



Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

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

TO: Interested Parties / Applicant  
DATE: October 12, 2006  
RE: Walter Piano Company, Inc. / 039-22312-00271  
FROM: Nisha Sizemore  
Chief, Permits Branch  
Office of Air Quality

### Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, 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 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar 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.

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

Enclosures  
FNPER.dot 03/23/06



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## FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

**Walter Piano Company, Inc.  
25416 CR 6  
Elkhart, Indiana 46514**

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

**The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; and denial of a permit renewal application. 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.**

Indiana statutes from IC 13 and rules from 326 IAC, quoted 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 FESOP under 326 IAC 2-8.

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 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F039-22312-00271	
Original signed by:  Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: October 12, 2006  Expiration Date: October 12, 2011

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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 2-8-3(b)]

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The Permittee owns and operates a stationary custom grand piano manufacturing plant.

Authorized individual:	Vice President
Source Address:	25416 CR 6, Elkhart, Indiana 46514
Mailing Address:	25416 CR 6, Elkhart, Indiana 46514
General Source Phone:	(574) 266-0615
SIC Code:	3931
Source Location Status:	Elkhart Nonattainment for 8-hour Ozone Standard Attainment or unclassifiable for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) Four (4) paint booths, identified as EU-01A, EU-01C, EU-01D, and EU-01E, three (3) of which were constructed in 1995 and one (1) of which was constructed in 1997, each with a maximum capacity of 1.25 units per hour, each equipped with multiple HVLP spray guns, each equipped with dry filters for particulate control, and exhausting to stacks S-01A, S-01C, S-01D, and S01E, respectively; and
- (b) One (1) Glaze-Filler Room in which hand application of coatings and finish hand rubbing are conducted, with a maximum capacity of 1.25 units per hour, and exhausting into the general ventilation.

### A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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

- (a) One (1) woodworking operation, including thirty-five (35) woodworking machines, with a maximum consumption of one hundred (100) pounds per hour, and equipped with a cyclone dust collector and a baghouse;
- (b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour:
  - (1) One (1) natural gas-fired roof top unit heater, rated at 0.1 million British thermal units per hour, and exhausting to stack G;
  - (2) Two (2) natural gas-fired roof top unit heaters, each rated at 0.13 million British thermal units per hour, and each exhausting to stacks H and I, respectively;
  - (3) Two (2) natural gas-fired roof top unit heaters, each rated at 0.2 million British thermal units per hour, and each exhausting to stacks J and K, respectively; and

- (4) One (1) natural gas-fired roof top unit heater, rated at 0.27 million British thermal units per hour, and exhausting to stack L.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

## SECTION B

## GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-8-1]

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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 2-7) shall prevail.

### B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]

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- (a) This permit F039-22312-00271, 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) IF IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

### B.4 Enforceability [326 IAC 2-8-6]

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

### B.5 Severability [326 IAC 2-8-4(4)]

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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 2-8-4(5)(D)]

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

### B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

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- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). 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 Compliance Order Issuance [326 IAC 2-8-5(b)]

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IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.9 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (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 an authorized individual 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) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.10 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:  
  
Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251
- (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 2-8-4(3); and
  - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

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(1).

B.11 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "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.12 Emergency Provisions [326 IAC 2-8-12]

- (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, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes 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 No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,  
Telephone No.: 317-233-0178 (ask for Compliance Section)  
Facsimile No.: 317-233-6865

- (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 2-8-4(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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 2-8-3(c)(6) 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 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) 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.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.
- (h) Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

**B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]**

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- (a) All terms and conditions of permits established prior to F039-22312-00271 and issued pursuant to permitting programs approved into the state implementation plan have been either;
- (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

**B.14 Termination of Right to Operate [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]**

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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 2-8-3(h) and 326 IAC 2-8-9.

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]**

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), 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 need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP 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 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 2-8-8(a)]

- (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 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(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 2-8-8(c)]

**B.17 Permit Renewal [326 IAC 2-8-3(h)]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
  - (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 until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

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 2-8 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 needed to process the application.

**B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]**

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without 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 approval required by 326 IAC 2-8-11.1 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 emissions trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(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 2-8-15(c).

- (c) Alternative Operating Scenarios [326 IAC 2-8-15(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 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.20 Source Modification Requirement [326 IAC 2-8-11.1]**

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A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

**B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-17-3-2][IC13-30-3-1]**

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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 FESOP 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 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 at reasonable times, 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, 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.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)][326 IAC 2-8-16][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) 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 317-233-4320 (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

### Emissions Limitations and Standards [326 IAC 2-8-4(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 matter 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 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-3 (Emission Offset) not applicable;
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

#### 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 nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

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

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

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

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

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

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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- (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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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.

### **Testing Requirements [326 IAC 2-8-4(3)]**

#### **C.9 Performance Testing [326 IAC 3-6]**

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- (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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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.10 Compliance Requirements [326 IAC 2-1.1-11]**

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

### **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

#### **C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]**

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

#### **C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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

### **Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

#### **C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]**

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

#### **C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]**

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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.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]**

- (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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

**C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

- (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.17 General Reporting Requirements [326 IAC 2-8-4(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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

### **Stratospheric Ozone Protection**

#### **C.18 Compliance with 40 CFR 82 and 326 IAC 22-1**

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

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

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (a) Four (4) paint booths, identified as EU-01A, EU-01C, EU-01D, and EU-01E, three (3) of which were constructed in 1995 and one (1) of which was constructed in 1997, each with a maximum capacity of 1.25 units per hour, each equipped with multiple HVLP spray guns, each equipped with dry filters for particulate control, and exhausting to stacks S-01A, S-01C, S-01D, and S01E, respectively; and
- (b) One (1) Glaze-Filler Room in which hand application of coatings and finish hand rubbing are conducted, with a maximum capacity of 1.25 units per hour, and exhausting into the general ventilation.

(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 2-8-4(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 Volatile Organic Compounds (VOC) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), the amount of VOCs delivered to the applicators plus the amount of VOCs used for clean-up from the four (4) paint booths EU-01A, EU-01C, EU-01D, and EU-01E and the Glaze-Filler Room, including coatings, dilution solvents, and cleaning solvents shall be limited to less than ninety-nine (99) tons per twelve (12) consecutive month period.

This limit is structured such that when including emissions from all other emission units and insignificant activities, the source wide total VOC emissions remain below 100 tons per twelve (12) consecutive month period. Compliance with this limit satisfies the requirements of 326 IAC 2-8-4 (FESOP).

#### D.1.3 Hazardous Air Pollutants (HAPS)

Pursuant to F039-10086-00271, issued on November 5, 1998:

- (a) The amount of any single Hazardous Air Pollutant delivered to the applicators plus the amount of any single HAP used for clean-up from the four (4) paint booths EU-01A, EU-01C, EU-01D, and EU-01E, and the Glaze Filler Room shall be limited to less than ten (10) tons per twelve (12) consecutive month period. This overall usage limit is required to

limit the potential to emit of any single HAP to less than 10 tons per year, calculated on a rolling monthly basis.

- (b) The amount of any combination of Hazardous Air Pollutant delivered to the applicators plus the amount of any combination of HAP used for clean-up from the four (4) paint booths EU-01A, EU-01C, EU-01D, and EU-01E, and the Glaze Filler Room shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period. This overall usage limit is required to limit the potential to emit of any combination HAP to less than 25 tons per year, calculated on a rolling monthly basis.
- (c) Compliance with these limits will satisfy the requirements of 326 2-8-4 (FESOP).

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

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

#### D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

### **Compliance Determination Requirements**

#### D.1.6 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2] [326 IAC 8-1-4]

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Compliance with the VOC and HAP content and usage limitations contained in Conditions D.1.2 and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data and/or MSDS sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

### **Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

#### D.1.7 Monitoring

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks S-01A, S-01C, S-01D, and S01E 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 stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances, shall be considered a deviation from this permit.

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-16]**

#### D.1.8 Record Keeping Requirements

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- (a) To document compliance with Conditions D.1.2 and D.1.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and the VOC and HAP emission limits established in

Condition 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 and 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 volume weighted VOC and HAP content of the coatings used for each month;
  - (4) The cleanup solvent usage for each or month;
  - (5) The total VOC and HAP usage for each month; and
  - (6) The weight of VOCs and HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.4, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 and D.1.3 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

One (1) woodworking operation, including thirty-five (35) woodworking machines, with a maximum consumption of one hundred (100) pounds per hour, and equipped with a cyclone dust collector and a baghouse.

(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 2-8-4(1)]

#### D.2.1 Particulate Matter (PM) [326 IAC 6-3-2(e)]

Pursuant to F039-14028-00271, issued on August 31, 2001 and 326 IAC 6-3-2(e) (Particulate Emission Limitations for Manufacturing Processes), the PM from the woodworking operation shall not exceed 0.551 pounds per hour when operating at a process weight rate of 100 pounds per hour.

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

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Walter Piano Company, Inc.  
Source Address: 25416 CR 6, Elkhart, Indiana 46517  
Mailing Address: 25416 CR 6, Elkhart, Indiana 46517  
FESOP No.: F039-22312-00271

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-0178  
Fax: 317-233-6865**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: Walter Piano Company, Inc.  
Source Address: 25416 CR 6, Elkhart, Indiana 46517  
Mailing Address: 25416 CR 6, Elkhart, Indiana 46517  
FESOP No.: F039-22312-00271

**This form consists of 2 pages**

**Page 1 of 2**

<input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none"><li>• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and</li><li>• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16</li></ul>
---

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

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

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

Page 2 of 2

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

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

A certification is not required for this report.

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

**FESOP Quarterly Report**

Source Name: Walter Piano Company, Inc.  
Source Address: 25416 CR 6, Elkhart, Indiana 46517  
Mailing Address: 25416 CR 6, Elkhart, Indiana 46517  
FESOP No.: F039-22312-00271  
Facility: Four (4) Paint Booths EU-01A, EU-01C, EU-01D, and EU-01E and the Glaze-Filler Room  
Parameter: VOC usage in all surface coating and clean up solvents  
Limit: Less than 99 tons per rolling 12-month period

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

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

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

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

Attach a signed certification to complete this report.

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

### FESOP Quarterly Report

Source Name: Walter Piano Company, Inc.  
 Source Address: 25416 CR 6, Elkhart, Indiana 46517  
 Mailing Address: 25416 CR 6, Elkhart, Indiana 46517  
 FESOP No.: F039-22312-00271  
 Facility: Four (4) Paint Booths EU-01A, EU-01C, EU-01D, and EU-01E and  
 The Glaze-Filler Room  
 Parameter: HAPs in all surface coating and clean up solvents  
 Limit: Less than 10 tons per rolling 12 month period for a single HAP  
 Less than 25 tons per rolling 12 month period for a combination of HAPs

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

Month	Column 1 This Month		Column 2 Previous 11 Months		Column 1 + Column 2 12 Month Total	
	Single HAP	Total HAPs	Single HAP	Total HAPs	Single HAP	Total 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**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Walter Piano Company, Inc.  
 Source Address: 25416 CR 6, Elkhart, Indiana 46517  
 Mailing Address: 25416 CR 6, Elkhart, Indiana 46517  
 FESOP No.: F039-22312-00271

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

Page 1 of 2

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

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

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## Indiana Department of Environmental Management Office of Air Quality

### Addendum to the Technical Support Document for a Federally Enforceable State Operating Permit

Source Name: Walter Piano Company, Inc.  
Source Location: 25416 CR 6  
County: Elkhart  
SIC Code: 3931  
Operation Permit No.: F039-22312-00271  
Permit Reviewer: Marcia Earl

On August 2, 2006, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Walter Piano Company, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a custom wooden grand piano 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.

All conditions in a FESOP permit are federally enforceable. Therefore, the following language has been removed from Condition C.8 Asbestos Abatement Projects. The language with a line through it has been deleted.

1. ~~C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]~~
  - (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.~~

Upon further review, the OAQ has decided to delete condition D.1.7 due to the same condition being referenced in D.1.4. The language with a line through it has been deleted. The Table Of Contents has been modified to reflect this change.

2. ~~D.1.7 Particulate Emission Limitations [326 IAC 6-3-2(d)]~~

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

## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Federally Enforceable Operating Permit (FESOP) Renewal

#### Source Background and Description

Source Name:	Walter Piano Company, Inc.
Source Location:	25416 CR 6, Elkhart, Indiana 46514
County:	Elkhart
SIC Code:	3931
Original Operation Permit No.:	F039-5627-00271
Original Permit Issuance Date:	November 5, 1998
Permit Renewal No.:	039-22312-00271
Permit Reviewer:	AKY/MLE

The Office of Air Quality (OAQ) has reviewed a renewal FESOP application from Walter Piano Company, Inc. relating to the operation of a custom wooden grand piano manufacturing plant. A more appropriate SIC code, 3931 (musical instruments, including grand pianos), replaces the previous FESOP SIC code, 2519 (household furniture, not elsewhere classified).

#### Permitted Emission Units and Pollution Control Equipment

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

- (a) Four (4) paint booths, identified as EU-01A, EU-01C, EU-01D, and EU-01E, three (3) of which were constructed in 1995 and one (1) of which was constructed in 1997, each with a maximum capacity of 1.25 units per hour, each equipped with multiple HVLP spray guns, each equipped with dry filters for particulate control, and exhausting to stacks S-01A, S-01C, S-01D, and S01E, respectively; and
- (b) One (1) Glaze-Filler Room in which hand application of coatings and finish hand rubbing are conducted, with a maximum capacity of 1.25 units per hour, and exhausting into the general ventilation.

#### Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this renewal review process.

#### New Emission Units and Pollution Control Equipment Receiving New Source Review Approval

There are no new emission units and pollution control equipment receiving new source review approval during this renewal review process.

#### Insignificant Activities

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

- (a) Emission units with PM and PM<sub>10</sub> emissions less than five (5) tons per year, SO<sub>2</sub>, NO<sub>x</sub>, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and a half (2.5) tons per year:

- (1) One (1) woodworking operation, including thirty-five (35) woodworking machines, with a maximum consumption of one hundred (100) pounds per hour, and equipped with a cyclone dust collector and a baghouse for particulate control.
- (b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour:
  - (1) One (1) natural gas-fired roof top unit heater, rated at 0.1 million British thermal units per hour, and exhausting to stack G;
  - (2) Two (2) natural gas-fired roof top unit heaters, each rated at 0.13 million British thermal units per hour, and each exhausting to stacks H and I, respectively;
  - (3) Two (2) natural gas-fired roof top unit heaters, each rated at 0.2 million British thermal units per hour, and each exhausting to stacks J and K, respectively; and
  - (4) One (1) natural gas-fired roof top unit heater, rated at 0.27 million British thermal units per hour, and exhausting to stack L.

### Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) AA039-20129-00271, issued on February 17, 2005;
- (b) F039-14028-00271, issued on August 31, 2001;
- (c) AA039-11081-00271, issued on July 22, 1999;
- (d) AA039-10948-00271, issued on June 1, 1999;
- (e) MPR039-10086-00271, issued on November 5, 1998;
- (f) F039-5627-00271, issued on November 5, 1998;
- (g) AA039-4388-00271, issued on November 6, 1995; and
- (h) CP039-4388-00271, issued on May 22, 1995.

All conditions from previous approvals were incorporated into this FESOP except:

Condition D.2.1 in FESOP No.: 039-5627-00271 specifying a particulate matter emission limit for the 4.2 million British thermal units per hour natural gas-fired boiler was not included in this permit because this boiler has been removed from the source.

### Enforcement Issue

There are no enforcement actions pending.

### Recommendation

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

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

An administratively complete renewal FESOP application for the purposes of this review was received, in a timely manner, on December 1, 2005, nine (9) months prior to the expiration date of the previous FESOP #F039-14028-00217 issued on August 21, 2001.

**Emission Calculations**

See Appendix A of this document for detailed emissions calculations (pages 1 through 6). All emission calculations were taken from FESOP F039-5627-00271, issued on November 5, 1998. Emission factors for combustion were updated in the previous FESOP F039-14028-00271, issued on August 31, 2001.

**Potential To Emit**

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

Pursuant to F039-5627-00271, issued November 5, 1998, and updated calculations performed for the insignificant woodworking for this renewal, the tables below reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Potential to Emit (tons/year)						
	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>
Paint Booths and Glaze Filler Room	13.62	13.62	0	227.49	0	0
Woodworking	8.21	8.21	0	0	0	0
Insignificant – Combustion	0.03	0.03	0	0.02	0.38	0.45
<b>Total Emissions</b>	<b>21.9</b>	<b>21.9</b>	<b>0</b>	<b>227.5</b>	<b>0.38</b>	<b>0.45</b>

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

HAP	Potential To Emit (tons/year)
Xylene	61.97
Toluene	12.76
Formaldehyde	0.10
Methanol	9.24
Ethyl Benzene	1.58
MEK	27.10
MIBK	8.94
DOP	6.81
EGPE	1.91

Manganese	1.71x10 <sup>-6</sup>
Benzene	9.47x10 <sup>-6</sup>
Dichlorobenzene	5.41x10 <sup>-6</sup>
Hexane	8.12x10 <sup>-3</sup>
Lead	2.26x10 <sup>-6</sup>
Cadmium	4.96x10 <sup>-6</sup>
Chromium	6.32x10 <sup>-6</sup>
Nickel	9.47x10 <sup>-6</sup>
<b>TOTAL</b>	<b>130.41</b>

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOCs are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Pursuant to 326 IAC 2-8, this source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict PTE to below Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP). This source has chosen to limit the emissions of VOC to less than one hundred (100) tons per twelve (12) consecutive month period, the emissions of single HAPs to below ten (10) tons per twelve (12) consecutive month period, and the emissions of any combination of HAPs to below twenty-five (25) tons per twelve (12) consecutive month period. This limitation will render the requirements of 326 IAC 2-7 not applicable.
- (d) **Fugitive Emissions**  
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

**Actual Emissions**

The following table shows the actual reported emissions from the source. This information reflects the 2002 OAQ emission data.

<b>Pollutant</b>	<b>Actual Emissions (tons/year)</b>
PM	0.0
PM <sub>10</sub>	0.0
SO <sub>2</sub>	0.0
VOC	14.1
CO	0.0
NO <sub>x</sub>	0.0
Lead	0.0

**Potential to Emit After Issuance**

The table below summarizes the potential to emit, reflecting all limits, of the significant emission

units after controls. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP F039-5627-00271, issued on December 9, 1996. Walter Piano Company, Inc. has chosen to limit emissions of VOCs to below one hundred (100) tons per year, emissions of individual HAPs to below ten (10) tons per year, and emissions of any combination of HAPs to below twenty-five (25) tons per year. This limitation will render 326 IAC 2-7 (Part 70 Permit Program) not applicable.

Limited Potential to Emit (tons/year)								
	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	single HAP	combination of HAPs
Paint Booths and Glaze Filler Room	13.62	13.62	0	<99	0	0	< 10	< 25
Woodworking	8.21	8.21	0	0	0	0	0	0
Insignificant – Combustion	0.03	0.03	0	0.02	0.38	0.45	0	0
Total Emissions	<250	<100	<100	<100	<100	<100	< 10	< 25

### County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM <sub>10</sub>	Attainment
PM <sub>2.5</sub>	Attainment
SO <sub>2</sub>	Attainment
NO <sub>x</sub>	Attainment
8-Hour Ozone	Non-Attainment
CO	Attainment
Lead	Attainment

- (a) Elkhart County has been classified as attainment for PM<sub>2.5</sub>. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM<sub>2.5</sub> emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM<sub>2.5</sub> emissions, it has directed states to regulate PM<sub>10</sub> emissions as surrogate for PM<sub>2.5</sub> emissions. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

- (c) Elkhart 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. See the State Rule Applicability for the source section.

### **Federal Rule Applicability**

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (b) This source has chosen to limit its HAPs emissions to below ten (10) tons per year for a single HAP and twenty-five (25) tons per year for any combination of HAPs. Thus, the source is not a major source of HAPs and is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Wood Furniture Manufacturing Operations, 40 CFR Part 63, Subpart JJ. No other NESHAPS are included in the permit for this source.

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

#### 326 IAC 2-4.1 – Major Sources of Hazardous Air Pollutants (HAPs)

The operation of a custom wooden grand piano manufacturing plant shall be limited to less than ten (10) tons per year of a single HAP or twenty-five (25) tons per year of a combination of HAPs. Therefore, the requirements of 326 IAC 2-4.1 do not apply.

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

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have a Part 70 operating permit. In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted by July 1 beginning in 2004 and every 3 years after. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

#### 326 IAC 2-8-4 (FESOP)

The amount of VOCs delivered to the applicators plus the amount of VOCs used for clean-up shall be limited to less than ninety-nine (99) tons per twelve (12) consecutive month period. These limits are structured such that when including the emissions from insignificant combustion sources, the source total emissions of VOC do not exceed one hundred (100) tons per twelve (12) consecutive month period, respectively. This limit will render the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.

The amount of any single HAP delivered to the applicators plus the amount of any single HAP used for clean-up shall be limited to less than ten (10) tons per twelve (12) consecutive month period. The amount of any combination of HAPs delivered to the applicators plus the amount of any combination of HAPs used for clean-up shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period. These limits will render the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.

#### 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 this 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.

- (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 – Surface Coating Operations**

#### 326 IAC 6-3-2(d) (Particulate Emission Limitations)

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

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

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

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

Pursuant to CP039-4388-00271, issued on May 22, 1995, 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating) applies to the surface coating operations because the operations have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls. Pursuant to this rule, the surface coating applied to wooden pianos 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 8-11 (Wood Furniture Coating)

326 IAC 8-11 (Wood Furniture Coating) is not applicable to this source because this rule pertains to wood furniture coating in Lake, Porter, Clark, or Floyd Counties. This source is in Elkhart County.

### **State Rule Applicability - Woodworking Operations**

#### 326 IAC 6-3-2(e) (Particulate Emission Limitations)

The potential emissions for particulate matter, prior to controls, exceed five (5) tons per year for the woodworking operation. Therefore, the woodworking activities do not qualify as an insignificant activity. See page 6 of Appendix A of this TSD for calculations.

The particulate matter (PM) from the woodworking operation shall be limited to 0.55 pounds per hour when operating at a process weight rate of 100 pounds per hour. This limitation was calculated by use of the following equation:

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

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

The cyclone dust collector and baghouse shall be in operation at all times the woodworking equipment is in operation, in order to comply with this rule.

### Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

The compliance monitoring requirements applicable to this source are as follows:

1. The surface coating operations (paint booths and Glaze Filler room) have applicable compliance monitoring conditions as specified below:
  - (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 while one or more of the booths are in operation. Whenever a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with the Response to Excursions or Exceedances. Failure to take response steps in accordance with Response to Excursions or Exceedances shall be 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 a noticeable change in overspray emission, or evidence of overspray emission is observed, the Permittee shall take reasonable response steps in accordance with the Response to Excursions or Exceedances. Failure to take response steps in accordance with Response to Excursions or Exceedances shall be a deviation from this permit.

It has been determined that the daily and monthly inspections and weekly observations are sufficient compliance monitoring requirements for these units, therefore the Visible Emissions Notations listed as condition D.1.8 in FESOP F 039-14028-00271 have been removed.

These monitoring conditions are necessary because the dry filters for the paint booths must operate properly to ensure compliance with 326 IAC 6-3-2(d) (Particulate emission limitations) and 326 IAC 2-8 (FESOP).

### **Conclusion**

The operation of this custom wooden grand piano manufacturing plant shall be subject to the conditions of the attached Renewal FESOP No.: F039-22312-00271.

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

**Company Name:** Walter Piano Company, Inc.  
**Address City IN Zip:** 25416 CR 6, Elkhart, Indiana 46514  
**Permit Number:** F039-22312-00271  
**Pit ID:** 039-00271  
**Reviewer:** AKY/MLE  
**Date:** July 11, 2006

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Lacquer Sealer (worst case)	7.1	77.69%	0.0%	77.7%	0.0%	15.70%	1.2300	1.25	5.52	5.52	8.48	203.54	37.15	2.67	35.13	75%
Lacquer Sealer (worst case)	7.1	77.69%	0.0%	77.7%	0.0%	15.70%	1.2300	1.25	5.52	5.52	8.48	203.54	37.15	2.67	35.13	75%
Mohogany Shade (worst case)	6.9	92.22%	0.0%	92.2%	0.0%	4.60%	0.3850	1.25	6.36	6.36	3.06	73.49	13.41	0.28	138.33	75%
Semi-gloss Laquer (worst case)	7.7	79.72%	0.0%	79.7%	0.0%	14.60%	3.7570	1.25	6.14	6.14	28.83	691.86	126.27	8.03	42.04	75%
Mahogany Filler	13.7	17.40%	0.6%	16.8%	60.0%	82.60%	0.0130	1.25	5.75	2.30	0.04	0.90	0.16	0.00	2.79	100%
Lacquer Thinner	7.0	100.00%	0.0%	100.0%	0.0%	0.00%	0.2280	1.25	7.00	7.00	2.00	47.88	8.74	0.00	0.00	75%
Retarder	6.0	100.00%	0.0%	100.0%	0.0%	0.00%	0.0580	1.25	6.00	6.00	0.44	10.44	1.91	0.00	0.00	75%
Mineral Spirits (solvent)	6.5	100.00%	0.0%	100.0%	0.0%	0.00%	0.0460	1.25	6.50	6.50	0.37	8.97	1.64	0.00	0.00	100%
VM & P Naptha (solvent)	6.3	100.00%	0.0%	100.0%	0.0%	0.00%	0.0460	1.25	6.30	6.30	0.36	8.69	1.59	0.00	0.00	100%

**State Potential Emissions**

**Add worst case coating to all solvents**

**52.05      1249.32      228.00      13.65**

METHODOLOGY

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

**Appendix A: Emission Calculations**  
**HAP Emission Calculations - for Surface Coating and Cleaning Operations**

**Company Name:** Walter Piano Company, Inc.  
**Address City IN Zip:** 25416 CR 6, Elkhart, Indiana 46514  
**Permit Number:** F039-22312-00271  
**Pit ID:** 039-00271  
**Permit Reviewer:** AKY/MLE  
**Date:** July 11, 2006

Material	Density (lb/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Benzene	Weight % MIBK	Weight % DOP	Weight % Methanol	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Benzene Emissions (ton/yr)	MIBK Emissions (ton/yr)	DOP Emissions (ton/yr)	Methanol Emissions (ton/yr)
M Stain	6.89	0.25400	1.250	0.00%	0.00%	0.00%	0.00%	0.00%	n/a	30.00%	0.00	0.00	0.00	0.00	0.00	0.00	2.87
Brown Concentrate	6.73	0.05900	1.250	0.00%	6.65%	0.00%	0.00%	0.00%	n/a	87.94%	0.00	0.14	0.00	0.00	0.00	0.00	1.91
Blister Free	7.44	0.61500	1.250	24.00%	18.69%	0.10%	0.29%	6.83%	n/a	0.00%	6.01	4.68	0.03	0.07	1.71	0.00	0.00
Lacquer Sealer	7.14	1.23000	1.250	1.53%	2.22%	0.00%	0.00%	10.70%	n/a	0.00%	0.74	1.07	0.00	0.00	5.14	0.00	0.00
Varnish	8.11	0.20300	1.250	38.84%	0.34%	0.79%	5.78%	0.00%	n/a	0.00%	3.50	0.03	0.07	0.52	0.00	0.00	0.00
Catalyst	7.51	0.00700	1.250	0.00%	0.00%	n/a	n/a	0.00%	n/a	12.82%	0.00	0.00	0.00	0.00	0.00	0.00	0.04
Mahogany Shade	6.85	0.38500	1.250	5.88%	7.05%	n/a	n/a	8.36%	1.83%	18.48%	0.85	1.02	0.00	0.00	1.21	0.26	2.67
Lacquer Thinner	7.00	0.22800	1.250	0.00%	60.00%	n/a	n/a	10.00%	0.00%	20.00%	0.00	5.24	0.00	0.00	0.87	0.00	1.75
Semi Gloss	7.65	3.75700	1.250	32.32%	0.36%	n/a	0.63%	n/a	4.16%	n/a	50.86	0.57	0.00	0.99	0.00	6.55	0.00
Retarder	6.00	0.05800	1.250	0.00%	0.00%	n/a	0.00%	n/a	0.00%	n/a	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mineral Spirits	6.5	0.04600	1.250	0.00%	0.00%	n/a	n/a	n/a	n/a	n/a	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mahogany Filler	13.71	0.01300	1.250	1.70%	0.68%	n/a	n/a	n/a	n/a	n/a	0.02	0.01	0.00	0.00	0.00	0.00	0.00
VM & P Naptha	6.25	0.04600	1.250	0.00%	0.00%	n/a	n/a	n/a	n/a	n/a	0.00	0.00	0.00	0.00	0.00	0.00	0.00
																	0.00
																	0.00
																	0.00

Total State Potential Emissions **61.97    12.76    0.10    1.58    8.94    6.81    9.24**

**METHODOLOGY**

HAPS emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2

**Appendix A: Emission Calculations**  
**HAP Emission Calculations - Surface Coating & Cleaning Operations**

**Company Name:** Walter Piano Company  
**Address City IN Zip:** 25416 CR 6, Elkhart, IN  
**Permit Number:** F039-22312-00271  
**Pit ID:** 039-00271  
**Permit Reviewer:** AKY/MLE  
**Date:** July 11, 2006`

Material	Density (lb/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % EGPE	Weight % Trimethyl- benzine	Weight % Manganese	Weight % Methylethyl- ketone (MEK)	Weight % Naphthalene	EGPE Emissions (ton/yr)	Trimethyl- benzene Emissions (ton/yr)	Manganese Emissions (ton/yr)	Methylethylke tone (MEK) Emissions (ton/yr)	Napthalene Emissions (ton/yr)
M Stain	6.89	0.25400	1.250	n/a	n/a	n/a	n/a	n/a	0.00	0.00	0.00	0.00	0.00
Brown Concentrate	6.73	0.05900	1.250	n/a	n/a	n/a	n/a	n/a	0.00	0.00	0.00	0.00	0.00
Blister Free	7.44	0.61500	1.250	n/a	n/a	n/a	13.42%	n/a	0.00	0.00	0.00	3.36	0.00
Lacquer Sealer	7.14	1.23000	1.250	n/a	n/a	n/a	13.03%	n/a	0.00	0.00	0.00	6.27	0.00
Varnish	8.11	0.20300	1.250	n/a	n/a	n/a	n/a	n/a	0.00	0.00	0.00	0.00	0.00
Catalyst	7.51	0.00700	1.250	n/a	n/a	n/a	n/a	n/a	0.00	0.00	0.00	0.00	0.00
Mahogany Shade	6.85	0.38500	1.250	n/a	n/a	n/a	10.69%	n/a	0.00	0.00	0.00	1.54	0.00
Lacquer Thinner	7.00	0.22800	1.250	n/a	n/a	n/a	10.00%	n/a	0.00	0.00	0.00	0.87	0.00
Semi Gloss	7.65	3.75700	1.250	0.00%	n/a	n/a	9.57%	n/a	0.00	0.00	0.00	15.06	0.00
Retarder	6.00	0.05800	1.250	100.00%	n/a	n/a	n/a	n/a	1.91	0.00	0.00	0.00	0.00
Mineral Spirits	6.5	0.04600	1.250	n/a	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Mahogany Filler	13.71	0.01300	1.250	n/a	0.05%	0.06%	0.06%	0.20%	0.00	0.00	0.00	0.00	0.00
VM & P Naptha	6.25	0.04600	1.250	n/a	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00

Total State Potential Emissions 1.91      0.00      0.00      27.10      0.00

**METHODOLOGY**

HAPS emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr

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

**Insignificant Combustion Activities**

**Company Name:** Walter Piano Company, Inc.  
**Address City IN Zip:** 25416 CR 6, Elkhart, Indiana 46514  
**Permit Number:** F039-22312-00271  
**Pit ID:** 039-00271  
**Reviewer:** AKY/MLE  
**Date:** July 11, 2006

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

1.03  
(total capacity = 0.1 + (2 \* 0.13) + (2 \* 0.2) + 0.27)

9.0

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.0086	0.0343	0.00	0.45	0.02	0.38

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

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**Insignificant Combustion Activities**

**HAPs Emissions**

**Company Name:** Walter Piano Company, Inc.  
**Address City IN Zip:** 25416 CR 6, Elkhart, Indiana 46514  
**Permit Number:** F039-22312-00271  
**Pit ID:** 039-00271  
**Reviewer:** AKY/MLE  
**Date:** July 11, 2006

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	9.474E-06	5.414E-06	3.384E-04	8.121E-03	1.534E-05

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.256E-06	4.963E-06	6.316E-06	1.714E-06	9.474E-06

Methodology is the same as page 1.

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

## Appendix A: Emissions Calculations

Particulate Matter  
From Woodworking Activities

**Company Name:** Walter Piano Company, Inc.  
**Address City IN Zip:** 25416 CR 6, Elkhart, Indiana 46514  
**Permit Number:** 037-22312-00271  
**Plant D:** 037-00271  
**Reviewer:** AKY/MLE  
**Date:** July 11, 2006

**Based on the amount collected by the dust collector:**

$$E_{\text{out}} = E_{\text{collected}} \left( \frac{1}{\% \text{ efficiency}} - 1 \right)$$

$$E_{\text{in}} = E_{\text{collected}} \left( \frac{1}{\% \text{ efficiency}} \right)$$

**Potential PM/PM<sub>10</sub> – after controls:**

$$\begin{aligned} E_{\text{collected}} &= 8.2 \text{ tons/year} \\ \text{Efficiency of collector} &= 99.9\% \end{aligned}$$

$$\begin{aligned} E_{\text{out}} &= 8.2 \text{ tons/year} \left( \frac{1}{0.999} - 1 \right) \\ &= 0.0082 \text{ tons/year after controls} \end{aligned}$$

**Potential PM/PM<sub>10</sub> – before controls:**

$$\begin{aligned} E_{\text{in}} &= 8.2 \text{ tons/year} \left( \frac{1}{0.999} \right) \\ &= 8.21 \text{ tons / year} \end{aligned}$$