



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: May 1, 2006
RE: Hill Rom Inc. / 137-21681-00002
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

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

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

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

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

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

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

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

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

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

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Governor

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Mr. Steven Ball
Hill-Rom, Inc.
1069 State Route 46 East
Batesville, Indiana 47006

May 1, 2006

Re: 137-21681-00002
First Significant Permit Modification to
Part 70 Permit No. 137-17585-00002

Dear Mr. Ball:

Hill-Rom, Inc. was issued a Part 70 permit on March 18, 2004 for a stationary hospital bed and support furniture manufacturing operation. A letter requesting a modification to the Part 70 permit was received on June 20, 2005. The request by Hill-Rom, Inc. is to 1) replace the burners in the two (2) existing boilers, 2) remove certain emission units, 3) correct the exhaust stack IDs, and 4) incorporate federally enforceable limits on HAP emissions in order to obtain area source status under the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20, (40 CFR Part 63, Subpart RRRR (Surface Coating of Metal Furniture)).

Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document. All other conditions of the permit shall remain unchanged and in effect. Please find attached the revised Part 70 permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Adeel Yousuf, at (973) 575-2555, ext. 3252 or dial (800) 451-6027, and ask for extension 3-6878.

Sincerely,

Original Signed By:
Paul Dubenetzky, Assistant Commissioner
Office of Air Quality

Attachments

AY/EVP

cc: File – Ripley County
U.S. EPA, Region V
Ripley County Health Department
Air Compliance Section Inspector – Jennifer Dorn
Compliance Data Section
Administrative and Development
Technical Support and Modeling



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PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Hill-Rom, Inc.
1125 East Pearl Street
Batesville, Indiana 47006**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses National Emission Standards for Hazardous Air Pollutants for Surface Coating of Metal Furniture, 40 CFR 63, Subpart RRRR, promulgated on May 23, 2003 for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions.

Operation Permit No.: T137-17585-00002	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: March 18, 2004 Expiration Date: March 18, 2009

First Significant Permit Modification No.: 137-21681-00002	
Issued by: Original Signed By: Paul Dubenetzky, Assistant Commissioner Office of Air Quality	Issuance Date: May 1, 2006 Expiration Date: March 18, 2009

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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)]

The Permittee owns and operates a hospital bed and support furniture manufacturing operation.

Responsible Official: Mark Baron
Source Address: 1125 East Pearl Street, Batesville, IN 47006
Mailing Address: 1069 State Route 46 E, Batesville, IN 47006
SIC Code: 2599
County Location: Ripley
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD
Major Source, Section 112 of the Clean Air Act

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

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

- (a) One (1) metal coating spray booth using high volume low pressure (HVLPP) spray method, identified as EU 01, with a maximum capacity of 8 units per hour, using dry filters for overspray control, and exhausting to one (1) stack identified as 9423 EU01 EF1/6.
- (b) Wood surface coating operations, identified as EU 02, consisting of the following operations:
 - (1) One (1) wood chair surface coating line, identified as the 142 Chair line, consisting of the following:
 - (A) One (1) stain spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 7.5 units per hour, and exhausting through one (1) exhaust vent, identified as 98064 EU02 EF1;
 - (B) One (1) sanding sealer spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as 98065 EU02 EF2; and
 - (C) One (1) topcoat spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as 98066 EU02 EF3.
 - (2) One (1) wood chair surface coating line, identified as the 370 Chair line, consisting of the following:
 - (A) One (1) stain spray booth, using an air assisted spray application system, with dry filters for particulate matter overspray control, coating a maximum of 7.5 units per hour, and exhausting through one (1) exhaust vent,

- identified as 98021 EU02 EF4/3;
- (B) One (1) sanding sealer spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as 98020 EU02 EF5; and
 - (C) One (1) topcoat spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as 98022 EU02 EF6;
- (3) One (1) wood chair surface coating line, identified as the 125 Chair line, consisting of the following:
- (A) One (1) stain spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 7.5 units per hour, and exhausting through one (1) exhaust vent, identified as 9911 EU02 EF7;
 - (B) One (1) sanding sealer spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as 9910 EU02 EF8; and
 - (C) One (1) topcoat spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as 9909 EU02 EF9;
- (4) One (1) wood cabinet surface coating line, identified as the Cabinet line, consisting of the following:
- (A) One (1) stain spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 7.5 units per hour, and exhausting through one (1) exhaust vent, identified as 9940 EU02 EF10;
 - (B) One (1) combined sanding/sealer spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as 9941 EU02 EF11/12; and
 - (C) One (1) topcoat spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as 9941 EU02 EF11/12;
- (5) One (1) repair booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as 9939 EU02.
- (c) One (1) metal coating wet paint spray booth using high volume low pressure (HVLP) spray method, identified as EU 03, consisting of the following:

One (1) wet paint spray booth, with a maximum rating of 45 units per hour, using dry filters for overspray control and exhausting to one (1) stack 7083 EU03 EF3.

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

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

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment; [326 IAC 6-3-2]
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburning; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations; [326 IAC 6-3-2] and
- (c) Three (3) enclosed powder coat booths.[326 IAC 6-3-2]

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

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

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

SECTION B GENERAL CONDITIONS

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

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

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

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

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

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

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

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

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

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

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

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

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

-
- (a) The Permittee shall furnish to IDEM, OAQ a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

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

information in the document are true, accurate, and complete.

- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. 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.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted 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 46204-2251

and

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

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

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

**B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]**

- (a) The Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, for the source as described in 326 IAC 1-6-3. At a minimum, the PMPs shall include:
 - (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 46204-2251

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

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

B.11 Emergency Provisions [326 IAC 2-7-16]

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,

Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
 - (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance

Monitoring Report.

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

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ has issued the modifications. [326 IAC 2-7-12(c)(7)]

- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ has issued the modification. [326 IAC 2-7-12(b)(8)]

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

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

- (1) incorporated as originally stated,
- (2) revised, or
- (3) deleted

by this permit.

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

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

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

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

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

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

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

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

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

- (1) That this permit contains a material mistake.

- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-4]

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

B.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

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

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

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

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

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

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

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

B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

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

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

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

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

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

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

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

- (c) Emission Trades [326 IAC 2-7-20(c)]

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

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

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

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

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

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

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

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

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

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

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

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

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate

326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 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 unit vented to the control equipment is in operation.

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 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 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and

project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

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

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

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

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

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

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

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

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

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

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

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

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs)

consistent with safe operating February 3, 1999.

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

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

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

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

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records;
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;

- (2) monitor performance data, if applicable; and
- (3) corrective actions taken.

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

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred 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.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
[326 IAC 2-6]**

- (a) Pursuant to 326 IAC 2-6-3(b)(3), starting in 2006 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 46204-2251

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

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

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

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

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

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

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

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

SECTION D.1

FACILITY OPERATION CONDITIONS

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

One (1) metal coating spray booth using high volume low pressure (HVLP) spray method, identified as 01, with a maximum capacity of 8 units per hour, using dry filters for overspray control, and exhausting to one (1) stack identified as 9423 EU01 EF1/6.

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-6]

Pursuant to 326 IAC 8-2-6, (metal furniture coating operations), the volatile organic compound content of coatings applied to metal furniture or any metal component that is assembled into furniture products shall be limited to 3.0 pounds VOC per gallon of coating delivered to the applicator, less water.

D.1.2 Volatile Organic Compounds (VOC) [40 CFR 60.312 (Subpart EE)]

Pursuant to CP 137-3411, issued on May 12, 1994 and 40 CFR 60.312 (Subpart EE) (Surface Coating of Metal Furniture), the metal furniture coating operation shall not discharge into the air in excess of 0.9 kilograms of VOC per liter of coating solids (7.5 pounds VOC per gallon coating solids) applied.

D.1.3 Hazardous Air Pollutants (HAPs) [326 IAC 20] [40 CFR 63]

- (a) The amount of each individual HAP input to the surface coating operations identified as EU 01, EU 02 (listed in Section D.2) and EU 03 (listed in Section D.3), including coatings, dilution solvents and cleaning solvents shall be limited to less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

- (b) The amount of any combination of HAPs input to the surface coating operations identified as EU 01, EU 02 (listed in Section D.2) and EU 03 (listed in Section D.3), including coatings, dilution solvents and cleaning solvents shall be limited to less than 24.76 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with above conditions shall limit the source-wide single HAP and total HAPs emissions to less than 10 and 25 tons per twelve (12) consecutive month period, respectively. Therefore, requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20, (40 CFR Part 63, Subpart RRRR (Surface Coating of Metal Furniture)) do not apply.

D.1.4 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the metal coating spray booth operation shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1), (6)]

Compliance with the limit specified in Condition D.1.2 shall be determined by a performance test conducted in accordance with 40 CFR 60.313.

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3), 326 IAC 8-1-2(a) and 40 CFR 60.313 using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4 and 40 CFR 60.313.

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

D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack (9423 EU01 EF1/6), while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section

C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19] [40 CFR 60.315]

D.1.8 Record Keeping Requirements

- (a) To document compliance with conditions D.1.1, D.1.2, and D.1.3 the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits established in conditions D.1.1, D.1.2, and D.1.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC, individual HAP and total HAPs content of each coating material and solvent used less water.
 - (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 solvent.
 - (3) The volume weighted average VOC, individual HAP and total HAPs content of the coatings used for each month;
 - (4) The monthly cleanup solvent usage;
 - (5) The calculated pounds of VOC per gallon of coating, less water;
 - (6) The individual HAP and total HAPs usage for each month; and
 - (7) The weight of each individual HAP and total HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations and daily and monthly inspections.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.3(a) and (b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2

FACILITY OPERATION CONDITIONS

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

One (1) Wood surface coating operations, identified as EU 02, consisting of the following operations:

- (1) One (1) wood chair surface coating line, identified as the 142 Chair line, consisting of the following:
 - (A) One (1) stain spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 7.5 units per hour, and exhausting through one (1) exhaust vent, identified as 98064 EU02 EF1;
 - (B) One (1) sanding sealer spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as 98065 EU02 EF2; and
 - (C) One (1) topcoat spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as 98066 EU02 EF3.
- (2) One (1) wood chair surface coating line, identified as the 370 Chair line, consisting of the following:
 - (A) One (1) stain spray booth, using an air assisted spray application system, with dry filters for particulate matter overspray control, coating a maximum of 7.5 units per hour, and exhausting through one (1) exhaust vent, identified as 98021 EU02 EF4/3;
 - (B) One (1) sanding sealer spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as 98020 EU02 EF5; and

- (C) One (1) topcoat spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as 98022 EU02 EF6;
- (3) One (1) wood chair surface coating line, identified as the 125 Chair line, consisting of the following:
 - (A) One (1) stain spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 7.5 units per hour, and exhausting through one (1) exhaust vent, identified as 9911 EU02 EF7;
 - (B) One (1) sanding sealer spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as 9910 EU02 EF8; and
 - (C) One (1) topcoat spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as 9909 EU02 EF9;
- (4) One (1) wood cabinet surface coating line, identified as the Cabinet line, consisting of the following:
 - (A) One (1) stain spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 7.5 units per hour, and exhausting through one (1) exhaust vent, identified as 9940 EU02 EF10;
 - (B) One (1) sanding sealer spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as 9941 EU02 EF11/12; and
 - (C) One (1) topcoat spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as 9941 EU02 EF11/12;
- (5) One (1) repair booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as 9939 EU02.

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

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

D.2.2 Volatile Organic Compounds (326 IAC 8-2-12)

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

D.2.3 Hazardous Air Pollutants (HAPs) [326 IAC 20] [40 CFR 63]

- (a) The amount of each individual HAP input to the surface coating operations identified as EU 01 (listed in Section D.1), EU 02 and EU 03 (listed in Section D.3), including coatings, dilution solvents and cleaning solvents shall be limited to less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The amount of any combination of HAPs input to the surface coating operations identified as EU 01 (listed in Section D.1), EU 02 and EU 03 (listed in Section D.3), including coatings, dilution solvents and cleaning solvents shall be limited to less than 24.76 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with above conditions shall limit the source-wide single HAP and total HAPs emissions to less than 10 and 25 tons per twelve (12) consecutive month period, respectively. Therefore, requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20, (40 CFR Part 63, Subpart RRRR (Surface Coating of Metal Furniture)) do not apply.

D.2.4 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

- (a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (CFR 63, Subpart JJ).
- (b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:
 - (1) Limit the Volatile Hazardous Air Pollutant (VHAP) emissions from finishing operations as follows:
 - (a) Use compliance finishing materials in which all stains, washcoats, sealers,

topcoats, basecoats and enamels have a maximum VHAP content of eight-tenths (0.8) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight.

- (2) Limit VHAP emissions contact adhesives as follows:
 - (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed two-tenths (0.2) pound VHAP per pound solids.
 - (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed two-tenths (0.2) pound VHAP per pound solid.
 - (C) Use a control device to limit emissions.
- (3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

D.2.5 Work Practice Standards [40 CFR 63.803]

The owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

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

D.2.6 Particulate [326 IAC 6-3-2(d)]

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

Compliance Determination Requirements

D.2.7 Volatile Organic Compounds (VOC)

Compliance with the VOC limitations contained in Condition D.2.5 shall be determined by reviewing

the Certified Product Data Sheets for wood complaint coatings and thinner mixtures, prior to the purchase, to assure they comply with the limits in condition D.2.5.

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

D.2.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (98064 EU02 EF1, 98065 EU02 EF2, 98066 EU02 EF3, 98021 EU02 EF4/3, 98020 EU02 EF5, 98022 EU02 EF6, 9911 EU02 EF7, 9910 EU02 EF8, 9909 EU02 EF9, 9940 EU02 EF10, and 9941 EU02 EF11/12), while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.2.9 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limit established in Condition D.2.5.
 - (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
 - (2) The VHAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
 - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.
 - (4) The VHAP content in weight percent of each thinner used.
 - (5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (b) To document compliance with condition D.2.3, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the

HAP usage limits established in condition D.2.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (1) The individual HAP and total HAP content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (3) The individual HAP and total HAP usage for each month; and
 - (4) The weight of each individual HAP and total HAPs emitted for each compliance period.
- (c) To document compliance with Condition D.2.8, the Permittee shall maintain a log of weekly overspray observations and daily and monthly inspections.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.10 Reporting Requirements

- (a) A semi-annual Continuous Compliance Report to document compliance with Condition D.2.5 and the Certification form, shall be submitted within thirty (30) calendar days after the end of the each six (6) month period following the first report.
- (b) The reports required in (a) of this condition shall be submitted to:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE - 17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590
- (c) A quarterly summary of the information to document compliance with Condition D.2.3(a) and (b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.3

FACILITY OPERATION CONDITIONS

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

One (1) metal coating wet paint spray booth using high volume low pressure (HVLP) spray method, identified as EU 03, consisting of the following:

One (1) wet paint spray booth, with a maximum rating of 45 units per hour, using dry filters for overspray control and exhausting to one (1) stack 7083 EU03 EF3&6.

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

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

D.3.1 Hazardous Air Pollutants (HAPs) [326 IAC 20] [40 CFR 63]

- (a) The amount of each individual HAP input to the surface coating operations identified as EU 01 (listed in Section D.1), EU 02 (listed in Section D.2) and EU 03 shall be limited to less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The amount of any combination of HAPs input to the surface coating operations identified as EU 01 (listed in Section D.1), EU 02 (listed in Section D.2) and EU 03 shall be limited to

less than 24.76 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with above conditions shall limit the source-wide single HAP and total HAPs emissions to less than 10 and 25 tons per twelve (12) consecutive month period, respectively. Therefore, requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20, (40 CFR Part 63, Subpart RRRR (Surface Coating of Metal Furniture)) do not apply.

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

Pursuant to 326 IAC 6-3-2(d), particulate from two (2) metal coating wet paint spray booths operation shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

D.3.3 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (7083 EU03 EF3), while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

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

D.3.4 Record Keeping Requirements

- (a) To document compliance with Condition D.3.3, the Permittee shall maintain a log of weekly overspray observations and daily and monthly inspections.

- (b) To document compliance with condition D.3.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the HAP usage limits established in condition D.3.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The individual HAP and total HAP content of each coating material and solvent used.

- (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (3) The individual HAP and total HAP usage for each month; and
 - (4) The weight of each individual HAP and total HAPs emitted for each compliance period.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.5 Reporting Requirements

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Hill-Rom Inc.
Source Address: 1125 East Pearl Street, Batesville, IN 47006
Mailing Address: 1069 State Route 46 E, Batesville, IN 47006
Part 70 Permit No.: T137-17585-00002

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)

<p><input type="radio"/> Affidavit (specify)</p> <p><input type="radio"/> Other (specify)</p>

<p>I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.</p>
<p>Signature:</p>
<p>Printed Name:</p>
<p>Title/Position:</p>
<p>Phone:</p>
<p>Date:</p>

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Hill-Rom Inc.
Source Address: 1125 East Pearl Street, Batesville, IN 47006
Mailing Address: 1069 State Route 46 E, Batesville, IN 47006
Part 70 Permit No.: T137-17585-00002

This form consists of 2 pages

Page 1 of 2

<p><input type="radio"/> This is an emergency as defined in 326 IAC 2-7-1(12) <input type="checkbox"/> The Permittee must notify the Office of Air Quality (OAQ), within four (4) business</p>
--

C	hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7- 16.
---	--

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

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

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

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:

Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:

Title / Position:

Date:

Phone:

A certification is not required for this report.

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

**PART 70 OPERATING PERMIT
Semi-Annual Report**

VOC and VHAP Content - Wood Furniture NESHAP

Source Name: Hill-Rom Inc.
Source Address: 1125 East Pearl Street, Batesville, IN 47006
Mailing Address: 1069 State Route 46 E, Batesville, IN 47006
Part 70 Permit No.: T137-17585-00002
Facility: Wood Surface Coating Operation
Parameter: VOC and VHAPs Content- NESHAP
Limit: (1) Finishing operations -0.8 lb VHAP/lb Solids
(2) Thinners used for on-site formulation of washcoats, basecoats and enamels - 3% VHAP content by weight

- (3) All other thinner mixtures - 10% VHAP content by weight
- (4) Foam adhesives meeting the upholstered seating flammability requirements - 0.2 lb VHAP/lb Solids
- (5) All other contact adhesives - 0.2 lb VHAP/lb Solids
- (6) Strippable spray booth material - 0.8 pounds VOC per pound solids

YEAR: _____

Month	Finishing Operations (lb VHAP/lb Solid)	Thinners used for on-site formulation (% by weight)	All other thinner mixtures (% by weight)	Foam Adhesives (upholstered) (lb VHAP/lb Solid)	Contact adhesives (lb VHAP/lb Solid)	Strippable spray booth material (lb VOC/lb Solid)
1						
2						
3						
4						
5						
6						

- 9 No deviation occurred in this six month period.
- 9 Deviation/s occurred in this six month period.
Deviation has been reported on:

Submitted by:
Title/Position:

Signature: _____
Date:
Phone: _____

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

Part 70 Quarterly Report

Source Name:	Hill-Rom, Inc.
Source Address:	1125 East Pearl Street, Batesville, IN 47006
Mailing Address:	1069 State Route 46 E, Batesville, IN 47006
Part 70 Permit No.:	T137-17585-00002
Facility:	Surface Coating Operations (EU 01, EU 02, and EU 03)
Parameter:	Single HAP and total HAPs
Limit:	(a) The amount of each individual HAP input to the surface coating operations identified as EU 01 (listed in Section D.1), EU 02 (listed in Section D.2) and EU 03 (listed in Section D.3) shall be limited to

less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The amount of any combination of HAPs input to the surface coating operations identified as EU 01 (listed in Section D.1), EU 02 (listed in Section D.2) and EU 03 (listed in Section D.3) shall be limited to less 24.76 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR:

Month	Total Usage This Month (tons)		Total Usage Previous 11 Months (tons)		Total Usage 12 Months (tons)	
	Single HAP	Combined HAPs	Single HAP	Combined HAPs	Single HAP	Combined HAPs
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
 NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Hill-Rom Inc.
 Source Address: 1125 East Pearl Street, Batesville, IN 47006
 Mailing Address: 1069 State Route 46 E, Batesville, IN 47006
 Part 70 Permit No.: T137-17585-00002

This certification shall be included when submitting monitoring, testing reports/results

or other documents as required by this permit.

Report period

Beginning: _____

Ending: _____

Boiler Affected

Alternate Fuel

Days burning alternate fuel

From

To

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:

Date:

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

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

Source Name: Hill-Rom Inc.
Source Address: 1125 East Pearl Street, Batesville, IN 47006
Mailing Address: 1069 State Route 46 E, Batesville, IN 47006
Part 70 Permit No.: T137-17585-00002

Months: _____ to _____ Year: _____

Page 1 of 2

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

Page 2 of 2

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

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

Form Completed By:

Title/Position:

Date:

Phone:

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Significant Permit Modification to a Part 70 Operating Permit

Source Name:	Hill-Rom, Inc.
Source Location:	1125 East Pearl Street, Batesville, IN 47006
County:	Ripley
SIC Code:	2599
Operation Permit No.:	T137-17585-00002
Operation Permit Issuance Date:	March 18, 2004
Significant Permit Modification No.:	137-21681-00002
Permit Reviewer:	Adeel Yousuf / EVP

On December 21, 2005, the Office of Air Quality (OAQ) had a notice published in The Herald Tribune in Batesville, Ripley County, Indiana, stating that Hill-Rom, Inc. had applied for a Part 70 permit modification application is to 1) replace the two (2) existing boilers with two (2) heat exchangers, 2) remove certain emission units, 3) correct the exhaust stack IDs, and 4) incorporate federally enforceable limits on HAP emissions in order to obtain area source status under the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20, (40 CFR Part 63, Subpart RRRR (Surface Coating of Metal Furniture)). The notice also stated that OAQ proposed to issue source and permit modifications for this operation and provided information on how the public could review the proposed Part 70 modifications 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 modification should be issued as proposed.

On January 12, 2006, Steven R. Ball, of Hill-Rom, Inc. submitted comments on the proposed Part 70 permit modification. The summary of the comments and corresponding responses is as follows (bolded language has been added and the language with a line through it has been deleted):

Comment 1

Notice for Public Comment Page and Cover Letter

Please note that the two existing boilers were replaced with two natural gas fired heat exchangers. The language in both the first paragraph of the Public Notice page and the first paragraph of the Cover letter indicate that boilers remain in the facility, which is not accurate. The boilers were replaced with "natural gas fired burners." These should be further referenced as heat exchangers.

Response 1

IDEM, OAQ has noted that the two (2) existing boilers were replaced with the two (2) natural gas fired heat exchangers. There will be no change made to the public notice letter, however, these units are being removed from the permit since they qualify as insignificant activities and are not subject to any rules.

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

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

~~(d) Two (2) natural gas fired boilers, identified as 07, each with a maximum rating of 3.0 MMBtu per hour and exhausting to stack #7.~~

SECTION D.4 FACILITY OPERATION CONDITIONS

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

~~Two (2) natural gas fired boilers, identified as 07, each with a maximum rating of 3.0 MMBtu per hour and exhausting to stack #7.~~

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

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

~~D.4.1 Particulate Matter (PM) [326 IAC 6-2-3(3)(d)]~~

~~Pursuant to 326 IAC 6-2-3 (3)(d) (Particulate emission limitations for sources of indirect heating), the particulate matter emissions from the two (2) 3.0 MMBtu per hour natural gas boilers shall each be limited to 0.6 pounds per MMBTU.~~

Comment 2

Section A.1 General Information
Change Responsible Official to *Mark Baron*

Response 2

Section A.1 has been updated to change the responsible official as follows:

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

The Permittee owns and operates a hospital bed and support furniture manufacturing operation.

Responsible Official: ~~Anthony Orsini~~ **Mark Baron**

Comment 3

Section A.2 Emission Units and Pollution Control Equipment Summary

- Page 5 of 45, (a) Change 9423 EU01 EF1&6 to 9423 EU01 EF1/6
- Page 6 of 45, (b)(3)(A) Change 9911 EU02 EF4/3 to 9911 EU02 EF7
- Page 6 of 45, Please ADD as A.2(b)(5): "One (1) repair booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one(1) exhaust vent, identified as 9939 EU02."
- Page 7 of 45, (c) Change 7083 EU03 EF3&6 to 7083 EU03 EF3
- Page 7 of 45, (d) Change language to "Two (2) natural gas fired heat exchangers, identified as 07, each with a maximum rating of 3.0 MMBtu per hour and exhausting to two twelve (12) inch stacks identified as 2005067 and 2005068."

Response 3

One (1) repair booth used for wood surface coating is being added as per source's request. The source has confirmed that this is the repair booth for the wood surface coating operations and it has been present for several years. Although the emissions from this unit have been accounted for under EU02, it was never listed in the permit before.

Item (d) of Section A.2 listing two (2) natural gas fired boilers is being deleted since the source has confirmed that these units do not qualify as boilers but are only heat exchangers. Therefore, these units qualify as insignificant activities and are not subject to any rule.

All other requested changes have been incorporated in Section A.2 as follows:

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

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

- (a) One (1) metal coating spray booth using high volume low pressure (HVLP) spray method, identified as EU 01, with a maximum capacity of 8 units per hour, using dry filters for overspray control, and exhausting to one (1) stack identified as 9423 EU01 EF1&6.
- (b) Wood surface coating operations, identified as EU 02, consisting of the following operations:
 - ****
 - (3) One (1) wood chair surface coating line, identified as the 125 Chair line, consisting of the following:
 - (A) One (1) stain spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 7.5 units per hour, and exhausting through one (1) exhaust vent, identified as 9911 EU02 EF4/37;
 - ****
 - (5) One (1) repair booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as 9939 EU02.**
- (c) One (1) metal coating wet paint spray booths using high volume low pressure (HVLP) spray method, identified as EU 03, consisting of the following:
 - One (1) wet paint spray booth, with a maximum rating of 45 units per hour, using dry filters for overspray control and exhausting to one (1) stack 7083 EU03 EF3&6.
- ~~(d) Two (2) natural gas fired boilers, identified as 07, each with a maximum rating of 3.0 MMBtu per hour and exhausting to stack #7.~~

Comment 4

Section A.3 Specifically Regulated Insignificant Activities

- Page 7 of 45, (d) Change language to "Two (2) natural gas fired heat exchangers, identified as 07, each with a maximum rating of 3.0 MMBtu per hour and exhausting to two twelve (12) inch stacks identified as 2005067 and 2005068."

Response 4

As explained above under Response 3, item (d) listing two (2) natural gas boilers is being deleted since the units are actually heat exchangers which are not subject to any rules.

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

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

~~(d) Two (2) natural gas fired boilers, identified as 07, each with a maximum rating of 3.0 MMBtu per hour and exhausting to stack #7.~~

Comment 5

Section B.10 Preventative Maintenance Plan

- Page 9&10 of 45, B.10(c): *Hill-Rom, Inc. requests that clarification be made in this condition as to whether or not the requirement under the wood furniture MACT to have a Work Practice Implementation Plan (WPIP) would also satisfy the requirement to have a PMP.*

Response 5

Condition D.2.5 requiring Work Practice Implementation Plan (WPIP) is a federal requirement pursuant to 40 CFR 63.803 for wood surface coating operations. However, Condition B.10 (Preventive Maintenance Plan (PMP)) is a state requirement applicable to the entire facility and shall be prepared and maintained separately from WPIP. Each condition has separate requirements which do not coincide with each other.

Comment 6

- Page 26 of 45, Facility Description, Change 9423 EU01 EF1&6 to 9423 EU01 EF1/6

Response 6

Facility description in Section D.1 has been revised as follows:

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

One (1) metal coating spray booth using high volume low pressure (HVLP) spray method, identified as 01, with a maximum capacity of 8 units per hour, using dry filters for overspray control, and exhausting to one (1) stack identified as 9423 EU01 EF1&6.

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

Condition D.1.7 has been revised accordingly.

D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack (9423 EU01 EF1&6), while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

Comment 7

- Page 27& 28 of 45, Section D.1.8, Recordkeeping Requirements: Hill-Rom, Inc. would like to request that items (a)(3) and (a)(5) be removed from the permit as no coatings employed on this line are thinned on-site.

Response 7

Items (a)(3) and (5) of Condition D.1.8 are required to show compliance with Conditions D.1.1, D.1.2, and D.1.3 regardless of whether coatings are thinned or not. This requirement will stay in the permit in the event that coatings are thinned any time in the future. There are no changes to Condition D.1.8 as a result of this comment.

Comment 8

Section D.2 FACILITY OPERATION CONDITIONS

- Page 29 of 45, Facility Description, (3) Change 9911 EU02 EF4/3 to 9911 EU02 EF7
- Page 30 of 45, Facility Description, Please ADD: *“D.2(5) One (1) repair booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one(1) exhaust vent, identified as 9939 EU02.”*
- Page 32 of 45, Compliance Monitoring Requirements, D.2.8(a) Monitoring, Change 98022 EU02 EF 5 to 98022 EU02 EF6 and 9911 EU02 EF4/3 to 9911 EU02 EF 7

Response 8

Section D.2 has been revised as follows:

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

One (1) Wood surface coating operations, identified as EU 02, consisting of the following operations:

- (3) One (1) wood chair surface coating line, identified as the 125 Chair line, consisting of the following:
- (A) One (1) stain spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 7.5 units per hour, and exhausting through one (1) exhaust vent, identified as 9911 EU02 EF4/37;
- (B) One (1) sanding sealer spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as 9910 EU02 EF8; and

(C) One (1) topcoat spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as 9909 EU02 EF9;

(5) One (1) repair booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one(1) exhaust vent, identified as 9939 EU02.

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

Condition D.2.8 has been revised accordingly

D.2.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (98064 EU02 EF1, 98065 EU02 EF2, 98066 EU02 EF3, 98021 EU02 EF4/3, 98020 EU02 EF5, 98022 EU02 EF5~~6~~, 9911 EU02 EF4~~3~~⁷, 9910 EU02 EF8, 9909 EU02 EF9, 9940 EU02 EF10, and 9941 EU02 EF11/12), while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

Comment 9

Section D.3 FACILITY OPERATION CONDITIONS

- Page 35 of 45, Facility Description, Change 7083 EU03 EF3&6 to 7083 EU03 EF3
- Page 35 of 45, Compliance Monitoring Requirements, D.3.3(a) Monitoring, Change (7083 EU03 EF3&6) to 7083 EU03 EF3

Response 9

Section D.3 has been revised as follows:

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

One (1) metal coating wet paint spray booth using high volume low pressure (HVLP) spray method, identified as EU 03, consisting of the following:

One (1) wet paint spray booth, with a maximum rating of 45 units per hour, using dry filters for overspray control and exhausting to one (1) stack 7083 EU03 EF3~~&6~~³.

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

D.3.3 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (7083 EU03 EF3&63), while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

Comment 10

Section D.4 FACILITY OPERATION CONDITIONS

- Page 37 of 45, Facility Description, Change language to “Two (2) natural gas fired heat exchangers, identified as 07, each with a maximum rating of 3.0 MMBtu per hour and exhausting to two twelve (12) inch stacks identified as 2005067 and 2005068.”

Response 10

Entire Section D.4 has been deleted since the source has confirmed that there are no natural gas boilers at the source. The two (2) natural gas fired heat exchangers are not subject to the requirements of 326 IAC 6-2-3.

SECTION D.4 FACILITY OPERATION CONDITIONS

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

~~Two (2) natural gas fired boilers, identified as 07, each with a maximum rating of 3.0 MMBtu per hour and exhausting to stack #7.~~

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

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

~~D.4.1 Particulate Matter (PM) [326 IAC 6-2-3(3)(d)]~~

~~Pursuant to 326 IAC 6-2-3 (3)(d) (Particulate emission limitations for sources of indirect heating), the particulate matter emissions from the two (2) 3.0 MMBtu per hour natural gas boilers shall each be limited to 0.6 pounds per MMBTU.~~

Comment 11

TECHNICAL SUPPORT DOCUMENT

Background and Description of Proposed Modification

- Page 3 of 36, (2)(a) – Please change 9423 EU01 EF1&6 to 9423 EU01 EF1/6
- Page 4 of 36, (2)(b)(3)(A) – Please change 9911 EU02 EF4/3 to 9911 EU02 EF7
- Page 5 of 36, (2)(c) – Please change 7083 EU03 EF3&6 to 7083 EU03 EF3
- Page 5 of 36, (3) – Please change to the following language: “The two existing natural gas fired boilers (each rated at 10.5 MMBtu per hour) are being replaced with two new natural gas fired heat exchangers, each rated at 3.0 MMBtu per hour.”
- Page 5 of 36, (3) Insignificant Activities:

(d) Two (2) natural gas fired heat exchangers, identified as 07, each with a maximum rating of 3.0 MMBtu per hour and exhausting to two twelve (12) inch stacks identified as 2005067 and 2005068.

Response 11

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

Background and Description of Proposed Modification

(a) One (1) metal coating spray booth using high volume low pressure (HVLP) spray method, identified as EU 01, with a maximum capacity of 8 units per hour, using dry filters for overspray control, and exhausting to one (1) stack identified as 9423 EU01 EF1&6.

(3) One (1) wood chair surface coating line, identified as the 125 Chair line, consisting of the following:

(A) One (1) stain spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 7.5 units per hour, and exhausting through one (1) exhaust vent, identified as 9911 EU02 EF4/37;

(3) The two existing natural gas fired boilers (each rated at 10.5 MMBtu per hour) are being replaced with two new natural gas fired ~~boilers~~ **heat exchangers**, each rated at 3.0 MMBtu per hour. These new boilers qualify as insignificant activities.

Following are the new ~~boilers~~ **heat exchangers** listed under the insignificant activities.

Insignificant Activities:

(d) Two (2) natural gas fired ~~boilers~~ **heat exchangers**, identified as 07, each with a maximum rating of 3.0 MMBtu per hour and exhausting to stack #7.

Comment 12

Federal Rule Applicability Determination

- Page 7 of 36, (b), Change "The two (2) existing natural gas fired boilers ..." to "*the two (2) natural gas fired heat exchangers...*"

Response 12

The two (2) natural gas fired boilers are being deleted since the source has confirmed that these units do not qualify as boilers but are only heat exchangers. Therefore, these units qualify as insignificant activities and are not subject to any rule. The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Federal Rule Applicability Determination

- (b) The two (2) natural gas fired ~~boilers~~ **heat exchangers**, each with a maximum heat input capacity of 3.0 MMBtu per hour, are **not** subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD. ~~The two (2) boilers are part of the affected source for the small gaseous fuel subcategory, as defined by 40 CFR 63.7575, because they have a rated capacity of less than or equal to 10 million British thermal units per hour heat input. However, pursuant to 40 CFR 63.7506(c), there are no applicable requirements from 40 CFR 63, Subpart DDDDD and 40 CFR 63, Subpart A for the affected source for the small gaseous fuel subcategory.~~ **The two (2) heat exchangers do not qualify as boilers or process heaters, therefore the rule does not apply.**

Comment 13

Proposed Changes

- Page 10 of 36, (a) Change 9423 EU01 EF1&6 to *9423 EU01 EF1/6*
- Page 11 of 36, (b)(3)(A) Change 9911 EU02 EF4/3 to *9911 EU02 EF7*
- Page 12 of 36, Please ADD as A.2(b)(5): *“One (1) repair booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one(1) exhaust vent, identified as 9939 EU02.”*
- Page 12 of 36, (c) Change 7083 EU03 EF3&6 to *7083 EU03 EF3*
- Page 12 of 36, Section A.3, Specifically Regulated Insignificant Activities, (d) Change language to *“Two (2) natural gas fired heat exchangers, identified as 07, each with a maximum rating of 3.0 MMBtu per hour and exhausting to two twelve (12) inch stacks identified as 2005067 and 2005068.”*
- Page 12 of 36, Section D.1 FACILITY OPERATION CONDITIONS Facility Description, Change 9423 EU01 EF1&6 to *9423 EU01 EF1/6*
- Page 17 of 36, Section D.2 FACILITY OPERATION CONDITIONS, Facility Description, (3) Change 9911 EU02 EF4/3 to *9911 EU02 EF7*
- Page 17 of 36, ADD: *“D.2(5) One (1) repair booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one(1) exhaust vent, identified as 9939 EU02.”*
- Page 20 of 36, Section D.3 FACILITY OPERATION CONDITIONS, Facility Description, Change 7083 EU03 EF3&6 to *7083 EU03 EF3*
- Page 24 of 36, Section D.4, FACILITY OPERATION CONDITIONS, Facility Description, Change language to *“Two (2) natural gas fired heat exchangers, identified as 07, each with a maximum rating of 3.0 MMBtu per hour and exhausting to two twelve (12) inch stacks identified as 2005067 and 2005068.”*
- Page 24 of 36, Section D.1.7 (a), Monitoring, Change 9423 EU01 EF1&6 to *9423 EU01 EF1/6*
- Page 25 of 36, Section D.2.8 (a), Monitoring, Change 98022 EU02 EF5 to *98022 EU02 EF6* and 9911 EU02 EF4/3 to *9911 EU02 EF7*
- Page 26 of 36, Section D.3.3 (a), Monitoring, Change 7083 EU03 EF3&6 to *7083 EU03 EF3*

Response 13

All the above requested changes have already been made under previous responses above.

Upon further review, IDEM, OAQ has decided to make following changes in the permit.

1. Conditions D.1.3 and D.2.3 have been revised to list the accurate total HAPs limit which is consistent with the reporting form and Condition D.3.1.

D.1.3 Hazardous Air Pollutants (HAPs) [326 IAC 20] [40 CFR 63]

- (b) The amount of any combination of HAPs input to the surface coating operations identified as EU 01, EU 02 (listed in Section D.2) and EU 03 (listed in Section D.3), including coatings, dilution solvents and cleaning solvents shall be limited to less **than ~~25~~ 24.76** tons per twelve (12) consecutive month period with compliance determined at the end of each month.

D.2.3 Hazardous Air Pollutants (HAPs) [326 IAC 20] [40 CFR 63]

- (b) The amount of any combination of HAPs input to the surface coating operations identified as EU 01 (listed in Section D.1), EU 02 and EU 03 (listed in Section D.3), including coatings, dilution solvents and cleaning solvents shall be limited to less **than ~~25~~ 24.76** tons per twelve (12) consecutive month period with compliance determined at the end of each month.

2. Condition D.1.8 has been revised to list the correct reference to the Monitoring Condition (D.1.7).

D.1.8 Record Keeping Requirements

- (b) To document compliance with Condition D.1.~~8~~7, the Permittee shall maintain a log of weekly overspray observations and daily and monthly inspections.
- (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**

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

Source Description and Location

Source Name: Hill-Rom, Inc.
Source Location: 1125 East Pearl Street, Batesville, IN 47006
County: Ripley
SIC Code: 2599
Operation Permit No.: T137-17585-00002
Operation Permit Issuance Date: March 18, 2004
Permit Modification No.: 137-21681-00002
Permit Reviewer: Adeel Yousuf / EVP

Existing Approvals

The source was issued a Part 70 Operating Permit Renewal No. 137-17585-00002 on March 18, 2004. No other permit has been issued since the issuance of the Part 70 Operating Permit Renewal.

County Attainment Status

The source is located in Ripley County.

Pollutant	Status
PM10	Attainment
PM2.5	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

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

- (b) Ripley County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for 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 a surrogate for PM2.5 emissions.
- (c) Ripley County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Source Status

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

Pollutant	Emissions (tons/year)
PM	31.45
PM10	31.95
SO ₂	0.10
VOC	211.83
CO	7.70
NO _x	9.20

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) These emissions are based upon the Title V permit renewal (137-17585-00002) issued on March 18, 2004.

The table below summarizes the potential to emit HAPs for the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

HAP's	Potential To Emit (tons/year)
Single HAP	Greater than 10
Total HAPs	Greater than 25

This existing source is a major source of HAPs, as defined in 40 CFR 63.41, because HAP emissions are greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

Actual Emissions

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

Pollutant	Actual Emissions (tons/year)
PM	0.00
PM10	0.00
SO ₂	0.00
VOC	33.0
CO	1.0
NO _x	3.0
HAP (specify)	Not reported

Background and Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a permit modification application, submitted by Hill-Rom, Inc. on August 25, 2005, relating to a request for a permit modification to incorporate federally enforceable limits on HAP emissions in order to obtain area source status under the National Emissions Standard for Hazardous Air Pollutants (NESHAP) to render the requirements of 40 CFR 63, Surface Coating of Metal Furniture (Subpart RRRR) not applicable. In addition, the source is requesting to replace the two existing natural gas fired boilers with two new insignificant natural gas fired boilers and correct the stack IDs for several units. Following is a list of modifications:

- (1) Source wide single HAP and total HAPs emissions including metal coating operations (EU 01 and EU 03) and wood surface coating operation (EU 02) shall be limited to less than 10 and 25 tons per year, respectively. The limit on HAPs will render the requirements of 40 CFR 63, Surface Coating of Metal Furniture (Subpart RRRR) not applicable to this source.
- (2) Following are the revisions to the existing emission units at the source including the removal of emission units, change in description of the unit and corrections in stack IDs.
 - (a) One (1) metal coating spray booth using high volume low pressure (HVLP) spray method, identified as EU 01, with a maximum capacity of 8 units per hour, using dry filters for overspray control, and exhausting to **one (1) stacks #1 and #6 identified as 9423 EU01 EF1&6.**
 - (b) Wood surface coating operations, identified as EU 02, consisting of the following operations:
 - (1) One (1) wood chair surface coating line, identified as the 142 Chair line, consisting of the following:
 - (A) One (1) stain spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 7.5 units per hour, and exhausting through one (1) exhaust vent, identified as **98064 EU02 EF1 EF-4;**

- (B) One (1) sanding sealer spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as **98065 EU02 EF2 EF-2**; and
 - (C) One (1) topcoat spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as **98066 EU02 EF3 EF-3**.
- (2) One (1) wood chair surface coating line, identified as the 370 Chair line, consisting of the following:
- (A) One (1) stain spray booth, using an air assisted spray application system, with dry filters for particulate matter overspray control, coating a maximum of 7.5 units per hour, and exhausting through one (1) exhaust vent, identified as **98021 EU02 EF4/3 EF-4-3**;
 - (B) One (1) sanding sealer spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as **98020 EU02 EF5 EF-5**; and
 - (C) One (1) topcoat spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as **98022 EU02 EF6 EF-6**;
- (3) One (1) wood chair surface coating line, identified as the 125 Chair line, consisting of the following:
- (A) One (1) stain spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 7.5 units per hour, and exhausting through one (1) exhaust vent, identified as **9911 EU02 EF4/3 EF-7**;
 - (B) One (1) sanding sealer spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as **9910 EU02 EF8 EF-8**; and
 - (C) One (1) topcoat spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as **9909 EU02 EF9 EF-9**;
- (4) One (1) wood cabinet surface coating line, identified as the Cabinet line, consisting of the following:
- (A) One (1) stain spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 7.5 units per hour, and exhausting through one (1) exhaust vent, identified as **9940**

EU02 EF10 EF-10;

- (B) One (1) **combined** sanding/sealer spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as **9941 EU02 EF11/12 EF-11;** and
- (C) One (1) topcoat spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as **9941 EU02 EF11/12 EF-12;**

~~(5) One (1) router, processing a maximum of 4 units per hour on the Cabinet line, with a dust collector for particulate matter control, exhausting through (1) stack, identified as S/V-2; and~~

~~(6) One (1) 4" stoke sander, processing a maximum of 1 unit per hour, with a dust collector for particulate matter control, exhausting through one (1) stack, identified as S/V-2.~~

- (c) ~~Two~~ **One (21)** metal coating wet paint spray booths using high volume low pressure (HVLP) spray method, identified as EU 03, consisting of the following:

- (1) One (1) wet paint spray booth, with a maximum rating of 45 units per hour, using dry filters for overspray control and exhausting to **one (1)** stacks **7083 EU03 EF3&6 #3 and #6.**

~~(2) One (1) wet paint spray booth, with a maximum rating of 1200 units per hour, using dry filters for overspray control and exhausting to stacks 7083 EU03 EF3&6 #3 and #6.~~

- (3) The two existing natural gas fired boilers (each rated at 10.5 MMBtu per hour) are being replaced with two new natural gas fired boilers, each rated at 3.0 MMBtu per hour. These new boilers qualify as insignificant activities.

~~(d) Two (2) natural gas fired boilers, identified as 07, with a maximum rating of 10.5 MMBtu per hour each and exhausting to stack #7.~~

Following are the new boilers listed under the insignificant activities.

Insignificant Activities:

- (d) **Two (2) natural gas fired boilers, identified as 07, each with a maximum rating of 3.0 MMBtu per hour and exhausting to stack #7.**

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

Permit Level Determination – Part 70

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit 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, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. 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	0.20
PM10	0.20
SO ₂	0.02
VOC	0.14
CO	2.21
NO _x	2.63

HAPs	Potential To Emit (tons/year)
Hexane	Negligible
TOTAL	Negligible

Pollutant	PTE Before Modification For the Source (tons/year) *	PTE For This Modification	PTE After Modification For the Source (tons/year)
PM	31.45 31.25	0.20	31.45
PM10	31.95 31.25	0.20	31.45
SO ₂	0.10 0.00	0.02	0.02
VOC	211.83 211.33	0.14	211.47
CO	7.70 0.00	2.21	2.21
NO _x	9.20 0.00	2.63	2.63
HAPs	Single HAP > 10 Total HAPs >25	Negligible	Single HAP > 10 Total HAPs >25

* PTE before modification for the entire source reflects the subtracted emissions from the old boilers, each rated at 10.5 MMBtu per hour. These boilers are being replaced with two new boilers with heat input rating of 3.0 MMBtu per hour each.

This modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d)(1) for a request that does not qualify as a minor permit modification or administrative amendment, and is considered as a significant change to existing permit terms and conditions, including record keeping and reporting.

The source modification is not required since the new boilers qualify as insignificant activities and pursuant to 326 IAC 2-7-10.5(d)(3), this modification results in a potential to emit for each regulated pollutant that is less than or equal to less than five (5) tons per year of PM/PM10, ten (10) tons per year of SO₂/NO_x/VOC and twenty-five (25) tons per year of CO.

Permit Level Determination – PSD or Emission Offset

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

Process/Emission Unit	Potential to Emit (tons/year)						
	PM	PM10	SO ₂	VOC	CO	NO _x	HAPs
Insignificant Activity (Two natural gas fired boilers)	0.20	0.20	0.02	0.14	2.21	2.63	Negligible
Total for Modification	0.20	0.20	0.02	0.14	2.21	2.63	Negligible
PSD Significant Levels	250	250	250	250	250	250	N/A

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

- (a) The requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc) do not apply to the two (2) natural gas fired boilers, identified as EU04, each with a maximum heat input capacity of 3.0 MMBtu per hour because each boiler's capacity is less than the rule applicability threshold of 10 MMBtu per hour.
- (b) The two (2) natural gas fired boilers, each with a maximum heat input capacity of 3.0 MMBtu per hour, are subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD. The two (2) boilers are part of the affected source for the small gaseous fuel subcategory, as defined by 40 CFR 63.7575, because they have a rated capacity of less than or equal to 10 million British thermal units per hour heat input. However, pursuant to 40 CFR 63.7506(c), there are no applicable requirements from 40 CFR 63, Subpart DDDDD and 40 CFR 63, Subpart A for the affected source for the small gaseous fuel subcategory.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20, (40 CFR Part 63, Subpart RRRR (Surface Coating of Metal Furniture)) are not included in this permit because this source is not a major source of HAP. The source has chosen to limit the source wide emissions of any combination of HAPs and any single HAP to less than 25 and 10 tons per twelve (12) consecutive month period, respectively.
- (d) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified emission units that involve a pollutant-specific emission unit and meet the

following criteria:

- (1) has a potential to emit before or after controls equal to or greater than the major source threshold for the pollutant involved;
- (2) is subject to an emission limitation or standard for that pollutant; and
- (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

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

Emission Unit	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Two boilers (EU04) PM10	None	N	0.20	0.20	100	N	N
Two boilers (EU04) SO ₂	None	N	0.02	0.02	100	N	N
Two boilers (EU04) NOx	None	N	2.63	2.63	100	N	N
Two boilers (EU04) VOC	None	N	0.14	0.14	100	N	N
Two boilers (EU04) CO	None	N	2.21	2.21	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to any of the new units as part of this modification.

State Rule Applicability Determination

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

This source is not subject to this rule because potential uncontrolled emissions of all criteria pollutants are less than 250 tons per year. This source is also not one of the 28 listed source categories. This modification to an existing minor stationary source is not major because the emissions increase is less than the applicable PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

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

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any source that constructs or reconstructs a major source of HAPs, which has the potential to emit (PTE) 10 tons per year of any single HAP or 25 tons per year of any combination of HAPs, must control emissions from that source using technologies consistent with the Maximum Achievable Control Technology (MACT). This source has elected to take a limit on single HAP and total HAP emissions of less than 10 and 25 tons per year, respectively, therefore, this rule does not apply.

The operation of the two (2) natural gas fired boilers will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 8-1-6 (General Reduction Requirements)

The requirements of 326 IAC 8-1-6 apply to facilities constructed after January 1, 1980 which have the potential to emit 25 tons per year or more of VOC and are not regulated by any other provisions of 326 IAC 8. The two (2) natural gas fired boilers, each has the potential to emit less than 25 tons of VOC per year, therefore, 326 IAC 8-1-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

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

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

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially. The first report is due no later than July 1, 2006, and subsequent reports are due every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 20 (National Emission Standards for Hazardous Air Pollutants)

Pursuant to 326 IAC 20 and 40 CFR 63,

- (a) The amount of each individual HAP input to the surface coating operations (EU 01, EU 02 and EU 03) shall be limited to less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The amount of any combination of HAPs input to the surface coating operations (EU 01, EU 02, and EU 03) shall be limited to less than 24.76 tons per twelve (12) consecutive month period with compliance determined at the end of each month (24.76 + 0.14 tons per year from insignificant activities < 25).

Compliance with above conditions shall limit the source-wide single HAP and total HAPs emissions to less than 10 and 25 tons per twelve (12) consecutive month period, respectively. Therefore, the requirements of 326 IAC 20 and 40 CFR 63 (NESHAP) do not apply.

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

The two (2) natural gas fired boilers (EU 04), each rated at 3.0 MMBtu/hr, installed in 2005 are subject to the particulate matter limitations of 326 IAC 6-2-4. Pursuant to this rule, particulate emissions from indirect heating facilities constructed after September 21, 1983, shall be limited by the following equation:

$$Pt = 1.09/Q^{0.26}$$

where: Pt = maximum allowable particulate matter (PM) emitted per MMBtu heat input
Q = total source max. operation capacity rating = 3.0 + 3.0 = 6.0 MMBtu/hr

$$Pt = 1.09/6.0^{0.26} = 0.684 \text{ lbs PM/MMBtu}$$

However, pursuant to 326 IAC 6-2-4(a), because the maximum heat input capacity is less than 10 MMBtu/hr, the two (2) boilers are limited to emissions of less than 0.6 lbs PM/MMBtu.

compliance calculation:

Potential PM emissions for the two boilers = 1.9 lb PM/MMCF * (1/1000) (MMCF/MMBtu) = 0.0019

lbs PM/MMBtu

Potential PM emissions for the two boilers (0.0019 lbs PM/MMBtu) are less than the allowable 0.60 lbs PM/MMBtu, therefore the boilers are capable of complying with the requirements of 326 IAC 6-2-4.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance determination requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also 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.

There are no new compliance monitoring requirements applicable to this source.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. 137-17585-00002. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

1. Section A.2 has been revised to list the correct information about the emission units.

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

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

- (a) One (1) metal coating spray booth using high volume low pressure (HVLP) spray method, identified as EU 01, with a maximum capacity of 8 units per hour, using dry filters for overspray control, and exhausting to **one (1) stacks #1 and #6 identified as 9423 EU01 EF1&6.**
- (b) Wood surface coating operations, identified as EU 02, consisting of the following operations:
 - (1) One (1) wood chair surface coating line, identified as the 142 Chair line, consisting of the following:
 - (A) One (1) stain spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 7.5 units per hour, and exhausting through one (1) exhaust vent, identified as **98064 EU02 EF1 EF-4;**

- (B) One (1) sanding sealer spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as **98065 EU02 EF2 EF-2**; and
 - (C) One (1) topcoat spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as **98066 EU02 EF3 EF-3**.
- (2) One (1) wood chair surface coating line, identified as the 370 Chair line, consisting of the following:
- (A) One (1) stain spray booth, using an air assisted spray application system, with dry filters for particulate matter overspray control, coating a maximum of 7.5 units per hour, and exhausting through one (1) exhaust vent, identified as **98021 EU02 EF4/3 EF-4-3**;
 - (B) One (1) sanding sealer spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as **98020 EU02 EF5 EF-5**; and
 - (C) One (1) topcoat spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as **98022 EU02 EF6 EF-6**;
- (3) One (1) wood chair surface coating line, identified as the 125 Chair line, consisting of the following:
- (A) One (1) stain spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 7.5 units per hour, and exhausting through one (1) exhaust vent, identified as **9911 EU02 EF4/3 EF-7**;
 - (B) One (1) sanding sealer spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as **9910 EU02 EF8 EF-8**; and
 - (C) One (1) topcoat spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as **9909 EU02 EF9 EF-9**;
- (4) One (1) wood cabinet surface coating line, identified as the Cabinet line, consisting of the following:
- (A) One (1) stain spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 7.5 units per hour, and

exhausting through one (1) exhaust vent, identified as **9940 EU02 EF10 EF-10**;

- (B) One (1) **combined** sanding/sealer spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as **9941 EU02 EF11/12 EF-11**; and
- (C) One (1) topcoat spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as **9941 EU02 EF11/12 EF-12**;

~~(5) One (1) router, processing a maximum of 4 units per hour on the Cabinet line, with a dust collector for particulate matter control, exhausting through (1) stack, identified as S/V-2; and~~

~~(6) One (1) 4" stoke sander, processing a maximum of 1 unit per hour, with a dust collector for particulate matter control, exhausting through one (1) stack, identified as S/V-2.~~

(c) ~~Two~~ **One (21)** metal coating wet paint spray booths using high volume low pressure (HVLP) spray method, identified as EU 03, consisting of the following:

(1) One (1) wet paint spray booth, with a maximum rating of 45 units per hour, using dry filters for overspray control and exhausting to **one (1)** stacks ~~7083 EU03 EF3&6 #3 and #6~~.

~~(2) One (1) wet paint spray booth, with a maximum rating of 1200 units per hour, using dry filters for overspray control and exhausting to stacks 7083 EU03 EF3&6 #3 and #6.~~

~~(d) Two (2) natural gas fired boilers, identified as 07, with a maximum rating of 10.5 MMBtu per hour each and exhausting to stack #7.~~

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

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

(d) Two (2) natural gas fired boilers, identified as 07, each with a maximum rating of 3.0 MMBtu per hour and exhausting to stack #7.

2. Section D.1 has been revised to list the correct stack ID.

SECTION D.1

FACILITY OPERATION CONDITIONS

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

One (1) metal coating spray booth using high volume low pressure (HVLP) spray method, identified as EU 01, with a maximum capacity of 8 units per hour, using dry filters for overspray control, and exhausting to **one (1)** stacks ~~#1 and #6~~ **identified as 9423 EU01 EF1&6**.

(The information describing the process contained in this facility description box is descriptive

information and does not constitute enforceable conditions.)

3. The 326 IAC 6-3 revisions that became effective on June 12, 2002 were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP; therefore, the requirements of the previous version of 326 IAC 6-3-2 are no longer applicable to this source. Condition D.1.3 which contained these requirements has been removed.

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

~~Pursuant to 40 CFR 52 Subpart P, the PM from the metal coating spray booth, 01, 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:~~

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

4. Condition D.1.3 has been added to include the HAPs limit for the source.

D.1.3 Hazardous Air Pollutants (HAPs) [326 IAC 20] [40 CFR 63]

- (a) **The amount of each individual HAP input to the surface coating operations identified as EU 01, EU 02 (listed in Section D.2) and EU 03 (listed in Section D.3), including coatings, dilution solvents and cleaning solvents shall be limited to less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month.**
- (b) **The amount of any combination of HAPs input to the surface coating operations identified as EU 01, EU 02 (listed in Section D.2) and EU 03 (listed in Section D.3), including coatings, dilution solvents and cleaning solvents shall be limited to less 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.**

Compliance with above conditions shall limit the source-wide single HAP and total HAPs emissions to less than 10 and 25 tons per twelve (12) consecutive month period, respectively. Therefore, requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20, (40 CFR Part 63, Subpart RRRR (Surface Coating of Metal Furniture)) do not apply.

5. The requirements of 40 CFR Part 63 (Subpart RRRR) have been removed from the permit.

~~D.1.5 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A]~~

~~(a) The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the metal coating spray booth coating metal furniture, as designated by 40 CFR 63.4882 (b), except when otherwise specified in 40 CFR 63 Subpart RRRR. The Permittee must comply with these requirements on and after May 23, 2003.~~

~~(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.~~

~~D.1.6 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Metal~~

~~Furniture [40 CFR Part 63, Subpart RRRR] [40 CFR 63.4881] [40 CFR 63.4882]~~

- (a) ~~The affected source, the facility-wide collection of surface coating of metal furniture units that are associated with coating metal furniture described in 40 CFR 63.4881(a)(1), storage containers and mixing vessels, manual and automated equipment, and all storage containers pumps, and piping that are associated with the operations described in 40 CFR 63.4882 (b) (2) through (b) (4), is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Metal Furniture (40 CFR 63, Subpart RRRR), effective May 23, 2003. Pursuant to this rule, the Permittee must comply with 40 CFR 63, Subpart RRRR on and after May 23, 2006, or accept and meet an enforceable HAP emissions limit below the major source threshold prior to three years after the effective date of the rule. Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.~~
- (b) ~~The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart RRRR:~~
- (1) ~~One (1) metal coating spray booth using high volume low pressure (HVLP) spray method, identified as EU 01.~~
- (2) ~~The definitions of 40 CFR 63, Subpart RRRR at 40 CFR 63.4981 are applicable to the affected source.~~

6. The Record Keeping Requirements Condition has been revised to include record keeping for HAPs. In addition, the record keeping frequency is being revised from daily to monthly since the source uses all the compliant coatings. This has been confirmed with the source.

~~D.1.148~~ Record Keeping Requirements

- (a) To document compliance with conditions D.1.1, ~~and~~ D.1.2, **and D.1.3** the Permittee shall maintain records in accordance with (1) through (57) below. Records maintained for (1) through (57) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC **and HAP** usage limits established in conditions D.1.1, ~~and~~ D.1.2, **and D.1.3**. **Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.**
- (1) The VOC, **individual HAP and total HAPs** content of each coating material and solvent used less water.
- (2) The amount of coating material and solvent used on ~~daily~~ **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 solvent.
- (3) The volume weighted average VOC, **individual HAP and total HAPs** content of the coatings used for each ~~day~~ **month**;

- (4) The ~~daily~~ **monthly** cleanup solvent usage; ~~and~~
- (5) The calculated pounds of VOC per gallon of coating, less water;
- (6) The individual HAP and total HAPs usage for each month; and**
- (7) The weight of each individual HAP and total HAPs emitted for each compliance period.**

- (b) To document compliance with Condition D.1.408, the Permittee shall maintain a log of weekly overspray observations, **and** daily and monthly inspections, ~~and these 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.

7. The requirements of 40 CFR Part 63 (Subpart RRRR) have been removed from the permit.

~~D.1.12 National Emissions Standards for Hazardous Air Pollutants for Surface Coating of Metal Furniture - Notification Requirements [40 CFR 63, Subpart RRRR]~~

- ~~(a) Pursuant to 40 CFR 63.4910(a), the Permittee shall submit the notifications in 40 CFR 63.7(b) and (c), 63.8 (f)(4) and 63.9(b) through (e), (h), and (j) that apply to the metal coating spray booth and chosen compliance method by the dates specified.~~
- ~~(b) Pursuant to 40 CFR 63.4910(b), the Permittee shall submit Initial Notification containing the information specified in 40 CFR 63.9(b) no later than 1 year after the effective date of 40 CFR 63, Subpart RRRR.~~
- ~~(c) Pursuant to 40 CFR 63.4910(c), the Permittee shall submit a notification of compliance status required by 40 CFR 63.9 (h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4940 or 40 CFR 63.4950 that applies to the metal coating spray booth. The notification of compliance status report shall contain the information specified in paragraphs (c) (1) through (9) of 40 CFR 63.4910.~~
- ~~(d) The notifications required by paragraphs (a) through (c) shall be submitted to:~~

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

~~and~~

~~United States Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604-3590~~

~~D.1.13 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]~~

~~The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Title V permit.~~

- ~~(a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart RRRR, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.~~
- ~~(b) The significant permit modification application shall be submitted no later than August 23, 2005.~~
- ~~(c) The significant permit modification application shall be submitted to:~~

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

8. A new reporting condition has been added requiring HAPs usage reporting.

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.3(a) and (b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

9. Section D.2 has been revised to list the correct emission unit stack IDs.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

One (1) Wood surface coating operations, **identified as EU 02**, consisting of the following operations:

- (1) One (1) wood chair surface coating line, identified as the 142 Chair line, consisting of the following:
 - (A) One (1) stain spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 7.5 units per hour, and exhausting through one (1) exhaust vent, identified as **98064 EU02 EF1 EF-4**;
 - (B) One (1) sanding sealer spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as

- 98065 EU02 EF2 EF-2**; and
- (C) One (1) topcoat spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as **98066 EU02 EF3 EF-3**.
- (2) One (1) wood chair surface coating line, identified as the 370 Chair line, consisting of the following:
- (A) One (1) stain spray booth, using an air assisted spray application system, with dry filters for particulate matter overspray control, coating a maximum of 7.5 units per hour, and exhausting through one (1) exhaust vent, identified as **98021 EU02 EF4/3 EF-4-3**;
 - (B) One (1) sanding sealer spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as **98020 EU02 EF5 EF-5**; and
 - (C) One (1) topcoat spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as **98022 EU02 EF6 EF-6**;
- (3) One (1) wood chair surface coating line, identified as the 125 Chair line, consisting of the following:
- (A) One (1) stain spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 7.5 units per hour, and exhausting through one (1) exhaust vent, identified as **9911 EU02 EF4/3 EF-7**;
 - (B) One (1) sanding sealer spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as **9910 EU02 EF8 EF-8**; and
 - (C) One (1) topcoat spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as **9909 EU02 EF9 EF-9**;
- (4) One (1) wood cabinet surface coating line, identified as the Cabinet line, consisting of the following:
- (A) One (1) stain spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 7.5 units per hour, and exhausting through one (1) exhaust vent, identified as **9940 EU02 EF10 EF-10**;
 - (B) One (1) sanding sealer spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as **9941 EU02 EF11/12 EF-11**; and
 - (C) One (1) topcoat spray booth, using an air assisted airless spray application system, with dry filters for particulate matter overspray control, coating a maximum of 16.25 units per hour, and exhausting through one (1) exhaust vent, identified as **9941 EU02 EF11/12 EF-12**;
- (5) ~~One (1) router, processing a maximum of 4 units per hour on the Cabinet line, with a dust collector for particulate matter control, exhausting through (1) stack, identified as SA-2 and;~~
- (6) ~~One (1) 4" stoke sander, processing a maximum of 1 unit per hour, with a dust collector for particulate matter control, exhausting through one (1) stack, identified as SA-2.~~

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

10. The 326 IAC 6-3 revisions that became effective on June 12, 2002 were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP; therefore, the requirements of the previous version of 326 IAC 6-3-2 are no longer applicable to this source. Condition D.2.3 which contained these requirements has been removed.

~~D.2.3 Particulate Matter (PM) [40 CFR 52 Subpart P]~~

~~Pursuant to CP 137-9710, issued on August 6, 1998, and 40 CFR 52 Subpart P, the PM emissions from each of the twelve (12) wood surface coating booths 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:~~

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

11. Condition D.2.3 has been added to include the HAPs limit for the source.

D.2.3 Hazardous Air Pollutants (HAPs) [326 IAC 20] [40 CFR 63]

- (a) **The amount of each individual HAP input to the surface coating operations identified as EU 01 (listed in Section D.1), EU 02 and EU 03 (listed in Section D.3), including coatings, dilution solvents and cleaning solvents shall be limited to less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month.**
- (b) **The amount of any combination of HAPs input to the surface coating operations identified as EU 01 (listed in Section D.1), EU 02 and EU 03 (listed in Section D.3), including coatings, dilution solvents and cleaning solvents shall be limited to less 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.**

Compliance with above conditions shall limit the source-wide single HAP and total HAPs emissions to less than 10 and 25 tons per twelve (12) consecutive month period, respectively. Therefore, requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20, (40 CFR Part 63, Subpart RRRR (Surface Coating of Metal Furniture)) do not apply.

12. Condition D.2.4 has been deleted due to the removal of emission units.

~~D.2.4 326 IAC 6-3-2 (Particulate Emissions Limitations for Manufacturing Processes)~~

~~Pursuant to 326 IAC 6-3-2 (Particulate Emissions Limitations for Manufacturing Processes), the allowable particulate emission from the woodworking operation, including the router and sander, shall not exceed 0.86 pounds per hour when operating at a process weight rate of 0.098 tons per hour.~~

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

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

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

13. The Record Keeping Requirements Condition has been revised to include record keeping for HAPs.

D.2.419 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limit established in Condition D.2.5.
- (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
 - (2) The VHAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
 - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.
 - (4) The VHAP content in weight percent of each thinner used.
 - (5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (b) **To document compliance with condition D.2.3, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the HAP usage limits established in condition D.2.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.**
- (1) **The individual HAP and total HAP content of each coating material and solvent used.**
 - (2) **The amount of coating material and solvent less water used on monthly basis.**
 - (A) **Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.**
 - (B) **Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;**
 - (3) **The individual HAP and total HAP usage for each month; and**
 - (4) **The weight of each individual HAP and total HAPs emitted for each compliance period.**

- (bc) To document compliance with Condition D.2.40 **8**, the Permittee shall maintain a log of weekly overspray observations, **and** daily and monthly inspections., ~~and these additional inspections prescribed by the Preventive Maintenance Plan.~~
- (ed) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

14. A new reporting requirement has been added requiring HAPs usage reporting.

D.2.120 Reporting Requirements

(a) A semi-annual Continuous Compliance Report to document compliance with Condition D.2.5 and the Certification form, shall be submitted within thirty (30) calender days after the end of the each six (6) month period following the first report.

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015-2251

and

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

(c) **A quarterly summary of the information to document compliance with Condition D.2.3(a) and (b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

15. Section D.3 has been revised to list the correct information about the emission units.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

~~The~~ **One** (21) metal coating wet paint spray booths using high volume low pressure (HVLP) spray method, identified as EU 03, consisting of the following:

- (1) One (1) wet paint spray booth, with a maximum rating of 45 units per hour, using dry filters for overspray control and exhausting to **one (1) stacks 7083 EU03 EF3&6 #3 and #6.**
- (2) ~~One (1) wet paint spray booth, with a maximum rating of 1200 units per hour, using dry filters for overspray control and exhausting to stacks 7083 EU03 EF3&6 #3 and #6.~~

(The information describing the process contained in this facility description box is descriptive

information and does not constitute enforceable conditions.)

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

~~D.3.1 Particulate Matter (PM) [40 CFR 52 Subpart P]~~

~~Pursuant to 40 CFR 52 Subpart P, the PM from the two (2) metal coating booths, EU 03, 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:~~

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

16. Condition D.3.1 has been added to include the HAPs limit for the source.

D.3.1 Hazardous Air Pollutants (HAPs) [326 IAC 20] [40 CFR 63]

- (a) **The amount of each individual HAP input to the surface coating operations identified as EU 01 (listed in Section D.1), EU 02 (listed in Section D.2) and EU 03 shall be limited to less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month.**
- (b) **The amount of any combination of HAPs input to the surface coating operations identified as EU 01 (listed in Section D.1), EU 02 (listed in Section D.2) and EU 03 shall be limited to less 24.76 tons per twelve (12) consecutive month period with compliance determined at the end of each month.**

Compliance with above conditions shall limit the source-wide single HAP and total HAPs emissions to less than 10 and 25 tons per twelve (12) consecutive month period, respectively. Therefore, requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20, (40 CFR Part 63, Subpart RRRR (Surface Coating of Metal Furniture)) do not apply.

17. The requirements of 40 CFR Part 63 (Subpart RRRR) have been removed from the permit.

~~D.3.3 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 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 two (2) metal coating wet paint spray booths coating metal furniture, as designated by 40 CFR 63.4882 (b), except when otherwise specified in 40 CFR 63 Subpart RRRR. The Permittee must comply with these requirements on and after May 23, 2003.~~

~~D.3.4 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Metal Furniture [40 CFR Part 63, Subpart RRRR] [40 CFR 63.4881] [40 CFR 63.4882]~~

- ~~(a) The affected source, the facility-wide collection of surface coating of metal furniture units that are associated with coating metal furniture described in 40~~

~~CFR 63.4881(a)(1), storage containers and mixing vessels, manual and automated equipment, and all storage containers pumps, and piping that are associated with the operations described in 40 CFR 63.4882 (b) (2) through (b) (4), is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Metal Furniture (40 CFR 63, Subpart RRRR), effective May 23, 2003. Pursuant to this rule, the Permittee must comply with 40 CFR 63, Subpart RRRR on and after May 23, 2006, or accept and meet an enforceable HAP emissions limit below the major source threshold prior to three years after the effective date of the rule. Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.~~

~~(b) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart RRRR:~~

~~Two (2) metal coating wet paint spray booths using high volume low pressure (HVLP) spray method, identified as EU 03, consisting of the following:~~

~~(1) One (1) wet paint spray booth, with a maximum rating of 45 units per hour; and~~

~~(2) One (1) wet paint spray booth with a maximum rating of 1200 units per hour.~~

~~(c) The definitions of 40 CFR 63, Subpart RRRR at 40 CFR 63.4981 are applicable to the affected source.~~

18. The Record Keeping Requirements Condition has been revised to include record keeping for HAPs.

D.3.74 Record Keeping Requirements

- (a) To document compliance with Condition D.3.63, the Permittee shall maintain a log of weekly overspray observations, **and** daily and monthly inspections, ~~and these additional inspections prescribed by the Preventive Maintenance Plan.~~
- (b) To document compliance with condition D.3.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the HAP usage limits established in condition D.3.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.**
- (1) The individual HAP and total HAP content of each coating material and solvent used.**
- (2) The amount of coating material and solvent less water used on monthly basis.**
- (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.**
- (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;**
- (3) The individual HAP and total HAP usage for each month; and**

(4) The weight of each individual HAP and total HAPs emitted for each compliance period.

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

19. The requirements of 40 CFR Part 63 (Subpart RRRR) have been removed from the permit.

~~D.3.8 National Emissions Standards for Hazardous Air Pollutants for Surface Coating of Metal Furniture - Notification Requirements [40 CFR 63, Subpart RRRR]~~

~~Pursuant to 40 CFR 63.4910(a), the Permittee shall submit the notifications in 40 CFR 63.7(b) and (c), 63.8 (f)(4) and 63.9(b) through (e), (h), and (j) that apply to the metal coating spray booth and chosen compliance method by the dates specified.~~

~~(a) Pursuant to 40 CFR 63.4910(b), the Permittee shall submit Initial Notification containing the information specified in 40 CFR 63.9(b) no later than 1 year after the effective date of 40 CFR 63, Subpart RRRR.~~

~~(d) Pursuant to 40 CFR 63.4910(c), the Permittee shall submit a notification of compliance status required by 40 CFR 63.9 (h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4940 or 40 CFR 63.4950 that applies to the metal coating spray booth. The notification of compliance status report shall contain the information specified in paragraphs (e) (1) through (9) of 40 CFR 63.4910.~~

~~(e) The notifications required by paragraphs (a) through (c) shall be submitted to:~~

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

~~And~~

~~United States Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604-3590~~

~~D.3.9 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]~~

~~The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Title V permit.~~

~~(a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart RRRR, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.~~

~~(b) The significant permit modification application shall be submitted no later than~~

~~August 23, 2005.~~

~~(c) The significant permit modification application shall be submitted to:~~

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

20. A new reporting condition has been added requiring HAPs usage reporting.

D.3.5 Reporting Requirements

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

21. Section D.4 has been revised to reflect the change in boilers.

SECTION D.4 FACILITY OPERATION CONDITIONS

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

Two (2) natural gas fired boilers, identified as 07, **each** with a maximum rating of ~~40.5~~ **3.0** MMBtu per hour ~~each~~ and exhausting to stack #7.

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

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

D.4.1 Particulate Matter (PM) [326 IAC 6-2-3(3)(d)]

Pursuant to 326 IAC 6-2-3 (3)(d), Particulate emission limitations for sources of indirect heating), the particulate matter emissions from the two (2) ~~40.5~~ **3.0** MMBtu per hour natural gas boilers shall each be limited to ~~0.86~~ pounds per MMBTU.

22. Conditions D.1.10, D.2.10, and D.3.6 have been revised to replace the reference to Compliance Response Plan with the Response to Excursions or Exceedances.

D.1.107 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (**9423 EU01 EF1&6**), while one or more of the booths are in operation. ~~The Compliance Response Plan shall be followed whenever~~ **If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances.** Failure to take response steps in accordance with Section C - ~~Compliance Monitoring Plan – Failure to Take Response Steps~~ **Response to Excursions or Exceedances**, shall be considered a ~~violation of~~ **deviation from** this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for w~~**When there is** a noticeable change in overspray emissions, or **when** evidence of overspray emissions is observed, **the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances.** ~~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 Monitoring Plan – Failure to Take Response Steps~~ **Response to Excursions or Exceedances**, shall be considered a ~~violation of~~ **deviation from** this permit.
- ~~(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

D.2.408 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks **(98064 EU02 EF1, 98065 EU02 EF2, 98066 EU02 EF3, 98021 EU02 EF4/3, 98020 EU02 EF5, 98022 EU02 EF5, 9911 EU02 EF4/3, 9910 EU02 EF8, 9909 EU02 EF9, 9940 EU02 EF10, and 9941 EU02 EF11/12)**, while one or more of the booths are in operation. ~~The Compliance Response Plan shall be followed whenever~~ **If** a condition exists which should result in a response step, **the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances.** Failure to take response steps in accordance with Section C - ~~Compliance Monitoring Plan – Failure to Take Response Steps~~ **Response to Excursions or Exceedances**, shall be considered a ~~violation of~~ **deviation from** this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for w~~**When there is** a noticeable change in overspray emissions, or **when** evidence of overspray emissions is observed, **the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances.** ~~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 Monitoring Plan – Failure to Take Response Steps~~ **Response to Excursions or Exceedances**, shall be considered a ~~violation of~~ **deviation from** this permit.
- ~~(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

D.3.63 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (**7083 EU03 EF3&6**), while one or more of the booths are in operation. ~~The Compliance Response Plan shall be followed whenever~~ **If** a condition exists which should result in a response step, **the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances**. Failure to take response steps in accordance with Section C - ~~Compliance Monitoring Plan – Failure to Take Response Steps~~ **Response to Excursions or Exceedances**, shall be considered a ~~violation of~~ **deviation from** this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for w~~ **When there is** a noticeable change in overspray emissions, or **when** evidence of overspray emissions is observed, **the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances**. ~~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 Monitoring Plan – Failure to Take Response Steps~~ **Response to Excursions or Exceedances**, shall be considered a ~~violation of~~ **deviation from** this permit.
- ~~(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

23. The following Reporting Form has been added for HAPs reporting.

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

Part 70 Quarterly Report

Source Name: Hill-Rom, Inc.
Source Address: 1125 East Pearl Street, Batesville, IN 47006
Mailing Address: 1069 State Route 46 E, Batesville, IN 47006
Part 70 Permit No.: T137-17585-00002
Facility: Surface Coating Operations (EU 01, EU 02, and EU 03)
Parameter: Single HAP and total HAPs
Limit: (a) The amount of each individual HAP input to the surface coating operations identified as EU 01 (listed in Section D.1), EU 02 (listed in Section D.2) and EU 03 (listed in Section D.3) shall be limited to less

- than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The amount of any combination of HAPs input to the surface coating operations identified as EU 01 (listed in Section D.1), EU 02 (listed in Section D.2) and EU 03 (listed in Section D.3) shall be limited to less 24.76 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR:

Month	Total Usage This Month (tons)		Total Usage Previous 11 Months (tons)		Total Usage 12 Months (tons)	
	Single HAP	Combined HAPs	Single HAP	Combined HAPs	Single HAP	Combined HAPs
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.

Upon further review, OAQ has determined the following changes (bolded language has been added and the language with a line through it has been deleted) will be made to the permit:

24. The letterhead for the Title V permit has been revised to reflect the name of the new Governor of Indiana and the new Commissioner of IDEM. The P.O. box and the zip code on the cover page and throughout the permit have been revised as well.
25. A statement was added to condition B.8, Certification, in order to clarify that the certification form may cover more than one document that is submitted.

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. **One (1) certification may cover multiple forms in one (1) submittal.**

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

26. Condition B.23, Annual Fee Payment, has been revised to show the correct name of the section that collects operating fees as follows:

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

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

27. In accordance with the credible evidence rule (62 Fed. Reg. 8314, Feb 24, 1997); Section 113(a) of the Clean Air Act, 42 U.S. C. § 7413 (a); and a letter from the United States Environmental Protection Agency (USEPA) to IDEM, OAQ dated May 18, 2004, all permits must address the use of credible evidence; otherwise, USEPA will object to the permits. The following language will be incorporated into the permit to address credible evidence:

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

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

28. The 326 IAC 6-3 revisions that became effective on June 12, 2002 were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP; therefore, the requirements of the previous version of 326 IAC 6-3-2 are no longer applicable to this source. Condition C.1 has been revised to remove item (a) which contained these requirements. Since the requirements of the 326 IAC 6-3-2(d) that were effective June 12, 2002 are now federally enforceable, the last statement from Condition C.1 has been removed.

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. ~~This condition is not federally enforceable.~~

29. The following revisions were made to Condition C.16, Emission Statement, to incorporate the revisions to 326 IAC 2-6 that became effective March 27, 2004. The revised rule was published in the April 1, 2004 Indiana Register.

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

~~(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:~~

~~(1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);~~

~~(2) Indicate estimated actual emissions of 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 purposes of Part 70 fee assessment.~~

~~(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:~~

~~Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015~~

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

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

(a) Pursuant to 326 IAC 2-6-3(b)(3), starting in 2006 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 46204-2251**

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

- (b) **The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.**
30. IDEM, OAQ has reconsidered the requirement to develop and follow a Compliance Response Plan. The Permittee will still be required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. Replacing the requirement to develop and follow a Compliance Response Plan with a requirement to take reasonable response steps will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated. The Section D conditions that refer to this condition have been revised to reflect the new condition title, and the following changes have been made to the Section C condition:
- C.14 **Compliance Response Plan—Preparation, Implementation, Records, and Reports Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]**
-
- (a) ~~The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:~~
- (1) ~~Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.~~
- (2) ~~If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (c) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.~~
- (b) ~~For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:~~
- (1) ~~Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or~~
- (2) ~~If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.~~

- ~~(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be 10 days or more until the unit or device will be shut down, then the permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.~~
- ~~(4) Failure to take reasonable response steps shall be considered a deviation from the permit.~~
- ~~(c) The Permittee is not required to take any further response steps for any of the following reasons:
 - ~~(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.~~
 - ~~(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.~~
 - ~~(3) An automatic measurement was taken when the process was not operating.~~
 - ~~(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.~~~~
- ~~(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.~~
- ~~(e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.~~
- ~~(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.~~
- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.**
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;**
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or****

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 46204-2251

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

B.11 Emergency Provisions [326 IAC 2-7-16]

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

~~Northwest Regional Office:
Telephone Number: 219-757-0265~~

- (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 46204-2251

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) **The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.**
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

~~A Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.~~

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

~~A Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan, of this permit, is required for this facility and its control device.~~

~~D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

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

~~D.4.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan, of this permit, is required for this facility.~~

All the subsequent D conditions in each D section have been re-numbered accordingly.

32. IDEM, OAQ has clarified the Condition B.19 (Operational Flexibility) as follows:

B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the ~~emissions allowable under~~ **limitations provided in** this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

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

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

- (5) The Permittee maintains records on-site, **on a rolling five (5) year basis**, which document, ~~on a rolling five (5) year basis~~, all such changes and emissions trading **trades** that are subject to 326 IAC 2-7-20(b), (c), or (e). ~~and makes The~~

Permittee shall make such records available, upon reasonable request, for public review.

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

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
- (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

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

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade **emissions** increases and decreases ~~in emissions in~~ at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

33. Condition D.4.2 (Reporting Requirements) has been removed since reporting is not required for boilers which are only capable of burning natural gas.

~~D.4.2 Reporting Requirements~~

~~The Permittee shall semi-annually certify, on the form provided, that natural gas was fired in the boiler at all times during the report period. Alternatively the Permittee shall report the number of days during which alternate fuel was burned during the report period.~~

Conclusion and Recommendation

This proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 137-21681-00002. The staff recommend to the Commissioner that this Part 70 Significant Permit Modification be approved.