



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: September 13, 2006
RE: Paoli, Inc / 117-22455-00014
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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

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Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204-2251
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Mr. Alan Pielemeier
Director of Safety/Environmental Compliance
Paoli, Inc.
201 East Martin Street
Orleans, IN 47454

September 13, 2006

Re: 117-22455-00014
2nd Significant Source Modification to
Part 70 Permit No.: T117-6003-00014

Dear Mr. Pielemeier:

Paoli, Inc. was issued a Part 70 operating permit on March 28, 2002 for a stationary wood office furniture manufacturing plant located at 201 East Martin Street, Orleans, IN 47454. An application to modify the source was received on January 23, 2006. Pursuant to 326 IAC 2-7-10.5, the following emission units are approved for construction at the source:

- (1) One (1) SAP Stain Booth, identified as N-1, constructed in 2006, with a maximum capacity of 14 units per hour, emissions controlled by dry filters, exhausting to stack N-1.
- (2) One (1) NGR Stain Booth, identified as N-2, constructed in 2006, with a maximum capacity of 14 units per hour, emissions controlled by dry filters, exhausting to stack N-2.
- (3) One (1) SAP Stain Booth, identified as N-3, constructed in 2006, with a maximum capacity of 14 units per hour, emissions controlled by dry filters, exhausting to stack N-3.
- (4) One (1) NGR Stain Booth, identified as N-4, constructed in 2006, with a maximum capacity of 14 units per hour, emissions controlled by dry filters, exhausting to stack N-4.
- (5) One (1) Washcoat Booth, identified as N-5, constructed in 2006, with a maximum capacity of 28 units per hour, emissions controlled by dry filters, exhausting to stack N-5.
- (6) One (1) Top Coat Booth, identified as N-6, constructed in 2006, with a maximum capacity of 28 units per hour, emissions controlled by dry filters, exhausting to stack N-6.
- (7) One (1) Top Coat Booth, identified as N-7, constructed in 2006, with a maximum capacity of 28 units per hour, emissions controlled by dry filters, exhausting to stack N-7.
- (8) One (1) Repair Booth, identified as N-8, constructed in 2006, with a maximum capacity of 14 units per hour, emissions controlled by dry filters, exhausting to stack N-8.
- (9) One (1) Paint Booth, identified as N-9, constructed in 2006, with a maximum capacity of 10 units per hour, emissions controlled by dry filters, exhausting to stack N-9.
- (10) One (1) Paint Booth, identified as N-10, constructed in 2006, with a maximum capacity of 10 units per hour, emissions controlled by dry filters, exhausting to stack N-10.
- (11) One (1) Paint Booth, identified as N-11, constructed in 2006, with a maximum capacity of 10 units per hour, emissions controlled by dry filters, exhausting to stack N-11.
- (12) One (1) Paint Booth, identified as N-12, constructed in 2006, with a maximum capacity of 10 units per hour, emissions controlled by dry filters, exhausting to stack N-12.

- (13) One (1) Paint Booth, identified as N-13, constructed in 2006, with a maximum capacity of 10 units per hour, emissions controlled by dry filters, exhausting to stack N-13.
- (14) One (1) Paint Booth, identified as N-14, constructed in 2006, with a maximum capacity of 10 units per hour, emissions controlled by dry filters, exhausting to stack N-14.
- (15) One (1) Paint Booth, identified as N-15, constructed in 2006, with a maximum capacity of 7 units per hour, emissions controlled by dry filters, exhausting to stack N-15.
- (16) One (1) Paint Booth, identified as N-16, constructed in 2006, with a maximum capacity of 7 units per hour, emissions controlled by dry filters, exhausting to stack N-16.
- (17) One (1) Paint Booth, identified as N-17, constructed in 2006, with a maximum capacity of 7 units per hour, emissions controlled by dry filters, exhausting to stack N-17.
- (18) One (1) Paint Booth, identified as N-18, constructed in 2006, with a maximum capacity of 7 units per hour, emissions controlled by dry filters, exhausting to stack N-18.
- (19) One (1) Paint Booth, identified as N-19, constructed in 2006, with a maximum capacity of 7 units per hour, emissions controlled by dry filters, exhausting to stack N-19.
- (20) One (1) Paint Booth, identified as N-20, constructed in 2006, with a maximum capacity of 5 units per hour, emissions controlled by dry filters, exhausting to stack N-20.
- (21) One (1) Paint Booth, identified as N-21, constructed in 2006, with a maximum capacity of 5 units per hour, emissions controlled by dry filters, exhausting to stack N-21.
- (22) One (1) Paint Booth, identified as N-22, constructed in 2006, with a maximum capacity of 5 units per hour, emissions controlled by dry filters, exhausting to stack N-22.
- (23) One (1) Paint Booth, identified as N-23, constructed in 2006, with a maximum capacity of 5 units per hour, emissions controlled by dry filters, exhausting to stack N-23.
- (24) One (1) Paint Booth, identified as N-24, constructed in 2006, with a maximum capacity of 5 units per hour, emissions controlled by dry filters, exhausting to stack N-24.
- (25) One (1) Paint Booth, identified as N-25, constructed in 2006, with a maximum capacity of 28 units per hour, emissions controlled by dry filters, exhausting to stack N-25.
- (26) One (1) Paint Booth, identified as N-26, constructed in 2006, with a maximum capacity of 28 units per hour, emissions controlled by dry filters, exhausting to stack N-26.
- (27) One (1) Paint Booth, identified as N-27, constructed in 2006, with a maximum capacity of 28 units per hour, emissions controlled by dry filters, exhausting to stack N-27.
- (28) One (1) Paint Booth, identified as N-28, constructed in 2006, with a maximum capacity of 28 units per hour, emissions controlled by dry filters, exhausting to stack N-28.
- (29) One (1) Paint Booth, identified as N-29, constructed in 2006, with a maximum capacity of 28 units per hour, emissions controlled by dry filters, exhausting to stack N-29.
- (30) One (1) Paint Booth, identified as N-30, constructed in 2006, with a maximum capacity of 28 units per hour, emissions controlled by dry filters, exhausting to stack N-30.
- (31) One (1) Paint Booth, identified as N-31, constructed in 2006, with a maximum capacity of 28 units per hour, emissions controlled by dry filters, exhausting to stack N-31.

Pursuant to 326 IAC 2-7-10.5, a capacity increase to 28 units per hour for existing booths F27 and F29 is also approved.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.
6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source=s Part 70 Operating Permit to incorporate the required operation conditions.

This significant source modification authorizes construction of the new emission units. Operating conditions shall be incorporated into the Part 70 operating permit as a significant permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12. Operation is not approved until the significant permit modification has been issued.

Pursuant to Contract No. A305-5-65, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Bob Sidner, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (703) 633-1701 to speak directly to Mr. Sidner. Questions may also be directed to Matt Stuckey at IDEM, OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204-2251, or call (800) 451-6027, and ask for Matt Stuckey or extension 3-0203, or reach him at e-mail address mstuckey@idem.in.gov.

Sincerely,
Original signed by
Nisha Sizemore
Branch Chief
Office of Air Quality

ERG/BS

Attachments:

cc: File - Orange County
U.S. EPA, Region V
Orange County Health Department
Air Compliance Section Inspector – Gene Kelso
Compliance Data Section - Karen Nowak
Administrative and Development - Sara Cloe
Technical Support and Modeling - Jeffrey Stoakes



Mitchell E. Daniels, Jr.
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PART 70 SIGNIFICANT SOURCE MODIFICATION OFFICE OF AIR QUALITY

**Paoli, Inc.
201 E. Martin Street
Orleans, Indiana 47454**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T117-6003-00014	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: March 28, 2002 Expiration Date: March 28, 2007
1 st Administrative Amendment No.: 117-18430-00014, issued February 10, 2004. 2 nd Administrative Amendment No.: 117-18980-00014, issued June 10, 2004 3 rd Administrative Amendment No.: 117-19590-00014, issued August 10, 2004 1 st Permit Review Request No.: 117-16394-00014, issued December 10, 2004 4 th Administrative Amendment No.: 117-20071-00014, issued February 18, 2005 2 nd Permit Review Request No.: 117-20909-00014, issued April 13, 2005 1 st Significant Permit Modification No.: 117-22546-00014, issued May 19, 2006	
2 nd Significant Source Modification No.: 117-22455-00014	Pages Affected: Whole Permit
Original signed by: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: September 13, 2006

SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary source that manufactures and coats wood office furniture.

Responsible Official:	Michael D. McCracken, Vice President of Operations
Source Address:	201 E. Martin Street, Orleans, IN, 47452
Mailing Address:	P.O. Box 30, Paoli, IN, 47454
General Source Phone Number:	(812) 723-2791
SIC Code:	2521
County Location:	Orange
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

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

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

Desk Line 1:

- (a) One (1) NGR #3 Booth, identified as F2A, constructed in 1994, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack F2A.
- (b) One (1) Topcoat #1 Booth, identified as F6A, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F6A.
- (c) One (1) Topcoat #2 Booth, identified as F6B, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F6B.
- (d) One (1) SAP #1 Booth, identified as F1, constructed in 1994, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack F1.
- (e) One (1) SAP #3 Booth, identified as F12, constructed in 1994, with a maximum capacity of 9.375 units per hour, using SAP stains and clearcoats and emissions controlled by a dry filter, exhausting to stack F12.
- (f) One (1) NGR #1 Booth, identified as F2, constructed in 1994, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack F2.
- (g) One (1) Washcoat Booth, identified as F3, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F3.
- (h) One (1) Wipestain Booth, identified as F4, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F4.

- (i) One (1) Sealer Booth, identified as F5, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F5.
- (j) One (1) Topcoat #3 Booth, identified as F6, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F6.
- (k) One (1) Repair Booth, identified as F13, constructed in 1994, with a maximum capacity of 3.75 units per hour, emissions controlled by a dry filter, exhausting to stack F13.
- (l) One (1) SAP #2 Booth, identified as F18, constructed in 1995, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack F18.
- (m) One (1) NGR #2 Booth, identified as G1, constructed in 1995, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack G1.

Desk Line 2:

- (n) One (1) SAP Booth, identified as F15, constructed in 1994, with a maximum capacity of 28 units per hour, emissions controlled by a dry filter, exhausting to stack F15.
- (o) One (1) NGR #1 Booth, identified as F16, constructed in 1994, with a maximum capacity of 28 units per hour, emissions controlled by a dry filter, exhausting to stack F16.
- (p) One (1) Repair Booth, identified as F10, constructed in 1994, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F10.
- (q) One (1) Washcoat Booth, identified as F17, constructed in 1995, with a maximum capacity of 28 units per hour, emissions controlled by a dry filter, exhausting to stack F17.
- (r) One (1) Wipestain Booth, identified as F19, constructed in 1995, with a maximum capacity of 28 units per hour, emissions controlled by a dry filter, exhausting to stack F19.
- (s) One (1) Topcoat #1 and #3 Booth, identified as F23, constructed in 1995, with a maximum capacity of 28 units per hour, emissions controlled by a dry filter, exhausting to stack F23.
- (t) One (1) Topcoat #2 and Sealer Booth, identified as F22, constructed in 1995, with a maximum capacity of 28 units per hour, emissions controlled by a dry filter, exhausting to stack F22.
- (u) One (1) SAP Booth, identified as F45, constructed in 1998, with a maximum capacity of 28 units per hour, emissions controlled by a dry filter, exhausting to stack F45.
- (v) One (1) NGR Booth, identified as F46, constructed in 1998, with a maximum capacity of 28 units per hour, emissions controlled by a dry filter, exhausting to stack F46.
- (w) One (1) Washcoat Booth, identified as F47, constructed in 1998, with a maximum capacity of 28 units per hour, emissions controlled by a dry filter, exhausting to stack F47.
- (x) One (1) Repair Booth, identified as F30, constructed in 1998, with a maximum capacity of 1.25 units per hour, emissions controlled by a dry filter, exhausting to stack F30.
- (y) One (1) Topcoat #2 and Sealer Booth, identified as F28, constructed in 1999, with a maximum capacity of 28 units per hour, emissions controlled by a dry filter, exhausting to stack F28.

Desk Line 3:

- (z) One (1) Wipestain Booth, identified as F27, constructed in 1999, with a maximum capacity of 28 units per hour, emissions controlled by a dry filter, exhausting to stack F27.
- (aa) One (1) Topcoat #1 and #3 Booth, identified as F29, constructed in 1999, with a maximum capacity of 28 units per hour, emissions controlled by a dry filter, exhausting to stack F29.
- (bb) One (1) SAP Stain Booth, identified as N-1, constructed in 2006, with a maximum capacity of 14 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-1.
- (cc) One (1) NGR Stain Booth, identified as N-2, constructed in 2006, with a maximum capacity of 14 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-2.
- (dd) One (1) SAP Stain Booth, identified as N-3, constructed in 2006, with a maximum capacity of 14 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-3.
- (ee) One (1) NGR Stain Booth, identified as N-4, constructed in 2006, with a maximum capacity of 14 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-4.
- (ff) One (1) Washcoat Booth, identified as N-5, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-5.
- (gg) One (1) Top Coat Booth, identified as N-6, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-6.
- (hh) One (1) Top Coat Booth, identified as N-7, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-7.
- (ii) One (1) Repair Booth, identified as N-8, constructed in 2006, with a maximum capacity of 14 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-8.

Desk Line 4:

- (jj) One (1) Topcoat and Sealer Booth, identified as F25, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F25.
- (kk) One (1) Repair Booth, identified as F24, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F24.

Desk Line 5:

- (ll) One (1) SAP/NGR #1 Booth, identified as F14, constructed in 1994, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F14.
- (mm) One (1) Wipestain Booth, identified as F11, constructed in 1994, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F11.

- (nn) One (1) Topcoat Booth, identified as F8, constructed in 1994, with a maximum capacity of 3.75 units per hour, emissions controlled by a dry filter, exhausting to stack F8.

Desk Line 6:

- (oo) One (1) SAP/NGR #1 Booth, identified as F20, constructed in 1995, with a maximum capacity of 3.125 units per hour, emissions controlled by a dry filter, exhausting to stack F20.
- (pp) One (1) Washcoat Booth, identified as F21, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F21.
- (qq) One (1) Topcoat and Sealer Booth, identified as C12, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack C12.
- (rr) One (1) Wipestain Booth, identified as F26, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F26.
- (ss) One (1) Repair Booth, identified as F44, constructed in 1997, with a maximum capacity of 1.25 units per hour, emissions controlled by a dry filter, exhausting to stack F44.

Drawer Line:

- (tt) One (1) Drawer Enamel Booth, identified as F9, constructed in 1994, with a maximum capacity of 37.5 units per hour, emissions controlled by a dry filter, exhausting to stack F9.
- (uu) One (1) Drawer Coat Booth, identified as F7, constructed in 1994, with a maximum capacity of 37.5 units per hour, emissions controlled by a dry filter, exhausting to stack F7.

Chair Line:

- (vv) One (1) SAP Booth, identified as C1, constructed in 1995, with a maximum capacity of 67.5 units per hour, emissions controlled by a dry filter, exhausting to stack C1.
- (ww) One (1) NGR Booth, identified as C2, constructed in 1995, with a maximum capacity of 67.5 units per hour, emissions controlled by a dry filter, exhausting to stack C2.
- (xx) One (1) SAP/NGR #1 Booth, identified as C3, constructed in 1995, with a maximum capacity of 10 units per hour, emissions controlled by a dry filter, exhausting to stack C3.
- (yy) One (1) SAP/NGR #3 Booth, identified as C10, constructed in 1995, with a maximum capacity of 10 units per hour, emissions controlled by a dry filter, exhausting to stack C10.
- (zz) One (1) Washcoat Booth, identified as C4, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C4.
- (aaa) One (1) Wipestain Booth, identified as C5, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C5.
- (bbb) One (1) Sealer #1 Booth, identified as C8, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C8.

- (ccc) One (1) Topcoat #1 and Sealer #2 Booth, identified as C7, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C7.
- (ddd) One (1) Topcoat #2 Booth, identified as C6, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C6.
- (eee) One (1) Repair Booth, identified as C9, constructed in 1995, with a maximum capacity of 9 units per hour, emissions controlled by a dry filter, exhausting to stack C9.
- (fff) One (1) Mix Booth, identified as C11, constructed in 1997, with a maximum capacity of 1 unit per hour, emissions controlled by a dry filter, exhausting to stack C11.

UV Line:

- (ggg) One (1) Robotic Spray Booth, identified as U1, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by water pans, exhausting to stack U1.
- (hhh) One (1) Topcoat Booth, identified as U1A/U1B/U1C/U2, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by dry filters, exhausting to stacks U1A, U1B, U1C, or U2.
- (iii) One (1) NGR Booth, identified as U3, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by a dry filter, exhausting to stack U3.
- (jjj) One (1) Sealer Booth, identified as U4, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by a dry filter, exhausting to stack U4.
- (kkk) One (1) Wipestain Booth, identified as U5, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by a dry filter, exhausting to stack U5.
- (lll) One (1) Washcoat Booth, identified as U6, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by a dry filter, exhausting to stack U6.

HON Desk Line:

- (mmm) One (1) Paint Booth, identified as N-9, constructed in 2006, with a maximum capacity of 10 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-9.
- (nnn) One (1) Paint Booth, identified as N-10, constructed in 2006, with a maximum capacity of 10 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-10.
- (ooo) One (1) Paint Booth, identified as N-11, constructed in 2006, with a maximum capacity of 10 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-11.
- (ppp) One (1) Paint Booth, identified as N-12, constructed in 2006, with a maximum capacity of 10 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-12.
- (qqq) One (1) Paint Booth, identified as N-13, constructed in 2006, with a maximum capacity of 10 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-13.

- (rrr) One (1) Paint Booth, identified as N-14, constructed in 2006, with a maximum capacity of 10 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-14.

Vertical Line:

- (sss) One (1) Paint Booth, identified as N-15, constructed in 2006, with a maximum capacity of 7 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-15.
- (ttt) One (1) Paint Booth, identified as N-16, constructed in 2006, with a maximum capacity of 7 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-16.
- (uuu) One (1) Paint Booth, identified as N-17, constructed in 2006, with a maximum capacity of 7 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-17.
- (vvv) One (1) Paint Booth, identified as N-18, constructed in 2006, with a maximum capacity of 7 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-18.
- (www) One (1) Paint Booth, identified as N-19, constructed in 2006, with a maximum capacity of 7 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-19.

Small Parts Line:

- (xxx) One (1) Paint Booth, identified as N-20, constructed in 2006, with a maximum capacity of 5 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-20.
- (yyy) One (1) Paint Booth, identified as N-21, constructed in 2006, with a maximum capacity of 5 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-21.
- (zzz) One (1) Paint Booth, identified as N-22, constructed in 2006, with a maximum capacity of 5 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-22.
- (aaaa) One (1) Paint Booth, identified as N-23, constructed in 2006, with a maximum capacity of 5 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-23.
- (bbbb) One (1) Paint Booth, identified as N-24, constructed in 2006, with a maximum capacity of 5 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-24.

Desk Line 7:

- (cccc) One (1) Paint Booth, identified as N-25, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-25.
- (dddd) One (1) Paint Booth, identified as N-26, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-26.

- (eeee) One (1) Paint Booth, identified as N-27, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-27.
- (ffff) One (1) Paint Booth, identified as N-28, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-28.
- (gggg) One (1) Paint Booth, identified as N-29, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-29.
- (hhhh) One (1) Paint Booth, identified as N-30, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-30.
- (iiii) One (1) Paint Booth, identified as N-31, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-31.

Wood Milling and Assembly Operations:

- (jjjj) One (1) Wood Milling Process, identified as DC4/6, constructed in 1995, with a maximum capacity of 6,622.65 pounds per hour, emissions controlled by two baghouses, DC 4 and DC 6, each with an outlet grain loading of 0.008 gr/dscf and exhaust gas flow rate of 61,000 dscfm, exhausting to stacks 4 and 6.
- (kkkk) One (1) Furniture Assembly Process, identified as DC4/6, constructed in 1995, with a maximum capacity of 6,622.65 pounds per hour, emissions controlled by two baghouses, DC4 and DC6, each with an outlet grain loading of 0.008 gr/dscf and exhaust gas flow rate of 61,000 dscfm, exhausting to stacks 4 and 6.

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

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

- (a) Woodworking facilities, identified as DC7/8 and DC9/10, constructed in 1996, with a maximum capacity of 4,800 pounds per hour, with an air flow rate no greater than 125,000 cubic feet of air per minute and a grain loading no greater than 0.003 grains per dry standard cubic feet of outlet air, emissions controlled by two baghouses, exhausting to stack 7. [326 IAC 2-7-1(21)(G)(xxix)][326 IAC 6-3-2]
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations. [326 IAC 6-3-2]
- (c) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour: two (2) 2.07 MMBtu/hr boilers, constructed in 1998. [326 IAC 6-2-4]
- (d) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (e) Paved and unpaved roads and parking lots with public access.
- (f) Other activities with particulate emissions equal to or less than 5 lb/hr or 25 lb/day: Woodworking operations and sawdust storage.

- (g) Activities with VOC emissions equal to or less than 3 lb/hour or 15 lb/day: Two (2) dip tanks with a total maximum capacity of 42.125 units per hour; one (1) test booth, identified as R&D1, constructed in 1998, with a maximum capacity of 12 oz. stain per 8 hour day.

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

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

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

Desk Line 1:

- (a) One (1) NGR #3 Booth, identified as F2A, constructed in 1994, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack F2A.
- (b) One (1) Topcoat #1 Booth, identified as F6A, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F6A.
- (c) One (1) Topcoat #2 Booth, identified as F6B, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F6B.
- (d) One (1) SAP #1 Booth, identified as F1, constructed in 1994, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack F1.
- (e) One (1) SAP #3 Booth, identified as F12, constructed in 1994, with a maximum capacity of 9.375 units per hour, using SAP stains and clearcoats and emissions controlled by a dry filter, exhausting to stack F12.
- (f) One (1) NGR #1 Booth, identified as F2, constructed in 1994, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack F2.
- (g) One (1) Washcoat Booth, identified as F3, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F3.
- (h) One (1) Wipestain Booth, identified as F4, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F4.
- (i) One (1) Sealer Booth, identified as F5, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F5.
- (j) One (1) Topcoat #3 Booth, identified as F6, constructed in 1994, with a maximum capacity of 28.125 units per hour, emissions controlled by a dry filter, exhausting to stack F6.
- (k) One (1) Repair Booth, identified as F13, constructed in 1994, with a maximum capacity of 3.75 units per hour, emissions controlled by a dry filter, exhausting to stack F13.
- (l) One (1) SAP #2 Booth, identified as F18, constructed in 1995, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack F18.
- (m) One (1) NGR #2 Booth, identified as G1, constructed in 1995, with a maximum capacity of 9.375 units per hour, emissions controlled by a dry filter, exhausting to stack G1.

Desk Line 2:

- (n) One (1) SAP Booth, identified as F15, constructed in 1994, with a maximum capacity of 28 units per hour, emissions controlled by a dry filter, exhausting to stack F15.
- (o) One (1) NGR #1 Booth, identified as F16, constructed in 1994, with a maximum capacity of 28 units per hour, emissions controlled by a dry filter, exhausting to stack F16.
- (p) One (1) Repair Booth, identified as F10, constructed in 1994, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F10.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (q) One (1) Washcoat Booth, identified as F17, constructed in 1995, with a maximum capacity of 28 units per hour, emissions controlled by a dry filter, exhausting to stack F17.
- (r) One (1) Wipestain Booth, identified as F19, constructed in 1995, with a maximum capacity of 28 units per hour, emissions controlled by a dry filter, exhausting to stack F19.
- (s) One (1) Topcoat #1 and #3 Booth, identified as F23, constructed in 1995, with a maximum capacity of 28 units per hour, emissions controlled by a dry filter, exhausting to stack F23.
- (t) One (1) Topcoat #2 and Sealer Booth, identified as F22, constructed in 1995, with a maximum capacity of 28 units per hour, emissions controlled by a dry filter, exhausting to stack F22.
- (u) One (1) SAP Booth, identified as F45, constructed in 1998, with a maximum capacity of 28 units per hour, emissions controlled by a dry filter, exhausting to stack F45.
- (v) One (1) NGR Booth, identified as F46, constructed in 1998, with a maximum capacity of 28 units per hour, emissions controlled by a dry filter, exhausting to stack F46.
- (w) One (1) Washcoat Booth, identified as F47, constructed in 1998, with a maximum capacity of 28 units per hour, emissions controlled by a dry filter, exhausting to stack F47.
- (x) One (1) Repair Booth, identified as F30, constructed in 1998, with a maximum capacity of 1.25 units per hour, emissions controlled by a dry filter, exhausting to stack F30.
- (y) One (1) Topcoat #2 and Sealer Booth, identified as F28, constructed in 1999, with a maximum capacity of 28 units per hour, emissions controlled by a dry filter, exhausting to stack F28.

Desk Line 3:

- (z) One (1) Wipestain Booth, identified as F27, constructed in 1999, with a maximum capacity of 28 units per hour, emissions controlled by a dry filter, exhausting to stack F27.
- (aa) One (1) Topcoat #1 and #3 Booth, identified as F29, constructed in 1999, with a maximum capacity of 28 units per hour, emissions controlled by a dry filter, exhausting to stack F29.
- (bb) One (1) SAP Stain Booth, identified as N-1, constructed in 2006, with a maximum capacity of 14 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-1.
- (cc) One (1) NGR Stain Booth, identified as N-2, constructed in 2006, with a maximum capacity of 14 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-2.
- (dd) One (1) SAP Stain Booth, identified as N-3, constructed in 2006, with a maximum capacity of 14 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-3.
- (ee) One (1) NGR Stain Booth, identified as N-4, constructed in 2006, with a maximum capacity of 14 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-4.
- (ff) One (1) Washcoat Booth, identified as N-5, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-5.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (gg) One (1) Top Coat Booth, identified as N-6, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-6.
- (hh) One (1) Top Coat Booth, identified as N-7, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-7.
- (ii) One (1) Repair Booth, identified as N-8, constructed in 2006, with a maximum capacity of 14 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-8.

Desk Line 4:

- (jj) One (1) Topcoat and Sealer Booth, identified as F25, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F25.
- (kk) One (1) Repair Booth, identified as F24, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F24.

Desk Line 5:

- (ll) One (1) SAP/NGR #1 Booth, identified as F14, constructed in 1994, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F14.
- (mm) One (1) Wipestain Booth, identified as F11, constructed in 1994, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F11.
- (nn) One (1) Topcoat Booth, identified as F8, constructed in 1994, with a maximum capacity of 3.75 units per hour, emissions controlled by a dry filter, exhausting to stack F8.

Desk Line 6:

- (oo) One (1) SAP/NGR #1 Booth, identified as F20, constructed in 1995, with a maximum capacity of 3.125 units per hour, emissions controlled by a dry filter, exhausting to stack F20.
- (pp) One (1) Washcoat Booth, identified as F21, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F21.
- (qq) One (1) Topcoat and Sealer Booth, identified as C12, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack C12.
- (rr) One (1) Wipestain Booth, identified as F26, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F26.
- (ss) One (1) Repair Booth, identified as F44, constructed in 1997, with a maximum capacity of 1.25 units per hour, emissions controlled by a dry filter, exhausting to stack F44.

Drawer Line:

- (tt) One (1) Drawer Enamel Booth, identified as F9, constructed in 1994, with a maximum capacity of 37.5 units per hour, emissions controlled by a dry filter, exhausting to stack F9.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

(uu) One (1) Drawer Coat Booth, identified as F7, constructed in 1994, with a maximum capacity of 37.5 units per hour, emissions controlled by a dry filter, exhausting to stack F7.

Chair Line:

(vv) One (1) SAP Booth, identified as C1, constructed in 1995, with a maximum capacity of 67.5 units per hour, emissions controlled by a dry filter, exhausting to stack C1.

(ww) One (1) NGR Booth, identified as C2, constructed in 1995, with a maximum capacity of 67.5 units per hour, emissions controlled by a dry filter, exhausting to stack C2.

(xx) One (1) SAP/NGR #1 Booth, identified as C3, constructed in 1995, with a maximum capacity of 10 units per hour, emissions controlled by a dry filter, exhausting to stack C3.

(yy) One (1) SAP/NGR #3 Booth, identified as C10, constructed in 1995, with a maximum capacity of 10 units per hour, emissions controlled by a dry filter, exhausting to stack C10.

(zz) One (1) Washcoat Booth, identified as C4, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C4.

(aaa) One (1) Wipestain Booth, identified as C5, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C5.

(bbb) One (1) Sealer #1 Booth, identified as C8, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C8.

(ccc) One (1) Topcoat #1 and Sealer #2 Booth, identified as C7, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C7.

(ddd) One (1) Topcoat #2 Booth, identified as C6, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C6.

(eee) One (1) Repair Booth, identified as C9, constructed in 1995, with a maximum capacity of 9 units per hour, emissions controlled by a dry filter, exhausting to stack C9.

(fff) One (1) Mix Booth, identified as C11, constructed in 1997, with a maximum capacity of 1 unit per hour, emissions controlled by a dry filter, exhausting to stack C11.

UV Line:

(ggg) One (1) Robotic Spray Booth, identified as U1, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by water pans, exhausting to stack U1.

(hhh) One (1) Topcoat Booth, identified as U1A/U1B/U1C/U2, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by dry filters, exhausting to stacks U1A, U1B, U1C, or U2.

(iii) One (1) NGR Booth, identified as U3, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by a dry filter, exhausting to stack U3.

(jjj) One (1) Sealer Booth, identified as U4, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by a dry filter, exhausting to stack U4.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (kkk) One (1) Wipestain Booth, identified as U5, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by a dry filter, exhausting to stack U5.
- (lll) One (1) Washcoat Booth, identified as U6, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by a dry filter, exhausting to stack U6.

HON Desk Line:

- (mmm) One (1) Paint Booth, identified as N-9, constructed in 2006, with a maximum capacity of 10 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-9.
- (nnn) One (1) Paint Booth, identified as N-10, constructed in 2006, with a maximum capacity of 10 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-10.
- (ooo) One (1) Paint Booth, identified as N-11, constructed in 2006, with a maximum capacity of 10 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-11.
- (ppp) One (1) Paint Booth, identified as N-12, constructed in 2006, with a maximum capacity of 10 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-12.
- (qqq) One (1) Paint Booth, identified as N-13, constructed in 2006, with a maximum capacity of 10 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-13.
- (rrr) One (1) Paint Booth, identified as N-14, constructed in 2006, with a maximum capacity of 10 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-14.

Vertical Line:

- (sss) One (1) Paint Booth, identified as N-15, constructed in 2006, with a maximum capacity of 7 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-15.
- (ttt) One (1) Paint Booth, identified as N-16, constructed in 2006, with a maximum capacity of 7 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-16.
- (uuu) One (1) Paint Booth, identified as N-17, constructed in 2006, with a maximum capacity of 7 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-17.
- (vvv) One (1) Paint Booth, identified as N-18, constructed in 2006, with a maximum capacity of 7 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-18.
- (www) One (1) Paint Booth, identified as N-19, constructed in 2006, with a maximum capacity of 7 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-19.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

Small Parts Line:

- (xxx) One (1) Paint Booth, identified as N-20, constructed in 2006, with a maximum capacity of 5 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-20.
- (yyy) One (1) Paint Booth, identified as N-21, constructed in 2006, with a maximum capacity of 5 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-21.
- (zzz) One (1) Paint Booth, identified as N-22, constructed in 2006, with a maximum capacity of 5 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-22.
- (aaaa) One (1) Paint Booth, identified as N-23, constructed in 2006, with a maximum capacity of 5 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-23.
- (bbbb) One (1) Paint Booth, identified as N-24, constructed in 2006, with a maximum capacity of 5 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-24.

Desk Line 7:

- (cccc) One (1) Paint Booth, identified as N-25, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-25.
- (dddd) One (1) Paint Booth, identified as N-26, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-26.
- (eeee) One (1) Paint Booth, identified as N-27, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-27.
- (ffff) One (1) Paint Booth, identified as N-28, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-28.
- (gggg) One (1) Paint Booth, identified as N-29, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-29.
- (hhhh) One (1) Paint Booth, identified as N-30, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-30.
- (iiii) One (1) Paint Booth, identified as N-31, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-31.

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

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

D.1.1 PM and PM₁₀ Emissions Limitations [326 IAC 2-2]

Pursuant to SSM 117-22455-00014,

- (a) The coatings applied by booths F27, F29 and N-1 through N-31 shall be limited such that total PM emissions shall be less than 25 tons per twelve consecutive month period with compliance determined at the end of each month.
- (b) The coatings applied by booths F27, F29 and N-1 through N-31 shall be limited such that total PM₁₀ emissions shall be less than 15 tons per twelve consecutive month period with compliance determined at the end of each month.
- (c) The PM emissions from booths F27, F29 and N-1 through N-31 shall not exceed 0.154 pounds PM per pound solids applied.
- (d) The PM₁₀ emissions from booths F27, F29 and N-1 through N-31 shall not exceed 0.092 pounds PM₁₀ per pound solids applied.

Compliance with these limits will render the requirements of 326 IAC 2-2 not applicable with respect to PM and PM₁₀ to the modification described in SSM 117-22455-00014.

D.1.2 VOC BACT [326 IAC 2-2-3(a)]

Pursuant to CP 117-4210-00014, issued March 28, 1995, and 326 IAC 2-2-3(a), facilities F17 through F26, F44 through F47, G1, and C1 through C12, shall use:

- (a) Less than thirty-seven (37) tons of VOC, including coatings, dilution solvents, and cleaning solvents, per month. This limit is equivalent to less than four hundred and forty-five (445) tons VOC, calculated on a twelve month average rolled on a monthly basis. This usage limit is based upon actual hours of operation and has been determined to serve as the BACT for this source;
- (b) Dry filters for overspray control; and
- (c) HVLP spray application methods when applying SAP stain, NGR, and washcoats; and air-assisted airless or airless application methods when applying sealers, topcoats, fillers, and wipestains.

In addition, the following pollution prevention techniques shall be applied:

- (d) The cleanup solvents shall be stored in closed containers with soft gasketed spring-loaded closures,
- (e) The cleanup rags saturated with solvent be stored, transported, and disposed of in containers that are closed tightly, and
- (f) The spray guns used are the type that can be cleaned without the need for spraying the solvent into the air.

D.1.3 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply to the paint booths except when otherwise specified in 40 CFR Part 60, Subpart JJ.

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

- (a) The wood furniture coating operations are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 14, (40 CFR 63 Subpart JJ). A copy of this

rule is attached. Pursuant to 40 CFR 63.802, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:

- (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations used in conjunction with booths F1 through F30, F44 through F47, F2A, F6A, F6B, G1, U1, U1A/U1B/U1C/U2, U3 through U6 and C1 through C12 as follows:
 - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of 1.0 pound VHAP per pound solids; or
 - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content on one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. Solvent and thinner mixtures used for other purposes have a ten percent (10%) maximum VHAP content by weight; or
 - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or
 - (D) Use a combination of (A), (B), and (C).
- (2) Limit VHAP emissions from contact adhesives used in conjunction with booths F1 through F30, F44 through F47, F2A, F6A, F6B, G1, U1, U1A/U1B/U1C/U2, U3 through U6 and C1 through C12 as follows:
 - (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed one and eight-tenths (1.8) pound VHAP per pound solids.
 - (B) For all contact adhesives (except aerosols and contact adhesives applied to nonporous substances) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.
 - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.
- (3) Limit VHAP emissions from finishing operations used in conjunction with booths N-1 through N-31 as follows:
 - (A) Achieve a weighted average VHAP content across all coatings of 0.8 pound VHAP per pound solids; or
 - (B) Use compliant finishing materials in which all washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of 0.8 pound VHAP per pound solids, as applied. Use compliant finishing materials in which all stains have a maximum VHAP content of 1.0 pound VHAP per pound solids, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. Solvent and thinner mixtures used for other purposes have a ten percent (10%) maximum VHAP content by weight; or
 - (C) Use a control device to limit emissions to 0.8 pound VHAP per pound solids; or
 - (D) Use a combination of (A), (B), and (C).

- (4) Limit VHAP emissions from contact adhesives used in conjunction with booths N-1 through N-31 as follows:
 - (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 0.2 pound VHAP per pound solids.
 - (B) For all contact adhesives (except aerosols and contact adhesives applied to nonporous substances) the VHAP content shall not exceed 0.2 pound VHAP per pound solids.
 - (C) Use a control device to limit emissions to 0.2 pound VHAP per pound solids.
- (5) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.
- (b) Pursuant to 40 CFR 63.803, the owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within the first sixty (60) calendar days of startup. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803.
 - (1) Operator training courses.
 - (2) Leak inspection and maintenance plan.
 - (3) Cleaning and washoff solvent accounting system.
 - (4) Chemical composition of cleaning and washoff solvents.
 - (5) Spray booth cleaning.
 - (6) Storage requirements.
 - (7) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
 - (8) Line cleaning.
 - (9) Gun cleaning.
 - (10) Washoff operations.
 - (11) Formulation assessment plan for finishing operations.
- (c) Pursuant to 40 CFR 63, Subpart JJ, an Initial Compliance Report must be submitted within sixty (60) calendar days of startup and a Continuous Compliance Demonstration Report must be submitted within thirty (30) days following every six (6) month period, thereafter.

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

Pursuant to 326 IAC 6-3-2(d), the particulate matter emissions from the surface coating units shall be controlled by a dry particulate filter, waterwash, or an equivalent control device and comply with the following requirements:

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

D.1.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and the dry filters.

Compliance Determination Requirements

D.1.8 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.2 and D.1.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.9 Particulate Matter (PM) Control

Pursuant to 117-2932-00014, issued January 12, 1994, 117-2759-00014, issued August 6, 1994, 117-4210-00014, issued March 28, 1995, SSM 117-22455-00014 and in order to comply with Conditions D.1.1 and D.1.6, the dry filters for PM control shall be in proper placement and control emissions from the booths at all times when the respective booths are in operation.

D.1.10 Particulate Matter (PM/PM₁₀) Emissions Determination [326 IAC 2-2]

- (a) Compliance with Condition D.1.1(a) shall be determined by demonstrating compliance with Condition D.1.1(c).
- (b) Compliance with Condition D.1.1(b) shall be determined by demonstrating compliance with Condition D.1.1(d).
- (c) Compliance with Conditions D.1.1(c) and D.1.1(d) shall be determined through stack testing per Condition D.1.11 and by calculating the PM/PM₁₀ emissions associated with each coating applied by booths F27 and F29 and N-1 through N-31 using the following equation:

$$PM/PM_{10} = 1/D \times 1/W\%S \times ER$$

Where:

PM/PM₁₀ = The PM/PM₁₀ emissions (lb per lb solids applied) for a given coating type. (SAP stain, NGR stain, wipe stain, washcoat, topcoat)

D = The density (lb coating per gal coating) of a given coating type.

W%S = The weight percent solids (lb solids applied per lb coating) of a given coating type.

ER = The tested emission rate (lb PM/PM₁₀ per gal coating applied) as determined by complying with Condition D.1.11.

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

D.1.11 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

- (a) The Permittee shall conduct performance tests (as described in (b) and (c) below) to demonstrate compliance with Conditions D.1.1 and D.1.10.
- (b) Within 60 days after achieving maximum production rate, but no later than 180 days after initial start up, the Permittee shall conduct PM testing on five (5) representative booths covered by Condition D.1.1. Representative booths shall be the following: one SAP or NGR stain booth; one wipe stain booth; one washcoat booth; and one topcoat booth. The testing shall be done on booths that have not been tested for PM in the past ten (10) years. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted using methods approved by the Commissioner and in accordance with 326 IAC 3-6-3 and Section C - Performance Testing.
- (c) Within 60 days after achieving maximum production rate, but no later than 180 days after initial start up, the Permittee shall conduct PM₁₀ testing on five (5) booths covered by Condition D.1.1. Representative booths shall be the following: one SAP or NGR stain booth; one wipe stain booth; one washcoat booth; and one topcoat booth. The testing shall be done on booths that have not been tested for PM₁₀ in the past ten (10) years. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted using methods approved by the Commissioner and in accordance with 326 IAC 3-6-3 and Section C - Performance Testing.

D.1.12 Operator Training Program

The Permittee shall implement an operator training program.

- (a) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
- (b) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.
- (c) All operators shall be given refresher training annually.

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

D.1.13 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records of:
 - (1) Material safety data sheets (MSDS) of each coating used by booths F27 and F29 and N-1 through N-31.
 - (2) The density and weight percent solids of each coating used (as applied) by booths F27 and F29 and N-1 through N-31.
 - (3) The completed tests required by Condition D.1.11.
- (b) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.2.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) The volume weighted VOC content of the coatings used for each month;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (c) To document compliance with Condition D.1.10, the Permittee shall maintain copies of the training program, the list of trained operators, and training records shall be maintained on site or available within 1 hour for inspection by IDEM.
- (d) To document compliance with Condition D.1.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.1.4.

- (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
 - (2) The VHAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
 - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable spray booth coating used.
 - (4) The VHAP content in weight percent of each thinner used.
 - (5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (e) To document compliance with Condition D.1.4(b), the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.14 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) A semi-annual Continuous Compliance Report to document compliance with Condition D.1.3 and the Certification form, shall be submitted to the addresses listed in Section C - General Reporting Requirements of this permit, within thirty (30) days after the end of the six (6) months being reported.

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

- (1) January 1 through June 30.
 - (2) July 1 through December 31.
- (c) The report required by (c) of this condition shall be submitted to:

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

and

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

SECTION D.2 FACILITY OPERATION CONDITIONS

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

Wood Milling and Assembly Operations:

- (jjjj) One (1) Wood Milling Process, identified as DC4/6, constructed in 1995, with a maximum capacity of 6,622.65 pounds per hour, emissions controlled by two baghouses, DC 4 and DC 6, each with an outlet grain loading of 0.008 gr/dscf and exhaust gas flow rate of 61,000 dscfm, exhausting to stacks 4 and 6.
- (kkkk) One (1) Furniture Assembly Process, identified as DC4/6, constructed in 1995, with a maximum capacity of 6,622.65 pounds per hour, emissions controlled by two baghouses, DC 4 and DC 6, each with an outlet grain loading of 0.008 gr/dscf and exhaust gas flow rate of 61,000 dscfm, exhausting to stacks 4 and 6.

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

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

D.2.1 Best Available Control Technology (BACT) Condition

Pursuant to CP 117-4210-00014, issued on March 28, 1995, the baghouses have been determined to be BACT for the Wood Milling and Furniture Assembly processes. The allowable outlet grain loadings from baghouses DC4 and DC6 are 0.008 grains per dry standard cubic foot (gr/dscf) each, with the input gas flow rates not to exceed 61,000 dry standard cubic feet per minute (dscfm) each. The PM emissions from the Wood Milling and Furniture Assembly operations shall be in compliance provided that the visible emissions from stacks 4 and 6 are limited to ten (10) percent opacity and there no are visible emissions from the building openings.

The equivalent allowable particulate matter (PM) emissions for the wood milling and assembly processes are 18.3 tons per year, each. Compliance with this limit will satisfy the requirements of 326 IAC 6-3-2.

D.2.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to CP 117-4210-00014, issued on March 28, 1995, and pursuant to 326 IAC 6-3-2, the PM from the Wood Milling and Furniture Assembly processes shall not exceed 9.14 pounds per hour each when operating at a process weight rate of 6,622.65 pounds per hour.

The pounds per hour limitation was calculated with 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:

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

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.2.4 Particulate Matter (PM)

Pursuant to CP 117-4210-00014, issued on March 28, 1995, and in order to comply with Conditions D.2.1 and D.2.2, the baghouses for PM control shall be in operation and control emissions from the Wood Milling and Furniture Assembly operations at all times that the facilities are in operation.

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

D.2.5 Visible Emissions Notations

- (a) Daily visible emission notations of the Wood Milling and Furniture Assembly stack exhaust (stacks 4 and 6) shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed at the Wood Milling and Furniture Assembly stack exhaust, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Response to Excursions or Exceedances, shall be considered a deviation from this permit.

D.2.6 Parametric Monitoring

Pursuant to CP 117-4210-00014, issued on March 28, 1995, the Permittee shall record the pressure drop across the baghouses used in conjunction with the Wood Milling and Furniture Assembly operations, at least once weekly when the wood milling and furniture assembly are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable steps in accordance with Section C- Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.2.7 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the wood milling and furniture assembly stack exhaust when venting to the atmosphere.
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain the following:
 - (1) Weekly records of the pressure during normal operation when venting to the atmosphere; and
 - (2) Documentation of the dates vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

Addendum to the
Technical Support Document for Part 70 Permit

Source Background and Description

Source Name:	Paoli, Inc.
Source Location:	201 East Martin St., Orleans IN 47454
County:	Orange
SIC Code:	2521
Operation Permit No.:	T117-6003-00014
Operation Permit Issuance Date:	March 28, 2002
Significant Source Modification No.:	117-22455-00014
Significant Permit Modification No.:	117-22829-00014
Permit Reviewer:	ERG/BS

On July 11, 2006, the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) had a notice published in The Paoli-New Republican of Orleans, Indiana stating that Paoli, Inc. ("Paoli") had applied for a source modification and permit modification to its Part 70 Permit relating to the construction of 31 surface coating booths and an increase in the production capacity of two (2) booths. 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.

On August 1, 2006, Paoli submitted comments on the proposed source modification and permit modification. A summary of the comments, and the corresponding OAQ responses, is contained in this document. Text with a line through it has been deleted and bold text has been added. The Table of Contents has been updated as necessary.

Comment 1:

Condition D.1.13(b) requires Paoli to keep various records to document compliance with the 37 ton per month and 445 ton per year BACT emission limits in Condition D.1.2. Those emission limitations were established by CP 117-4210-00014, issued March 28, 1995, and applies to a fraction of the surface coating booths at the source. Pursuant to 117-22546-00014, issued May 19, 2006, Paoli was given a VOC PAL of 419.5 tons per year for the entire source – approximately 25 tons per year less than the BACT limit. Condition E.1.5 of Paoli's revised Part 70 permit specifies the record keeping requirements necessary to document compliance with the VOC PAL. As a result, compliance with the PAL will ensure compliance with the BACT emission limitation and Condition D.1.13(b) is redundant and unnecessary.

Response to Comment 1:

Condition D.1.2 states that pursuant to CP 117-4210-00014, issued March 28, 1995, and 326 IAC 2-2-3(a), facilities F17 through F26, F44 through F47, G1, and C1 through C12, shall use less than 37 tons of VOC per month (equivalent to 445 tons of VOC per year). Compliance with this monthly PSD BACT limitation requires record keeping of the VOC input to the respective booths. PSD requirements are separate from PAL requirements and records of the VOC input must be maintained because compliance with the PAL does not ensure compliance with BACT.

No changes were made to the permit as a result of this comment.

Comment 2:

Condition D.1.1 limits PM/PM₁₀ emissions from the booths to PSD minor thresholds. Compliance with those limits is determined using the equation in Condition D.1.10 - which utilizes coating usage, transfer efficiency and collection efficiency as inputs. Condition D.1.11 requires testing to determine the transfer efficiency of the booths and the collection efficiency of the dry filters. Condition D.1.13(a) requires that Paoli keep records of the coatings used by the respective booths. As commented before the draft went to PN, Paoli is not aware of any EPA-approved methods that could be used to determine transfer and collection efficiencies. As a result, Paoli feels that the existing conditions are not acceptable and would like them revised as follows:

- (1) Revise Condition D.1.1 to remove the transfer and collection efficiency requirements. Instead, include the following practically-enforceable emission limits: 0.154 lb PM per lb of solids applied and 0.092 lb PM₁₀ per lb of solids applied.
- (2) Revise Condition D.1.10 by removing the compliance equation and include a statement that compliance with Condition D.1.1 will be determined by demonstrating that emissions do not exceed the aforementioned emission rates.
- (3) Revise Condition D.1.11 to require periodic emissions testing to demonstrate compliance with the aforementioned emission rates.
- (4) Revise Condition D.1.13 to match the aforementioned revisions.

Response to Comment 2:

The OAQ has decided to make the following changes to the permit in order to replace existing limits for practically-enforceable emission limits and permit conditions. Note that the supporting data and emission calculations included in Appendix A to the TSD have not been changed. However, a few calculations have been added to Appendix A to show the derivation of the 0.154 and 0.092 lb PM/PM₁₀ per pound solids emission limitations.

D.1.1 PM and PM₁₀ Emissions Limitations [326 IAC 2-2]

Pursuant to SSM 117-22455-00014,

- (a) The coatings applied by booths F27, F29 and N-1 through N-31 shall be limited such that total PM emissions shall be less than 25 tons per twelve consecutive month period with compliance determined at the end of each month.
- (b) The coatings applied by booths F27, F29 and N-1 through N-31 shall be limited such that total PM₁₀ emissions shall be less than 15 tons per twelve consecutive month period with compliance determined at the end of each month.
- (c) ~~The transfer efficiency of booths F27, F29 and N-1 through N-31 shall not be less than 65%.~~ **The PM emissions from booths F27, F29 and N-1 through N-31 shall not exceed 0.154 pounds PM per pound solids applied.**
- (d) ~~The control efficiency of the dry filters used by booths F27, F29 and N-1 through N-31 shall not be less than 90%.~~ **The PM₁₀ emissions from booths F27, F29 and N-1 through N-31 shall not exceed 0.092 pounds PM₁₀ per pound solids applied.**

Compliance with these limits will render the requirements of 326 IAC 2-2 not applicable with respect to PM and PM₁₀ to the modification described in SSM 117-22455-00014.

D.1.10 Particulate Matter (PM/PM₁₀) Emissions Determination [326 IAC 2-2]

~~Compliance with Conditions D.1.1(a) and D.1.1(b) shall be determined by calculating the PM/PM₁₀ emissions associated with each coating applied by booths F27 and F29 and N-1 through N-31 using the following equation:~~

$$PM/PM_{10} = \frac{CU \times D \times W\%S \times (1 - TE/100) \times (1 - CE/100) \times 1/2000}{1}$$

Where:

PM/PM_{10} = The total PM/PM_{10} emissions (ton/month) from booths N1 through N31 for a given coating.

CU = The total coating use (gal coating/month) of a given coating.

D = The density (lb coating/gal coating) of a given coating.

$W\%S$ = The weight percent solids (lb solids/ lb coating) of a given coating.

TE = The transfer efficiency (%) of the spray applicators. This value shall equal 65% or a value determined from the most recent valid compliance demonstration.

CE = The control efficiency (%) of the dry filters. This value shall equal 90% or a value determined from the most recent valid compliance demonstration.

The total PM/PM_{10} emissions (ton/month) from booths F27 and F29 and N-1 through N-31 is equal to the sum of the PM/PM_{10} emissions (ton/month) associated with each coating applied by these booths.

- (a) Compliance with Condition D.1.1(a) shall be determined by demonstrating compliance with Condition D.1.1(c).
- (b) Compliance with Condition D.1.1(b) shall be determined by demonstrating compliance with Condition D.1.1(d).
- (c) Compliance with Conditions D.1.1(c) and D.1.1(d) shall be determined through stack testing per Condition D.1.11 and by calculating the PM/PM_{10} emissions associated with each coating applied by booths F27 and F29 and N-1 through N-31 using the following equation:

$$PM/PM_{10} = 1/D \times 1/W\%S \times ER$$

Where:

PM/PM_{10} = The PM/PM_{10} emissions (lb per lb solids applied) for a given coating type. (SAP stain, NGR stain, wipe stain, washcoat, topcoat)

D = The density (lb coating per gal coating) of a given coating type.

$W\%S$ = The weight percent solids (lb solids applied per lb coating) of a given coating type.

ER = The tested emission rate (lb PM/PM_{10} per gal coating applied) as determined by complying with Condition D.1.11.

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

D.1.11 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

- (a) The Permittee shall conduct performance tests (as described in (b) and (c) below) to verify the transfer efficiency and particulate matter control efficiency requirements in Conditions D.1.1(c) and D.1.1(d). **demonstrate compliance with Conditions D.1.1 and D.1.10.**
- (b) Within 60 days after achieving maximum production rate, but no later than 180 days after initial start up, the Permittee shall conduct transfer efficiency **PM** testing on ~~seven (7)~~ **five (5)** of the **representative** booths covered by Condition D.1.1. **Representative booths**

shall be the following: one SAP or NGR stain booth; one wipe stain booth; one washcoat booth; and one topcoat booth. The testing shall be done on booths that have not been tested **for PM** in the past ten (10) years. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted using methods approved by the Commissioner and in accordance with 326 IAC 3-6-3 and Section C - Performance Testing.

- (c) Within 60 days after achieving maximum production rate, but no later than 180 days after initial start up, the Permittee shall conduct ~~control efficiency~~ **PM₁₀** testing on ~~the dry filters used by seven (7) of the five (5) booths covered by Condition D.1.1.~~ **Representative booths shall be the following: one SAP or NGR stain booth; one wipe stain booth; one washcoat booth; and one topcoat booth.** The testing shall be done on ~~filters~~ **booths** that have not been tested **for PM₁₀** in the past ten (10) years. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted using methods approved by the Commissioner and in accordance with 326 IAC 3-6-3 and Section C - Performance Testing.

D.1.13 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records ~~of: in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the PM/PM₁₀ emission limits established in Condition D.1.1.~~
- (1) ~~The amount of each coating material used (as applied). Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used of each coating used by booths F27 and F29 and N-1 through N-31.~~
 - (2) ~~The density and weight percent solids of each coating material used (as applied) by booths F27 and F29 and N-1 through N-31.~~
 - (3) **The completed tests required by Condition D.1.11.**

...

D.1.14 Reporting Requirements

- (a) ~~A quarterly summary of the monthly PM/PM₁₀ emissions from the booths covered by Condition D.1.1 as calculated by Condition D.1.10. The summary shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~
- (ba) A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (eb) A semi-annual Continuous Compliance Report to document compliance with Condition D.1.3 and the Certification form, shall be submitted to the addresses listed in Section C - General Reporting Requirements of this permit, within thirty (30) days after the end of the six (6) months being reported.

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

- (1) January 1 through June 30.

(2) July 1 through December 31.

(dc) The report required by (c) of this condition shall be submitted to:

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

and

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

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

Part 70 QUARTERLY REPORT

Source Name: _____ Paoli, Inc.
 Source Address: _____ 201 E. Martin Street, Orleans, IN 47452
 Mailing Address: _____ P.O. Box 30, Paoli, IN 47454
 Part 70 Permit No.: _____ T117-6003-00014
 Facility: _____ Booths F27, F29 and N 1 through N 31
 Limit: _____ Total PM and PM₄₀ emissions shall be less than 25 tons, and 15 tons respectively, per twelve consecutive month period with compliance determined at the end of each month. PM/PM₄₀ emissions shall be determined using the equation in Condition D.1.10

YEAR: _____

Month	PM/PM ₄₀ -Emissions	PM/PM ₄₀ -Emissions	PM/PM ₄₀ -Emissions
	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.~~

1. On August 7, 2006, a temporary emergency rule took effect redesignating Delaware, Greene, Jackson, Vanderburgh, Vigo and Warrick Counties to attainment for the eight-hour ozone standard, redesignating Lake County to attainment for the sulfur dioxide standard, and revoking the one-hour ozone standard in Indiana. The Indiana Air Pollution Control Board has approved a permanent rule revision to incorporate these changes into 326 IAC 1-4-1. The permanent revision to 326 IAC 1-4-1 will take effect prior to the expiration of the emergency rule. Therefore, the County Attainment Status table located on page 1 of the TSD inaccurately refers to the one-hour ozone standard.

No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

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

**Technical Support Document (TSD) for a
Part 70 Significant Source and
Significant Permit Modification**

Source Description and Location

Source Name:	Paoli, Inc.
Source Location:	201 East Martin St., Orleans IN 47454
County:	Orange
SIC Code:	2521
Operation Permit No.:	T117-6003-00014
Operation Permit Issuance Date:	March 28, 2002
Significant Source Modification No.:	117-22455-00014
Significant Permit Modification No.:	117-22829-00014
Permit Reviewer:	ERG/BS

Existing Approvals

The source was issued Part 70 Operating Permit No. T117-6003-00014 on March 28, 2002. The source has since received the following approvals:

- (a) AA 117-18430-00014, issued February 10, 2004;
- (b) AA 117-18980-00014, issued June 10, 2004;
- (c) AA 117-19590-00014, issued August 10, 2004;
- (e) Applicability Determination 117-16394-00014, issued December 10, 2004;
- (f) AA 117-20071-00014, issued February 18, 2005;
- (g) Review Request 117-20909-00014, issued April 13, 2005; and
- (h) SPM 117-22546-00014, issued May 19, 2006.

County Attainment Status

The source is located in Orange County.

Pollutant	Status
PM ₁₀	Attainment
PM _{2.5}	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO_x) 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_x emissions are

considered when evaluating the rule applicability relating to ozone. Orange County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) Orange County has been classified as attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM_{2.5} emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions.
- (c) Orange County has been classified as attainment or unclassifiable for PM₁₀, SO₂, NO₂, CO and lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) Fugitive Emissions
 Since this type of operation is not in one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD applicability.

Source Status

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

Pollutant	Emissions (tons/year)
PM	Less than 100
PM ₁₀	Less than 100
SO ₂	Less than 100
VOC	Greater than 250
CO	Less than 100
NO _x	Less than 100

- (a) This existing source is a major stationary source, under PSD (326 IAC 2-2), because a regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) These emissions are based upon the emissions information contained in the TSD for T117-6003-00014 on March 28, 2002.

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

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

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

Actual Emissions

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

Pollutant	Actual Emissions (tons/year)
PM	Not reported
PM ₁₀	Not reported
SO ₂	Not reported
VOC	266
CO	Not reported
NO _x	Not reported
HAP	Not reported

Background and Description of Source and Permit Modification

Paoli, Inc. owns and operates a stationary source that manufactures and coats wood office furniture. On January 23, 2006, the Office of Air Quality (OAQ) received a Significant Source Modification and Significant Permit Modification application from Paoli, Inc relating to the following:

- (a) To correct several listed production capacities for booths in Desk Line 2. The booths in Desk Line 2 will not be modified. The revisions update the permit so it accurately lists the correct capacities.
- (b) To increase the capacity of the existing booths in Desk Line 3 (booths F27 and F29).
- (c) For the construction of thirty-one (31) new surface coating booths (N-1 through N-31). These booths will be used to modify and expand the existing Desk Line 3 and create four (4) new surface coating lines identified as the HON Desk Line, Vertical Line, Small Parts Line and Desk Line 7. A description of the booths is as follows:

Desk Line 3:

- (1) One (1) SAP Stain Booth, identified as N-1, constructed in 2006, with a maximum capacity of 14 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-1.
- (2) One (1) NGR Stain Booth, identified as N-2, constructed in 2006, with a maximum capacity of 14 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-2.
- (3) One (1) SAP Stain Booth, identified as N-3, constructed in 2006, with a maximum capacity of 14 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-3.
- (4) One (1) NGR Stain Booth, identified as N-4, constructed in 2006, with a maximum capacity of 14 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-4.
- (5) One (1) Washcoat Booth, identified as N-5, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-5.
- (6) One (1) Top Coat Booth, identified as N-6, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-6.

- (7) One (1) Top Coat Booth, identified as N-7, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-7.
- (8) One (1) Repair Booth, identified as N-8, constructed in 2006, with a maximum capacity of 14 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-8.

HON Desk Line:

- (9) One (1) Paint Booth, identified as N-9, constructed in 2006, with a maximum capacity of 10 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-9.
- (10) One (1) Paint Booth, identified as N-10, constructed in 2006, with a maximum capacity of 10 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-10.
- (11) One (1) Paint Booth, identified as N-11, constructed in 2006, with a maximum capacity of 10 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-11.
- (12) One (1) Paint Booth, identified as N-12, constructed in 2006, with a maximum capacity of 10 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-12.
- (13) One (1) Paint Booth, identified as N-13, constructed in 2006, with a maximum capacity of 10 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-13.
- (14) One (1) Paint Booth, identified as N-14, constructed in 2006, with a maximum capacity of 10 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-14.

Vertical Line:

- (15) One (1) Paint Booth, identified as N-15, constructed in 2006, with a maximum capacity of 7 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-15.
- (16) One (1) Paint Booth, identified as N-16, constructed in 2006, with a maximum capacity of 7 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-16.
- (17) One (1) Paint Booth, identified as N-17, constructed in 2006, with a maximum capacity of 7 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-17.
- (18) One (1) Paint Booth, identified as N-18, constructed in 2006, with a maximum capacity of 7 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-18.
- (19) One (1) Paint Booth, identified as N-19, constructed in 2006, with a maximum capacity of 7 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-19.

Small Parts Line:

- (20) One (1) Paint Booth, identified as N-20, constructed in 2006, with a maximum capacity of 5 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-20.
- (21) One (1) Paint Booth, identified as N-21, constructed in 2006, with a maximum capacity of 5 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-21.
- (22) One (1) Paint Booth, identified as N-22, constructed in 2006, with a maximum capacity of 5 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-22.
- (23) One (1) Paint Booth, identified as N-23, constructed in 2006, with a maximum capacity of 5 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-23.
- (24) One (1) Paint Booth, identified as N-24, constructed in 2006, with a maximum capacity of 5 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-24.

Desk Line 7:

- (25) One (1) Paint Booth, identified as N-25, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-25.
- (26) One (1) Paint Booth, identified as N-26, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-26.
- (27) One (1) Paint Booth, identified as N-27, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-27.
- (28) One (1) Paint Booth, identified as N-28, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-28.
- (29) One (1) Paint Booth, identified as N-29, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-29.
- (30) One (1) Paint Booth, identified as N-30, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-30.
- (31) One (1) Paint Booth, identified as N-31, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-31.

Paoli was issued a Part 70 permit (T117-6003-00014) on March 28, 2002. On May 19, 2006, Paoli was issued a significant permit modification (SPM 117-22546-00014) to that Part 70 permit that created a VOC Plantwide Applicability Limit (PAL) of 419.5 tons per year. The PAL allows Paoli to streamline compliance determination and provide maximum operational flexibility. The thirty-one (31) surface coating booths covered by this modification will be included in the VOC PAL since it covers the entire source.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

See Appendix A for emission calculations.

Stack Summary

Thirty-one (31) new stacks (stacks N-1 through N-31) will be added along with the new booths. The information below describes each of the new stacks.

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
N-1 through N-31	Surface Coating	33	2.5	10,800	70

Emission Calculations

See Appendix A of this document for detailed emission calculations.

Permit Level Determination – Part 70

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

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE of the modification before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	56.9
PM ₁₀	56.9
SO ₂	0
VOC	793
CO	0
NO _x	0

HAP	Potential to Emit (ton/yr)
Ethyl Benzene	8.17
Formaldehyde	0.81
Methanol	0.57
Toluene	69.9
Xylene	33.5
Total HAPs	113

Pursuant to 326 IAC 2-7-10.5(f)(4), this source modification requires a Significant Source Modification because the PM, PM₁₀ and VOC PTE of the new units is greater than 25 tons per year. Additionally, the modification will be incorporated into the Part 70 Operating Permit through a significant permit modification pursuant to 326 IAC 2-7-12(d)(1), because the permit modification incorporates a case-by-case limitation (for PM/PM₁₀) in order to render the requirements of 326 IAC 2-2 not applicable.

Permit Level Determination – PSD or Emission Offset

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

Process/ Emission Unit	Potential to Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	Total HAPs
Surface Coating Booths N-1 through N-31 and capacity increase to booths F27 and F29	Less than 25 *	Less than 15 *	0	**	0	0	**
Significant Level or Major Source Threshold	25	15	40	40	100	40	NA

* In order to render the requirements of 326 IAC 2-2 not applicable to this modification, the total PM and PM₁₀ emission from the new surface coating booths and existing booths in Desk Line 3 shall not exceed 25 and 15 tons per year, respectively. See the *State Rule Applicability* section of this document for more information.

** These units are covered by the existing VOC PAL established by SPM 117-22546-00014. Therefore, the VOC emissions from these units are included when determining compliance with that PAL and are not subject to the requirements of 326 IAC 2-2.

This modification to an existing PSD major stationary source is not major because:

- (a) The VOC emissions from the modification are included under the existing VOC PAL established under 326 IAC 2-2.4;
- (b) The total PM/PM₁₀ emissions from the modification have been limited to less than the relevant PSD significant levels (25 and 15 tpy respectively) – see the *State Rule Applicability* section of this document for more information; and
- (c) The SO₂, CO, and NO_x emissions from the modification are less than the respective PSD significant levels (40, 100 and 40 tpy respectively).

Therefore, the requirements of 326 IAC 2-2 do not apply to the modification.

The requirements of 326 IAC 2-3 do not apply to the modification because Paoli is located in Orange County, which is designated as an attainment area for all criteria pollutants.

Federal Rule Applicability Determination

- (a) As indicated in the Part 70 permit, the source is subject to the National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations (40 CFR Part 63, Subpart JJ) which is incorporated by reference in 326 IAC 20. Pursuant to 40 CFR 63.800(a), the new booths N-1 through N-31 are subject to the requirements of this subpart because each booth is engaged in the manufacture of wood office furniture and is located at a major source of HAPs.

Pursuant to 40 CFR 63.800(f), new booths N-1 through N-31 (new affected sources) must comply with the provisions of the subpart immediately upon startup.

Pursuant to 40 CFR 63.802, the Permittee shall:

- (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations used in conjunction with booths N1 through N31 as follows:
 - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of 0.8 pound VHAP per pound solids; or
 - (B) Use compliant finishing materials in which all washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of 0.8 pound VHAP per pound solids, as applied. Use compliant finishing materials in which all stains have a maximum VHAP content of 1.0 pound VHAP per pound solids, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. Solvent and thinner mixtures used for other purposes have a ten percent (10%) maximum VHAP content by weight; or
 - (C) Use a control device to limit emissions to 0.8 pound VHAP per pound solids; or
 - (D) Use a combination of (A), (B), and (C).
- (2) Limit VHAP emissions from contact adhesives used in conjunction with booths N1 through N31 as follows:
 - (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 0.2 pound VHAP per pound solids.
 - (B) For all contact adhesives (except aerosols and contact adhesives applied to nonporous substances) the VHAP content shall not exceed 0.2 pound VHAP per pound solids.
 - (C) Use a control device to limit emissions to 0.2 pound VHAP per pound solids.
- (3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

Pursuant to 40 CFR 63.803, the owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within the first sixty (60) calendar days of startup. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing

operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803.

- (1) Operator training courses.
- (2) Leak inspection and maintenance plan.
- (3) Cleaning and washoff solvent accounting system.
- (4) Chemical composition of cleaning and washoff solvents.
- (5) Spray booth cleaning.
- (6) Storage requirements.
- (7) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
- (8) Line cleaning.
- (9) Gun cleaning.
- (10) Washoff operations.
- (11) Formulation assessment plan for finishing operations.

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

- (b) 40 CFR Part 64 (Compliance Assurance Monitoring (CAM))
In order for this rule to apply, a pollutant-specific-emissions-unit at a source that requires a Part 70 or Part 71 permit must meet three criteria for a given pollutant: 1) the unit has potential emissions (before controls), of the applicable regulated air pollutant, equal or greater than 100 percent of the amount required for a source to be classified as a major source, 2) the unit is subject to an applicable emission limitation or standard for the applicable regulated air pollutant, and 3) the unit uses a control device to achieve compliance with the applicable emission limitation or standard.

Booths N-1 through N-31 do not use control devices to comply with applicable VOC limitations. Therefore, the requirements of 40 CFR Part 64 do not apply to booths N-1 through N-31 with respect to VOC.

Booths N-1 through N-31 have a PM/PM₁₀ PTE (before controls) less than 100 tons per year. Therefore, the requirements of 40 CFR Part 64 do not apply to booths N-1 through N-31 with respect to PM/PM₁₀.

State Rule Applicability Determination

The following state rules are applicable to the source due to the modification:

326 IAC 2-2 (Prevention of Significant Deterioration)

The uncontrolled PM/PM₁₀ PTE of the modification is greater than 25 tons per year and 15 tons per year, respectively. Therefore, in order to render the requirements of 326 IAC 2-2 not applicable to the modification with respect to PM and PM₁₀, controls are required at all times the booths are in operation and the following limits have been established:

- (a) The coatings applied by booths F27, F29 and N-1 through N-31 shall be limited such that

total PM emissions shall be less than 25 tons per twelve consecutive month period with compliance determined at the end of each month.

- (b) The coatings applied by booths F27, F29 and N-1 through N-31 shall be limited such that total PM₁₀ emissions shall be less than 15 tons per twelve consecutive month period with compliance determined at the end of each month.
- (c) The transfer efficiency of booths F27, F29 and N-1 through N-31 shall not be less than 65%.
- (d) The control efficiency of the dry filters used by booths F27, F29 and N-1 through N-31 shall not be less than 90%.

Compliance with these limits will render the requirements of 326 IAC 2-2 not applicable with respect to PM and PM₁₀ to the modification described in SSM 117-22455-00014.

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

The HAP PTE of the modification is greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. However, pursuant to 326 IAC 2-4.1-1(b)(2), because this source is covered by 40 CFR Part 63, Subpart JJ, which was issued pursuant to Section 112(d) of the CAA, this source is exempt from the requirements of 326 2-4.1.

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

Pursuant to 326 IAC 6-3-1(a), booths N-1 through N-31 are subject to the requirements of 326 IAC 6-3-2 because they have the potential to emit particulate and are not specifically exempted by 326 IAC 6-3-1(b).

Pursuant to 326 IAC 6-3-2(d), the particulate emissions from the surface coating units shall be controlled by a dry particulate filter, waterwash, or an equivalent control device and comply with the following requirements:

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

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

Pursuant to 326 IAC 8-2-1(a)(4), booths N-1 through N-31 are subject to the requirements of 326 IAC 8-2-12 because construction will commence after July 1, 1990, and will have actual pre-control VOC emissions greater than 15 pounds per day.

Pursuant to 326 IAC 8-2-12, 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.

Booths N-1 through N-31 use HVLP spray application.

326 IAC 8-1-6 (Volatile Organic Compounds – BACT)

Booths N-1 through N-31 are not subject to the requirements of 326 IAC 8-1-6 because they are subject to another Article 8 (326 IAC 8) rule.

Testing Requirements

Testing is not required to determine compliance with any of the applicable rules. Compliance with the booths contribution to the VOC PAL will be determined through monitoring of VOC usage.

Testing to determine compliance with the PM/PM₁₀ PSD minor limit established in this permit is required as follows:

- (a) Within 60 days after achieving maximum production rate, but no later than 180 days after initial start up, the Permittee shall conduct transfer efficiency testing on seven (7) of the booths covered by Condition D.1.1. The testing shall be done on booths that have not been tested in the past ten (10) years. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted using methods approved by the Commissioner and in accordance with 326 IAC 3-6-3 and Section C - Performance Testing.
- (b) Within 60 days after achieving maximum production rate, but no later than 180 days after initial start up, the Permittee shall conduct control efficiency testing on the dry filters used by seven (7) of the booths covered by Condition D.1.1. The testing shall be done on filters that have not been tested in the past ten (10) years. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted using methods approved by the Commissioner and in accordance with 326 IAC 3-6-3 and Section C - Performance Testing.

Compliance Determination and Monitoring Requirements

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

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

The compliance determination and monitoring requirements applicable to this modification are presented in the *Proposed Changes* section of this document.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T117-6003-00014. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

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

...

Desk Line 2:

- (n) One (1) SAP Booth, identified as F15, constructed in 1994, with a maximum capacity of ~~44~~ **28** units per hour, emissions controlled by a dry filter, exhausting to stack F15.
- (o) One (1) NGR #1 Booth, identified as F16, constructed in 1994, with a maximum capacity of ~~44~~ **28** units per hour, emissions controlled by a dry filter, exhausting to stack F16.
- (p) One (1) Repair Booth, identified as F10, constructed in 1994, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F10.
- (q) One (1) Washcoat Booth, identified as F17, constructed in 1995, with a maximum capacity of ~~44~~ **28** units per hour, emissions controlled by a dry filter, exhausting to stack F17.
- (r) One (1) Wipestain Booth, identified as F19, constructed in 1995, with a maximum capacity of ~~44~~ **28** units per hour, emissions controlled by a dry filter, exhausting to stack F19.
- (s) One (1) Topcoat #1 and #3 Booth, identified as F23, constructed in 1995, with a maximum capacity of ~~44~~ **28** units per hour, emissions controlled by a dry filter, exhausting to stack F23.
- (t) One (1) Topcoat #2 and Sealer Booth, identified as F22, constructed in 1995, with a maximum capacity of ~~44~~ **28** units per hour, emissions controlled by a dry filter, exhausting to stack F22.
- (u) One (1) SAP Booth, identified as F45, constructed in 1998, with a maximum capacity of ~~44~~ **28** units per hour, emissions controlled by a dry filter, exhausting to stack F45.
- (v) One (1) NGR Booth, identified as F46, constructed in 1998, with a maximum capacity of ~~7~~ **28** units per hour, emissions controlled by a dry filter, exhausting to stack F46.
- (w) One (1) Washcoat Booth, identified as F47, constructed in 1998, with a maximum capacity of ~~44~~ **28** units per hour, emissions controlled by a dry filter, exhausting to stack F47.

- (x) One (1) Repair Booth, identified as F30, constructed in 1998, with a maximum capacity of 1.25 units per hour, emissions controlled by a dry filter, exhausting to stack F30.
- (y) One (1) Topcoat #2 and Sealer Booth, identified as F28, constructed in 1999, with a maximum capacity of 44 ~~28~~ units per hour, emissions controlled by a dry filter, exhausting to stack F28.

Desk Line 3:

- (z) One (1) Wipestain Booth, identified as F27, constructed in 1999, with a maximum capacity of 7 units per hour, emissions controlled by a dry filter, exhausting to stack F27.
- (aa) One (1) Topcoat #1 and #3 Booth, identified as F29, constructed in 1999, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F29.
- (bb) One (1) SAP Stain Booth, identified as N-1, constructed in 2006, with a maximum capacity of 14 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-1.**
- (cc) One (1) NGR Stain Booth, identified as N-2, constructed in 2006, with a maximum capacity of 14 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-2.**
- (dd) One (1) SAP Stain Booth, identified as N-3, constructed in 2006, with a maximum capacity of 14 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-3.**
- (ee) One (1) NGR Stain Booth, identified as N-4, constructed in 2006, with a maximum capacity of 14 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-4.**
- (ff) One (1) Washcoat Booth, identified as N-5, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-5.**
- (gg) One (1) Top Coat Booth, identified as N-6, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-6.**
- (hh) One (1) Top Coat Booth, identified as N-7, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-7.**
- (ii) One (1) Repair Booth, identified as N-8, constructed in 2006, with a maximum capacity of 14 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-8.**

Desk Line 4:

- ~~(bb)~~ **jj) One (1) Topcoat and Sealer Booth, identified as F25, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F25.**
- ~~(ee)~~ **kk) One (1) Repair Booth, identified as F24, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F24.**

Desk Line 5:

~~(dd)~~ **ll**) One (1) SAP/NGR #1 Booth, identified as F14, constructed in 1994, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F14.

~~(ee)~~ **mm**) One (1) Wipestain Booth, identified as F11, constructed in 1994, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F11.

~~(ff)~~ **nn**) One (1) Topcoat Booth, identified as F8, constructed in 1994, with a maximum capacity of 3.75 units per hour, emissions controlled by a dry filter, exhausting to stack F8.

Desk Line 6:

~~(gg)~~ **oo**) One (1) SAP/NGR #1 Booth, identified as F20, constructed in 1995, with a maximum capacity of 3.125 units per hour, emissions controlled by a dry filter, exhausting to stack F20.

~~(hh)~~ **pp**) One (1) Washcoat Booth, identified as F21, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F21.

~~(ii)~~ **qq**) One (1) Topcoat and Sealer Booth, identified as C12, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack C12.

~~(jj)~~ **rr**) One (1) Wipestain Booth, identified as F26, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F26.

~~(kk)~~ **ss**) One (1) Repair Booth, identified as F44, constructed in 1997, with a maximum capacity of 1.25 units per hour, emissions controlled by a dry filter, exhausting to stack F44.

Drawer Line:

~~(tt)~~ **tt**) One (1) Drawer Enamel Booth, identified as F9, constructed in 1994, with a maximum capacity of 37.5 units per hour, emissions controlled by a dry filter, exhausting to stack F9.

~~(uu)~~ **uu**) One (1) Drawer Coat Booth, identified as F7, constructed in 1994, with a maximum capacity of 37.5 units per hour, emissions controlled by a dry filter, exhausting to stack F7.

Chair Line:

~~(vv)~~ **vv**) One (1) SAP Booth, identified as C1, constructed in 1995, with a maximum capacity of 67.5 units per hour, emissions controlled by a dry filter, exhausting to stack C1.

~~(ww)~~ **ww**) One (1) NGR Booth, identified as C2, constructed in 1995, with a maximum capacity of 67.5 units per hour, emissions controlled by a dry filter, exhausting to stack C2.

~~(xx)~~ **xx**) One (1) SAP/NGR #1 Booth, identified as C3, constructed in 1995, with a maximum capacity of 10 units per hour, emissions controlled by a dry filter, exhausting to stack C3.

~~(yy)~~ **yy**) One (1) SAP/NGR #3 Booth, identified as C10, constructed in 1995, with a maximum capacity of 10 units per hour, emissions controlled by a dry filter, exhausting to stack C10.

~~(zz)~~ **zz**) One (1) Washcoat Booth, identified as C4, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C4.

- (~~ss~~ **aaa**) One (1) Wipestain Booth, identified as C5, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C5.
- (~~tt~~ **bbb**) One (1) Sealer #1 Booth, identified as C8, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C8.
- (~~uu~~ **ccc**) One (1) Topcoat #1 and Sealer #2 Booth, identified as C7, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C7.
- (~~vv~~ **ddd**) One (1) Topcoat #2 Booth, identified as C6, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C6.
- (~~ww~~ **eee**) One (1) Repair Booth, identified as C9, constructed in 1995, with a maximum capacity of 9 units per hour, emissions controlled by a dry filter, exhausting to stack C9.
- (~~xx~~ **fff**) One (1) Mix Booth, identified as C11, constructed in 1997, with a maximum capacity of 1 unit per hour, emissions controlled by a dry filter, exhausting to stack C11.

UV Line:

- (~~yy~~ **ggg**) One (1) Robotic Spray Booth, identified as U1, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by water pans, exhausting to stack U1.
- (~~zz~~ **hhh**) One (1) Topcoat Booth, identified as U1A/U1B/U1C/U2, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by dry filters, exhausting to stacks U1A, U1B, U1C, or U2.
- (~~aaa~~ **iii**) One (1) NGR Booth, identified as U3, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by a dry filter, exhausting to stack U3.
- (~~bbb~~ **jjj**) One (1) Sealer Booth, identified as U4, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by a dry filter, exhausting to stack U4.
- (~~eee~~ **kkk**) One (1) Wipestain Booth, identified as U5, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by a dry filter, exhausting to stack U5.
- (~~ddd~~ **lll**) One (1) Washcoat Booth, identified as U6, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by a dry filter, exhausting to stack U6.

HON Desk Line:

- (**mmm**) One (1) Paint Booth, identified as N-9, constructed in 2006, with a maximum capacity of 10 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-9.
- (**nnn**) One (1) Paint Booth, identified as N-10, constructed in 2006, with a maximum capacity of 10 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-10.
- (**ooo**) One (1) Paint Booth, identified as N-11, constructed in 2006, with a maximum capacity of 10 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-11.

- (ppp) One (1) Paint Booth, identified as N-12, constructed in 2006, with a maximum capacity of 10 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-12.**
- (qqq) One (1) Paint Booth, identified as N-13, constructed in 2006, with a maximum capacity of 10 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-13.**
- (rrr) One (1) Paint Booth, identified as N-14, constructed in 2006, with a maximum capacity of 10 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-14.**

Vertical Line:

- (sss) One (1) Paint Booth, identified as N-15, constructed in 2006, with a maximum capacity of 7 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-15.**
- (ttt) One (1) Paint Booth, identified as N-16, constructed in 2006, with a maximum capacity of 7 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-16.**
- (uuu) One (1) Paint Booth, identified as N-17, constructed in 2006, with a maximum capacity of 7 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-17.**
- (vvv) One (1) Paint Booth, identified as N-18, constructed in 2006, with a maximum capacity of 7 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-18.**
- (www) One (1) Paint Booth, identified as N-19, constructed in 2006, with a maximum capacity of 7 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-19.**

Small Parts Line:

- (xxx) One (1) Paint Booth, identified as N-20, constructed in 2006, with a maximum capacity of 5 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-20.**
- (yyy) One (1) Paint Booth, identified as N-21, constructed in 2006, with a maximum capacity of 5 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-21.**
- (zzz) One (1) Paint Booth, identified as N-22, constructed in 2006, with a maximum capacity of 5 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-22.**
- (aaaa) One (1) Paint Booth, identified as N-23, constructed in 2006, with a maximum capacity of 5 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-23.**
- (bbbb) One (1) Paint Booth, identified as N-24, constructed in 2006, with a maximum capacity of 5 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-24.**

Desk Line 7:

- (cccc) One (1) Paint Booth, identified as N-25, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-25.
- (dddd) One (1) Paint Booth, identified as N-26, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-26.
- (eeee) One (1) Paint Booth, identified as N-27, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-27.
- (ffff) One (1) Paint Booth, identified as N-28, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-28.
- (gggg) One (1) Paint Booth, identified as N-29, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-29.
- (hhhh) One (1) Paint Booth, identified as N-30, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-30.
- (iiii) One (1) Paint Booth, identified as N-31, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-31.

Wood Milling and Assembly Operations

- (~~eee~~ jjjj) One (1) Wood Milling Process, identified as DC4/6, constructed in 1995, with a maximum capacity of 6,622.65 pounds per hour, emissions controlled by two baghouses, DC 4 and DC 6, each with an outlet grain loading of 0.008 gr/dscf and exhaust gas flow rate of 61,000 dscfm, exhausting to stacks 4 and 6.
- (~~fff~~ kkkk) One (1) Furniture Assembly Process, identified as DC4/6, constructed in 1995, with a maximum capacity of 6,622.65 pounds per hour, emissions controlled by two baghouses, DC4 and DC6, each with an outlet grain loading of 0.008 gr/dscf and exhaust gas flow rate of 61,000 dscfm, exhausting to stacks 4 and 6.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

...

Desk Line 2:

- (n) One (1) SAP Booth, identified as F15, constructed in 1994, with a maximum capacity of 44 **28** units per hour, emissions controlled by a dry filter, exhausting to stack F15.
- (o) One (1) NGR #1 Booth, identified as F16, constructed in 1994, with a maximum capacity of 44 **28** units per hour, emissions controlled by a dry filter, exhausting to stack F16.
- (p) One (1) Repair Booth, identified as F10, constructed in 1994, with a maximum capacity of 6.25

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- units per hour, emissions controlled by a dry filter, exhausting to stack F10.
- (q) One (1) Washcoat Booth, identified as F17, constructed in 1995, with a maximum capacity of 44 **28** units per hour, emissions controlled by a dry filter, exhausting to stack F17.
 - (r) One (1) Wipestain Booth, identified as F19, constructed in 1995, with a maximum capacity of 44 **28** units per hour, emissions controlled by a dry filter, exhausting to stack F19.
 - (s) One (1) Topcoat #1 and #3 Booth, identified as F23, constructed in 1995, with a maximum capacity of 44 **28** units per hour, emissions controlled by a dry filter, exhausting to stack F23.
 - (t) One (1) Topcoat #2 and Sealer Booth, identified as F22, constructed in 1995, with a maximum capacity of 44 **28** units per hour, emissions controlled by a dry filter, exhausting to stack F22.
 - (u) One (1) SAP Booth, identified as F45, constructed in 1998, with a maximum capacity of 44 **28** units per hour, emissions controlled by a dry filter, exhausting to stack F45.
 - (v) One (1) NGR Booth, identified as F46, constructed in 1998, with a maximum capacity of 7 **28** units per hour, emissions controlled by a dry filter, exhausting to stack F46.
 - (w) One (1) Washcoat Booth, identified as F47, constructed in 1998, with a maximum capacity of 44 **28** units per hour, emissions controlled by a dry filter, exhausting to stack F47.
 - (x) One (1) Repair Booth, identified as F30, constructed in 1998, with a maximum capacity of 1.25 units per hour, emissions controlled by a dry filter, exhausting to stack F30.
 - (y) One (1) Topcoat #2 and Sealer Booth, identified as F28, constructed in 1999, with a maximum capacity of 44 **28** units per hour, emissions controlled by a dry filter, exhausting to stack F28.

Desk Line 3:

- (z) One (1) Wipestain Booth, identified as F27, constructed in 1999, with a maximum capacity of 7 units per hour, emissions controlled by a dry filter, exhausting to stack F27.
- (aa) One (1) Topcoat #1 and #3 Booth, identified as F29, constructed in 1999, with a maximum capacity of 14 units per hour, emissions controlled by a dry filter, exhausting to stack F29.
- (bb) One (1) SAP Stain Booth, identified as N-1, constructed in 2006, with a maximum capacity of 14 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-1.**
- (cc) One (1) NGR Stain Booth, identified as N-2, constructed in 2006, with a maximum capacity of 14 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-2.**
- (dd) One (1) SAP Stain Booth, identified as N-3, constructed in 2006, with a maximum capacity of 14 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-3.**
- (ee) One (1) NGR Stain Booth, identified as N-4, constructed in 2006, with a maximum capacity of 14 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-4.**

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (ff) One (1) Washcoat Booth, identified as N-5, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-5.
- (gg) One (1) Top Coat Booth, identified as N-6, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-6.
- (hh) One (1) Top Coat Booth, identified as N-7, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-7.
- (ii) One (1) Repair Booth, identified as N-8, constructed in 2006, with a maximum capacity of 14 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-8.

Desk Line 4:

- ~~(bb)~~ (jj) One (1) Topcoat and Sealer Booth, identified as F25, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F25.
- ~~(ee)~~ (kk) One (1) Repair Booth, identified as F24, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F24.

Desk Line 5:

- ~~(ed)~~ (ll) One (1) SAP/NGR #1 Booth, identified as F14, constructed in 1994, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F14.
- ~~(ee)~~ (mm) One (1) Wipestain Booth, identified as F11, constructed in 1994, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F11.
- ~~(ff)~~ (nn) One (1) Topcoat Booth, identified as F8, constructed in 1994, with a maximum capacity of 3.75 units per hour, emissions controlled by a dry filter, exhausting to stack F8.

Desk Line 6:

- ~~(gg)~~ (oo) One (1) SAP/NGR #1 Booth, identified as F20, constructed in 1995, with a maximum capacity of 3.125 units per hour, emissions controlled by a dry filter, exhausting to stack F20.
- ~~(hh)~~ (pp) One (1) Washcoat Booth, identified as F21, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F21.
- ~~(ii)~~ (qq) One (1) Topcoat and Sealer Booth, identified as C12, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack C12.
- ~~(jj)~~ (rr) One (1) Wipestain Booth, identified as F26, constructed in 1995, with a maximum capacity of 6.25 units per hour, emissions controlled by a dry filter, exhausting to stack F26.
- ~~(kk)~~ (ss) One (1) Repair Booth, identified as F44, constructed in 1997, with a maximum capacity of 1.25 units per hour, emissions controlled by a dry filter, exhausting to stack F44.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

Drawer Line:

- (~~tt~~ tt) One (1) Drawer Enamel Booth, identified as F9, constructed in 1994, with a maximum capacity of 37.5 units per hour, emissions controlled by a dry filter, exhausting to stack F9.
- (~~uu~~ uu) One (1) Drawer Coat Booth, identified as F7, constructed in 1994, with a maximum capacity of 37.5 units per hour, emissions controlled by a dry filter, exhausting to stack F7.

Chair Line:

- (~~vv~~ vv) One (1) SAP Booth, identified as C1, constructed in 1995, with a maximum capacity of 67.5 units per hour, emissions controlled by a dry filter, exhausting to stack C1.
- (~~ww~~ ww) One (1) NGR Booth, identified as C2, constructed in 1995, with a maximum capacity of 67.5 units per hour, emissions controlled by a dry filter, exhausting to stack C2.
- (~~xx~~ xx) One (1) SAP/NGR #1 Booth, identified as C3, constructed in 1995, with a maximum capacity of 10 units per hour, emissions controlled by a dry filter, exhausting to stack C3.
- (~~yy~~ yy) One (1) SAP/NGR #3 Booth, identified as C10, constructed in 1995, with a maximum capacity of 10 units per hour, emissions controlled by a dry filter, exhausting to stack C10.
- (~~zz~~ zz) One (1) Washcoat Booth, identified as C4, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C4.
- (~~aaa~~ aaa) One (1) Wipestain Booth, identified as C5, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C5.
- (~~bbb~~ bbb) One (1) Sealer #1 Booth, identified as C8, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C8.
- (~~ccc~~ ccc) One (1) Topcoat #1 and Sealer #2 Booth, identified as C7, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C7.
- (~~ddd~~ ddd) One (1) Topcoat #2 Booth, identified as C6, constructed in 1995, with a maximum capacity of 87.5 units per hour, emissions controlled by a dry filter, exhausting to stack C6.
- (~~eee~~ eee) One (1) Repair Booth, identified as C9, constructed in 1995, with a maximum capacity of 9 units per hour, emissions controlled by a dry filter, exhausting to stack C9.
- (~~fff~~ fff) One (1) Mix Booth, identified as C11, constructed in 1997, with a maximum capacity of 1 unit per hour, emissions controlled by a dry filter, exhausting to stack C11.

UV Line:

- (~~ggg~~ ggg) One (1) Robotic Spray Booth, identified as U1, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by water pans, exhausting to stack U1.
- (~~hhh~~ hhh) One (1) Topcoat Booth, identified as U1A/U1B/U1C/U2, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by dry filters, exhausting to stacks U1A, U1B,

SECTION D.1 FACILITY OPERATION CONDITIONS

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

U1C, or U2.

- ~~(aaa iii)~~ One (1) NGR Booth, identified as U3, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by a dry filter, exhausting to stack U3.
- ~~(bbb jjj)~~ One (1) Sealer Booth, identified as U4, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by a dry filter, exhausting to stack U4.
- ~~(eee kkk)~~ One (1) Wipestain Booth, identified as U5, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by a dry filter, exhausting to stack U5.
- ~~(ddd III)~~ One (1) Washcoat Booth, identified as U6, constructed in 1998, with a maximum capacity of 25 units per hour, emissions controlled by a dry filter, exhausting to stack U6.

HON Desk Line:

- ~~(mmm)~~ One (1) Paint Booth, identified as N-9, constructed in 2006, with a maximum capacity of 10 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-9.
- ~~(nnn)~~ One (1) Paint Booth, identified as N-10, constructed in 2006, with a maximum capacity of 10 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-10.
- ~~(ooo)~~ One (1) Paint Booth, identified as N-11, constructed in 2006, with a maximum capacity of 10 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-11.
- ~~(ppp)~~ One (1) Paint Booth, identified as N-12, constructed in 2006, with a maximum capacity of 10 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-12.
- ~~(qqq)~~ One (1) Paint Booth, identified as N-13, constructed in 2006, with a maximum capacity of 10 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-13.
- ~~(rrr)~~ One (1) Paint Booth, identified as N-14, constructed in 2006, with a maximum capacity of 10 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-14.

Vertical Line:

- ~~(sss)~~ One (1) Paint Booth, identified as N-15, constructed in 2006, with a maximum capacity of 7 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-15.
- ~~(ttt)~~ One (1) Paint Booth, identified as N-16, constructed in 2006, with a maximum capacity of 7 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-16.
- ~~(uuu)~~ One (1) Paint Booth, identified as N-17, constructed in 2006, with a maximum capacity of 7 units per hour, using HVLP spray application, emissions controlled by dry filters,

SECTION D.1 FACILITY OPERATION CONDITIONS

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

exhausting to stack N-17.

(vvv) One (1) Paint Booth, identified as N-18, constructed in 2006, with a maximum capacity of 7 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-18.

(www) One (1) Paint Booth, identified as N-19, constructed in 2006, with a maximum capacity of 7 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-19.

Small Parts Line:

(xxx) One (1) Paint Booth, identified as N-20, constructed in 2006, with a maximum capacity of 5 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-20.

(yyy) One (1) Paint Booth, identified as N-21, constructed in 2006, with a maximum capacity of 5 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-21.

(zzz) One (1) Paint Booth, identified as N-22, constructed in 2006, with a maximum capacity of 5 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-22.

(aaaa) One (1) Paint Booth, identified as N-23, constructed in 2006, with a maximum capacity of 5 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-23.

(bbbb) One (1) Paint Booth, identified as N-24, constructed in 2006, with a maximum capacity of 5 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-24.

Desk Line 7:

(cccc) One (1) Paint Booth, identified as N-25, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-25.

(dddd) One (1) Paint Booth, identified as N-26, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-26.

(eeee) One (1) Paint Booth, identified as N-27, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-27.

(ffff) One (1) Paint Booth, identified as N-28, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-28.

(gggg) One (1) Paint Booth, identified as N-29, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters,

SECTION D.1 FACILITY OPERATION CONDITIONS

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

exhausting to stack N-29.

(hhhh) One (1) Paint Booth, identified as N-30, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-30.

(iii) One (1) Paint Booth, identified as N-31, constructed in 2006, with a maximum capacity of 28 units per hour, using HVLP spray application, emissions controlled by dry filters, exhausting to stack N-31.

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

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

D.1.1 PM and PM₁₀ Emissions Limitations [326 IAC 2-2]

Pursuant to SSM 117-22455-00014,

- (a) The coatings applied by booths F27, F29 and N-1 through N-31 shall be limited such that total PM emissions shall be less than 25 tons per twelve consecutive month period with compliance determined at the end of each month.
- (b) The coatings applied by booths F27, F29 and N-1 through N-31 shall be limited such that total PM₁₀ emissions shall be less than 15 tons per twelve consecutive month period with compliance determined at the end of each month.
- (c) The transfer efficiency of booths F27, F29 and N-1 through N-31 shall not be less than 65%.
- (d) The control efficiency of the dry filters used by booths F27, F29 and N-1 through N-31 shall not be less than 90%.

Compliance with these limits will render the requirements of 326 IAC 2-2 not applicable with respect to PM and PM₁₀ to the modification described in SSM 117-22455-00014.

D.1.12 VOC BACT [326 IAC 2-2-3(a)]

...

D.1.2 3 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

...

D.1.3 4 Wood Furniture Manufacturing Limits [40 CFR Part 63, Subpart JJ]

- (a) The wood furniture coating operations are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 14, (40 CFR 63 Subpart JJ). A copy of this rule is attached. Pursuant to 40 CFR ~~63-800~~ **63.802**, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:
 - (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations **used in conjunction with booths F1 through F30, F44 through F47, F2A, F6A, F6B, G1, U1, U1A/U1B/U1C/U2, U3 through U6 and C1 through C12** as follows:

- (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of 1.0 pound VHAP per pound solids; or
 - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content on one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. Solvent and thinner mixtures used for other purposes have a ten percent (10%) maximum VHAP content by weight; or
 - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or
 - (D) Use a combination of (A), (B), and (C).
- (2) Limit VHAP emissions from contact adhesives **used in conjunction with booths F1 through F30, F44 through F47, F2A, F6A, F6B, G1, U1, U1A/U1B/U1C/U2, U3 through U6 and C1 through C12** as follows:
- (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed one and eight-tenths (1.8) pound VHAP per pound solids.
 - (B) For all contact adhesives (except aerosols and contact adhesives applied to nonporous substances) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.
 - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.
- (3) **Limit VHAP emissions from finishing operations used in conjunction with booths N-1 through N-31 as follows:**
- (A) **Achieve a weighted average VHAP content across all coatings of 0.8 pound VHAP per pound solids; or**
 - (B) **Use compliant finishing materials in which all washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of 0.8 pound VHAP per pound solids, as applied. Use compliant finishing materials in which all stains have a maximum VHAP content of 1.0 pound VHAP per pound solids, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. Solvent and thinner mixtures used for other purposes have a ten percent (10%) maximum VHAP content by weight; or**
 - (C) **Use a control device to limit emissions to 0.8 pound VHAP per pound solids; or**
 - (D) **Use a combination of (A), (B), and (C).**
- (4) **Limit VHAP emissions from contact adhesives used in conjunction with booths N-1 through N-31 as follows:**

- (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 0.2 pound VHAP per pound solids.
- (B) For all contact adhesives (except aerosols and contact adhesives applied to nonporous substances) the VHAP content shall not exceed 0.2 pound VHAP per pound solids.
- (C) Use a control device to limit emissions to 0.2 pound VHAP per pound solids.

(3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

...

D.1.45 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

...

D.1.56 Particulate Matter (PM) [326 IAC 6-3-2]

...

D.1.67 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

....

D.1.78 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions ~~D.1.1 and D.1.3~~ **D.1.2 and D.1.4** shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.89 Particulate Matter (PM) Control

Pursuant to 117-2932-00014, issued January 12, 1994, 117-2759-00014, issued August 6, 1994, 117-4210-00014, issued March 28, 1995, **SSM 117-22455-00014** and in order to comply with Conditions ~~D.1.5~~ **D.1.1 and D.1.6**, the dry filters for PM control shall be in proper placement and control emissions from the booths at all times when the respective booths are in operation.

D.1.10 Particulate Matter (PM/PM₁₀) Emissions Determination [326 IAC 2-2]

Compliance with Conditions D.1.1(a) and D.1.1(b) shall be determined by calculating the PM/PM₁₀ emissions associated with each coating applied by booths F27 and F29 and N-1 through N-31 using the following equation:

$$PM/PM_{10} = CU \times D \times W\%S \times (1 - TE/100) \times (1 - CE/100) \times 1/2000$$

Where:

PM/PM₁₀ = The total PM/PM₁₀ emissions (ton/month) from booths N1 through N31 for a given coating.

CU = The total coating use (gal coating/month) of a given coating.

D = The density (lb coating/gal coating) of a given coating.

W%S = The weight percent solids (lb solids/ lb coating) of a given coating.

TE = The transfer efficiency (%) of the spray applicators. This value shall

equal 65% or a value determined from the most recent valid compliance demonstration.

CE = The control efficiency (%) of the dry filters. This value shall equal 90% or a value determined from the most recent valid compliance demonstration.

The total PM/PM₁₀ emissions (ton/month) from booths F27 and F29 and N-1 through N-31 is equal to the sum of the PM/PM₁₀ emissions (ton/month) associated with each coating applied by those booths.

D.1.11 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

- (a) The Permittee shall conduct performance tests (as described in (b) and (c) below) to verify the transfer efficiency and particulate matter control efficiency requirements in Conditions D.1.1(c) and D.1.1(d).
- (b) Within 60 days after achieving maximum production rate, but no later than 180 days after initial start up, the Permittee shall conduct transfer efficiency testing on seven (7) of the booths covered by Condition D.1.1. The testing shall be done on booths that have not been tested in the past ten (10) years. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted using methods approved by the Commissioner and in accordance with 326 IAC 3-6-3 and Section C - Performance Testing.
- (c) Within 60 days after achieving maximum production rate, but no later than 180 days after initial start up, the Permittee shall conduct control efficiency testing on the dry filters used by seven (7) of the booths covered by Condition D.1.1. The testing shall be done on filters that have not been tested in the past ten (10) years. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted using methods approved by the Commissioner and in accordance with 326 IAC 3-6-3 and Section C - Performance Testing.

D.1.912 Operator Training Program

...

D.1.4013 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the PM/PM₁₀ emission limits established in Condition D.1.1.
 - (1) The amount of each coating material used (as applied). Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used
 - (2) The density and weight percent solids of each coating material used (as applied).
- (a b) To document compliance with Condition ~~D.1.1~~ **D.1.2**, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition ~~D.1.1~~ **D.1.2**.

...

- (b c) To document compliance with Condition ~~D.1.9~~ **D.1.12**, the Permittee shall maintain copies of the training program, the list of trained operators, and training records shall be maintained on site or available within 1 hour for inspection by IDEM.
- (e d) To document compliance with Condition ~~D.1.3~~ **D.1.4**, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition ~~D.1.3~~ **D.1.4**.
...
- (d e) To document compliance with Condition ~~D.1.3(b)~~ **D.1.4(b)**, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
...
- (e f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.414 Reporting Requirements

- (a) **A quarterly summary of the monthly PM/PM₁₀ emissions from the booths covered by Condition D.1.1 as calculated by Condition D.1.10. The summary shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**
- (a b) A quarterly summary of the information to document compliance with Condition ~~D.1.1~~ **D.1.2** shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b c) A semi-annual Continuous Compliance Report to document compliance with Condition D.1.3 and the Certification form, shall be submitted to the addresses listed in Section C - General Reporting Requirements of this permit, within thirty (30) days after the end of the six (6) months being reported.

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

- (1) January 1 through June 30.
- (2) July 1 through December 31.

- (e d) The report required by (b c) of this condition shall be submitted to:

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

and

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

Chicago, Illinois 60604-3590

SECTION D.2 FACILITY OPERATION CONDITIONS

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

Wood Milling and Assembly Operations:

(eee jjjj) One (1) Wood Milling Process, identified as DC4/6, constructed in 1995, with a maximum capacity of 6,622.65 pounds per hour, emissions controlled by two baghouses, DC 4 and DC 6, each with an outlet grain loading of 0.008 gr/dscf and exhaust gas flow rate of 61,000 dscfm, exhausting to stacks 4 and 6.

(fff kkkk) One (1) Furniture Assembly Process, identified as DC4/6, constructed in 1995, with a maximum capacity of 6,622.65 pounds per hour, emissions controlled by two baghouses, DC 4 and DC 6, each with an outlet grain loading of 0.008 gr/dscf and exhaust gas flow rate of 61,000 dscfm, exhausting to stacks 4 and 6.

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

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

Part 70 QUARTERLY REPORT

Source Name:	Paoli, Inc.
Source Address:	201 E. Martin Street, Orleans, IN 47452
Mailing Address:	P.O. Box 30, Paoli, IN 47454
Part 70 Permit No.:	T117-6003-00014
Facility:	Booths F27, F29 and N-1 through N-31
Limit:	Total PM and PM ₁₀ emissions shall be less than 25 tons, and 15 tons respectively, per twelve consecutive month period with compliance determined at the end of each month. PM/PM ₁₀ emissions shall be determined using the equation in Condition D.1.10.

YEAR: _____

Month	PM/PM ₁₀ Emissions	PM/PM ₁₀ Emissions	PM/PM ₁₀ Emissions
	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.

Upon further review, IDEM, OAQ has decided to make the following changes:

1. The phrase "in letter form" was deleted from B.9 to clarify how the forms may be submitted.

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

...

2. The General Recording Keeping and Reporting Requirement conditions were updated to include 326 IAC 2-3 citations:

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2]

- (c) If there is a reasonable possibility that a "project" (as defined in 326 IAC 2-2-1(qq) **and 326 IAC 2-3-3(II)**) at an existing emissions unit, other than projects at a Clean Unit, which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) **and 326 IAC 2-3-1(z)**) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) **and 326 IAC 2-3-3(mm)**), the Permittee shall comply with following:

- (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(qq) **and 326 IAC 2-3-1(II)**) at an existing emissions unit, document and maintain the following records:

...

- (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:

- (i) Baseline actual emissions;
- (ii) Projected actual emissions;
- (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) **and 326 IAC 2-3-1(mm)(2)(A)(3)**; and

...

...

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]

...

(f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any project (as defined in **326 IAC 2-2-1(qq) and 326 IAC 2-3-1(II)**) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ :

(1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C - General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1(xx) and **326 IAC 2-3-1(II)**, for that regulated NSR pollutant, and

...

(g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:

...

(3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and **326 IAC 2-3-2(c)(3)**.

...

Conclusion and Recommendation

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 117-22455-00014 and Significant Permit Modification 177-22829 -00014. The staff recommends to the Commissioner that this Part 70 Significant Source Modification and Significant Permit Modification be approved.

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

**Company Name: Paoli, Inc.
Address City IN Zip: 201 East Martin St., Orleans IN 47454
Permit Number: SSM 117-22455-00014
Reviewer: ERG/BS
Date: 3/29/2006**

Material	Density (Lb/Gal)	Weight % 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	VOC PTE (ton/yr)	lb VOC/gal solids	Transfer Efficiency (%)	Un controlled PM PTE (ton/yr)	Control Efficiency (%)	Controlled PM PTE (ton/yr)
SAP STAIN	6.59	99.80%	0.00%	99.80%	0.00%	0.20%	0.03	78.00	6.58	6.58	17.53	420.62	76.76	3287.71	65%	0.05	90.0%	0.01
NGR STAIN	6.59	99.89%	0.00%	99.89%	0.00%	0.11%	0.05	78.00	6.58	6.58	23.14	555.37	101.36	5983.05	65%	0.04	90.0%	0.00
WIPE STAIN	7.84	83.57%	0.00%	83.57%	0.00%	12.34%	0.01	78.00	6.55	6.55	5.62	134.91	24.62	53.09	65%	1.69	90.0%	0.17
SEALER	7.59	82.51%	0.00%	82.51%	0.00%	17.49%	0.07	78.00	6.26	6.26	33.21	797.13	145.48	35.80	65%	10.79	90.0%	1.08
CATALYST	9.09	48.96%	0.00%	48.96%	0.00%	51.04%	0.00	78.00	4.45	4.45	0.35	8.33	1.52	8.72	65%	0.55	90.0%	0.06
WASHCOAT	6.92	93.79%	0.00%	93.79%	0.00%	6.21%	0.06	78.00	6.49	6.49	28.76	690.19	125.96	104.55	65%	2.92	90.0%	0.29
TOPCOAT	7.84	73.13%	0.00%	73.13%	0.00%	26.86%	0.16	78.00	5.73	5.73	72.53	1740.65	317.67	21.34	65%	40.85	90.0%	4.09
TOTAL													793.37			56.91		5.69

METHODOLOGY

Note that emission calculations are based on the use of the coatings that produce the worst emissions.

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 to Emit VOC (ton/yr) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Potential to Emit PM (ton/yr) = (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)

THE EMISSION ESTIMATES PROVIDED IN THE ABOVE TABLE REFLECT THE ENTIRE MODIFICATION (INCREASE IN CAPACITY TO EXISTING UNITS AND THE ADDITION OF 31 BOOTHS).

Appendix A: Emission Calculations
HAP Emission Calculations from Surface Coating

Company Name: Paoli, Inc.
Address City IN Zip: 201 East Martin St., Orleans IN 47454
Permit Number: SSM 117-22455-00014
Reviewer: ERG/BS
Date: 3/29/2006

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Ethyl Benzene	Weight % Formaldehyde	Weight % Methanol	Weight % MEK	Weight % Methyl Isobutyl Ketone	Weight % Toluene	Weight % Xylene	Ethyl Benzene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Methanol Emissions (ton/yr)	MEK Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)
SAP STAIN	6.59	0.03	78.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
NGR STAIN	6.59	0.05	78.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIPE STAIN	7.84	0.01	78.00	0.46%	0.00%	0.00%	0.00%	0.00%	0.00%	2.08%	0.14	0.00	0.00	0.00	0.00	0.00	0.61
SEALER	7.59	0.07	78.00	1.50%	0.14%	0.00%	0.00%	0.00%	9.24%	7.01%	2.64	0.25	0.00	0.00	0.00	16.29	12.36
CATALYST	9.09	0.00	78.00	0.00%	0.00%	18.50%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.57	0.00	0.00	0.00	0.00
WASHCOAT	6.92	0.06	78.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
TOPCOAT	7.84	0.16	78.00	1.24%	0.13%	0.00%	0.00%	0.00%	12.34%	4.72%	5.39	0.56	0.00	0.00	0.00	53.60	20.50
Subtotals											8.17	0.81	0.57	0.00	0.00	69.90	33.48
TOTAL											112.9						

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
 Note that emission calculations are based on the use of the coatings that produce the worst emissions.

THE EMISSION ESTIMATES PROVIDED IN THE ABOVE TABLE REFLECT THE ENTIRE MODIFICATION (INCREASE IN CAPACITY TO EXISTING UNITS AND THE ADDITION OF 31 BOOTHS).