
 - (1) Limit VHAP emissions from finishing operations by meeting the emission limitations for existing sources presented in Table 3 of this subpart, using any of the compliance methods in Sec. 63.804(a). To determine VHAP emissions from a finishing material containing formaldehyde or styrene, the owner or operator of the affected source shall use the methods presented in Sec. 63.803(l)(2) for determining styrene and formaldehyde usage.
 - (3) Limit HAP emissions from strippable spray booth coatings by using coatings that contain no more than 0.8 kg VOC/kg solids (0.8 lb VOC/lb solids), as applied.
- (b) Each owner or operator of a new affected source subject to this subpart shall:
 - (1) Limit VHAP emissions from finishing operations by meeting the emission limitations for new sources presented in Table 3 of this subpart using any of the compliance methods in Sec. 63.804(d). To determine VHAP emissions from a finishing material containing formaldehyde or styrene, the owner or operator of the affected source shall use the methods presented in Sec. 63.803(l)(2) for determining styrene and formaldehyde usage.
 - (3) Limit HAP emissions from strippable spray booth coatings by using coatings that contain no more than 0.8 kg VOC/kg solids (0.8 lb VOC/lb solids), as applied.

§ 63.803 Work Practice Standards

- (a) **Work practice implementation plan.** Each owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan that defines environmentally desirable work practices for each wood furniture manufacturing operation and addresses each of the work practice standards presented in paragraphs (b) through (l) of this section. The plan shall be developed no more than 60 days after the compliance date. The written work practice implementation plan shall be available for inspection by the Administrator upon request. If the Administrator determines that the work practice implementation plan does not adequately address each of the topics specified in paragraphs (b) through (l) of this section or that the plan does not include sufficient mechanisms for ensuring that the work practice standards are being implemented, the Administrator may require the affected source to modify the plan. Revisions or modifications to the plan do not require a revision of the source's Title V permit.
- (b) **Operator training course.** Each owner or operator of an affected source shall train all new and existing personnel, including contract personnel, who are involved in finishing, gluing, cleaning, and washoff operations, use of manufacturing equipment, or implementation of the requirements of this subpart. All new personnel, those hired after the compliance date of the standard, shall be trained upon hiring. All existing personnel, those hired before the compliance date of the standard, shall be trained within six months of the compliance date of the standard. All personnel shall be given refresher training annually. The affected source shall maintain a copy of the training program with the work practice implementation plan. The training program shall include, at a minimum, the following:
- (1) A list of all current personnel by name and job description that are required to be trained;
 - (2) An outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;
 - (3) Lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and
 - (4) A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.
- (c) **Inspection and maintenance plan.** Each owner or operator of an affected source shall prepare and maintain with the work practice implementation plan a written leak inspection and maintenance plan that specifies:
- (1) A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or organic solvents;
 - (2) An inspection schedule;
 - (3) Methods for documenting the date and results of each inspection and any repairs that were made;
 - (4) The timeframe between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:

- (i) A first attempt at repair (e.g., tightening of packing glands) shall be made no later than five calendar days after the leak is detected; and
 - (ii) Final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three months.
- (d) **Cleaning and washoff solvent accounting system.** Each owner or operator of an affected source shall develop an organic solvent accounting form to record:
 - (1) The quantity and type of organic solvent used each month for washoff and cleaning, as defined in Sec. 63.801 of this subpart;
 - (2) The number of pieces washed off, and the reason for the washoff; and
 - (3) The quantity of spent solvent generated from each washoff and cleaning operation each month, and whether it is recycled onsite or disposed offsite.
- (e) **Chemical composition of cleaning and washoff solvents.** Each owner or operator of an affected source shall not use cleaning or washoff solvents that contain any of the pollutants listed in Table 4 to this subpart, in concentrations subject to MSDS reporting as required by OSHA.
- (f) **Spray booth cleaning.** Each owner or operator of an affected source shall not use compounds containing more than 8.0 percent by weight of VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, unless the spray booth is being refurbished. If the spray booth is being refurbished, that is the spray booth coating or other protective material used to cover the booth is being replaced, the affected source shall use no more than 1.0 gallon of organic solvent per booth to prepare the surface of the booth prior to applying the booth coating.
- (g) **Storage requirements.** Each owner or operator of an affected source shall use normally closed containers for storing finishing, gluing, cleaning, and washoff materials.
- (h) **Application equipment requirements.** Each owner or operator of an affected source shall use conventional air spray guns to apply finishing materials only under any of the following circumstances:
 - (1) To apply finishing materials that have a VOC content no greater than 1.0 lb VOC/lb solids, as applied;
 - (2) For touchup and repair under the following conditions:
 - (i) The touchup and repair occurs after completion of the finishing operation; or
 - (ii) The touchup and repair occurs after the application of stain and before the application of any other type of finishing material, and the materials used for touchup and repair are applied from a container that has a volume of no more than 2.0 gallons.
 - (3) When spray is automated, that is, the spray gun is aimed and triggered automatically, not manually;

- (4) When emissions from the finishing application station are directed to a control device;**
- (5) The conventional air gun is used to apply finishing materials and the cumulative total usage of that finishing material is no more than 5.0 percent of the total gallons of finishing material used during that semiannual period; or**
- (6) The conventional air gun is used to apply stain on a part for which it is technically or economically infeasible to use any other spray application technology. The affected source shall demonstrate technical or economic infeasibility by submitting to the Administrator a videotape, a technical report, or other documentation that supports the affected source's claim of technical or economic infeasibility. The following criteria shall be used, either independently or in combination, to support the affected source's claim of technical or economic infeasibility:**
 - (i) The production speed is too high or the part shape is too complex for one operator to coat the part and the application station is not large enough to accommodate an additional operator; or**
 - (ii) The excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain.**
- (i) Line cleaning. Each owner or operator of an affected source shall pump or drain all organic solvent used for line cleaning into a normally closed container.**
- (j) Gun cleaning. Each owner or operator of an affected source shall collect all organic solvent used to clean spray guns into a normally closed container.**
- (k) Washoff operations. Each owner or operator of an affected source shall control emissions from washoff operations by:**
 - (1) Using normally closed tanks for washoff; and**
 - (2) Minimizing dripping by tilting or rotating the part to drain as much solvent as possible.**
- (l) Formulation assessment plan for finishing operations. Each owner or operator of an affected source shall prepare and maintain with the work practice implementation plan a formulation assessment plan that:**
 - (1) Identifies VHAP from the list presented in Table 5 of this subpart that are being used in finishing operations by the affected source;**
 - (2) Establishes a baseline level of usage by the affected source, for each VHAP identified in paragraph (l)(1) of this section. The baseline usage level shall be the highest annual usage from 1994, 1995, or 1996, for each VHAP identified in paragraph (l)(1) of this section. For formaldehyde, the baseline level of usage shall be based on the amount of free formaldehyde present in the finishing material when it is applied. For styrene, the baseline level of usage shall be an estimate of unreacted styrene, which shall be calculated by multiplying the amount of styrene monomer in the finishing material, when it is applied, by a factor of 0.16. Sources using a control device to reduce emissions may adjust their usage based on the overall control efficiency of the control system, which is determined using the equation in Sec. 63.805 (d) or (e).**

- (3) Tracks the annual usage of each VHAP identified in (I)(1) by the affected source that is present in amounts subject to MSDS reporting as required by OSHA.**
- (4) If, after November 1998, the annual usage of the VHAP identified in paragraph (I)(1) exceeds its baseline level, then the owner or operator of the affected source shall provide a written notification to the permitting authority that describes the amount of the increase and explains the reasons for exceedance of the baseline level. The following explanations would relieve the owner or operator from further action, unless the affected source is not in compliance with any State regulations or requirements for that VHAP:**

 - (i) The exceedance is no more than 15.0 percent above the baseline level;**
 - (ii) Usage of the VHAP is below the de minimis level presented in Table 5 of this subpart for that VHAP (sources using a control device to reduce emissions may adjust their usage based on the overall control efficiency of the control system, which is determined using the procedures in Sec. 63.805 (d) or (e);**
 - (iii) The affected source is in compliance with its State's air toxic regulations or guidelines for the VHAP; or**
 - (iv) The source of the pollutant is a finishing material with a VOC content of no more than 1.0 kg VOC/kg solids (1.0 lb VOC/lb solids), as applied.**
- (5) If none of the above explanations are the reason for the increase, the owner or operator shall confer with the permitting authority to discuss the reason for the increase and whether there are practical and reasonable technology-based solutions for reducing the usage. The evaluation of whether a technology is reasonable and practical shall be based on cost, quality, and marketability of the product, whether the technology is being used successfully by other wood furniture manufacturing operations, or other criteria mutually agreed upon by the permitting authority and owner or operator. If there are no practical and reasonable solutions, the facility need take no further action. If there are solutions, the owner or operator shall develop a plan to reduce usage of the pollutant to the extent feasible. The plan shall address the approach to be used to reduce emissions, a timetable for implementing the plan, and a schedule for submitting notification of progress.**
- (6) If after November 1998, an affected source uses a VHAP of potential concern for which a baseline level has not been previously established, then the baseline level shall be established as the de minimis level, based on 70 year exposure levels and data provided in the proposed rulemaking pursuant to Section 112(g) of the CAA, for that pollutant. A list of VHAP of potential concern is provided in Table 6 of this subpart. If usage of the VHAP of potential concern exceeds the de minimis level, then the affected source shall provide an explanation to the permitting authority that documents the reason for exceedance of the de minimis level. If the explanation is not one of those listed in paragraphs (I)(4)(i) through (I)(4)(iv), the affected source shall follow the procedures established in (I)(5).**

§ 63.804 Compliance Procedures and Monitoring Requirements

- (a) The owner or operator of an existing affected source subject to Sec. 63.802(a)(1) shall comply with those provisions using any of the methods presented in Sec. 63.804 (a)(1) through (a)(4).**

 - (1) Calculate the average VHAP content for all finishing materials used at the facility using Equation 1, and maintain a value of E no greater than 1.0;**

$$E = \frac{(M_{c1}C_{c1} + M_{c2}C_{c2} + \dots + M_{cn}C_{cn} + S_1W_1 + S_2W_2 + \dots + S_nW_n)}{(M_{c1} + M_{c2} + \dots + M_{cn})} \quad \text{Equation 1}$$

- (2) Use compliant finishing materials according to the following criteria:
- (i) Demonstrate that each stain, sealer, and topcoat has a VHAP content of no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight by maintaining certified product data sheets for each coating and thinner;
 - (ii) Demonstrate that each washcoat, basecoat, and enamel that is purchased pre-made, that is, it is not formulated onsite by thinning another finishing material, has a VHAP content of no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight by maintaining certified product data sheets for each coating and thinner; and
 - (iii) Demonstrate that each washcoat, basecoat, and enamel that is formulated at the affected source is formulated using a finishing material containing no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids) and a thinner containing no more than 3.0 percent VHAP by weight.
- (4) Use any combination of an averaging approach, as described in paragraph (a)(1) of this section, compliant finishing materials, as described in paragraph (a)(2) of this section, and a control system, as described in paragraph (a)(3) of this section.

$$R = \left[\frac{(G_{bc} - G_{ac})}{G_{bc}} \right] (100) \quad \text{Equation 3}$$

- (d) The owner or operator of a new affected source subject to Sec. 63.802(b)(1) may comply with those provisions by using any of the following methods:
- (1) Calculate the average VHAP content across all finishing materials used at the facility using Equation 1, and maintain a value of E no greater than 0.8;
 - (2) Use compliant finishing materials according to the following criteria:
 - (i) Demonstrate that each sealer and topcoat has a VHAP content of no more than 0.8 kg VHAP/kg solids (0.8 lb VHAP/lb solids), as applied, each stain has a VHAP content of no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight;
 - (ii) Demonstrate that each washcoat, basecoat, and enamel that is purchased pre-made, that is, it is not formulated onsite by thinning another finishing material, has a VHAP content of no more than 0.8 kg VHAP/kg solids (0.8 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight; and
 - (iii) Demonstrate that each washcoat, basecoat, and enamel that is formulated onsite is formulated using a finishing material containing no more than 0.8 kg VHAP/kg solids (0.8 lb VHAP/lb solids) and a thinner containing no more than 3.0 percent HAP by weight.

- (4) Use any combination of an averaging approach, as described in (d)(1), compliant finishing materials, as described in (d)(2), and a control system, as described in (d)(3).**

(f) Initial compliance.

- (1) Owners or operators of an affected source subject to the provisions of Sec. 63.802 (a)(1) or (b)(1) that comply through the procedures established in Sec. 63.804 (a)(1) or (d)(1) shall submit the results of the averaging calculation (Equation 1) for the first month with the initial compliance status report required by Sec. 63.807(b). The first month's calculation shall include data for the entire month in which the compliance date falls. For example, if the source's compliance date is November 21, 1997, the averaging calculation shall include data from November 1, 1997 to November 30, 1997.**
- (2) Owners or operators of an affected source subject to the provisions of Sec. 63.802 (a)(1) or (b)(1) that comply through the procedures established in Sec. 63.804 (a)(2) or (d)(2) shall submit an initial compliance status report, as required by Sec. 63.807(b), stating that compliant stains, washcoats, sealers, topcoats, basecoats, enamels, and thinners, as applicable, are being used by the affected source.**
- (3) Owners or operators of an affected source subject to the provisions of Sec. 63.802 (a)(1) or (b)(1) that are complying through the procedures established in Sec. 63.804 (a)(2) or (d)(2) and are applying coatings using continuous coaters shall demonstrate initial compliance by:**
 - (i) Submitting an initial compliance status report, as required by Sec. 63.807(b), stating that compliant coatings, as determined by the VHAP content of the coating in the reservoir and the VHAP content as calculated from records, and compliant thinners are being used; or**
 - (ii) Submitting an initial compliance status report, as required by Sec. 63.807(b), stating that compliant coatings, as determined by the VHAP content of the coating in the reservoir, are being used; the viscosity of the coating in the reservoir is being monitored; and compliant thinners are being used. The affected source shall also submit data that demonstrate that viscosity is an appropriate parameter for demonstrating compliance.**
- (7) Owners or operators of an affected source subject to the provisions of Sec. 63.802 (a)(3) or (b)(3) shall submit an initial compliance status report, as required by Sec. 63.807(b), stating that compliant strippable spray booth coatings are being used by the affected source.**
- (8) Owners or operators of an affected source subject to the work practice standards in Sec. 63.803 shall submit an initial compliance status report, as required by Sec. 63.807(b), stating that the work practice implementation plan has been developed and procedures have been established for implementing the provisions of the plan.**

(g) Continuous compliance demonstrations.

- (1) Owners or operators of an affected source subject to the provisions of Sec. 63.802 (a)(1) or (b)(1) that comply through the procedures established in Sec. 63.804 (a)(1) or (d)(1) shall demonstrate continuous compliance by submitting the results of the averaging calculation (Equation 1) for each month within that semiannual period and submitting a compliance certification with the semiannual report required by Sec. 63.807(c).**
 - (i) The compliance certification shall state that the value of (E), as calculated by Equation 1, is no greater than 1.0 for existing sources or 0.8 for new sources. An affected source is in violation of the standard if E is greater than 1.0 for existing sources or 0.8 for new sources for any month. A violation of the monthly average is a separate violation of the standard for each day of operation during the month, unless the affected source can demonstrate through records that the violation of the monthly average can be attributed to a particular day or days during the period.**
 - (ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.**

- (2) Owners or operators of an affected source subject to the provisions of Sec. 63.802 (a)(1) or (b)(1) that comply through the procedures established in Sec. 63.804 (a)(2) or (d)(2) shall demonstrate continuous compliance by using compliant coatings and thinners, maintaining records that demonstrate the coatings and thinners are compliant, and submitting a compliance certification with the semiannual report required by Sec. 63.807(c).**
 - (i) The compliance certification shall state that compliant stains, washcoats, sealers, topcoats, basecoats, enamels, and thinners, as applicable, have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance. An affected source is in violation of the standard whenever a noncompliant coating, as demonstrated by records or by a sample of the coating, is used.**
 - (ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.**

- (3) Owners or operators of an affected source subject to the provisions of Sec. 63.802 (a)(1) or (b)(1) that are complying through the procedures established in Sec. 63.804 (a)(2) or (d)(2) and are applying coatings using continuous coaters shall demonstrate continuous compliance by following the procedures in paragraph (g)(3) (i) or (ii) of this section.**
 - (i) Using compliant coatings, as determined by the VHAP content of the coating in the reservoir and the VHAP content as calculated from records, using compliant thinners, and submitting a compliance certification with the semiannual report required by Sec. 63.807(c).**
 - (A) The compliance certification shall state that compliant coatings have been used each day in the semiannual reporting period, or should otherwise identify the days of noncompliance and the reasons for noncompliance. An affected source is in violation of the standard whenever a noncompliant coating, as determined by records or by a sample of the coating, is used. Use of a noncompliant coating is a separate violation for each day the noncompliant coating is used.**

§ 63.805 Performance Test Methods

- (a) The EPA Method 311 of Appendix A of part 63 shall be used in conjunction with formulation data to determine the VHAP content of the liquid coating. Formulation data shall be used to identify VHAP present in the coating. The EPA Method 311 shall then be used to quantify those VHAP identified through formulation data. The EPA Method 311 shall not be used to quantify HAP such as styrene and formaldehyde that are emitted during the cure. The EPA Method 24 (40 CFR part 60, Appendix A) shall be used to determine the solids content by weight and the density of coatings. If it is demonstrated to the satisfaction of the Administrator that a coating does not release VOC or HAP byproducts during the cure, for example, all VOC and HAP present in the coating is solvent, then batch formulation information shall be accepted. The owner or operator of an affected source may request approval from the Administrator to use an alternative method for determining the VHAP content of the coating. In the event of any inconsistency between the EPA Method 24 or Method 311 test data and a facility's formulation data, that is, if the EPA Method 24/311 value is higher, the EPA Method 24/311 test shall govern unless after consultation, a regulated source could demonstrate to the satisfaction of the enforcement agency that the formulation data were correct. Sampling procedures shall follow the guidelines presented in "Standard Procedures for Collection of Coating and Ink Samples for VOC Content Analysis by Reference Method 24 and Reference Method 24A," EPA-340/1-91-010. (Docket No. A-93-10, Item No. IV-A-1).

§ 63.806 Recordkeeping Requirements

- (a) The owner or operator of an affected source subject to this subpart shall fulfill all recordkeeping requirements of Sec. 63.10 of subpart A, according to the applicability criteria in Sec. 63.800(d) of this subpart.
- (b) The owner or operator of an affected source subject to the emission limits in Sec. 63.802 of this subpart shall maintain records of the following:
- (1) A certified product data sheet for each finishing material, thinner, contact adhesive, and strippable spray booth coating subject to the emission limits in Sec. 63.802; and
 - (2) The VHAP content, in kg VHAP/kg solids (lb VHAP/lb solids), as applied, of each finishing material and contact adhesive subject to the emission limits in Sec. 63.802; and
 - (3) The VOC content, in kg VOC/kg solids (lb VOC/lb solids), as applied, of each strippable booth coating subject to the emission limits in Sec. 63.802 (a)(3) or (b)(3).
- (c) The owner or operator of an affected source following the compliance method in Sec. 63.804 (a)(1) or (d)(1) shall maintain copies of the averaging calculation for each month following the compliance date, as well as the data on the quantity of coatings and thinners used that is necessary to support the calculation of E in Equation 1.
- (d) The owner or operator of an affected source following the compliance procedures of Sec. 63.804 (f)(3)(ii) and (g)(3)(ii) shall maintain the records required by Sec. 63.806(b) as well as records of the following:
- (1) Solvent and coating additions to the continuous coater reservoir;
 - (2) Viscosity measurements; and

- (3) Data demonstrating that viscosity is an appropriate parameter for demonstrating compliance.**
- (e) The owner or operator of an affected source subject to the work practice standards in Sec. 63.803 of this subpart shall maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including, but not limited to:**
 - (1) Records demonstrating that the operator training program required by Sec. 63.803(b) is in place;**
 - (2) Records collected in accordance with the inspection and maintenance plan required by Sec. 63.803(c);**
 - (3) Records associated with the cleaning solvent accounting system required by Sec. 63.803(d);**
 - (4) Records associated with the limitation on the use of conventional air spray guns showing total finishing material usage and the percentage of finishing materials applied with conventional air spray guns for each semiannual period as required by Sec. 63.803(h)(5).**
 - (5) Records associated with the formulation assessment plan required by Sec. 63.803(l); and**
 - (6) Copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.**
- (h) The owner or operator of an affected source subject to the emission limits in Sec. 63.802 and following the compliance provisions of Sec. 63.804(f) (1), (2), (3), (5), (7) and (8) and Sec. 63.804(g) (1), (2), (3), (5), (7), and (8) shall maintain records of the compliance certifications submitted in accordance with Sec. 63.807(c) for each semiannual period following the compliance date.**
- (i) The owner or operator of an affected source shall maintain records of all other information submitted with the compliance status report required by Sec. 63.9(h) and Sec. 63.807(b) and the semiannual reports required by Sec. 63.807(c).**
- (j) The owner or operator of an affected source shall maintain all records in accordance with the requirements of Sec. 63.10(b)(1).**

§ 63.807 Reporting Requirements

- (a) The owner or operator of an affected source subject to this subpart shall fulfill all reporting requirements of Sec. 63.7 through Sec. 63.10 of subpart A (General Provisions) according to the applicability criteria in Sec. 63.800(d) of this subpart.**
- (b) The owner or operator of an affected source demonstrating compliance in accordance with Sec. 63.804(f) (1), (2), (3), (5), (7) and (8) shall submit the compliance status report required by Sec. 63.9(h) of subpart A (General Provisions) no later than 60 days after the compliance date. The report shall include the information required by Sec. 63.804(f) (1), (2), (3), (5), (7), and (8) of this subpart.**
- (c) The owner or operator of an affected source demonstrating compliance in accordance with Sec. 63.804(g) (1), (2), (3), (5), (7), and (8) shall submit a report covering the previous 6 months of wood furniture manufacturing operations:**

- (1) The first report shall be submitted 30 calendar days after the end of the first 6-month period following the compliance date.**
 - (2) Subsequent reports shall be submitted 30 calendar days after the end of each 6-month period following the first report.**
 - (3) The semiannual reports shall include the information required by Sec. 63.804(g) (1), (2), (3), (5), (7), and (8), a statement of whether the affected source was in compliance or noncompliance, and, if the affected source was in noncompliance, the measures taken to bring the affected source into compliance.**
 - (4) The frequency of the reports required by paragraph (c) of this section shall not be reduced from semiannually regardless of the history of the owner's or operator's compliance status.**
- (e) The owner or operator of an affected source required to provide a written notification under Sec. 63.803(1)(4) shall include in the notification one or more statements that explains the reasons for the usage increase. The notification shall be submitted no later than 30 calendar days after the end of the annual period in which the usage increase occurred.**

§ 63.808 Delegation of Authority

- (a) In delegating implementation and enforcement authority to a State under Sec. 112(d) of the Clean Air Act, the authorities contained in paragraph (b) of this section shall be retained by the Administrator and not transferred to a State.**
- (b) The authority conferred in Sec. 63.804(f)(4)(iv) (D) and (E), Sec. 63.804(g)(4)(iii)(C), Sec. 63.804(g)(4)(vi), Sec. 63.804(g)(6)(vi), Sec. 63.805(a), Sec. 63.805(d)(2)(V), and Sec. 63.805(e)(1) shall not be delegated to any State.**

The Table of Contents shall be adjusted to reflect the changes to the condition numbering.

TABLE 1.—GENERAL PROVISIONS APPLICABILITY TO SUBPART JJ

Reference	Applies to subpart JJ	Comment
63.1(a)	Yes	Subpart JJ specifies applicability.
63.1(b)(1)	No	
63.1(b)(2)	Yes	
63.1(b)(3)	Yes	
63.1(c)(1)	No	
63.1(c)(2)	No	
63.1(c)(4)	Yes	
63.1(c)(5)	Yes	
63.1(e)	Yes	
63.2	Yes	
63.3	Yes	
63.4	Yes	
63.5	Yes	
63.6(a)	Yes	
63.6(b)(1)	Yes	
63.6(b)(2)	Yes	
63.6(b)(3)	Yes	
63.6(b)(4)	No	
63.6(b)(5)	Yes	
63.6(b)(7)	Yes	May apply when standards are proposed under Section 112(f) of the CAA.
63.6(c)(1)	Yes	
63.6(c)(2)	No	
63.6(c)(5)	Yes	
63.6(e)(1)	Yes	
63.6(e)(2)	Yes	
63.6(e)(3)	Yes	
63.6(f)(1)	No	
63.6(f)(2)	Yes	
63.6(f)(3)	Yes	
63.6(g)	Yes	Applies only to affected sources using a control device to comply with the rule. Affected sources complying through the procedures specified in 63.804 (a)(1), (a)(2), (b), (c)(1), (d)(1), (d)(2), (e)(1), and (e)(2) are subject to the emission standards at all times, including periods of startup, shutdown, and malfunction.
63.6(h)	No.	
63.6 (i)(1)–(i)(3)	Yes	
63.6(i)(4)(i)	Yes	

TABLE 1.—GENERAL PROVISIONS APPLICABILITY TO SUBPART JJ - Continued

Reference	Applies to subpart JJ	Comment
63.6(i)(4)(ii)	No.	
63.6 (i)(5)–(i)(14)	Yes	
63.6(i)(16)	Yes	
63.6(j)	Yes	
63.7	Yes	Applies only to affected sources using a control device to comply with the rule.
63.8	Yes	Applies only to affected sources using a control device to comply with the rule.
63.9(a)	Yes	
63.9(b)	Yes	Existing sources are required to submit initial notification report within 270 days of the effective date.
63.9(c)	Yes	
63.9(d)	Yes	
63.9(e)	Yes	Applies only to affected sources using a control device to comply with the rule.
63.9(f)	No	
63.9(g)	Yes	Applies only to affected sources using a control device to comply with the rule.
63.9(h)	Yes	63.9(h)(2)(ii) applies only to affected sources using a control device to comply with the rule.
63.9(i)	Yes	
63.9(j)	Yes	
63.10(a)	Yes	
63.10(b)(1)	Yes	
63.10(b)(2)	Yes	Applies only to affected sources using a control device to comply with the rule.
63.10(b)(3)	Yes	
63.10(c)	Yes	
63.10(d)(1)	Yes	
63.10(d)(2)	Yes	Applies only to affected sources using a control device to comply with the rule.
63.10(d)(3)	No	
63.10(d)(4)	Yes	
63.10(d)(5)	Yes	Applies only to affected sources using a control device to comply with the rule.
63.10(e)	Yes	Applies only to affected sources using a control device to comply with the rule.
63.10(f)	Yes	
63.11	No	
63.12–63.15	Yes	

TABLE 2.—LIST OF VOLATILE HAZARDOUS AIR POLLUTANTS

Chemical name	CAS No.	Chemical name	CAS No.
Acetaldehyde.....	75070	Diazomethane.....	334883
Acetamide.....	60355	Dibenzofuran.....	132649
Acetonitrile.....	75058	1,2-Dibromo-3-Chloropropane.....	96128
Acetophenone.....	98862	Dibutylphthalate.....	84742
2-Acetylaminofluorine.....	53963	1,4-Dichlorobenzene.....	106467
Acrolein.....	107028	3,3'-Dichlorobenzidine.....	91941
Acrylamide.....	79061	Dichloroethyl ether (Bis (2- chloroethyl) ether).....	111444
Acrylic acid.....	79107	1,3-Dichloropropene.....	542756
Acrylonitrile.....	107131	Diethanolamine.....	111422
Allyl chloride.....	107051	N,N-Dimethylaniline.....	121697
4-Aminobiphenyl.....	92671	Diethyl sulfate.....	64675
Aniline.....	62533	3,3'-Dimethoxybenzidine.....	119904
o-Anisidine.....	90040	4-Dimethylaminoazobenzene.....	60117
Benzene.....	71432	3,3'-Dimethylbenzidine.....	119937
Benzidine.....	92875	Dimethylcarbamoyl chloride.....	79447
Benzotrichloride.....	98077	N,N-Dimethylformamide.....	68122
Benzyl chloride.....	100447	1,1-Dimethylhydrazine.....	57147
Biphenyl.....	92524	Dimethylphthalate.....	131113
Bis(2-ethylhexyl) Phthalate	117817	Dimethyl Sulfate.....	77781
Bis(chloromethyl)ether.....	542881	4,6-Dinitro-o-cresol, and salts.....
Bromoform.....	75252	2,4-Dinitrophenol.....	51285
1,3-Butadiene.....	106990	2,4-Dinitrotoluene.....	121142
Caprolactam.....	105602	1,4-Dioxane (1,4-Diethyleneoxide).....	123911
Carbon disulfide.....	75150	1,2-Diphenylhydrazine.....	122667
Carbon tetrachloride.....	56235	Epichlorohydrin (1-Chloro-2,3- epoxypropane).....	106898
Carbonyl sulfide.....	463581	1,2-Epoxybutane.....	106887
Catechol.....	120809	Ethyl acrylate.....	140885
Chloroacetic acid.....	79118	Ethylbenzene.....	100414
2-Chloroacetophenone.....	532274	Ethyl carbamate (Urethane).....	51796
Chlorobenzene.....	108907	Ethyl chloride (Chloroethane).....	75003
Chloroform.....	67663	Ethylene dibromide (Dibromoethane). Ethylene dichloride.....	106934 107062
Chloromethyl methyl ether.....	107302	Ethylene glycol.....	107211
Chloroprene.....	126998	Ethylene oxide.....	75218
Cresols (isomers and mixture).....	131977	Ethylenethiourea.....	96457
o-Cresol.....	95487	Ethylidene dichloride (1,1- Dichloroethane).....	75343
m-Cresol.....	108394	Formaldehyde.....	50000
p-Cresol.....	106445	Glycol ethers.....	0
Cumene.....	98828		
2,4-D (2,4-Dichlorophenoxyacetic acid, including salts and esters) DDE (1,1-Dichloro-2,2-bis (pchlorophenyl) ethylene.....	72559		

TABLE 2.—LIST OF VOLATILE HAZARDOUS AIR POLLUTANTS - Continued

Chemical name	CAS No.	Chemical name	CAS No.
Hexachlorobenzene.....	118741	Polychlorinated biphenyls (Aroclors)..	133636
Hexachloro-1,3-butadiene.....	87683	Polycyclic Organic Matter b	0
Hexachloroethane.....	67721	1,3-Propane sultone	112071
Hexamethylene-1,6-diisocyanate.	822060	beta-Propiolactone	57578
Hexamethylphosphoramide.....	680319	Propionaldehyde	123386
Hexane.....	110543	Propoxur (Baygon)	114261
Hydrazine.....	302012	Propylene dichloride (1,2-	
Hydroquinone.....	123319	Dichloropropane)	78875
Isophorone.....	78591	Propylene oxide	75569
Maleic anhydride.....	108316	1,2-Propylenimine (2-Methyl aziridine)	75558
Methanol.....	67561	Quinone	106514
Methyl bromide (Bromomethane) .	74839	Styrene.....	100425
Methyl chloride (Chloromethane) .	74873	Styrene oxide.....	96093
Methyl chloroform (1,1,1-		2,3,7,8-Tetrachlorodibenzo-pdioxin.....	174601
Trichloroethane).....	71556	1,1,2,2-Tetrachloroethane.....	79345
Methyl ethyl ketone (2-Butanone).	78933	Tetrachloroethylene	127184
Methylhydrazine	60344	Toluene.....	108883
Methyl iodide (Iodomethane)	74884	2,4-Toluenediamine.....	95807
Methyl isobutyl ketone (Hexone)	108101	Toluene-2,4-diisocyanate.....	584849
Methyl isocyanate	624839	o-Toluidine.....	95534
Methyl methacrylate	80626	1,2,4-Trichlorobenzene	120821
Methyl tert-butyl ether	163404	1,1,2-Trichloroethane	79005
4,4'-Methylenebis	101144	Trichloroethylene	79016
Methylene chloride		2,4,5-Trichlorophenol	95954
(Dichloromethane).....	75092	2,4,6-Trichlorophenol	88062
4,4'-Methylenediphenyl		Triethylamine	121448
diisocyanate (MDI)	101688	Trifluralin	158209
4,4'-Methylenedianiline	101779	2,2,4-Trimethylpentane	540841
Naphthalene	91203	Vinyl acetate	108054
Nitrobenzene	98953	Vinyl bromide	593602
4-Nitrobiphenyl	92933	Vinyl chloride	75014
4-Nitrophenol	100027	Vinylidene chloride (1,1-	
2-Nitropropane	79469	Dichloroethylene).....	75354
N-Nitroso-N-methylurea	684935	Xylenes (isomers and mixture)	133020
N-Nitrosodimethylamine	62759	o-Xylene	95476
N-Nitrosomorpholine.....	59892	m-Xylene	108383
Phenol.....	108952	p-Xylene	106423
p-Phenylenediamine.....	106503		
Phosgene.....	75445		
Phthalic anhydride.....	85449		

^a Includes mono- and di-ethers of ethylene glycol, diethylene glycols and triethylene glycol; R-(OCH₂CH₂)_n-OR where: n = 1, 2, or 3, R = alkyl or aryl groups, R ϕ = R, H, or groups which, when removed, yield glycol ethers with the structure: R-(OCH₂CH₂)_n-OH. Polymers are excluded from the glycol category.

^b Includes organic compounds with more than one benzene ring, and which have a boiling point greater than or equal to 100°C.

TABLE 3.—SUMMARY OF EMISSION LIMITS

Emission point	Existing source	New source
Finishing Operations:		
(a) Achieve a weighted average VHAP content across all coatings (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied).....	a 1.0	a 0.8
(b) Use compliant finishing materials (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied):	a 1.0	a 1.0
—stains.....	a,b 1.0	a,b 0.8
—washcoats.....	a 1.0	a 0.8
—sealers.....	a 1.0	a 0.8
—topcoats.....	a,b 1.0	a,b 0.8
—basecoats.....	a,b 1.0	a,b 0.8
—enamels.....	a,b 1.0	a,b 0.8
—thinners (maximum % HAP allowable); or.....	10.0	10.0
(c) As an alternative, use control device; or	c 1.0	c 0.8
(d) Use any combination of (a), (b), and (c)	1.0	0.8
Cleaning Operations:		
Strippable spray booth material (maximum VOC content, kg VOC/kg solids [lb VOC/lb solids])....	0.8	0.8
Contact Adhesives:		
(a) Use compliant contact adhesives (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied) based on following criteria:		
i. For aerosol adhesives, and for contact adhesives applied to nonporous substrates.....	a NA	a NA
ii. For foam adhesives used in products that meet flammability requirements.....	1.8	0.2
iii. For all other contact adhesives (including foam adhesives used in products that do not meet flammability requirements); or.....	1.0	0.2
(b) Use a control device	c 1.0	c 0.2

^a The limits refer to the VHAP content of the coating, as applied.

^b Washcoats, basecoats, and enamels must comply with the limits presented in this table if they are purchased premade, that is, if they are not formulated onsite by thinning other finishing materials. If they are formulated onsite, they must be formulated using compliant finishing materials, i.e., those that meet the limits specified in this table, and thinners containing no more than 3.0 percent HAP by weight.

^c The control device must operate at an efficiency that is equivalent to no greater than 1.0 kilogram (or 0.8 kilogram) of VHAP being emitted from the affected emission source per kilogram of solids used.

^d There is no limit on the VHAP content of these adhesives.

^e The control device must operate at an efficiency that is equivalent to no greater than 1.0 kilogram (or 0.2 kilogram) of VHAP being emitted from the affected emission source per kilogram of solids used.

TABLE 4.—POLLUTANTS EXCLUDED FROM USE IN CLEANING AND WASHOFF SOLVENTS

Chemical Name	CAS No.	Chemical Name	CAS No.
4-Aminobiphenyl	92671	Ethylene dibromide(1,2-Dibromoethane).....	106934
Styrene oxide	96093	DDE (1,1-p-chlorophenyl 1-2dichloroethylene)	72559
Diethyl sulfate	64675	Clorobenzilate.....	510156
N-Nitrosomorpholine	59892	Dichlorvos.....	62737
Dimethyl formamide	68122	Vinyl chloride.....	75014
Hexamethylphosphoramide	680319	Coke Oven Emissions	99999908
Acetamide	60355	Ethylene oxide	75218
4,4'-Methylenedianiline	101779	Ethylene thiourea	96457
o-Anisidine	90040	Vinyl bromide (bromoethene)	593602
2,3,7,8-Tetrachlorodibenzo-pdioxin.....	1746016	Selenium sulfide (mono and di)	7488564
Beryllium salts		Chloroform	67663
Benzidine	92875	Pentachlorophenol	87865
N-Nitroso-N-methylurea	684935	Ethyl carbamate (Urethane)	51796
Bis(chloromethyl)ether	542881	Ethylene dichloride (1,2-Dichloroethane).....	107062
Dimethyl carbamoyl chloride	79447	Propylene dichloride (1,2-Dichloropropane)...	78875
Chromium compounds (hexavalent).....		Carbon tetrachloride	56235
1,2-Propylenimine (2-Methylaziridine).....	75558	Benzene	71432
Arsenic and inorganic arsenic compounds	99999904	Methyl hydrazine	60344
Hydrazine	302012	Ethyl acrylate	140885
1,1-Dimethyl hydrazine	57147	Propylene oxide	75569
Beryllium compounds	7440417	Aniline	62533
1,2-Dibromo-3-chloropropane	96128	1,4-Dichlorobenzene(p)	106467
N-Nitrosodimethylamine	62759	2,4,6-Trichlorophenol	88062
Cadmium compounds		Bis(2-ethylhexyl)phthalate (DEHP)	117817
Benzo (a) pyrene	50328	o-Toluidine	95534
Polychlorinated biphenyls (Aroclors).....	1336363	Propoxur	114261
Heptachlor	76448	Trichloroethylene	79016
3,3'-Dimethyl benzidine	119937	1,4-Dioxane (1,4-Diethyleneoxide)	123911
Nickel subsulfide	12035722	Acetaldehyde	75070
Acrylamide	79061	Bromoform	75252
Hexachlorobenzene	118741	Captan	133062
Chlordane	57749	Epichlorohydrin	106898
1,3-Propane sultone	1120714	Methylene chloride (Dichloromethane).....	75092
1,3-Butadiene	106990	Tetrachloroethylene (Perchloroethylene).....	127184
Nickel refinery dust		Dibenz (ah) anthracene	53703
2-Acetylaminoflourine	53963	Chrysene	218019
3,3'-Dichlorobenzidine	53963	Dimethyl aminoazobenzene	60117
Lindane (hexachlorcyclohexane, gamma)..	58899	Benzo (a) anthracene	56553
2,4-Toluene diamine	95807	Benzo (b) fluoranthene	205992
Dichloroethyl ether	111444	Antimony trioxide	1309644
1,2-Diphenylhydrazine	122667	2-Nitropropane	79469
Toxaphene (chlorinated camphene).....	801352	1,3-Dichloropropene	542756
2,4-Dinitrotoluene	121142	7, 12-Dimethylbenz(a)anthracene	57976
3,3'-Dimethoxybenzidine	119904	Benzo(c)acridine	225514
Formaldehyde	50000	Indeno(1,2,3-cd)pyrene	193395
4,4'-Methylene bis(2-chloroaniline).....	11144	1,2:7,8-Dibenzopyrene	189559
Acrylonitrile	107131		

TABLE 5.—LIST OF VHAP OF POTENTIAL CONCERN IDENTIFIED BY INDUSTRY

Chemical	CAS No.	EPA de minimis, tons/yr
Dimethyl formamide	68122	1.0
Formaldehyde	50000	0.2
Methylene chloride	75092	4.0
2-Nitropropane	79469	1.0
Isophorone	78591	0.7
Styrene monomer	1000425	1.0
Phenol	108952	0.1
Diethanolamine	11422	5.0
2-Methoxyethanol	109864	10.0
2-Ethoxyethyl acetate.....	111159	5.0

TABLE 6.—VHAP OF POTENTIAL CONCERN

Chemical Name	CAS No.	Chemical Name	CAS No.
‘Nonthreshold’ Pollutants		4,4'-Methylene bis(2-chloroaniline)	101144
4-Aminobiphenyl	92671	Acrylonitrile	107131
Styrene oxide	96093	Ethylene dibromide(1,2-Dibromoethane)	106934
Diethyl sulfate	64675	DDE(1,1-p-chlorophenyl 1-2 dichloroethylene)	72559
N-Nitrosomorpholine	59892	Chlorobenzilate	510156
Dimethyl formamide	68122	Dichlorvos	62737
Hexamethylphosphoramide	80319	Vinyl chloride	75014
Acetamide	60355	Ethylene oxide	75218
4,4'-Methylenedianiline	101779	Ethylene thiourea	96457
o-Anisidine	90040	Vinyl bromide (bromoethene)	593602
2,3,7,8-Tetrachlorodibenzo-pdioxin	1746016	Chloroform	67663
Benzidine	92875	Pentachlorophenol	87865
N-Nitroso-N-methylurea	684935	Ethyl carbamate (Urethane)	51796
Bis(chloromethyl)ether	542881	Ethylene dichloride (1,2-Dichloroethane).....	107062
Dimethyl carbamoyl chloride	79447	Propylene dichloride (1,2-Dichloropropane).....	78875
1,2-Propylenimine (2-Methyl aziridine).....	75558	Carbon tetrachloride.....	56235
1,1-Dimethyl hydrazine	57147	Benzene.....	71432
1,2-Dibromo-3-chloropropane	96128	Ethyl acrylate	140885
N-Nitrosodimethylamine	62759	Propylene oxide	75569
Benzo (a) pyrene	50328	Aniline.....	62533
Polychlorinated biphenyls (Aroclors)	1336363	1,4-Dichlorobenzene(p)	106467
Heptachlor	76448	2,4,6-Trichlorophenol	88062
3,3'-Dimethylbenzidine	119937	Bis(2-ethylhexyl)phthalate (DEHP)	117817
Acrylamide	79061	o-Toluidine.....	95534
Hexachlorobenzene	118741	Propoxur.....	114261
Chlordane	57749	Trichloroethylene	79016
1,3-Propane sultone	1120714	1,4-Dioxane (1,4-Diethyleneoxide)	123911
1,3-Butadiene	106990	Acetaldehyde	75070
2-Acetylaminoflourine	53963	Bromoform	75252
3,3'-Dichlorobenzidine.....	53963	Captan	133062
Lindane (hexachlorocyclohexane, gamma)..	58899	Epichlorohydrin	106898
2,4-Toluene diamine	95807	Methylene chloride (Dichloromethane)	75092
Dichloroethyl ether (Bis(2-chloroethyl) ether)	111444	Tetrachloroethylene (Perchloroethylene)	127184
1,2-Diphenylhydrazine	122667	Dibenz (ah) anthracene	53703
Toxaphene (chlorinated camphene)	8001352	Chrysene	218019
2,4-Dinitrotoluene	121142	Dimethyl aminoazobenzene	60117
3,3'-Dimethoxybenzidine	119904	Benzo (a) anthracene	56553
Formaldehyde	50000	Benzo (b) fluoranthene	205992

TABLE 6.—VHAP OF POTENTIAL CONCERN—Continued

Chemical Name	CAS No.	Chemical Name	CAS No.
2-Nitropropane	79469	Acrolein	107028
1,3-Dichloropropene	542756	2,4 - Toluene diisocyanate	584849
7, 12-Dimethylbenz(a)anthracene	57976	Tetramethyl lead	75741
Benz(c)acridine	225514	Tetraethyl lead	78002
Indeno(1,2,3-cd)pyrene	193395	Methylcyclopentadienyl manganese	12108133
1,2:7,8-Dibenzopyrene	189559	Methyl isocyanate	624839
1,1,2,2-Tetrachloroethane	79345	Hexachlorocyclopentadiene	77474
Quinoline	91225	Fluomine	62207765
Vinylidene chloride (1,1-Dichloroethylene)	75354	Cobalt carbonyl	10210681
Hexachlorobutadiene	87683	Chloroacetic acid	79118
Pentachloronitrobenzene (Quintobenzene)....	82688	4,6-Dinitro-o-cresol, and salts	534521
Isophorone	78591	Methylene diphenyl diisocyanate	101688
1,1,2-Trichloroethane	79005	Phenol	108952
Methyl chloride (Chloromethane)	74873	Mercury, (acetato-o) phenyl	62384
Hexachloroethane	67721	Acetophenone	98862
Trifluralin	1582098	Maleic anhydride	108316
Cresols/Cresylic acid (isomers and mixture) .	1319773	2-Chloroacetophenone	532274
m-Cresol	108394	2,4-Dinitrophenol	51285
Ethylidene dichloride (1,1-Dichloroethane)	75343	2-Methoxy ethanol	108864
o-Cresol	95487	Nitrobenzene	98953
p-Cresol	106445	Methyl bromide (Bromomethane)	74839
Methyl iodide (Iodomethane)	74884	Carbon disulfide	75150
Styrene a	100425	N,N-Dimethylaniline	121697
Allyl chloride.....	107051	‘Unrankable’ Pollutants	
Diazomethane	334883	Quinone	106514
2,4,5 – Trichlorophenol	95954	Propionaldehyde	123386
Chloramben	133904	Catechol	120809
1,2 - Epoxybutane	106887	Phthalic anhydride.....	85449
Vinyl acetate	108054	Carbonyl sulfide	463581
Chloroprene	126998	Dibenzofurans	132649
Hydroquinone	123319	4-Nitrophenol	100027
4-Nitrobiphenyl	92933	2,2,4-Trimethylpentane	540841
‘High-Concern’ Pollutants		Diethanolamine	11422
Parathion	56382	Hexamethylene-1,6-diisocyanate Glycol	
Nickel Carbonyl	13463393	ethers ^b	822060
Methyl hydrazine	60344	Polycyclic organic matter ^c	
Ethylene oxide	75218		
Ethylene imine	151564		
Dimethyl sulfate	77781		
Chloromethyl methyl ether	107302		
beta-Propiolactone	57578		
Benzyl chloride	100447		
Benzotrichloride	98077		

* = Currently an EPA weight of evidence classification is under review.

a The EPA does not currently have an official weight-of-evidence classification for styrene.

For purposes of this rule, styrene is treated as a “nonthreshold” pollutant. (See data report form in appendix A of the hazard ranking technical background document.)

b Except for 2-ethoxy ethanol, ethylene glycol monobutyl ether, and 2-methoxy ethanol.

c Except for benzo(b)fluoranthene, benzo(a)anthracene, benzo(a)pyrene, 7,12-dimethylbenz(a)anthracene, benz(c)acridine, chrysene, dibenz(ah) anthracene, 1,2:7,8-dibenzopyrene, indeno(1,2,3-cd)pyrene, but including dioxins and furans.

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description:

Source Name:	Smart, LLC
Source Location:	67742 CR 23, New Paris, Indiana 46553
County:	Elkhart
SIC Code:	2434
Operation Permit No.:	T039-7716-00177
Date Issued:	March 30, 1998
Significant Source Modification No.:	039-21392-00177
Significant Permit Modification No.:	039-21403-00177
Permit Reviewer:	SDF

The Office of Air Quality (OAQ) has reviewed an application from SMART, LLC requesting changes to their existing wood office furniture manufacturing operation.

Specifically, SMART, LLC has submitted a request to:

- (a) remove three of the nine existing spray booths,
- (b) remove veneer press EU-12, and
- (c) add a new flat line finish system, identified as EU-16, to be constructed in 2005, utilizing an airless spray application system, with dry filters for control of particulate matter overspray, with all emissions exhausted through Stack ID No. 15.

Insignificant Activities

There are no insignificant activities associated with the proposed modification.

Existing Approvals

The source has been operating under:

- (a) Part 70 permit 039-7716-00177, issued on March 30, 1998;
- (b) First Administrative Amendment 039-10754-00177, issued on April 5, 1999; and
- (c) Second Administrative Amendment 039-19463-00177, issued on September 17, 2004.

Recommendation

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

Unless otherwise stated, information used in this review was derived from the application.

Emission Calculations

The emissions due to the modification are the PM, PM10, VOC, and HAP emissions from the proposed finish line. The proposed modification will not result in an increase in the PTE of any other existing units.

Potential to Emit Before Controls:

The following calculations determine the potential to emit before controls from the proposed finish line.

PM/PM10:

The following calculations determine the potential to emit before controls from the proposed finish line based on the material densities in lb/gal, the maximum product usage rates in gal/unit, the maximum production rates in units/hr, the weight fraction solids, a transfer fraction of 0.75, 8760 hours of operation, and emissions before controls.

$lb/gal * gal/unit * unit/hr * wt\ fraction\ solids * [1 - fraction\ transferred] * 8760\ hr/yr * 1/2000\ ton/lb = tons/yr$

	Lb/gal	gal/unit	unit/hr	frac. Solids	frac. Transfer	PM (tons/yr)*
Stain	6.73	0.134	125	0.0793	0.75	9.79
Sealer	7.30	0.117	125	0.1999	0.75	23.37
Topcoat	7.58	0.073	125	0.2622	0.75	19.86
					Total	53.02

* PM10 is determined to be equal to PM.

VOC:

The following calculations determine the potential to emit before controls from the proposed finish line based on the material densities in lb/gal, the maximum product usage rates in gal/unit, the maximum production rates in units/hr, the fraction VOC, 8760 hours of operation, and emissions before controls.

$lb/gal * gal/unit * unit/hr * wt\ fraction\ VOC * 8760\ hr/yr * 1/2000\ ton/lb = tons/yr$

	lb/gal	gal/unit	unit/hr	frac. VOC	VOC (tons/yr)
Stain	6.73	0.134	125	0.9197	454.09
Sealer	7.30	0.117	125	0.3342	156.28
Topcoat	7.58	0.073	125	0.6359	192.65
				Total	803.02

HAP:

The following calculations determine the potential to emit before controls from the proposed finish line based on the material densities in lb/gal, the maximum product usage rates in gal/unit, the maximum production rates in units/hr, the fraction HAP, 8760 hours of operation, and emissions before controls.

$lb/gal * gal/unit * unit/hr * wt\ fraction\ HAP * 8760\ hr/yr * 1/2000\ ton/lb = tons/yr$

	Lb/gal	gal/unit	unit/hr	wt frac. methanol	wt. frac. ethyl benzene	wt. frac. Xylene	wt. frac. toluene	methanol (tons/yr)	ethyl benzene (tons/yr)	xylene (tons/yr)	toluene (tons/yr)
Stain	6.73	0.134	125	0.0025	0.022	0.0893	-	1.23	10.86	44.09	-
Sealer	7.30	0.117	125	-	-	0.0008	0.0092	-	-	0.37	4.30
Topcoat	7.58	0.073	125	-	-	0.0007	-	-	-	0.21	-
							Total	1.23	10.86	44.67	4.30

The total combined HAP potential to emit before controls is the sum of the individual HAP potential to emit.

$$1.23 \text{ tons/yr} + 10.86 \text{ tons/yr} + 44.67 \text{ tons/yr} + 4.30 \text{ tons/yr} = 61.06 \text{ tons/yr}$$

Potential to Emit After Controls:

The PM/PM10 overspray emissions from the proposed finish line are controlled by a dry filter system with an overall control efficiency of 90%. The following calculations determine the PM(PM10) emissions after controls based on the control efficiency of 90% and the estimated emissions before controls.

$$53.02 \text{ tons PM/yr} * (1 - 0.90) = 5.30 \text{ tons PM/yr}^*$$

* PM10 is determined to be equal to PM in this case.

The VOC and HAP emissions from the finish line are uncontrolled. Therefore, the potential to emit after controls of these pollutants are equal to their estimated potential to emit before controls. The following table lists the potential to emit after controls from the proposed finish line.

	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Single HAP (tons/yr)	Comb. HAP (tons/yr)
Finish Line	5.30	5.30	-	-	803.02	-	44.67	61.06

Potential To Emit

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

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

Pollutant	Potential To Emit (tons/year)
PM	53.02
PM-10	53.02
SO ₂	-
VOC	803.02
CO	-
NO _x	-

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Worst case Single HAP	44.67
TOTAL	61.06

The proposed modification shall be permitted via a significant source modification pursuant to 326 IAC 2-7-10.5(f)(6) which states any modification with a potential to emit greater than or equal to ten (10) tons per year of a single hazardous air pollutant as defined under Section 112(b) of the CAA or twenty-five (25) tons per year of any combination of hazardous air pollutants, shall be permitted via a significant source modification.

The proposed modification will be incorporated into the existing source Part 70 permit via a significant permit modification pursuant to 326 IAC 2-7-12(d), because the proposed modification is not an administrative amendment under 326 IAC 2-7-11 and does not qualify for a minor permit modification pursuant to 326 IAC 2-7-12(b)(1)(E) because the modification is a Title I modification with a new limit.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM10	Attainment
PM2.5	Attainment
SO2	Attainment
NOx	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Nonattainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as nonattainment for ozone. Therefore, VOC emissions and NOx were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) Elkhart County has been classified as unclassifiable or attainment for PM2.5. 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 PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.
- (c) Elkhart County has been classified as attainment or unclassifiable for all of the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Existing Source Emissions

Existing source federal major source definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited, as obtained from the Technical Support Document (TSD) of Part 70 permit 039-7716-00177, issued on March 30, 1998):

	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOX (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Single HAP (tons/yr)	Comb. HAP (tons/yr)
Existing Source	9.52	9.52	-	-	99.00	-	-	99.00
Part 70 Levels	-	100	100	100	100	100	10	25
PSD Levels	250	250	250	250	100	250	-	-

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

Potential to Emit After Issuance

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

	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Single HAP (tons/yr)	Comb. HAP (tons/yr)
Source	9.52	9.52	-	-	99.00	-	>10	>25
Proposed Changes	5.30	5.30	-	-	-*	-	>10	>25
Total	14.82	14.82	-	-	99.00	-	>10	>25

Fed. Major Source Levels	250	250	250	100	100	250	-	-
Part 70 Major Levels	-	100	100	100	100	100	10	25

* The source VOC emissions are limited to less than one hundred (100) tons per year. Therefore, the VOC emissions due to the modification are included in the existing source VOC PTE.

- (a) Elkhart County has been redesignated as nonattainment for ozone. Therefore, the major source level for VOC and NOx has been changed from 250 tons per year to 100 tons per year.
- (b) The proposed modification is not subject to PSD pursuant to 326 IAC 2-2 or emission offset pursuant to 326 IAC 2-3 because the VOC emissions are limited to less than the emission offset major source level of 100 tons per year, none of the other criteria pollutant emissions exceed their applicable PSD major source level of 250 tons per year, and the source is not one of the 28 listed source categories.
- (c) The source after the proposed modification is still determined to be a Title V major stationary source because the single and combined HAP emissions exceed their respective applicable levels of 10 and 25 tons per year.

Federal Rule Applicability

(a) New Source Performance Standards:

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

(b) National Emissions Standards for Hazardous Air Pollutants:

The proposed flat line finish system is subject to the requirements of 40 CFR 63, Subpart JJ, National Emission Standards for Wood Furniture Manufacturing Operations because the proposed line is a new affected source as specified in 63.800.

Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:

- (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
 - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of eight-tenths (0.8) pound VHAP per pound solids; or

- (B) use compliant finishing materials in which all stains have a maximum VHAP content of one (1.0) pound VHAP per pound solids, as applied, and all washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of eight-tenths (0.8) pound VHAP per pound solids, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3%) maximum VHAP content by weight. All other thinners have a ten percent (10%) maximum VHAP content by weight.
- (2) The owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:
- (3) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(d)(3) or (e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.
- (4) The Permittee shall submit an initial compliance status report pursuant to the requirements of 63.804(f)(1), (f)(2), and (f)(8).
- (5) The Permittee shall submit a semiannual report pursuant to the requirements of 63.804(g)(1), (g)(2), and (g)(8).
- (6) The Permittee shall keep and maintain records pursuant to the requirements of 63.806(a), (b), (c), (e), (h), (i), and (j).
- (7) The Permittee shall submit reports according to the requirements specified in 63.807(a), (b), (c), and (e).

State Rule Applicability - Entire Source

(a) 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-3 (Emission Offset):

The requirements of 326 IAC 2-2 and 2-3 do not apply to the proposed modification because the source VOC emissions are limited to less than the major source level of 100 tons per year and none of the other affected source pollutant emissions exceed their respective major source level of 250 tons per year.

(b) 326 IAC 2-6 (Emission Reporting):

This source is still subject to the requirements of 326 IAC 2-6 because it is a Title V source.

(c) 326 IAC 4:

The proposed modification will not affect the applicability or result in any changes to the requirements of 326 IAC 4.

(d) 326 IAC 5:

The proposed modification will not affect the applicability or result in any changes to the requirements of 326 IAC 5.

(e) 326 IAC 6-4:

The proposed modification will not affect the applicability or result in any changes to the requirements of 326 IAC 6-4.

State Rule Applicability – Individual Units

(a) 326 IAC 2-4.1-1 (New Source Toxics Control)

The proposed finish line is not subject to the MACT requirements of 326 IAC 2-4.1 because pursuant to 326 IAC 2-4.1-1(b)(2), the requirements of 326 IAC 2-4.1 do not apply to a major source of HAPs specifically regulated by a standard (NESHAP) issued pursuant to Section 112(d), 112(h), or 112(j) of the Clean Air Act. The finish line is subject to the requirements of 40 CFR 63, Subpart JJ.

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

The existing spray booths and the proposed finish line are subject to the requirements of 326 IAC 6-3-2 because the affected units generate particulate matter emissions, are not covered by any of the exemptions listed in 326 IAC 6-3-1(b), and there are no limitations of the kinds listed in 326 IAC 6-3-1(c).

Pursuant to 326 IAC 6-3-2(d), surface coating manufacturing processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device. The source shall operate the control device in accordance with the manufacturer's specifications.

The requirements of 326 IAC 6-3-2(d)(2) do not apply to the existing booths or proposed finish line because pursuant to 326 IAC 6-3-2(d)(3)(A), sources that operate according to a valid permit pursuant to 326 IAC 2-7 are not subject to the requirements of 326 IAC 6-3-2(d)(2).

Since the new 326 IAC 6-3 requirements have not been included in the state implementation plan, the old 326 IAC 6-3-2 requirements will still be applied and the new additional requirements added. These requirements will apply to both the existing and proposed affected units.

(c) 326 IAC 8-2-10 (Flat Wood Panel; Manufacturing Operations):

326 IAC 8-2-10 (Flat Wood Panel; Manufacturing Operations) is not applicable to the proposed finish line because this rule applies to sources constructing wood panels. This source constructs wood cabinets.

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

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating) applies to the proposed finish line because the line will be constructed after the applicable date of July 1, 1990 and the proposed line will have actual VOC emissions greater than fifteen (15) pounds of VOC per day before add-on controls.

Pursuant to this rule, the surface coatings, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, shall be applied using 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.

(e) 326 IAC 8-6 (Organic Solvent Emission Limitations):

326 IAC 8-6 (Organic Solvent Emission Limitations) does not apply to the proposed finish line because this source was not constructed after October 7, 1974 and before January 1, 1980, and the source VOC emissions are limited to less than the applicable level of one hundred (100) tons per year.

(f) 326 IAC 8-7 (Specific VOC Reduction Requirements):

326 IAC 8-7 (Specific VOC Reduction Requirements) does not apply to this source because this source is located in Elkhart County not Lake, Porter, Clark, or Floyd Counties.

(g) 326 IAC 8-11 (Wood Furniture Coating):

326 IAC 8-11 (Wood Furniture Coating) does not apply to the proposed finish line because the source is not located in any of the applicable counties (Lake, Porter, Clark, or Floyd). The source is located in Elkhart County.

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

326 IAC 8-1-6 (New Facilities; General Reduction Requirements) does not apply to the proposed finish line because the proposed line is subject to the requirements of 326 IAC 8-2-12.

Changes

In order to incorporate the proposed changes into the existing source permit, the following changes shall be made. All added language is indicated in bold type. All deleted language is struck-out.

(a) Condition A.2:

Condition A.2 shall be changed as follows to remove three of the existing spray booths, remove the veneer press, and add the new finish line.

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) ~~Nine (9)~~ **Six (6)** spray booths, identified as EU-03 through EU-448, each utilizing an airless spray application system, with dry filters for control of particulate matter overspray, and exhausting to Stack ID Nos. 3 through 448, respectively.

~~(b) One (1) veneer press, identified as EU-12, utilizing a rollcoating application method, and exhausting to Stack ID No.14.~~

(b) One (1) flat line finish system, identified as EU-16, to be constructed in 2005, utilizing an airless spray application system, with dry filters for control of particulate matter overspray, with all emissions exhausted through Stack ID No. 15.

.....

(b) Unit Description of Section D.1:

The unit description of Section D.1 shall be changed as follows to remove three of the existing spray booth, remove the veneer press, and add the new finish line.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

(a) ~~Nine (9)~~ **Six (6)** spray booths, identified as EU-03 through EU-448, each utilizing an airless spray application system, with dry filters for control of particulate matter overspray, and exhausting to Stack ID Nos. 3 through 448, respectively.

~~(b) One (1) veneer press, identified as EU-12, utilizing a rollcoating application method, and exhausting to Stack ID No.14.~~

(b) One (1) flat line finish system, identified as EU-16, to be constructed in 2005, utilizing an airless spray application system, with dry filters for control of particulate matter overspray, with all emissions exhausted through Stack ID No. 15.

(c) Condition D.1.1:

Condition D.1.1 shall be changed as follows to include the most recent version of 326 IAC 8-2-12.

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

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets, **with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair**, shall utilize one of the following application methods:

.....

(d) Condition D.1.3:

Condition D.1.3 shall be changed as follows to reflect the changes to the existing spray booths, remove the veneer press, add the new finish line, and add the new 326 IAC 6-3 requirements.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(e)] [40 CFR 52 Subpart P]

(a) Pursuant to 326 IAC 6-3-2(e), the PM from the ~~nine (9)~~ **six (6)** spray booths (EU-3 through EU-448) and ~~one (1) veneer press (EU-12)~~ **and flat line finish system (EU-16)** shall not exceed the pound per hour emission rate established as E in the following formula:

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

(b) Pursuant to 326 IAC 6-3-2(d), the particulate matter (PM) overspray emissions from the six (6) spray booths (EU-3 – EU-8) and finish line EU-16, shall be controlled by a dry particulate filter, waterwash, or an equivalent control device. Said control device shall be operated according to the manufacturer's specifications.

(e) Condition D.1.4:

Condition D.1.4 shall be changed as follows to include the new finish line limit and its applicable compliance date.

D.1.4 Wood Furniture NESHAP [40 CFR Part 63, Subpart JJ]

(a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) 326 IAC 20-14, (40 CFR Part 63, Subpart JJ), with a compliance dates of December 7, 1998 **for spray booths EU-3 through EU-8, and the date of startup for finish line EU-16.**

(b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:

(1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from ~~finishing operations~~ **spray booths EU-3 through EU-8** as follows:

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

(B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; ~~or~~

(2) **Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finish line EU-16 as follows:**

(A) **Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of eight-tenths (0.8) pound VHAP per pound solids; or**

(B) **use compliant finishing materials in which all stains have a maximum VHAP content of one (1.0) pound VHAP per pound solids, as applied, and all washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of eight-tenths (0.8) pound VHAP per pound solids, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3%) maximum VHAP content by weight. All other thinners have a ten percent (10%) maximum VHAP content by weight;**

(~~23~~) Limit VHAP emissions contact adhesives as follows:

- (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pounds VHAP per pound solids.
- (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.

A copy of this rule is enclosed.

(f) Condition D.1.5:

Condition D.1.5 shall be changed as follows to reference both the compliance date applicable to the existing spray booths, and the date applicable to the proposed finish line (EU-16).

D.1.5 Work Practice Standards [40 CFR 60.803] [326 IAC 20]

The owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the **applicable** compliance dates **specified in Condition D.1.4**. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

.....

(g) Condition D.1.8:

Condition D.1.8 shall be changed as follows to reference both the compliance date applicable to the existing spray booths and the date applicable to the proposed finish line.

D.1.8 HAP Content

Pursuant to 40 CFR 63, Subpart JJ, an Initial Compliance Report must be submitted within sixty (60) calendar days following the **applicable** compliance schedule dates specified in Condition D.1.4, and a Continuous Compliance Demonstration Report must be submitted within thirty (30) days following every six month period, thereafter.

(h) Condition D.1.10:

Condition D.1.10 shall be changed as follows to remove three existing spray booths, remove the veneer line, and add the new finish line.

D.1.10 Particulate Matter (PM)

Pursuant to CP-039-2974-00177, issued on December 13, 1994, **and Significant Permit Modification 039-21403-00177**, the dry filters for PM control shall be in operation at all times when the ~~nine (9)~~ **six (6)** spray booths (EU-03 through EU-14~~8~~) and ~~one (1) veneer press (EU-12)~~ **finish line EU-16** are in operation.

(i) Condition D.1.13:

Condition D.1.13 shall be changed as follows to reference both the compliance date applicable to the existing spray booths and the date applicable to the proposed finish line.

D.1.13 Reporting Requirements

- (a) An Initial Compliance Report to document compliance with Conditions D.1.4 and the Certification form, shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, within sixty (60) calendar days following the **applicable** compliance dates **specified in Condition D.1.4** of December 7, 1998. The initial compliance report must include data from the entire month that the compliance date falls.

.....

Conclusion

The proposed changes shall be constructed and operated according to the significant source modification, significant permit modification, and all other applicable approvals.