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**NEW SOURCE CONSTRUCTION PERMIT  
and MINOR SOURCE OPERATING PERMIT  
OFFICE OF AIR QUALITY**

**Southern Indiana Woodworking, LLC  
9798 East 1200 North  
Odon, Indiana 47562**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.:027-21910-00052	
Original signed by:  Nisha Sizemore, Branch Chief Office of Air Quality	Issuance Date: March 28, 2006  Expiration Date: March 28, 2011



## TABLE OF CONTENTS

<b>A</b>	<b>SOURCE SUMMARY</b> .....	<b>4</b>
A.1	General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]	
A.2	Emission Units and Pollution Control Equipment Summary	
<b>B</b>	<b>GENERAL CONDITIONS</b> .....	<b>5</b>
B.1	Permit No Defense [IC 13]	
B.2	Definitions	
B.3	Effective Date of the Permit [IC 13-15-5-3]	
B.4	Revocation of Permits [326 IAC 2-1.1-9(5)]	
B.5	Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]	
B.6	Modification to Permit [326 IAC 2]	
B.7	Minor Source Operating Permit [326 IAC 2-6.1]	
B.8	Annual Notification [326 IAC 2-6.1-5(a)(5)]	
B.9	Preventive Maintenance Plan [326 IAC 1-6-3]	
B.10	Permit Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]	
B.11	Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2] [IC 13-17-3-2][IC 13-30-3-1]	
B.12	Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]	
B.13	Annual Fee Payment [326 IAC 2-1.1-7]	
B.14	Credible Evidence [326 IAC 1-1-6]	
<b>C</b>	<b>SOURCE OPERATION CONDITIONS</b> .....	<b>9</b>
C.1	Particulate Emission Limitation For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2]	
C.2	Permit Revocation [326 IAC 2-1.1-9]	
C.3	Opacity [326 IAC 5-1]	
C.4	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
	<b>Testing Requirements</b>	
C.5	Performance Testing [326 IAC 3-6]	
	<b>Compliance Requirements [326 IAC 2-1.1-11]</b>	
C.6	Compliance Requirements [326 IAC 2-1.1-11]	
	<b>Compliance Monitoring Requirements</b>	
C.7	Compliance Monitoring [326 IAC 2-1.1-11]	
C.8	Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]	
C.9	Response to Excursions or Exceedances	
C.10	Actions Related to Noncompliance Demonstrated by a Stack Test	
	<b>Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]</b>	
C.11	Malfunctions Report [326 IAC 1-6-2]	
C.12	General Record Keeping Requirements [326 IAC 2-6.1-5]	
C.13	General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-5] [IC 13-14-1-13]	
<b>D.1</b>	<b>EMISSIONS UNIT OPERATION CONDITIONS</b> .....	<b>14</b>
	<b>Emission Limitations and Standards [326 IAC 2-6.1-5()(1)]</b>	
D.1.1	Volatile Organic Compounds (VOC) [326 IAC 8-2-12]	
D.1.2	Particulate [326 IAC 6-3-2(d)]	
D.1.3	Preventive Maintenance Plan [326 IAC 1-6-3]	
	<b>Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]</b>	
D.1.4	Record Keeping Requirements	

**TABLE OF CONTENTS (Continued)**

**D.2 EMISSIONS UNIT OPERATION CONDITIONS**..... 16

**Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]**

D.2.1 Particulate [326 IAC 6-3-2]

D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

**Compliance Determination Requirements**

D.2.3 Particulate Control

**Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)][326 IAC 2-6.1-5(a)(2)]**

D.2.4 Visible Emissions Notations

D.2.5 Baghouse Inspections

D.2.6 Broken or Failed Bag Detection

**Record Keeping and Reporting Requirement [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]**

D.2.7 Record Keeping Requirements

Annual Notification ..... 18

Malfunction Report ..... 19

## 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 and A.2 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 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

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

Authorized Individual:	Manager
Source Address:	9798 East 1200 North, Odon, Indiana 47562
Mailing Address:	10170 East 1200 North, Odon, Indiana 47562
General Source Phone:	(812) 636-1015
SIC Code:	2599
County Location:	Daviess County
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD; Minor Source, Section 112 of the Clean Air Act Not in 1 of 28 Source Categories

### A.2 Emissions Units and Pollution Control Equipment Summary

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This stationary source is approved to construct and operate the following emissions units and pollution control devices:

- (a) One (1) surface coating operation consisting of two (2) downdraft booths and one (1) touch-up booth, each with a maximum usage rate of 0.85 gallon per hour, using airless spray guns to apply coating to wood substrates and emissions controlled by dry particulate filters. This operation was constructed in 2006.
- (b) One (1) woodworking facility with a maximum throughput rate of 270 pounds of wood per hour, with emissions controlled by a baghouse which exhausts at stack 1. This facility was constructed in 2006.
- (c) One (1) liquefied petroleum gas-fired air make-up unit with a maximum heat input capacity of 0.35 MMBtu per hour. This unit was installed in 2006.
- (d) One (1) liquefied petroleum gas-fired drying oven, with a maximum heat input capacity of 0.237 MMBtu per hour. This unit will be installed in 2006.

## **SECTION B GENERAL CONDITIONS**

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

### **B.1 Permit No Defense [IC 13]**

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

### **B.2 Definitions**

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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 2-1.1-1 shall prevail.

### **B.3 Effective Date of the Permit [IC13-15-5-3]**

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

### **B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]**

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Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

### **B.5 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]**

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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 of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

### **B.6 Modification to Permit [326 IAC 2]**

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Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

### **B.7 Minor Source Operating Permit [326 IAC 2-6.1]**

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This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section.
  - (1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
  - (2) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2-6.1-6 and an Operation Permit Validation Letter is issued.
- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any

permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

- (c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.
- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).

**B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]**

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- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

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

- (d) The notification 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.

**B.9 Preventive Maintenance Plan [326 IAC 1-6-3]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each emissions unit:
  - (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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A copy of the PMP's 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 PMP 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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.10 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]**

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- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (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 an "authorized individual" as defined by 326 IAC 2-1.1-1.
- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a non-road engine, as defined in 40 CFR 89.2.

**B.11 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2] [IC13-17-3-2][IC 13-30-3-1]**

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

- (a) Enter upon the Permittee's premises where a permitted 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, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (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, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (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, at reasonable times, 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.12 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]**

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Pursuant to [326 IAC 2-6.1-6(d)(3)]:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

**B.13 Annual Fee Payment [326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
- (b) 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.14 Credible Evidence [326 IAC 1-1-6]**

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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

### 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 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

### C.3 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 non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

### C.4 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 an "authorized individual" 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

### C.5 Performance Testing [326 IAC 3-6]

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- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. 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.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ (and local agency) not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, (and local agency), 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.6 Compliance Requirements [326 IAC 2-1.1-11]**

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

### **Compliance Monitoring Requirements**

#### **C.7 Compliance Monitoring [326 IAC 2-1.1-11]**

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

#### **C.8 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]**

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

#### **C.9 Response to Excursions or Exceedances**

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- (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.10 Actions Related to Noncompliance Demonstrated by a Stack Test**

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected emissions unit 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 re-testing in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the re-testing deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to non-compliant stack tests.

The response action documents submitted pursuant to this condition do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.

**Record Keeping and Reporting Requirements**

**C.11 Malfunctions Report [326 IAC 1-6-2]**

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Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a

violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

**C.12 General Record Keeping Requirements [326 IAC 2-6.1-5]**

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- (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 when operation begins.

**C.13 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-5] [IC 13-14-1-13]**

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- (a) 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
- (b) 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.
- (c) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

## SECTION D.1

## EMISSIONS UNITS OPERATION CONDITIONS

### Emissions Unit Description [326 IAC 2-6.1-5(a)(1)]:

- (a) One (1) surface coating operation consisting of two (2) downdraft booths and one (1) touch-up booth, each with a maximum usage rate of 0.85 gallon per hour, using airless spray guns to apply coating to wood substrates and emissions controlled by dry particulate filters. This operation was constructed in 2006.

(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 2-6.1-5(a)(1)]

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

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

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

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

#### D.1.2 Particulate [326 IAC 6-3-2(d)]

- (a) Particulate from the surface coating operations shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
- (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
  - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

#### D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

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

**Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]**

**D.1.4 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.2 the Permittee shall maintain a record of any actions taken if overspray is visibly detected.
  
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.2

## EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description [326 IAC 2-6.1-5(a)(1)]:

- (b) One (1) woodworking facility with a maximum throughput rate of 270 pounds of wood per hour, with emissions controlled by a baghouse which exhausts at stack 1. This facility was constructed in 2006.

(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 2-6.1-5(a)(1)]

#### D.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking facilities shall not exceed 1.07 pounds per hour when operating at a process weight rate of 270 pounds per hour.

The pound 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.

#### D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

### Compliance Determination Requirements

#### D.2.3 Particulate Control

- (a) Except as otherwise provided by statute, rule, or this permit, the baghouse for particulate control shall be in operation and control emissions from the woodworking facilities at all times that the woodworking facilities are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

### Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)][326 IAC 2-6.1-5(a)(2)]

#### D.2.4 Visible Emissions Notations

- (a) Daily visible emission notations of the woodworking facility stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part

of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances shall be considered a deviation from this permit.

#### D.2.5 Baghouse Inspections

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

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

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

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

### **Record Keeping and Reporting Requirement [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]**

#### D.2.7 Record Keeping Requirements

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH**

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

<b>Company Name:</b>	<b>Southern Indiana Woodworking, LLC</b>
<b>Address:</b>	<b>9798 East, 1200 North</b>
<b>City:</b>	<b>Odon, Indiana 47562</b>
<b>Phone #:</b>	<b>(812) 636-1015</b>
<b>MSOP #:</b>	<b>027-21910-00052</b>

I hereby certify that Southern Indiana Woodworking, LLC is

- still in operation.
- no longer in operation.

I hereby certify that Southern Indiana Woodworking, LLC is

- in compliance with the requirements of MSOP 027-21910-00052.
- not in compliance with the requirements of MSOP 027-21910-00052.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

<b>Noncompliance:</b>

**MALFUNCTION REPORT**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
FAX NUMBER - 317 233-5967**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6  
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?\_\_\_\_\_, 25 TONS/YEAR SULFUR DIOXIDE ?\_\_\_\_\_, 25 TONS/YEAR NITROGEN OXIDES?\_\_\_\_\_, 25 TONS/YEAR VOC ?\_\_\_\_\_, 25 TONS/YEAR HYDROGEN SULFIDE ?\_\_\_\_\_, 25 TONS/YEAR TOTAL REDUCED SULFUR ?\_\_\_\_\_, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?\_\_\_\_\_, 25 TONS/YEAR FLUORIDES ?\_\_\_\_\_, 100TONS/YEAR CARBON MONOXIDE ?\_\_\_\_\_, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?\_\_\_\_\_, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?\_\_\_\_\_, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?\_\_\_\_\_, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?\_\_\_\_\_. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION \_\_\_\_\_.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC \_\_\_\_\_ OR, PERMIT CONDITION # \_\_\_\_\_ AND/OR PERM LIMIT OF \_\_\_\_\_

THIS INCIDENT MEETS THE DEFINITION OF >MALFUNCTION= AS LISTED ON REVERSE SIDE ?    Y    N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ?    Y    N

COMPANY: \_\_\_\_\_ PHONE NO. (    ) \_\_\_\_\_  
LOCATION: (CITY AND COUNTY) \_\_\_\_\_  
PERMIT NO. \_\_\_\_\_ AFS PLANT ID: \_\_\_\_\_ AFS POINT ID: \_\_\_\_\_ INSP: \_\_\_\_\_  
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: \_\_\_\_\_

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION:

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: \_\_\_\_\_

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_

INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

**Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.**

**326 IAC 1-6-1 Applicability of rule**

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

**326 IAC 1-2-39 "Malfunction" definition**

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

**\*Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

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

Addendum to the  
Technical Support Document (TSD) for a New Source Construction  
and Minor Source Operating Permit

**Source Background and Description**

Source Name:	Southern Indiana Woodworking, LLC
Source Location:	9798 East, 1200 North, Odon, Indiana 47562
County:	Daviess County
SIC Code:	2599
Operation Permit No.:	027-21910-00052
Permit Reviewer:	ERG/SD

On February 17, 2006, the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) had a notice published in the Washington Times Herald, Washington, Indiana, stating that Southern Indiana Woodworking, LLC had applied for a New Source Construction and Minor Source Operating Permit to operate a stationary wood furniture manufacturing plant. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

IDEM, OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). When conditions are added or deleted, the remaining conditions are renumbered accordingly. The Table Of Contents has been modified to reflect these changes.

1. The word unit has been added to Condition D.2.6(b).

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

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...

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

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

**Technical Support Document (TSD) for a New Source Construction  
and Minor Source Operating Permit**

**Source Background and Description**

Source Name:	Southern Indiana Woodworking, LLC
Source Location:	9798 East, 1200 North, Odon, Indiana 47562
County:	Daviess County
SIC Code:	2599
Operation Permit No.:	027-21910-00052
Permit Reviewer:	ERG/SD

The Office of Air Quality (OAQ) has reviewed an application from Southern Indiana Woodworking, LLC relating to the construction and operation of a stationary wood furniture manufacturing plant.

**New Emission Units and Pollution Control Equipment**

The source will be constructing the following new emission units and pollution control devices:

- (a) One (1) surface coating operation consisting of two (2) downdraft booths and one (1) touch-up booth, each with a maximum usage rate of 0.85 gallon per hour, using airless spray guns to apply coating to wood substrates and emissions controlled by dry particulate filters. This operation will be constructed in 2006.
- (b) One (1) woodworking facility with a maximum throughput rate of 270 pounds of wood per hour, with emissions controlled by a baghouse which exhausts at stack 1. This facility will be constructed in 2006.
- (c) One (1) liquefied petroleum gas-fired air make-up unit with a maximum heat input capacity of 0.35 MMBtu per hour. This unit will be installed in 2006.
- (d) One (1) liquefied petroleum gas-fired drying oven, with a maximum heat input capacity of 0.237 MMBtu per hour. This unit will be installed in 2006.

**Permitted Emission Units and Pollution Control Equipment**

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

**Unpermitted Emission Units and Pollution Control Equipment**

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

**Existing Approvals**

There are no previous approvals issued to this source.

**Enforcement Issue**

There are no enforcement actions pending.

**Recommendation**

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on October 27, 2005, with additional information received on December 5, 2005.

### Emission Calculations

See Appendix A of this document for detailed emission calculations (Appendix A, pages 1 through 5).

### Potential to Emit of the Source Before Controls

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

Pollutant	Potential to Emit (tons/year)
PM	64.8
PM10	64.8
SO <sub>2</sub>	2.75E-05
VOC	57.0
CO	0.05
NO <sub>x</sub>	0.38

HAPs	Potential to Emit (tons/year)
Ethylbenzene	0.12
MIK	3.76
Xylene	0.58
Toluene	2.37
Total	6.83

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of all criteria pollutants are less than 100 tons per year and potential to emit of VOC, PM and PM10 are greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A MSOP will be issued.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-7 are not applicable.
- (c) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.

### County Attainment Status

The source is located in Daviess County.

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

- (a) Daviess County has been classified as or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) emissions 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. Daviess 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. See the State Rule Applicability – Entire Source section.
- (c) Daviess County has been classified as attainment 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. See the State Rule Applicability – Entire Source section.

**Source Status**

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

Pollutant	Emissions (tons/year)
PM	64.8
PM10	64.8
SO <sub>2</sub>	2.75E-05
VOC	57.0
CO	0.05
NO <sub>x</sub>	0.38
Single HAPs	<10
Combination HAPs	<25

- (a) This new source is not a major stationary source (under PSD) because no regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in 1 of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (b) This status is based on the potential to emit calculations for the source as detailed in Appendix A.

**Part 70 Permit Determination**

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons per year.

This is the first air approval issued to this source.

### **Federal Rule Applicability**

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit for this source.
- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR 63, Subpart JJ - National Emission Standards for Wood Furniture Manufacturing Operations (326 IAC 20-14) are not included in this permit for this source. This NESHAP applies to sources that are major for HAPs as defined in 40 CFR 63, Subpart A and manufacture wood furniture or wood furniture components. The potential to emit of HAPs from this source are less than the major source threshold levels.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR 63, Subpart DDDDD – National Emission Standards for Industrial, Commercial, and Institutional Boilers and Process Heaters are not included in this permit for this source because it does not operate boilers or process heaters and is not a major source for HAPs.
- (d) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14, 20 and 40 CFR Part 63) included in this permit for this source.

### **State Rule Applicability – Entire Source**

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

Southern Indiana Woodworking, LLC will be constructed in 2006 and is not one (1) of the twenty-eight (28) source categories. The potential to emit of each regulated pollutant before control is less than the two hundred and fifty (250) tons per year PSD threshold (see Appendix A). Therefore, the source is a minor source under PSD and the provisions of 326 IAC 2-2 do not apply.

#### **326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))**

The potential to emit of HAPs from the operation of this wood furniture manufacturing plant are less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of a combination of HAPs (see Appendix A). If the PTE for HAPs exceeded 10 tons per year for a single HAP or 25 tons per year for combined HAPs, this source would be subject to the requirements of 40 CFR 63, Subpart JJ. Therefore, the provisions of 326 IAC 2-4.1 do not apply.

#### **326 IAC 2-6 (Emission Reporting)**

This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit under 326 IAC 2-7 (Part 70 Permit Program). Therefore, the provisions of 326 IAC 2-6 do 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%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

### **State Rule Applicability – Woodworking Facility**

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking facilities shall not exceed 1.07 pounds per hour when operating at a process weight rate of 270 pounds per hour.

The pound per hour limitation was calculated as follows:

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

Based on the potential to emit calculations for the source, the woodworking facility is in compliance with this rule (see Appendix A).

### **State Rule Applicability -- Surface Coating Operations**

#### 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

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

If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

#### 326 IAC 8-1-6 (New Facilities; General Reduction Requirement)

The Permittee is not subject to the provisions of 326 IAC 8-1-6 (Facilities; General Reduction Requirement) because the surface coating operations at the source are subject to the provisions of 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating).

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

The woodworking facilities are subject to 326 IAC 8-2-12 because it was constructed after July 1, 1990 and has actual emissions greater than fifteen (15) pounds per day before add-on controls. [326 IAC 8-2-1(a)(4)]

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

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

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

**326 IAC 8-2-10 (Flat Wood Panels; Manufacturing Operations)**

The provisions of 326 IAC 8-2-10 (Flat Wood Panels; Manufacturing Operations) are not applicable to this source because the Permittee does not utilize flat wood panels or surface finish printed interior panels of hardwood plywood and thin particle board or natural finish plywood panels. The Permittee purchases kiln dried cherry wood to manufacture desks.

**State Rule Applicability – Air Make-Up Unit**

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

The liquefied petroleum gas-fired air make-up unit is not subject to the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) because the particulate emissions from this unit are less than 0.551 pounds per hour. Pursuant to 326 IAC 6-3-1(b)(14), manufacturing processes with potential emissions less than 0.551 pounds per hour are exempt from the 326 IAC 6-3-2 limitations.

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

The liquefied petroleum gas-fired air make-up unit is not subject to the provisions of 326 IAC 6-2-4 (Emission Limitations for Sources of Indirect Heating) because this unit is not an indirectly-fired unit.

**State Rule Applicability – Drying Oven**

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

The liquefied petroleum gas-fired drying oven is not subject to the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) because the particulate emissions from this unit are less than 0.551 pounds per hour. Pursuant to 326 IAC 6-3-1(b)(14), manufacturing processes with potential emissions less than 0.551 pounds per hour are exempt from the 326 IAC 6-3-2 limitations.

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

The liquefied petroleum gas fired drying oven is not subject to the provisions of 326 IAC 6-2-4 (Emission Limitations for Sources of Indirect Heating) because this unit is not an indirectly-fired unit.

**Compliance Monitoring Requirements**

The woodworking facility has applicable compliance monitoring conditions as specified below:

Visible Emission Notations

- (a) Daily visible emission notations of the woodworking facility stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances shall be considered a deviation from this permit.

#### Baghouse Inspections

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

#### Broken or Failed Bag Detection

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

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

#### **Conclusion**

The construction and operation of this stationary wood furniture manufacturing plant shall be subject to the conditions of the New Source Construction and Minor Source Operating Permit 027-21910-00052.

**Appendix A: Emissions Calculations  
Woodworking Facility**

**Company Name:** Southern Indiana Woodworking, LLC  
**Address:** 9798 East 1200 North, Odon, Indiana 47562  
**Permit:** 027-21910  
**Plt ID:** 027-00052  
**Reviewer:** ERG/SD  
**Date:** January 19, 2006

**A. Potential To Emit in tons per year using amount of dust collected**

Emission Unit	Dust Collected (lbs/day)	Hours of Operation (hours/day)	PTE of PM/PM10 (lbs/hour)	PTE of PM/PM10 Before Control (tons/year)	PTE of PM/PM10 After Control (tons/year)
Woodworking	120	9.00	13.3	59.0	0.59

\* Assume all PM emissions are equal to PM10 emisisions

\*\* Source estimates to generate 120 lbs of dust per day and operate the facility for 9 hours each day.

Control efficiency (Dust Collector) = 99 percent

Note: when requested, the Permittee was unable to provide the air flow rate & outlet grain loading for the dust collector because the dust collector was purchased second-hand.

**METHODOLOGY**

PTE of PM/PM10 (lbs/hour) = Dust collected (lbs/day) \* Hours of Operation (hours/day)

Before Control PTE of PM/PM10 (tons/year) = Dust collected (lbs/day) \* Hours of Operation (hours/day) \* 8760 hours/year \* 1 ton/2000 lbs \* 1/Control Efficiency (%)

After Control PTE of PM/PM10 (tons/year) = Before Control PTE of PM/PM10 (tons/year) \* (1- Control efficiency %)

**B. Process Weight Rate**

PTE of PM After Control (lbs/hour)	Maximum Throughput Rate (lbs/hour)	Allowable PM (lbs/hour)
0.135	270	1.07

**METHODOLOGY**

Allowable PM (lbs/hou) = 4.10 \* [Max. Throughput (tons/hour)]<sup>0.67</sup>

**Appendix A: Emissions Calculations  
From Three (3) Surface Coating Booths**

**Company Name:** Southern Indiana Woodworking, LLC  
**Address:** 9798 East 1200 North, Odon, Indiana 47562  
**Permit:** 027-21910  
**Plt ID:** 027-00052  
**Reviewer:** ERG/SD  
**Date:** January 19, 2006

Material	Density (lb/gal)	Weight % Volatile (H <sub>2</sub> O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Max Usage (gal/unit)	Maximum Throughput (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE VOC (lbs/hour)	PTE VOC (lbs/day)	PTE VOC (tons/year)	PTE PM/PM10 (ton/year)	**Transfer Efficiency
Vinyl Washcoat	7.08	87.9%	18.2%	69.7%	19.5%	12.1%	0.50	1.70	6.13	4.93	4.2	101	18.4	1.12	65%
Laquer Topcoat	7.77	87.9%	18.2%	69.7%	19.5%	12.1%	0.50	1.70	6.73	5.42	4.6	110	20.2	1.23	65%
Stain	7.61	65.3%	0.0%	65.3%	0.0%	34.7%	0.50	1.70	4.97	4.97	4.2	101	18.5	3.44	65%

**Total PTE of VOC and Particulate from Three (3) Surface Coating Booths = 57.0 5.78**

\*\* Material will be applied using air atomization guns.  
The booths are equipped with dry particulate filters.

**Actual Emissions (lbs/day) = 117**

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = Density (lb/gal) \* Weight % Organics \* 1/(1-Volume % water)

Pounds of VOC per Gallon Coating = Density (lb/gal) \* Weight % Organics

PTE of VOC (lbs/hour) = Pounds of VOC/Gallon coating (lb/gal) \* Max. usage (gal/unit) \* Max. throughput (units/hour)

PTE of VOC (lbs/day) = Pounds of VOC/Gallon coating (lb/gal) \* Max. usage (gal/unit) \* Max. throughput(units/hour) \* 24 hours/day

PTE of VOC (tons/year) = Pounds of VOC per Gallon coating (lb/gal) \* Max. usage (gal/unit) \* Max. throughput(units/hour) \* 8760 hours/year \* 1 ton/2000 lbs

PTE of PM/PM10 (tons/year) = Density (lbs/gal) \* Max. usage (gal/unit) \* Max. throughput (units/hour) \* (1- Weight % Volatiles) \* (1-Transfer efficiency %) \* 8760 hours/year \* 1 ton/2000 lbs

Actual Emissions (lbs/day) = PTE of VOC (lbs/hour) \* 2,250 hours of operation/year \* 1/250 days of operation/year

**Appendix A: Emissions Calculations  
From Three (3) Surface Coating Booths**

**Company Name:** Southern Indiana Woodworking, LLC  
**Address:** 9798 East 1200 North, Odon, Indiana 47562  
**Permit:** 027-21910  
**Plt ID:** 027-00052  
**Reviewer:** ERG/SD  
**Date:** January 19, 2006

Material	Density (lb/gal)	Max. Usage (gal/unit)	Max. Throughput (unit/hour)	Weight % Ethylbenzene	Weight % MIK	Weight % Xylene	Weight % Toluene
Vinyl Washcoat	7.08	0.50	1.70				9.0%
Laquer Topcoat	7.77	0.50	1.70	0.40%	13.0%	2.0%	
Stain	7.61	0.50	1.70				

Material	Density (lb/gal)	Max. Usage (gal/unit)	Max. Throughput (unit/hour)	PTE Ethylbenzene	PTE MIK	PTE Xylene	PTE Toluene
Vinyl Washcoat				0.0	0.0	0.0	2.37
Laquer Topcoat	SEE ABOVE	SEE ABOVE	SEE ABOVE	0.12	3.76	0.58	0.0
Stain				0.0	0.0	0.0	0.0

**Total HAPs from three (3) surface coating booths =      0.12                      3.76                      0.58                      2.37**

MIK = Methyl Isobutyl Ketone  
 Stain to be used at this source does not contain a HAP

**METHODOLOGY**

PTE of HAPs (tons/year) = Density (lb/gal) \* Max. usage (gal/unit) \* Max. throughput (units/hour) \* Weight % HAP \* 8760 hours/year \* 1 ton/2000 lbs

**Appendix A: Emission Calculations  
Propane Combustion Only  
Air Make-up Unit and Drying Oven**

**Company Name:** Southern Indiana Woodworking, LLC  
**Address:** 9798 East 1200 North, Odon, Indiana 47562  
**Permit:** 027-21910  
**Plt ID:** 027-00052  
**Reviewer:** ERG/SD  
**Date:** January 19, 2006

Heat Input Capacity  
(MMBtu/hour)

Potential Throughput  
(kgals/year)

S = Weight % Sulfur

**0.59** (2 units in total)

**54.9**

**0.01**

	Pollutant					
	* PM	* PM10	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO
Emission Factor (lb/kgal)	0.40	0.40	0.001 <i>0.10S</i>	14.0	0.50	1.90
Potential To Emit (tons/year)	1.10E-02	1.10E-02	2.75E-05	3.85E-01	1.37E-02	5.22E-02

\* Assume all PM emissions are equal to PM10.

One (1) gallon of commercial-grade propane has a heating value of 94,000 Btu.

Emission factors are from AP-42, Table 1.5-1, SCC #1-03-010-02 (October, 1996)

**METHODOLOGY**

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hour) \* 8760 hours/year \* 1 kgal/1000 gallon \* 1 gal/ 0.094 MMBtu

PTE (tons/year) = Potential Throughput (kgals/year) \* Emission Factor (lb/kgal) \* 1 ton/2000 lbs

**Appendix A: Emissions Calculations  
Summary**

**Company Name:** Southern Indiana Woodworking, LLC  
**Address:** 9798 East 1200 North, Odon, Indiana 47562  
**Permit:** 027-21910  
**Pit ID:** 027-00052  
**Reviewer:** ERG/SD  
**Date:** January 19, 2006

**POTENTIAL TO EMIT IN TONS PER YEAR**

<b>Emission Units</b>	<b>PM</b>	<b>PM10</b>	<b>SO<sub>2</sub></b>	<b>NO<sub>x</sub></b>	<b>VOC</b>	<b>CO</b>	<b>HAPs</b>
Woodworking Operations	59.0	59.0					
Surface Coating Booths	5.78	5.78			57.0		6.83
LPG Combustion	0.01	0.01	2.75E-05	0.38	0.01	0.05	
<b>TOTALS</b>	<b>64.8</b>	<b>64.8</b>	<b>2.75E-05</b>	<b>0.38</b>	<b>57.0</b>	<b>0.05</b>	<b>6.83</b>

\* Highest Single HAP (MIK) = 3.76