



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: October 20, 2005  
RE: Medallion Cabinetry Inc / 099-21649-00102  
FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

### Notice of Decision: Approval – Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204.

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

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

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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



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## NEW SOURCE REVIEW and PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Medallion Cabinetry, Inc.  
515 West Mill Street  
Culver, Indiana 46511**

(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

NSR/Operation Permit No.: 099-21649-00102	
Issued by: Original Signed By: Paul Dubenetzky, Assistant Commissioner Office of Air Quality	Issuance Date: October 20, 2005 Expiration Date: October 20, 2010

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## SECTION A SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary wood kitchen cabinet manufacturing source.

Responsible Official:	Thomas E. Cook
Source Address:	515 West Mill Street, Culver, Indiana 46511
Mailing Address:	180 Industrial Boulevard, Waconia, Minnesota 55387
General Source Phone Number:	(952) 442-6988
SIC Code:	2434
Source Location Status:	Attainment for all 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)]

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

- (a) Paint Line 1, which consists of six (6) paint booths, identified as EU 001 through EU 006, with a maximum total usage rate of 40.7 gallons of paint an hour . Each booth is equipped with two (2) High Volume Low Pressure (HVLV) guns with panel filters to control the particulate overspray emissions.
- (b) Paint Line 2, which consists of six (6) paint booths, identified as EU 007 through EU 012, with a maximum total usage rate of 40.7 gallons of paint an hour . Each booth is equipped with two (2) High Volume Low Pressure (HVLV) guns with panel filters to control the particulate overspray emissions.
- (c) Paint Line 3, which consists of six (6) paint booths, identified as EU 013 through EU 018, with a maximum total usage rate of 40.7 gallons of paint an hour. Each booth is equipped with two (2) High Volume Low Pressure (HVLV) guns with panel filters to control the particulate overspray emissions.
- (d) One (1) specialty or touch-up paint booth, identified as EU 019, with a maximum total usage rate of 3.6 gallons of paint per hour, equipped with two (2) High Volume Low Pressure (HVLV) guns with panel filters to control the particulate overspray emissions.
- (e) Various natural gas-fired air make-up units and space heaters with a total heat input capacity of 41.5 million British thermal units per hour (mmBtu/hr).
- (f) Woodworking operations with a maximum capacity of 4,500 pounds of wood per hour, consisting of various machines controlled by two (2) baghouses each has a 60,000 actual cubic feet per minute (acfm).

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

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

- (a) Production of hot water for on-site personal use not related to any industrial or production process.
- (b) Ventilation exhaust, central chiller water systems, refrigeration and air conditioning equipment, not related to any industrial or production process, including natural draft hoods or ventilating systems that do not remove air pollutants./
- (c) Stacks and vents from plumbing traps used to prevent the discharge of sewer gases, handling domestic sewage only, excluding those at waste water treatment plant or those handling any industrial waste.
- (d) Painting, including interior and exterior painting of buildings, and solvent use, excluding degreasing
- (e) Activities performed using hand-held equipment including the following:
  - (1) Cutting, excluding cutting torches
  - (2) Drilling
  - (3) Grinding
  - (4) Machining wood, metal, or plastic
  - (5) Routing
  - (6) Sanding
  - (7) Sawing
- (f) Office related activities:
  - (1) Office supplies and equipment
  - (2) Photocopying equipment and associated supplies
- (g) Portable containers used for the collection, storage, or disposal of materials provided the container capacity is equal to or less than 0.46 cubic meters and the container is closed except when the material is added or removed.
- (h) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour:

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

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

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

## SECTION B GENERAL CONDITIONS

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

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

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

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

### B.3 Effective Date of the Permit IC 13-15-5-3

Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

### B.4 Enforceability [326 IAC 2-7-7]

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

### B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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

### B.6 Severability [326 IAC 2-7-5(5)]

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

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

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

### B.8 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

(a) The Permittee shall furnish to IDEM, OAQ,) within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

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

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

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

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

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

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

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

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

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

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

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

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

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

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

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

- (b) The Permittee shall implement the PMPs, including any required record keeping as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

Telephone Number: 1-800-753-5519 (ask for Northern Regional Office)  
Facsimile Number: 219-245-4877

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

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

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

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

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

**B.13 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

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

Indiana Department of Environmental Management

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

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

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

**B.14 Permit Modification, Reopening, Revocation and Reissuance, or Termination**  
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.15 Permit Renewal** [326 IAC 2-7-3] [326 IAC 2-7-4]

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

Request for renewal shall be submitted to:

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

Indianapolis, Indiana 46204

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
  - (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.16 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- (e) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.17 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]

[326 IAC 2-7-12 (b)(2)]

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.18 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
  - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
  - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204  
  
and  
  
United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590  
  
in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
  - (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.  
  
Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).
- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
  - (1) A brief description of the change within the source;

- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

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

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.19 Source Modification Requirement [326 IAC 2-7-10.5]**

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

**B.20 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

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

other change in the permit is necessary.

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

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

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

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

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

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

B.23 Advanced Source Modification Approval [326 IAC 2-7-5(16)] [326 IAC 2-7-10.5]

- (a) The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

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

Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

#### C.1 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### C.2 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

#### C.3 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

#### C.5 Operation of Equipment [326 IAC 2-7-6(6)]

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

#### C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

- (2) If there is a change in the following:
  - (A) Asbestos removal or demolition start date;
  - (B) Removal or demolition contractor; or
  - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

#### **C.7 Performance Testing [326 IAC 3-6]**

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

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

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

Indianapolis, Indiana 46204

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

#### **C.8 Compliance Requirements [326 IAC 2-1.1-11]**

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

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

#### **C.9 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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

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

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

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

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

#### **C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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

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

#### **C.11 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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

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

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

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

within 180 days from the date on which this source commences operation.

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

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

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

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

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

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

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

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

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

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

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

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

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

### **C.14 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]**

- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2007 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
  - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

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

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

### **C.15 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]**

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

### **C.16 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]**

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

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality

100 North Senate Avenue  
Indianapolis, Indiana 46204

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

### **Stratospheric Ozone Protection**

#### **C.17 Compliance with 40 CFR 82 and 326 IAC 22-1**

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

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) Paint Line 1, which consists of six (6) paint booths, identified as EU 001 through EU 006, with a maximum total usage rate of 40.7 gallons of paint an hour . Each booth is equipped with two (2) High Volume Low Pressure (HVLP) guns with panel filters to control the particulate overspray emissions.
- (b) Paint Line 2, which consists of six (6) paint booths, identified as EU 007 through EU 012, with a maximum total usage rate of 40.7 gallons of paint an hour . Each booth is equipped with two (2) High Volume Low Pressure (HVLP) guns with panel filters to control the particulate overspray emissions.
- (c) Paint Line 3, which consists of six (6) paint booths, identified as EU 013 through EU 018, with a maximum total usage rate of 40.7 gallons of paint an hour. Each booth is equipped with two (2) High Volume Low Pressure (HVLP) guns with panel filters to control the particulate overspray emissions.
- (d) One (1) specialty or touch-up paint booth, identified as EU 019, with a maximum total usage rate of 3.6 gallons of paint per hour, equipped with two (2) High Volume Low Pressure (HVLP) guns with panel filters to control the particulate overspray emissions.
- (e) Various natural gas-fired air make-up units and space heaters with a total heat input capacity of 41.5 million British thermal units per hour (mmBtu/hr).

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

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

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

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

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

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

#### D.1.2 PSD Minor Limit [326 IAC 2-2]

The use of VOC, including coatings, dilution solvents, and cleaning solvents from the nineteen (19) paint booths (EU001-EU-019) shall be limited to 247 tons per 12 consecutive month period with compliance determined at the end of each month. This usage limit shall also limit the potential to emit of VOC to 247 tons per 12 consecutive month period. Compliance with this limit is necessary to make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

**D.1.3 Particulate Matter (PM) [40 CFR 52 Subpart P]**

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Pursuant to 40 CFR 52 Subpart P, the PM from the nineteen (19) paint booths (001 through 019) 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:

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

**D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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

**Compliance Determination Requirements**

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

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Pursuant to 326 IAC 6-3-2(d), each booth shall be controlled by panel particulate filters, and shall be in place at all times the associated booth is in operation.

**D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]**

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Compliance with the VOC content and usage limitations contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

**D.1.7 Monitoring**

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the panel filters, weekly observations shall be made of the overspray from the surface coating booth stacks (001 through 019, 021 through 026) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the

Preventive Maintenance Plan.

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

### **D.1.8 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC content of each coating material and solvent used.
  - (2) The amount of coating material and solvent used on monthly basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) The 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 weekly overspray observations, daily and monthly 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**

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

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

- (a) Paint Line 1, which consists of six (6) paint booths, identified as EU 001 through EU 006, with a maximum total usage rate of 40.7 gallons of paint an hour . Each booth is equipped with two (2) High Volume Low Pressure (HVLP) guns with panel filters to control the particulate overspray emissions.
- (b) Paint Line 2, which consists of six (6) paint booths, identified as EU 007 through EU 012, with a maximum total usage rate of 40.7 gallons of paint an hour . Each booth is equipped with two (2) High Volume Low Pressure (HVLP) guns with panel filters to control the particulate overspray emissions.
- (c) Paint Line 3, which consists of six (6) paint booths, identified as EU 013 through EU 018, with a maximum total usage rate of 40.7 gallons of paint an hour. Each booth is equipped with two (2) High Volume Low Pressure (HVLP) guns with panel filters to control the particulate overspray emissions.
- (d) One (1) specialty or touch-up paint booth, identified as EU 019, with a maximum total usage rate of 3.6 gallons of paint per hour, equipped with two (2) High Volume Low Pressure (HVLP) guns with panel filters to control the particulate overspray emissions.
- (e) Various natural gas-fired air make-up units and space heaters with a total heat input capacity of 41.5 million British thermal units per hour (mmBtu/hr).

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

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

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

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

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

The Permittee which engage in wood furniture manufacturing operations shall comply with the provisions of 40 CFR Part 63, Subpart JJ which is incorporated by reference as 326 IAC 20-14-1, as follows:

- § 63.800(f) - Medallion Cabinetry, Inc., which is a new source must comply with the provisions of this standards immediately upon startup.
- § 63.802 - 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 § 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 § 63.803(l)(2) for determining styrene and formaldehyde usage.
  - (2) Limit VHAP emissions from contact adhesives by achieving a VHAP limit for contact adhesives, excluding aerosol adhesives and excluding contact adhesives applied to nonporous substrates, of no greater than 0.2 kg VHAP/kg solids (0.2 lb VHAP/lb solids), as applied, using either of the

compliance methods in § 63.804(e).

- (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.

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The Permittee shall be subject to the following 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 lands) 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 § 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:
- (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;
  - (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.
  - (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.

- (d) The owner or operator of a new affected source subject to § 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. or
- (e) The owner or operator of a new affected source subject to § 63.802(b)(2) shall comply with the provisions of the following method:
- (1) Use compliant contact adhesives with a VHAP content no greater than 0.2 kg VHAP/kg solids (0.2 lb VHAP/lb solids), as applied.
- (f) *Initial compliance.*
- (1) Owners or operators of an affected source subject to the provisions of § 63.802 (b)(1) that comply through the procedures established in § 63.804 (d)(1) shall submit the results of the averaging calculation (Equation 1) for the first month with the initial compliance status report required by § 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 § 63.802 (b)(1) that comply through the procedures established in § 63.804 (d)(2) shall submit an initial compliance status report, as required by § 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 § 63.802 (b)(1) that are complying through the procedures established in § 63.804 (d)(2) and are applying coatings using continuous coaters shall demonstrate initial compliance by:
    - (i) Submitting an initial compliance status report, as required by § 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 § 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 § 63.802 (b)(3) shall submit an initial compliance status report, as required by § 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 § 63.803 shall submit an initial compliance status report, as required by § 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 § 63.802 (b)(1) that comply through the procedures established in § 63.804 (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 § 63.807(c).
    - (i) The compliance certification shall state that the value of (E), as calculated by Equation 1, is no greater than 0.8 for new sources. An affected source is in violation of the standard if E is greater than 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 § 63.802 (b)(1) that comply through the procedures established in § 63.804 (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 § 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 § 63.802 (b)(1) that are complying through the procedures established in § 63.804 (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 § 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 non compliance. 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 § 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 § 63.804 (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.
- (5) Owners or operators of an affected source subject to the provisions of § 63.802 (b)(2) that comply through the procedures established in § 63.804 (e)(1), shall submit a compliance certification with the semiannual report required by § 63.807(c).
  - (i) The compliance certification shall state that compliant contact and/or foam adhesives have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant contact and/or foam adhesives were used. Each day a noncompliant contact or foam adhesive 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.
- (7) Owners or operators of an affected source subject to the provisions of § 63.802 (a)(3) or (b)(3) shall submit a compliance certification with the semiannual report required by § 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 § 63.803 shall submit a compliance certification with the semiannual report required by § 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 § 63.10 of subpart A, according to the applicability criteria in § 63.800(d) of this subpart.
- (b) The owner or operator of an affected source subject to the emission limits in § 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 § 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 § 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 § 63.802 (b)(3).
- (c) The owner or operator of an affected source following the compliance method in § 63.804 (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 § 63.804 (f)(3)(ii) and (g)(3)(ii) shall maintain the records required by § 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 § 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 § 63.803(b) is in place;
  - (2) Records collected in accordance with the inspection and maintenance plan required by § 63.803(c);
  - (3) Records associated with the cleaning solvent accounting system required by § 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 § 63.803(h)(5).
  - (5) Records associated with the formulation assessment plan required by § 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 § 63.802 and following the compliance provisions of § 63.804(f) (1), (2), (3), (5), (7) and (8) and § 63.804(g) (1), (2), (3), (5), (7), and (8) shall maintain records of the compliance certifications submitted in accordance with § 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 § 63.9(h) and § 63.807(b) and the semiannual reports required by § 63.807(c).
- (j) The owner or operator of an affected source shall maintain all records in

accordance with the requirements of § 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 § 63.7 through § 63.10 of subpart A (General Provisions) according to the applicability criteria in § 63.800(d) of this subpart.
- (b) The owner or operator of an affected source demonstrating compliance in accordance with § 63.804(f) (1), (2), (3), (5), (7) and (8) shall submit the compliance status report required by § 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 § 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 § 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 § 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.
- (d) The owner or operator of an affected source demonstrating compliance in accordance with § 63.804(g) (4) and (6) of this subpart shall submit the excess emissions and continuous monitoring system performance report and summary report required by § 63.10(e) of subpart A. The report shall include the monitored operating parameter values required by § 63.804(g) (4) and (6). If the source experiences excess emissions, the report shall be submitted quarterly for at least 1 year after the excess emissions occur and until a request to reduce reporting frequency is approved, as indicated in § 63.10(e)(3)(C). If no excess emissions occur, the report shall be submitted semiannually.
- (e) The owner or operator of an affected source required to provide a written notification under § 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.

TABLE 2.—LIST OF VOLATILE HAZARDOUS AIR POLLUTANTS

CHEMICAL NAME	CAS NUMBER	CHEMICAL NAME	CAS NUMBER
Acetaldehyde	75070	Ethylidene dichloride (1,1-Dichloroethane)	75343

Acetamide	60355	Formaldehyde	50000
Acetonitrile	75058	Glycol ethers	-----
Acetophenone	98862	Hexachlorobenzene	118741
2-Acetylaminofluorine	53963	Hexachloro-1,3-butadiene	87683
Acrolein	107028	Hexachloroethane	67721
Acrylamide	79061	Hexamethylene-1,6-diisocyanate	822060
Acrylic acid	79107	Hexamethylphosphoramide	680319
Acrylonitrile	107131	Hexane	110543
Allyl chloride	107051	Hydrazine	302012
4-Aminobiphenyl	92671	Hydroquinone	123319
Aniline	62533	Isophorone	78591
o-Anisidine	90040	Maleic anhydride	108316
Benzene	71432	Methanol	67561
Benzidine	92875	Methyl bromide (Bromomethane)	74839
Benzotrichloride	98077	Methyl chloride (Chloromethane)	74873
Benzyl chloride	100447	Methyl chloroform (1,1,1-Trichloroethane)	71556
Biphenyl	92524	Methyl ethyl ketone (2-Butanone)	78933
Bis(2-ethylhexyl) phthalate (DEHP)	117817	Methylhydrazine	60344
Bis(chloromethyl) ether	542881	Methyl iodide (Iodomethane)	74884
Bromoform	75252	Methyl isobutyl ketone (Hexone)	108101
1,3-Butadiene	106990	Methyl isocyanate	624839
Caprolactam	105602	Methyl methacrylate	80626
Carbon disulfide	75150	Methyl tert-butyl ether	1634044
Carbon tetrachloride	56235	4,4'-Methylenebis (2-chloroaniline)	101144
Carbonyl sulfide	463581	Methylene chloride (Dichloromethane)	75092
Catechol	120809	4,4'-Methylenediphenyl diisocyanate (MDI)	101688
Chloroacetic acid	79118	4,4'-Methylenedianiline	101779
2-Chloroacetophenone	532274	Naphthalene	91203
Chlorobenzene	108907	Nitrobenzene	98953
Chloroform	67663	4-Nitrobiphenyl	92933
Chloromethyl methyl ether	107302	4-Nitrophenol	100027
Chloroprene	126998	2-Nitropropane	79469
Cresols (isomers and mixture)	1319773	N-Nitroso-N-methylurea	684935
o-Cresol	95487	N-Nitrosodimethylamine	62759
m-Cresol	108394	N-Nitrosomorpholine	59892
p-Cresol	106445	Phenol	108952
Cumene	98828	p-Phenylenediamine	106503
2,4-D (2,4-Dichlorophenoxyacetic acid, including salts and esters)	94757	Phosgene	75445
DDE (1,1-Dichloro-2,2-bis (pchlorophenyl) ethylene)	72559	Phthalic anhydride	85449

Diazomethane	334883	Polychlorinated biphenyls (Aroclors)	1336363
Dibenzofuran	132649	Polycyclic Organic Matter	0
1,2-Dibromo-3-chloropropane	96128	1,3-Propane sultone	1120714
Dibutylphthalate	84742	beta-Propiolactone	57578
1,4-Dichlorobenzene	106467	Propionaldehyde	123386
3,3'-Dichlorobenzidine	91941	Propoxur (Baygon)	114261
Dichloroethyl ether (Bis (2-chloroethyl) ether)	111444	Propylene dichloride (1,2-Dichloropropane)	78875
1,3-Dichloropropene	542756	Propylene oxide	75569
Diethanolamine	111422	1,2-Propylenimine (2-Methyl aziridine)	75558
N,N-Dimethylaniline	121697	Quinone	106514
Diethyl sulfite	64675	Styrene	100425
3,3'-Dimethoxybenzidine	119904	Styrene oxide	96093
4-Dimethylaminoazobenzene	60117	2,3,7,8-Tetrachlorodibenzo-pdioxin	1746016
3,3'-Dimethylbenzidine	119937	1,1,2,2-Tetrachloroethane	79345
Dimethylcarbamoyl chloride	79447	Tetrachloroethylene (Perchloroethylene)	127184
N,N-Dimethylformamide	68122	Toluene	108883
1,1-Dimethylhydrazine	57147	2,4-Toluenediamine	95807
Dimethyl phthalate	131113	Toluene-2,4-diisocyanate	584849
Dimethyl sulfate	77781	o-Toluidine	95534
4,6-Dinitro-o-cresol, and salts	534521	1,2,4-Trichlorobenzene	120821
2,4-Dinitrophenol	51285	1,1,2-Trichloroethane	79005
2,4-Dinitrotoluene	121142	Trichloroethylene	79016
1,4-Dioxane (1,4-Diethyleneoxide)	123911	2,4,5-Trichlorophenol	95954
1,2-Diphenylhydrazine	122667	2,4,6-Trichlorophenol	88062
Epichlorohydrin (1-Chloro-2,3-epoxypropane)	106898	Triethylamine	121448
1,2-Epoxybutane	106887	Trifluralin	1582098
Ethyl acrylate	140885	2,2,4-Trimethylpentane	540841
Ethylbenzene	100414	Vinyl acetate	108054
Ethyl carbamate (Urethane)	51796	Vinyl bromide	593602
Ethyl chloride (Chloroethane)	75003	Vinyl chloride	75014
Ethylene dibromide (Dibromoethane)	106934	Vinylidene chloride (1,1-Dichloroethylene)	75354
Ethylene dichloride (1,2-Dichloroethane)	107062	Xylenes (isomers and mixture)	1330207
Ethylene glycol	107211	o-Xylene	95476
Ethylene oxide	75218	m-Xylene	108383
Ethylenethiourea	96457	p-Xylene	106423

TABLE 3.—SUMMARY OF EMISSION LIMITS

EMISSION POINT	NEW SOURCE
(a) Achieve a weighted average VHAP content across all coatings (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied)	a 0.8
(b) Use compliant finishing materials (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied)	

—stains .....	a 1.0
—washcoats .....	a,b 0.8
—sealers .....	a 0.8
—topcoats .....	a 0.8
—basecoats .....	a,b 0.8
—enamels .....	a,b 0.8
—thinners (maximum % HAP allowable); or .....	10.0
(d) Use any combination of (a) and (b),.....	0.8
Cleaning Operations:	
Strippable spray booth material (maximum VOC content, kg VOC/kg solids [lb VOC/lb solids].....	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
ii. For foam adhesives used in products that meet flammability requirements .....	0.2
iii. For all other contact adhesives (including foam adhesives used in products that do not meet flammability requirements) .....	0.2

<sup>a</sup> The limits refer to the VHAP content of the coating, as applied.

<sup>b</sup> 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.

<sup>d</sup> There is no limit on the VHAP content of these adhesives

## SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (f) Woodworking operations with a maximum capacity of 4,500 pounds of wood per hour, consisting of various machines controlled by two (2) baghouses each has a 60,000 actual cubic feet per minute (acfm).

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

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

#### D.2.1 Particulate Matter Emissions 40 CFR 52, Subpart P

Pursuant to 40 CFR 52 Subpart P, the PM from the woodworking operations 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:

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

#### D.2.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e), the particulate emissions from the woodworking operation shall not exceed 7.05 pounds per hour when operating at a process weight rate of 4,500 pounds per hour. The pound per hour limitations was calculated using the following equation:

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

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

### Compliance Determination Requirements

#### D.2.3 Particulate Control

In order to comply with condition D.2.2, the baghouse for particulate control shall be in operation at all times that the woodworking devices are in operation.

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

#### D.2.4 Visible Emissions Notations

- (a) Daily visible emission notations of the woodworking devices stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions

for that specific process.

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

#### D.2.5 Baghouse Inspections

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

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

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In the event that bag failure has been observed:

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

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

#### D.2.7 Record Keeping Requirements

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- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the woodworking devices stack exhausts.
- (b) To document compliance with Condition D.2.5, the Permittee shall maintain records of the results of the inspections required and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Medallion Cabinetry, Inc.  
Source Address: 515 West Mill Street, Culver, Indiana 46511  
Mailing Address: 515 West Mill Street, Culver, Indiana 46511  
NSR/Part 70 Permit No.: 099-21649-00102

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

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)
- Report (specify)
- Notification (specify)
- Affidavit (specify)
- Other (specify)

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46204  
Phone: 317-233-5674  
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Medallion Cabinetry, Inc.  
Source Address: 515 West Mill Street, Culver, Indiana 46511  
Mailing Address: 515 West Mill Street, Culver, Indiana 46511  
NSR/Part 70 Permit No.: 099-21649-00102

**This form consists of 2 pages**

**Page 1 of 2**

<input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none"><li>C The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and</li><li>C The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.</li></ul>
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If any of the following are not applicable, mark N/A

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

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:

Title / Position:

Date:

Phone:

A certification is not required for this report.

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

**Part 70 Quarterly Report**

Source Name: Medallion Cabinetry, Inc.  
Source Address: 515 West Mill Street, Culver, Indiana 46511  
Mailing Address: 515 West Mill Street, Culver, Indiana 46511  
NSR/Part 70 Permit No.: 099-21649-00102  
Facility: Nineteen paint booths (EU001-EU019)  
Parameter: VOC  
Limit: 247 tons per 12 consecutive month period of VOC usage, including coatings, dilution solvents, and cleaning solvents with compliance determined at the end of each month. This usage limit shall also limit the potential to emit of VOC to 247 tons per 12 consecutive month period

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.  
Deviation has been reported on:

Submitted by:  
Title / Position:  
Signature:  
Date:  
Phone:

Attach a signed certification to complete this report.

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

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

Source Name: Medallion Cabinetry, Inc.  
 Source Address: 515 West Mill Street, Culver, Indiana 46511  
 Mailing Address: 515 West Mill Street, Culver, Indiana 46511  
 NSR/Part 70 Permit No.: 099-21649-00102

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed By:

Title/Position:

Date:

Phone:

Attach a signed certification to complete this report.

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

**Technical Support Document (TSD) for a New Source Review and Part 70  
Permit**

**Source Background and Description**

Source Name:	Medallion Cabinetry, Inc.
Source Location:	515 West Mill Street, Culver, Indiana 46511
County:	Marshall
SIC Code:	2434
NSR/Operation Permit No.:	099-21649-00102
Permit Reviewer:	Aida De Guzman

The Office of Air Quality (OAQ) has reviewed a modification application from Medallion Cabinetry, Inc. relating to the construction and operation of a wood kitchen cabinet plant with a maximum production rate of 100 cabinets per hour. This plant will include the following emission units and pollution control devices:

- (a) Paint Line 1, which consists of six (6) paint booths, identified as EU 001 through EU 006, with a maximum total usage rate of 40.7 gallons of paint an hour . Each booth is equipped with two (2) High Volume Low Pressure (HVLV) guns with panel filters to control the particulate overspray emissions.
- (b) Paint Line 2, which consists of six (6) paint booths, identified as EU 007 through EU 012, with a maximum total usage rate of 40.7 gallons of paint an hour . Each booth is equipped with two (2) High Volume Low Pressure (HVLV) guns with panel filters to control the particulate overspray emissions.
- (c) Paint Line 3, which consists of six (6) paint booths, identified as EU 013 through EU 018, with a maximum total usage rate of 40.7 gallons of paint an hour. Each booth is equipped with two (2) High Volume Low Pressure (HVLV) guns with panel filters to control the particulate overspray emissions.
- (d) One (1) specialty or touch-up paint booth, identified as EU 019, with a maximum total usage rate of 3.6 gallons of paint per hour, equipped with two (2) High Volume Low Pressure (HVLV) guns with panel filters to control the particulate overspray emissions.
- (e) Various natural gas-fired air make-up units and space heaters with a total heat input capacity of 41.5 million British thermal units per hour (mmBtu/hr).
- (f) Woodworking operations with a maximum capacity of 4,500 pounds of wood per hour, consisting of various machines controlled by two (2) baghouses each has a 60,000 actual cubic feet per minute (acfm).

**Insignificant Activities**

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

- (a) Production of hot water for on-site personal use not related to any industrial or production process.
- (b) Ventilation exhaust, central chiller water systems, refrigeration and air conditioning equipment, not related to any industrial or production process, including natural draft hoods or ventilating systems that do not remove air pollutants./
- (c) Stacks and vents from plumbing traps used to prevent the discharge of sewer gases, handling domestic sewage only, excluding those at waste water treatment plant or those handling any industrial waste.
- (d) Painting, including interior and exterior painting of buildings, and solvent use, excluding degreasing
- (e) Activities performed using hand-held equipment including the following:
  - (1) Cutting, excluding cutting torches
  - (2) Drilling
  - (3) Grinding
  - (4) Machining wood, metal, or plastic
  - (5) Routing
  - (6) Sanding
  - (7) Sawing
- (f) Office related activities:
  - (1) Office supplies and equipment
  - (2) Photocopying equipment and associated supplies
- (g) Portable containers used for the collection, storage, or disposal of materials provided the container capacity is equal to or less than 0.46 cubic meters and the container is closed except when the material is added or removed.
- (h) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour:

**Stack Summary**

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
001	Paint booth	32	2.5	15,200	70°F
002	Paint booth	32	2.5	15,200	70°F
003	Paint booth	32	2.5	15,200	70°F
004	Paint booth	32	2.5	15,200	70°F
005	Paint booth	32	3	15,200	70°F
006	Paint booth	32	2.5	15,200	70°F
007	Paint booth	32	2.5	15,200	70°F
008	Paint booth	32	2.5	15,200	70°F
009	Paint booth	32	2.5	15,200	70°F
010	Paint booth	32	2.5	15,200	70°F
011	Paint booth	32	2.5	15,200	70°F
012	Paint booth	32	3	15,200	70°F

013	Paint booth	32	3	15,200	70°F
014	Paint booth	32	3	15,200	70°F

015	Paint booth	32	3	15,200	70°F
016	Paint booth	32	3	15,200	70°F
017	Paint booth	32	3	15,200	70°F
018	Paint booth	32	3	15,200	70°F
019	Paint booth	32	3	15,200	70°F
020	Woodworking	32	3	15,200	70°F
021	Paint booth	32	3	15,200	70°F
022	Paint booth	32	3	15,200	70°F
023	Paint booth	32	3	15,200	70°F
024	Paint booth	32	2.5	15,200	70°F
025	Paint booth	32	2.5	15,200	70°F
026	Paint booth	38	5	15,200	70°F

**Recommendation**

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

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

An application for the purposes of this review was received on August 10, 2005

**Emission Calculations**

- (a) Nineteen (19) Paint Booths – See Page 3 and 4 of 4 TSD Appendix A for detailed emission calculations
- (b) Natural Gas Combustion – See Page 1 and 2 of 4 TSD Appendix A for detailed emission calculations.
- (c) Woodworking – Using the baghouse information:

For calculating the uncontrolled PM/PM10 emissions, the Permittee has supplied the following information. This information came from two Medallion Cabinetry, Inc., located in Waconia, Minnesota and Independence, Oregon that are similar in operations and capacities as the proposed plant.

- 15% - 20% is waste wood that is collected and hauled in a truck
- 95% of the waste wood is scrap and 5% is fine dust.

PM/PM10 Uncontrolled Emissions = 4,500 lbs/hr \* 15% scrap \* 5% dust  
 = 33.75 tons/yr

PM/PM10 Controlled Emissions = 60,000 cu ft/min \* 0.005 gr/cuft \* 60 min/hr \* lb/7000 gr \* 8760 hr/yr \*

= ton/2000 lb  
 = 11.26 tons/yr \* 2 baghouses  
 = 22.5 tons/yr

**Potential To Emit of the New Source**

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

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

Pollutant	Potential To Emit (tons/year)
PM	219.05
PM-10	220.15
SO <sub>2</sub>	0.1
VOC	2,450.84
CO	15.3
NO <sub>x</sub>	18.2

HAP's	Potential To Emit (tons/year)
Xylene	176.78
Toluene	79.21
Formaldehyde	3.58
Ethyl Benzene	34.21
MEK	1.13
Glycol Ethers	29.7
Cumene	0.55
Methanol	0.93
Hexane	0.33
Dichlorobenzene	0.00022
Lead	<b>0.000091</b>
Cadmium	0.00020
Chromium	0.00025
Nickel	<b>0.00038</b>
Single HAP	176.78
Combined HAPs	326.08

**Justification for the Permit Level**

Pursuant to 326 IAC 2-5.1-4, the proposed project will be issued a Part 70 permit under 326 IAC 2-7 since the potential to emit or limited volatile organic compounds (VOC) are greater than 100 tons per year; or single HAP is greater than 10 tons per year; or combined HAPs are greater than 25 tons per year. This Part 70 permit will also serve as an initial construction permit.

**County Attainment Status**

The source is located in Marshall County.

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Pollutant	Status
PM2.5	attainment
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
8-hour Ozone	attainment
1-hour Ozone	attainment
CO	attainment
Lead	Not determined

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are regulated under the Clean Air Act for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Marshall County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Marshall County has been classified as attainment or unclassifiable for PM2.5. U.S. EPA has not yet established the requirements to Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 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) Marshall County has been classified as attainment for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2

**Potential to Emit of the New Source After Issuance Reflecting Major PSD Applicability**

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

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Paint Booths	0.539	0.539	0.0	247.0	0.0	0.0	Single HAP - 17.82 Combined HAPs - 32.8
Woodworking Operations	22.5	22.5	0.0	0.0	0.0	0.0	0.0
Natural Gas Combustion	0.3	1.4	0.1	1.0	15.3	18.2	0.327
Insignificant Activities	0.0	0.0	0.0	1.0	0.0	0.0	0.0
<b>TOTAL Limit</b>	<b>23.3</b>	<b>24.4</b>	<b>0.1</b>	<b>249.0</b>	<b>15.3</b>	<b>18.2</b>	Single HAP - 18.14 Combined HAPs - 33.13 tons/yr

Note: For the purposes of monitoring, record keeping, and reporting of the VOC usage limit, the

emissions from the insignificant activities of 1 ton of VOC per year and the emissions from natural gas combustion of 1 ton of VOC per year have been deducted from the sourcewide VOC limit of 249 tons/yr.

- (a) The VOC emissions from the paint booths will be limited to 247 tons per year. Therefore, HAP emissions and Particulate overspray emissions from these booths will be scaled down as follows:

$$\begin{aligned} \text{Single HAPs} &= \frac{\text{Single HAP PTE, 176.78 tons/yr}}{\text{Total VOC PTE, 2,449.84 tons/yr}} * \text{VOC Limit, 247 tons/yr} \\ &= 17.82 \text{ tons/yr} \end{aligned}$$

$$\begin{aligned} \text{Combined HAPs} &= \frac{\text{Combined HAPs PTE, 326.08 tons/yr}}{\text{Total VOC PTE, 2,449.84 tons/yr}} * \text{VOC Limit, 247 tons/yr} \\ &= 32.8 \text{ tons/yr} \end{aligned}$$

$$\begin{aligned} \text{Uncontrolled PM overspray} &= \frac{\text{PM PTE, 185 tons/yr}}{\text{Total VOC PTE, 2,449.84 tons/yr}} * \text{VOC Limit, 247 tons/yr} \\ &= 18.6 \text{ tons/yr} \end{aligned}$$

$$\begin{aligned} \text{Controlled PM overspray} &= 18.6 * (1-0.971) \\ &= 0.539 \text{ tons/yr} \end{aligned}$$

- (b) This new stationary source is not major because VOC emissions have been limited to less than 250 tons per year. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

### Federal Rule Applicability

- (a) New Source Performance Standards (NSPS):
- (1) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) included in this permit.
- (b) National Emission Standards for Hazardous Air Pollutants (NESHAPs)
- (1) 40 CFR Part 63.7480, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters.

This source's various air makeup units and space heaters are exempted from this NESHAP, 40 CFR Part 63.7480, Subpart DDDDD.

- (2) 326 IAC 20 and CFR Part 63.800, Subpart JJ- National Emission Standards for Hazardous Air Pollutants for – Wood Furniture Manufacturing Operations

This source is subject to 326 IAC 20 and CFR Part 63.800, Subpart JJ since it is a new major source of HAPs. The following sections of Subpart JJ applies to the new source, which has a compliance date upon startup:

40 CFR § 63.802(b)(1) through (3)  
40 CFR § 63.803  
40 CFR § 63.804(d)(1)  
40 CFR § 63.804  
40 CFR § 63.805  
40 CFR § 63.806  
40 CFR § 63.807

- (3) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) included in this permit.
- (c) Particulate Matter (PM) [40 CFR 52 Subpart P]  
Pursuant to 40 CFR 52 Subpart P, the PM from the woodworking operation and the surface coating operations 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:

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

- (d) 40 CFR Part 64, Compliance Assurance Monitoring  
The CAM is applicable to specific emission unit based on individual pollutant, and must meet all of the following criteria:
- (1) The emission unit must be located at a major source for which a Part 70 permit is required.
  - (2) Be subject to an emission limitation or standard.
  - (3) Use a control device to achieve compliance.
  - (4) Have potential precontrol emissions of at least 100 percent of the major source thresholds.

The source is not subject to CAM, as there is no emission unit with precontrol emissions of 100 percent of the major threshold, and VOC, which is the main pollutant is not controlled by a control equipment.

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

- (a) 326 IAC 2-2 (Prevention of Significant Deterioration)  
The new source is not subject to 326 IAC 2-2, PSD as its VOC emission is limited below 250 tons of VOC per year
- (b) 326 IAC 2-6 (Emission Reporting)  
The new source is subject to 326 IAC 2-6-3(a)(2), since it is a Part 70 source emitting less than 250 tons of PM10 or VOC and is subject to the triennial emission reporting requirements
- (c) 326 IAC 5-1-1 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following:
- (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

This rule applies to surface coated wood furnishings which include cabinets (kitchen, bath, and vanity), tables, beds, chairs, sofas (nonupholstered), art objects, and any other coated furnishings made of solid wood, wood composition, or simulated wood material. The new source is subject 326 IAC 8-2-12, as it is coating kitchen cabinets.

This rule requires that the owner or operator of the wood furniture or cabinet coating operation shall apply all coating material, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) or more of the following application systems: airless spray application system, air-assisted airless spray application system, electrostatic spray application system, electrostatic bell or disc application system, heated airless spray application system, roller coat, brush or wipe application system or dip-and-drain application system.

High Volume Low Pressure (HVLP) spray guns will be utilized in the surface coating of the kitchen cabinets. 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.

(b) 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices, and Control Technologies)

(1) Pursuant to 326 IAC 6-3-2(e), the particulate matter (PM) from the wood working operation shall be limited by the following:

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:

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

$$E = 4.10 (4500/2000)^{0.67} \\ = 7.05 \text{ lbs/hr}$$

The woodworking operation will comply with this rule using baghouses to control the PM emissions.

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

The source is in compliance with this rule as panel filters are used to control particulate overspray emissions.

(c) 326 IAC 6-2 (Particulate Emissions Limit from Sources of Indirect Heating)

The various air makeup units and space heaters are not subject to 326 IAC 6-2, as they are not sources of indirect heating.

## Compliance Requirements

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

### Requirements and Compliance Monitoring Requirements.

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

The following compliance monitoring requirements shall apply to the new source as follows:

- (a) Monitor, record and report the VOC usage in order to demonstrate compliance with the PSD minor limit.
- (b) Paint booths panel filters:
  - (1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the panel filters, weekly observations shall be made of the overspray from the surface coating booth stacks (001 through 019, 021 through 026) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
  - (2) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
  - (3) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
- (c) Baghouses for the woodworking operations:
  - (1) Daily visible emission notations of the woodworking devices stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
  - (2) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
  - (3) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

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

### **Conclusion**

The construction of this proposed wood kitchen cabinet manufacturing plant shall be subject to the conditions of the attached **NSR/Part 70 No. 099-21649-00102**.

## Indiana Department of Environmental Management Office of Air Quality

### Addendum to the Technical Support Document for a NSR/ Part 70 Operating Permit

Source Name: Medallion Cabinetry, Inc.  
Source Location: 515 West Mill Street, Culver, Indiana 46511  
County: Marshall  
SIC Code: 2434  
NSR/Operation Permit No.: 099-21649-00102  
Permit Reviewer: Aida De Guzman

On August 30, 2005, Medallion Cabinetry, Inc. had a notice published in the Plymouth Pilot News, Plymouth, Indiana, stating that Medallion Cabinetry, Inc. had applied for a NSR/Part 70 Operating Permit to construct and operate a cabinet manufacturing plant. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

OAQ made a change to Condition D.1.6 to correct the referenced condition from D.1.1 to D.1.2, as follows (additions are **bolded** and deletions are ~~struck through~~ for emphasis):

#### D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC content and usage limitations contained in Condition ~~D.1.4~~  
**D.1.2** shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**Appendix A: Emissions Calculations  
 Natural Gas Combustion Only  
 MM BTU/HR <100  
 Small Industrial Boiler**

**Company Name: Medallion Cabinetry, Inc.  
 Address City IN Zip: 515 West Mill St., Culver, IN 46511  
 Permit Number: 099-21649  
 Pit ID: 099-00102  
 Reviewer: Aida De Guzman  
 Date: 10-Aug-05**

Heat Input Capacity  
 MMBtu/hr

Potential Throughput  
 MMCF/yr

7 air make up unit @ 5.5 mmBtu/hr (38.5 mmBtu/hr) 10 space heaters @ 0.30 mmBtu/hr (3.0 mmBtu/hr)
--

41.5

363.5

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
Potential Emission in tons/yr	0.3	1.4	0.1	18.2	1.0	15.3

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 2 for HAPs emissions calculations.

**Appendix A: Emissions Calculations  
 Natural Gas Combustion Only  
 MM BTU/HR <100  
 Small Industrial Boiler  
 HAPs Emissions**

**Company Name:** Medallion Cabinetry, Inc.  
**Address City IN Zip:** 515 West Mill St., Culver, IN 46511  
**Permit Number:** 099-21649  
**Pit ID:** 099-00102  
**Reviewer:** Aida De Guzman  
**Date:** 10-Aug-05

Heat Input Capacity  
 MMBtu/hr  
 41.5

7 air make up unit @ 5.5 mmBtu/hr (38.5 mmBtu/hr)  
 10 space heaters @ 0.30 mmBtu/hr (3.0 mmBtu/hr)

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.817E-04	2.181E-04	1.363E-02	3.272E-01	6.180E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	9.089E-05	1.999E-04	2.545E-04	6.907E-05	3.817E-04

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.  
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations**  
**HAP Emission Calculations**

**Company Name:** Medallion Cabinetry, Inc.  
**Address City IN Zip:** 515 West Mill Street, Culver, Indiana 46511  
**Permit Number:** 099-21649  
**Plt ID:** 099-00102  
**Permit Reviewer:** Aida De Guzman  
**Date Application Received:** 10-Aug-05

Material	Density (Lb/Gal)	Gallons of Material (gal/hr)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Ethyl Benzen	Weight % MEK	Weight % Glycol Ethers	Weight % Cumene	Weight % Methanol	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	MEK Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Cumene Emissions	Methanol Emissions (ton/yr)
<b>Line 1</b>																		
Booth 1 - NGR	7.4	3.280	0.130%	0.00%	0.00%	0.00%	0.00%	0.00%	0.070%	0.00%	0.137	0.00	0.00	0.000	0.000	0.000	0.000	0.000
Booth 2- Stain	6.9	3.390	0.00%	0.80%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.82	0.00	0.00	0.00	0.00	0.00	0.00
Booth 3 - Washcoat	9.0	2.190	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Booth 4 - Sealer	7.7	2.510	0.00%	3.00%	0.13%	0.00%	0.00%	1.00%	0.00%	0.00%	0.00	2.55	0.11	0.00	0.00	0.85	0.00	0.00
	10.4	2.510	14.00%	0.00%	0.00%	2.90%	0.00%	0.00%	0.00%	0.00%	16.07	0.00	0.00	3.33	0.00	0.00	0.00	0.00
Booth 5 - Glaze	7.9	0.160	0.12%	0.00%	0.00%	0.00%	0.00%	0.00%	0.05%	0.00%	0.01	0.00	0.00	0.00	0.00	0.00	0.0028	0.00
Booth 6 - Topcoat	8.2	5.560	0.00%	8.68%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	17.27	0.00	0.00	0.00	0.00	0.00	0.00
	10.5	5.560	12.47%	0.00%	0.00%	2.28%	0.00%	0.00%	0.00%	0.00%	32.01	0.00	0.00	5.85	0.00	0.00	0.00	0.00
	11.1	5.560	0.00%	0.00%	0.30%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.81	0.00	0.00	0.00	0.00	0.00
	8.0	3.670	0.00%	0.00%	0.00%	0.00%	0.00%	5.26%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	6.77	0.00	0.00
<b>Line 2</b>																		
Booth 1 - NGR	7.4	3.280	0.130%	0.00%	0.00%	0.00%	0.00%	0.00%	0.070%	0.00%	0.137	0.00	0.00	0.000	0.000	0.000	0.000	0.000
Booth 2- Stain	6.9	3.390	0.00%	0.80%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.82	0.00	0.00	0.00	0.00	0.00	0.00
Booth 3 - Washcoat	9.0	2.190	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Booth 4 - Sealer	7.7	2.510	0.00%	3.00%	0.13%	0.00%	0.00%	1.00%	0.00%	0.00%	0.00	2.55	0.11	0.00	0.00	0.85	0.00	0.00
	10.4	2.510	14.00%	0.00%	0.00%	2.90%	0.00%	0.00%	0.00%	0.00%	16.07	0.00	0.00	3.33	0.00	0.00	0.00	0.00
Booth 5 - Glaze	7.9	0.160	0.12%	0.00%	0.00%	0.00%	0.00%	0.00%	0.05%	0.00%	0.01	0.00	0.00	0.00	0.00	0.00	0.0028	0.00
Booth 6 - Topcoat	8.2	5.560	0.00%	8.68%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	17.27	0.00	0.00	0.00	0.00	0.00	0.00
	10.5	5.560	12.47%	0.00%	0.00%	2.28%	0.00%	0.00%	0.00%	0.00%	32.01	0.00	0.00	5.85	0.00	0.00	0.00	0.00
	11.1	5.560	0.00%	0.00%	0.30%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.81	0.00	0.00	0.00	0.00	0.00
	8.0	3.670	0.00%	0.00%	0.00%	0.00%	0.00%	5.26%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	6.77	0.00	0.00
<b>Line 3</b>																		
Booth 1 - NGR	7.4	3.280	0.130%	0.00%	0.00%	0.00%	0.00%	0.00%	0.070%	0.00%	0.137	0.00	0.00	0.000	0.000	0.000	0.000	0.000
Booth 2- Stain	6.9	3.390	0.00%	0.80%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.82	0.00	0.00	0.00	0.00	0.00	0.00
Booth 3 - Washcoat	9.0	2.190	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Booth 4 - Sealer	7.7	2.510	0.00%	3.00%	0.13%	0.00%	0.00%	1.00%	0.00%	0.00%	0.00	2.55	0.11	0.00	0.00	0.85	0.00	0.00
	10.4	2.510	14.00%	0.00%	0.00%	2.90%	0.00%	0.00%	0.00%	0.00%	16.07	0.00	0.00	3.33	0.00	0.00	0.00	0.00
Booth 5 - Glaze	7.9	0.160	0.12%	0.00%	0.00%	0.00%	0.00%	0.00%	0.05%	0.00%	0.01	0.00	0.00	0.00	0.00	0.00	0.0028	0.00
Booth 6 - Topcoat	8.2	5.560	0.00%	8.68%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	17.27	0.00	0.00	0.00	0.00	0.00	0.00
	10.5	5.560	12.47%	0.00%	0.00%	2.28%	0.00%	0.00%	0.00%	0.00%	32.01	0.00	0.00	5.85	0.00	0.00	0.00	0.00
	11.1	5.560	0.00%	0.00%	0.30%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.81	0.00	0.00	0.00	0.00	0.00
	8.0	3.670	0.00%	0.00%	0.00%	0.00%	0.00%	5.26%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	6.77	0.00	0.00
<b>Specialty/Touchup Booth</b>																		
touchup paint	8.2	5.560	0.00%	8.68%	0.00%	2.28%	0.00%	0.00%	0.00%	0.00%	0.00	17.27	0.00	6.67	0.00	0.00	0.00	0.00
	8.1	2.190	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.70%	1.19%	0.00	0.00	0.00	0.00	0.00	0.00	0.55	0.93
	11.1	5.560	0.00%	0.00%	0.30%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.81	0.00	0.00	0.00	0.00	0.00
	10.5	5.600	12.47%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	32.12	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	8.0	3.700	0.00%	0.00%	0.00%	0.00%	0.50%	5.26%	0.00%	0.00%	0.00	0.00	0.00	0.65	6.83	0.00	0.00	0.00
	2.5	8.300	0.00%	0.00%	0.30%	0.00%	0.530%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.48	0.00	0.00	0.00	0.00

Total State Potential Emissions

176.78	79.21	3.57	34.21	1.13	29.70	0.55	0.93
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**METHODOLOGY**

Single Worst HAP  
 Combined HAPs

176.78
326.08

HAPS emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations**

**Company Name:** Medallion Cabinetry, Inc.  
**Address City IN Zip:** 515 West Mill Street, Culver, Indiana 46511  
**Permit Number:** 099-21649  
**Pit ID:** 099-00102  
**Reviewer:** Aida De Guzman  
**Date Application Received:** \*August 10, 2005

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
<b>Line 1</b>															
Booth 1 -Espresso/NGR Stain	6.9	46.43%	0.0%	46.4%	0.0%	4.12%	3.280	3.19	3.19	10.46	251.10	91.65	13.22	77.42	75%
Booth 2 - Wheat Stain	6.9	99.42%	0.0%	99.4%	0.0%	52.00%	3.610	6.90	6.90	24.91	597.79	218.19	0.16	13.27	75%
Booth 3 - Washcoat	9.0	75.00%	0.0%	75.0%	0.0%	25.00%	2.190	6.75	6.75	14.78	354.78	129.49	5.40	27.00	75%
Booth 4 - SageGreen Primer-Sealer	10.6	44.74%	0.0%	44.7%	0.0%	55.30%	2.510	4.76	4.76	11.95	286.76	104.67	16.16	8.61	75%
Booth 5 -Glaze	7.9	68.79%	0.0%	68.8%	0.0%	30.80%	0.160	5.40	5.40	0.86	20.74	7.57	0.43	17.53	75%
Booth 6 -MidnightTide Enamel-Topcoat	8.3	46.80%	0.0%	47.8%	0.0%	46.00%	5.560	3.95	3.95	21.95	526.86	192.30	26.25	8.58	75%
<b>Line 2</b>															
Booth 1 -Espresso/NGR Stain	6.9	46.43%	0.0%	46.4%	0.0%	4.12%	3.280	3.19	3.19	10.46	251.10	91.65	13.22	77.42	75%
Booth 2 - Wheat Stain	6.9	99.42%	0.0%	99.4%	0.0%	52.00%	3.610	6.90	6.90	24.91	597.79	218.19	0.16	13.27	75%
Booth 3 - Washcoat	9.0	75.00%	0.0%	75.0%	0.0%	25.00%	2.190	6.75	6.75	14.78	354.78	129.49	5.40	27.00	75%
Booth 4 - SageGreen Primer-Sealer	10.6	44.74%	0.0%	44.7%	0.0%	55.30%	2.510	4.76	4.76	11.95	286.76	104.67	16.16	8.61	75%
Booth 5 -Glaze	7.9	68.79%	0.0%	68.8%	0.0%	30.80%	0.160	5.40	5.40	0.86	20.74	7.57	0.43	17.53	75%
Booth 6 -MidnightTide Enamel-Topcoat	8.3	46.80%	0.0%	47.8%	0.0%	46.00%	5.560	3.95	3.95	21.95	526.86	192.30	26.25	8.58	75%
<b>Line 3</b>															
Booth 1 -Espresso/NGR Stain	6.9	46.43%	0.0%	46.4%	0.0%	4.12%	3.280	3.19	3.19	10.46	251.10	91.65	13.22	77.42	75%
Booth 2 - Wheat Stain	6.9	99.42%	0.0%	99.4%	0.0%	52.00%	3.610	6.90	6.90	24.91	597.79	218.19	0.16	13.27	75%
Booth 3 - Washcoat	9.0	75.00%	0.0%	75.0%	0.0%	25.00%	2.190	6.75	6.75	14.78	354.78	129.49	5.40	27.00	75%
Booth 4 - SageGreen Primer-Sealer	10.6	44.74%	0.0%	44.7%	0.0%	55.30%	2.510	4.76	4.76	11.95	286.76	104.67	16.16	8.61	75%
Booth 5 -Glaze	7.9	68.79%	0.0%	68.8%	0.0%	30.80%	0.160	5.40	5.40	0.86	20.74	7.57	0.43	17.53	75%
Booth 6 -MidnightTide Enamel-Topcoat	8.3	46.80%	0.0%	47.8%	0.0%	46.00%	5.560	3.95	3.95	21.95	526.86	192.30	26.25	8.58	75%
<b>Specialty/Touch up Booth</b>															
Wheat	6.9	99.42%	0.0%	99.4%	0.0%	52.00%	3.610	6.90	6.90	24.91	597.79	218.19	0.16	13.27	75%

Note: The calculation was based on the worst coating for each type of material.  
Each line has six booths and each material type is applied in each respective booth. The tons/yr VOC emission was multiplied by 2 for using 2 guns.  
Panel filters will be installed for particulate overspray control with 97.1 % efficiency.

**State Potential Emissions** Add worst case coating to all solvents

<b>279.66</b>	<b>6711.88</b>	<b>2449.84</b>	<b>185.00</b>
	Controlled		<b>5.36</b>

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)  
Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)  
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)  
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)  
Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)  
Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)  
Total = Worst Coating + Sum of all solvents used