



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: July 12, 2007
RE: U.B. Klem Furniture Company, Inc. / 037-22469-00094
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot 03/23/06



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100 North Senate Avenue
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Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**U.B. Klem Furniture Co., Inc.
3861 E. Schnellville Road
St. Anthony, Indiana 47575**

(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. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 037-22469-00094	
Issued by: <i>Original document signed by</i> Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: July 12, 2007 Expiration Date: July 12, 2012

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SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates miscellaneous wood furniture and fixture manufacturing source.

Source Address:	3861 E. Schnellville Road, St. Anthony, Indiana 47575
Mailing Address:	P.O. Box 146, St. Anthony, Indiana 47575
General Source Phone Number:	812-326-2236
SIC Code:	2599
County Location:	Dubois
Source Location Status:	Nonattainment for PM _{2.5} Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act

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

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

- (a) Two (2) surface coating spray booths (Sap and Wipe Stain), equipped with HVLP spray applicators and dry filters for overspray control, identified as EU-01A and EU-01B, both constructed in 1993, exhausting through stacks S1 and S2, respectively, capacity: 1,258 square feet of wood per hour, each.
- (b) Four (4) surface coating spray booths (Sealer #1, Sealer #2, Topcoat #1 and Topcoat #2), equipped with HVLP spray applicators, and dry filters for overspray control, identified as EU-01C through EU-01F, all constructed in 1993, exhausting through stacks S3, S4, S5 and S6, respectively, capacity: 629 square feet of wood per hour, each.
- (c) One (1) touch-up spray booth, equipped with HVLP spray applicators, and dry filters for overspray control, identified as EU-01G, constructed in 1984, capacity: 60 square feet of wood per hour.
- (d) One (1) adhesive spray booth, equipped with HVLP spray applicators, and dry filters for overspray control, identified as EU-01H, constructed in 1986, capacity: 65 square feet of wood per hour.
- (e) One (1) rollcoat area, identified as EU-01I, constructed in 1986, capacity: 549 square feet of wood per hour.
- (f) One (1) brush coat area, identified as EU-01J, constructed in 1980, capacity: 1,022 square feet of wood per hour.
- (g) One (1) woodworking operation, identified as WW1, constructed in 1984, exhausting to baghouse B1, capacity: 1,320 pounds of wood per hour.
- (h) One (1) wood-fired boiler, identified as EU-B1, constructed in 1984, exhausting through stack

SB1, heat input capacity: 2.10 million British thermal units per hour.

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, total heat input capacity: 10.595 million British thermal units per hour. [326 IAC 6.5]
- (b) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (d) One (1) sawdust storage silo, identified as SILO, throughput: 41 pounds sawdust per hour. [326 IAC 6.5]

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

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

SECTION B GENERAL CONDITIONS

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

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

B.2 Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)]

- (a) This permit, F 037-22469-00094, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U.S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and Southwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865
Southwest Regional Office
phone: (812) 380-2305;

phone: (888) 672-8323 (Toll free within Indiana);
fax: (812) 380-2304

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

- (a) All terms and conditions of permits established prior to F 037-22469-00094 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted under.
- (b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
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using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
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- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

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

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

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

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

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

copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

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

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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

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

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

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]

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

B.24 Credible Evidence [326 IAC 2-8-4(3)] [326 IAC 2-8-5] [62 FR 8314] [326 IAC 1-1-6]

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-8-4(1)]

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

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

C.2 Overall Source Limit [326 IAC 2-8] [326 IAC 2-2]

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

(a) Pursuant to 326 IAC 2-8:

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

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145 (a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

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

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
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no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compli-

ance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

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

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

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

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

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

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

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

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

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

C.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or

usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

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

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by an

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

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

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) Two (2) surface coating spray booths (Sap and Wipe Stain), equipped with HVLP spray applicators and dry filters for overspray control, identified as EU-01A and EU-01B, both constructed in 1993, exhausting through stacks S1 and S2, respectively, capacity: 1,258 square feet of wood per hour, each.
- (b) Four (4) surface coating spray booths (Sealer #1, Sealer #2, Topcoat #1 and Topcoat #2), equipped with HVLP spray applicators, and dry filters for overspray control, identified as EU-01C through EU-01F, all constructed in 1993, exhausting through stacks S3, S4, S5 and S6, respectively, capacity: 629 square feet of wood per hour, each.
- (c) One (1) touch-up spray booth, equipped with HVLP spray applicators, and dry filters for overspray control, identified as EU-01G, constructed in 1984, capacity: 60 square feet of wood per hour.
- (d) One (1) adhesive spray booth, equipped with HVLP spray applicators, and dry filters for overspray control, identified as EU-01H, constructed in 1986, capacity: 65 square feet of wood per hour.
- (e) One (1) rollcoat area, identified as EU-01I, constructed in 1986, capacity: 549 square feet of wood per hour.
- (f) One (1) brush coat area, identified as EU-01J, constructed in 1980, capacity: 1,022 square feet of wood per hour.

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

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

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating at the six (6) surface coating booths, identified as EU-01A, EU-01B, EU-01C, EU-01D, EU-01E and EU-01F shall utilize one of the following application methods:

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

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

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 2-8] [326 IAC 2-2]

The use of VOC, including coatings, dilution solvents, and cleaning solvents, shall be less than 98.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

This usage limit is required to limit the potential to emit of VOC to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit renders 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-7 (Part 70) not applicable.

D.1.3 Hazardous Air Pollutants (HAPs) Limitations [326 IAC 2-8] [326 IAC 2-4.1]

- (a) The worst case individual HAP delivered to the spray booths EU-01A through EU-01H, the rollcoat area EU-01I and the brush coat area EU-01J, shall be limited to 9.91 tons per year. This usage limit is required to limit the potential to emit each individual HAP to less than ten (10) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The total combined HAPs delivered to the coating applicators in spray booths EU-01A through EU-01H as well as the rollcoat area EU-01I and the brush coat area EU-01J shall be limited to 24.5 tons per year. This usage limit is required to limit the potential to emit HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

D.1.4 Particulate [326 IAC 6.5-1-2]

Pursuant 326 IAC 6.5-1-2(a), the PM emissions from the six (6) surface coating spray booths, identified as EU-01A through EU-01F, the touch-up spray booth, identified as EU-01G, and the adhesive spray booth, identified as EU-01H, shall be limited to 0.03 grains per dry standard foot of outlet air.

D.1.5 PM₁₀ Limits [326 IAC 2-8] [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4, the PM₁₀ emissions from the spray booths, EU-01A through EU-01H, shall be limited to 0.0578 pounds per hour, total. Compliance with this limit renders 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-7 (Part 70) not applicable.

D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.7 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

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

D.1.8 Particulate Control

In order to comply with Conditions D.1.4 and D.1.5, the dry filters for particulate control shall be in proper placement and control emissions from the eight (8) surface coating spray booths, identified as EU-01A through EU-01H, at all times that the eight (8) surface coating spray booths, identified as EU-01A through EU-01H, are in operation.

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

D.1.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S1 through S6) while one or more of

the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

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

D.1.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.2 and D.1.3, 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 and HAPs usage limits and the VOC and HAPs emission limits established in Conditions D.1.2 and D.1.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The VOC and HAP content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC and HAPs usage for each month; and
 - (5) The weight of VOCs and HAPs emitted for each compliance period.
- (b) To document compliance with Conditions D.1.4 and D.1.8, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.2 and D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (g) One (1) woodworking operation, identified as WW1, constructed in 1984, exhausting to baghouse B1, capacity: 1,320 pounds of wood per hour.

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the woodworking operation, identified as WW1, shall not exceed 3.10 pounds per hour when operating at a process weight rate of 1,320 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 60,000 pounds per hour shall be accomplished by use of the equation:

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

D.2.2 Particulate Matter [326 IAC 6.5-1]

Pursuant to 326 IAC 6.5-1-2(a), particulate emissions from the woodworking operation, identified as WW1, shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

D.2.3 PM₁₀ Limit [326 IAC 2-8] [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4, the PM emissions from the woodworking operations, identified as WW1, shall not exceed 3.10 pounds per hour. Compliance with this limit will render the requirements of 326 IAC 2-7 (Part 70) and 326 IAC 2-2 (PSD) not applicable.

D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.2.5 Testing Requirements [326 IAC 2-8] [326 IAC 2-1.1-11]

Within twelve (12) months after issuance of this permit, the Permittee shall perform an initial PM and PM₁₀ test of the one (1) woodworking operation baghouse to demonstrate compliance with Conditions D.2.1, D.2.2 and D.2.3. Testing shall be conducted in accordance with Condition C.8 Performance Testing.

D.2.6 Particulate Control

- (a) In order to comply with Conditions D.2.1 and D.2.2, the baghouse for particulate control shall be in operation and control emissions from the woodworking operations at all times that the woodworking operations are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date

the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.2.7 Visible Emissions Notations

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

D.2.8 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.2.9 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 emissions unit. 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 or dust traces.

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

D.2.10 Record Keeping Requirements

- (a) To document compliance with Condition D.2.7, the Permittee shall maintain records of daily visible emission notations of the woodworking operations stack exhaust.
- (b) To document compliance with Condition D.2.8, the Permittee shall maintain records of the results of the inspections required under Condition D.2.8 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Wood-fired Boiler

- (h) One (1) wood-fired boiler, identified as EU-B1, constructed in 1984, exhausting through stack SB1, heat input capacity: 2.1 million British thermal units per hour.

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Particulate [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(b)(1)(C), the PM emissions from the one (1) wood-fired boiler, identified as EU-B1, are limited to 0.60 pounds per million British thermal units heat input.

D.3.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

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

D.3.3 Visible Emissions Notations

- (a) Visible emission notations of the one (1) wood fired boiler, EU-B1, stack exhaust SB1 shall be performed once per day during normal daylight operations when exhausting directly to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

D.3.4 Record Keeping Requirements

- (a) To document compliance with Condition D.3.3, the Permittee shall maintain records of daily visible emission notations of the wood-fired boiler stack.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.4

FACILITY OPERATION CONDITIONS

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, total heat input capacity: 10.595 million British thermal units per hour. [326 IAC 6.5]
- (d) One (1) sawdust storage silo, identified as SILO, throughput: 41 pounds sawdust per hour. [326 IAC 6.5]

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.4.1 Particulate [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(a), particulate emissions from the natural gas-fired combustion sources and the one (1) sawdust storage silo, identified as SILO, shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

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

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

Source Name: U.B. Klem Furniture Co., Inc.
Source Address: 3861 E. Schnellville Road, St. Anthony, Indiana 47575
Mailing Address: P.O. Box 146, St. Anthony, Indiana 47575
FESOP No.: F 037-22469-00094

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

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

Source Name: U.B. Klem Furniture Co., Inc.
Source Address: 3861 E. Schnellville Road, St. Anthony, Indiana 47575
Mailing Address: P.O. Box 146, St. Anthony, Indiana 47575
FESOP No.: F 037-22469-00094

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: U.B. Klem Furniture Co., Inc.
Source Address: 3861 E. Schnellville Road, St. Anthony, Indiana 47575
Mailing Address: P.O. Box 146, St. Anthony, Indiana 47575
FESOP No.: F 037-22469-00094
Facilities: Surface coating booths, EU-01A through EU-01J.
Parameter: VOC usage
Limit: 98.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.
Deviation has been reported on _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: U.B. Klem Furniture Co., Inc.
Source Address: 3861 E. Schnellville Road, St. Anthony, Indiana 47575
Mailing Address: P.O. Box 146, St. Anthony, Indiana 47575
FESOP No.: F 037-22469-00094
Facilities: Surface coating booths, EU-01A through EU-01J.
Parameter: Worst case of any individual HAP usage.
Limit: Less than 9.91 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Individual HAP Usage (tons)	Individual HAP Usage (tons)	Individual HAP Usage (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.
Deviation has been reported on _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: U.B. Klem Furniture Co., Inc.
Source Address: 3861 E. Schnellville Road, St. Anthony, Indiana 47575
Mailing Address: P.O. Box 146, St. Anthony, Indiana 47575
FESOP No.: F 037-22469-00094
Facilities: Surface coating booths, EU-01A through EU-01J.
Parameter: Total HAPs usage.
Limit: Less than 24.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Total HAPs Usage (tons)	Total HAPs Usage (tons)	Total HAPs Usage (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.
Deviation has been reported on _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

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

Source Name: U.B. Klem Furniture Co., Inc.
Source Address: 3861 E. Schnellville Road, St. Anthony, Indiana 47575
Mailing Address: P.O. Box 146, St. Anthony, Indiana 47575
FESOP No.: F 037-22469-00094

Months: _____ to _____ Year: _____

Page 1 of 2

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the
Technical Support Document for Federally Enforceable State Operating Permit (FESOP)
Renewal

Source Name: U.B. Klem Furniture Co., Inc.
Source Location: 3861 E. Schnellville Road, St. Anthony, Indiana 47575
County: Dubois
FESOP: F 037-22469-00094
SIC Code: 2599
Permit Reviewer: Kyle Gregory

On April 18, 2007, the Office of Air Quality (OAQ) had a notice published in The Herald, Jasper, Indiana, stating that U.B. Klem Furniture Co., Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal to operate a miscellaneous furniture and fixture manufacturing source. The notice also stated that OAQ proposed to issue a FESOP Renewal for this operation and provided information on how the public could review the proposed FESOP Renewal 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 FESOP Renewal should be issued as proposed.

On April 27, 2007, Troy D. Stuart, Compliance Officer for U.B. Klem Furniture Co., Inc. submitted comments on the proposed FESOP Renewal. The comments are as follows (the permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded**):

Comment 1:

The cost of stack testing will put an undue financial burden on our company. Our original FESOP, circa 1996, contained no provision or requirements for this kind of testing and nothing has changed in our operations from 1996 to warrant this condition. Therefore, I urge you to remove this condition.

Response 1:

Stack testing is required to determine if the woodworking operations are in compliance with 326 IAC 2-2, 326 IAC 8-4, 326 IAC 6-3-2 and 326 IAC 6.5-1. In order to comply with the most stringent of these limits, the baghouse for the woodworking operations will need a minimum control efficiency of 96%. Therefore, no changes have been made to the permit.

Upon further review, the OAQ has decided to make the following additional changes to the FESOP: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

Change 1:

IDEM, OAQ has added mail codes to the addresses listed in the permit for the following: Permit Branch; Compliance Branch; Compliance Data Section; Technical Support and Modeling; and Asbestos Section.

Change 2:

IDEM, OAQ has added a toll free number to the contact information listed in the permit for the Emergency Provisions in Condition B.12(b)(4). The change is as follows:

B.12 Emergency Provisions [326 IAC 2-8-12]

- (b)(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and Southwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865
Southwest Regional Office
phone: (812) 380-2305;
phone: (888) 672-8323 (Toll free within Indiana);
fax: (812) 380-2304

Change 3:

Language in Condition D.1.8 has been changed to better portray the manner in which the dry filters for particulate control are used.

D.1.8 Particulate Control

In order to comply with Conditions D.1.4 and D.1.5, the dry filters for particulate control shall be in ~~operation~~ **proper placement** and control emissions from the eight (8) surface coating spray booths, identified as EU-01A through EU-01H, at all times that the eight (8) surface coating spray booths, identified as EU-01A through EU-01H, are in operation.

Change 4:

Although the PM emission limit pursuant to 326 IAC 6-3-2 in Condition D.2.1 is more stringent than the PM emission limit pursuant to 326 IAC 6.5-1-2(a), the requirements of 326 IAC 6.5-1-2(a) are still applicable. Therefore, Condition D.2.2 has been added and all subsequent conditions have been renumbered. In addition, Condition D.2.2 has been added as a citation in Conditions D.2.4 (now D.2.5) and D.2.5 (now D.2.6).

D.2.2 Particulate Matter [326 IAC 6.5-1]

Pursuant to 326 IAC 6.5-1-2(a), particulate emissions from the woodworking operation, , identified as WW1, shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

~~D.2.2~~ **D.2.3** PM₁₀ Limit [326 IAC 2-8] [326 IAC 2-2]

~~D.2.3~~ **D.2.4** Preventive Maintenance Plan [326 IAC 2-8-4(9)]

~~D.2.4~~ **D.2.5** Testing Requirements [326 IAC 2-8] [326 IAC 2-1.1-11]

Within twelve (12) months after issuance of this permit, the Permittee shall perform an initial PM and PM₁₀ test of the one (1) woodworking operation baghouse to demonstrate compliance with Conditions ~~D.2.1 and D.2.2~~ **D.2.1, D.2.2 and D.2.3**. Testing shall be conducted in accordance with Condition C.8 Performance Testing.

~~D.2.5~~ **D.2.6** Particulate Control

- (a) In order to comply with ~~Condition~~ **Conditions D.2.1 and D.2.2**, the baghouse for particulate control shall be in operation and control emissions from the woodworking operations at all times that the woodworking operations are in operation.

~~D.2.6~~ **D.2.7** Visible Emissions Notations

~~D.2.7~~ **D.2.8** Baghouse Inspections

~~D.2.8~~ **D.2.9** Broken or Failed Bag Detection

~~D.2.9~~ **D.2.10** Record Keeping Requirements

- (a) To document compliance with Condition ~~D.2.5~~ **D.2.7**, the Permittee shall maintain records of daily visible emission notations of the woodworking operations stack exhaust.
- (b) To document compliance with Condition ~~D.2.6~~ **D.2.8**, the Permittee shall maintain records of the results of the inspections required under Condition ~~D.2.6~~ **D.2.8** and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

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

Source Background and Description

Source Name:	U.B. Klem Furniture Co., Inc.
Source Location:	3861 E. Schnellville Road, St. Anthony, Indiana 47575
County:	Dubois
SIC Code:	2599
Operation Permit No.:	F 037-14091-00094
Operation Permit Issuance Date:	July 27, 2001
Permit Renewal No.:	F 037-22469-00094
Permit Reviewer:	Kyle Gregory/MES

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from U.B. Klem Furniture Co., Inc. relating to the operation of a miscellaneous wood furniture and fixture manufacturing source.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Two (2) surface coating spray booths (Sap and Wipe Stain), equipped with HVLP spray applicators and dry filters for overspray control, identified as EU-01A and EU-01B, both constructed in 1993, exhausting through stacks S1 and S2, respectively, capacity: 1,258 square feet of wood per hour, each.
- (b) Four (4) surface coating spray booths (Sealer #1, Sealer #2, Topcoat #1 and Topcoat #2), equipped with HVLP spray applicators, and dry filters for overspray control, identified as EU-01C through EU-01F, all constructed in 1993, exhausting through stacks S3, S4, S5 and S6, respectively, capacity: 629 square feet of wood per hour, each.
- (c) One (1) touch-up spray booth, equipped with HVLP spray applicators, and dry filters for overspray control, identified as EU-01G, constructed in 1984, capacity: 60 square feet of wood per hour.
- (d) One (1) adhesive spray booth, equipped with HVLP spray applicators, and dry filters for overspray control, identified as EU-01H, constructed in 1986, capacity: 65 square feet of wood per hour.
- (e) One (1) rollcoat area, identified as EU-01I, constructed in 1986, capacity: 549 square feet of wood per hour.
- (f) One (1) brush coat area, identified as EU-01J, constructed in 1980, capacity: 1,022 square feet of wood per hour.
- (g) One (1) woodworking operation, identified as WW1, constructed in 1984, exhausting to baghouse B1, capacity: 1,320 pounds of wood per hour.
- (h) One (1) wood-fired boiler, identified as EU-B1, constructed in 1984, exhausting through stack SB1, heat input capacity: 2.10 million British thermal units per hour.

Unpermitted Emission Units and Pollution Control Equipment

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

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

There are no proposed emission units during this review process.

Insignificant Activities

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, total heat input capacity: 10.595 million British thermal units per hour. [326 IAC 6.5]
- (b) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (d) One (1) sawdust storage silo, identified as SILO, throughput: 41 pounds sawdust per hour. [326 IAC 6.5]

Existing Approvals

The source has been operating under the previous FESOP 037-14091-00094 issued on July 27, 2001.

All conditions from previous approvals were incorporated into this FESOP.

Enforcement Issue

- (a) IDEM is aware that stack testing was not performed pursuant to 326 IAC 2-8-5 and 326 IAC 2-1.1-11 as required by condition D.2.6 of F 037-14091-00094, issued on July 27, 2001.
- (b) IDEM is reviewing this matter and will take appropriate action.

Recommendation

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

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

An administratively complete FESOP renewal application for the purposes of this review was received on January 9, 2006. Additional information was received on October 5, 2006 and December 12, 2006.

Emission Calculations

See pages 1 through 10 of Appendix A of this document for detailed emission calculations.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	350
PM ₁₀	351
SO ₂	0.258
VOC	132
CO	9.42
NO _x	9.15

HAPs	Unrestricted Potential Emissions (tons/yr)
Acrolein	0.037
Benzene	0.039
Dichlorobenzene	0.0001
Ethyl Benzene	0.021
Formaldehyde	0.044
Glycol Ethers	0.640
Hydrogen Chloride	0.175
Hexane	0.084
Styrene	0.017
Toluene	22.3
Xylene	29.7
Lead	0.00002
Cadmium	0.0001
Chromium	0.0001
Manganese	0.00002
Nickel	0.0001
Total	53.1

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM₁₀ and VOC are equal to or greater than one hundred (100) tons per year. This source, which would otherwise be subject to the provisions of 326 IAC 2-7, will limit its emissions below the Title V levels.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. This source, which would otherwise be subject to the provisions of 326 IAC 2-7, will limit its HAP emissions below the Title V levels.
- (c) Pursuant to 326 IAC 2-7-2(c), all fugitive emissions are included in determining the applicability of 326 IAC 2-7 (Part 70 Permit Program).

Potential to Emit After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP.

Process/emission unit	Potential To Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Surface Coating Booths	0.253	0.253	0.00	98.9	0.00	0.00	individual 9.91 total 24.5
Wood-Fired Boiler	3.68	3.47	0.230	0.120	5.52	4.51	individual 0.175 (Hydrogen Chloride) total 0.335
Woodworking Operation	13.6	13.6	0.00	0.00	0.00	0.00	0.00
Insignificant Activities (Natural Gas Combustion and Sawdust Storage Silo)	0.286	0.551	0.028	0.255	3.90	4.64	0.088
Total Emissions	17.8	17.9	0.258	99.3	9.42	9.15	individual 9.92 total 24.9

The emissions in the above table represent the unrestricted potential to emit for the wood-fired boiler and insignificant activities (natural gas combustion and silo). The PM and PM₁₀ emissions from the surface coating booths are the controlled emissions. The VOC and HAPs emissions from the surface coating booths are the limited by 326 IAC 2-8 (FESOP). For the one (1) wood-working operation, identified as WW1, the PM emissions are limited by 326 IAC 6-3-2 since this rule is more stringent than 326 IAC 6.5 and the PM₁₀ emissions are limited by 326 IAC 2-8 (FESOP).

County Attainment Status

The source is located in Dubois County, but not in Bainbridge Township.

Pollutant	Status
PM _{2.5}	Basic Nonattainment
PM ₁₀	Attainment
SO ₂	Attainment
NO ₂	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. Dubois 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. See the State Rule Applicability - Entire Source section of this document.
- (b) Dubois County has been classified as nonattainment for PM_{2.5} in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions pursuant to the Nonattainment New Source Review requirements. See the State Rule Applicability - Entire Source section of this document.
- (c) Dubois County has been classified as attainment or unclassifiable in Indiana for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section of this document.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 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.
- (e) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	17.8
PM ₁₀	17.9
SO ₂	0.258
VOC	98.9
CO	9.42
NO _x	9.15
Toluene	9.92
Xylene	9.91
Combination HAPs	24.5

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or greater and it is not in one of the twenty-eight (28) listed source categories.
- (b) This existing source is not a major stationary source because no nonattainment regulated pollutant is emitted at a rate of one hundred (100) tons per year or greater, and it is not in one of the twenty-eight (28) listed source categories.
- (c) The emissions listed above are based upon calculations found on pages 8, 9 and 10 of Appendix A of this document.

Federal Rule Applicability

- (a) The requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60.40, Subpart D), Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971 are not included in the permit for this source. The one (1) wood-fired boiler, identified as EU-B1, is rated less than two hundred and fifty (250) million British thermal units per hour.
- (b) The requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60.40da, Subpart Da), Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978 are not included in the permit for this source. The one (1) wood-fired, boiler identified as EU-B1, is rated less than two hundred and fifty (250) million British thermal units per hour.
- (c) The requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60.40b, Subpart Db), Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units are not included for this source. The one (1) wood-fired boiler, identified as EU-B1, is rated less than one hundred (100) million British thermal units per hour.
- (d) The requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60.40c, Subpart Dc), Standards of Performance for Small Industrial Commercial-Institutional Steam Generating Units are not included in the permit for this source. The one (1) wood-fired boiler, identified as EU-B1, is rated less than ten (10) million British thermal units per hour.

- (e) The requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60.530, Subpart AAA), Standards of Performance for New Residential Wood Heaters, are not included in the permit. The one (1) wood-fired boiler, identified as EU-B1, was manufactured prior to July 1, 1988 and sold to the source prior to July 1, 1990.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants: National Emission Standards for Wood Furniture Manufacturing Operations (NESHAP), Subpart JJ, 40 CFR Part 63.800, are still not included in the permit for this source. The HAPs from this source are still limited to less than ten (10) tons per year for single HAPs and less than twenty-five (25) tons per year for total combined HAPs.
- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products (NESHAP), Subpart QQQQ, 40 CFR Part 63.4680, are not included in the permit for this source. This source does not coat wood building products.

State Rule Applicability – Entire Source

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

- (a) This source has an unrestricted potential to emit greater than two hundred and fifty (250) tons per year of PM and PM₁₀. This source will remain a minor source pursuant to 326 IAC 2-2 (PSD), as a result of the following limits:
 - (1) Pursuant to 326 IAC 6-3-2, which is more stringent than the 0.03 grain limit required by 326 IAC 6.5, the PM emissions from the one (1) woodworking operation, identified as WW1, shall not exceed 3.10 pounds per hour, equivalent to 13.6 tons per year. The unrestricted potential PM emissions from the surface coating booths, silo, wood-fired boiler and the natural gas combustion is 9.03 tons per year, total. Therefore, the total source potential to emit PM is limited to less than two hundred fifty (250) tons per year.
 - (2) The PM₁₀ emissions from the one (1) woodworking operation, identified as WW1, shall not exceed the PM limit of 3.10 pounds per hour, equivalent to 13.6 tons per year because PM is a surrogate for PM₁₀. The unrestricted potential PM₁₀ emissions from the surface coating booths, silo, wood-fired boiler and the natural gas combustion is 9.03 tons per year, total. Therefore, the total source potential to emit PM₁₀ is limited to less than two hundred fifty (250) tons per year.

Therefore, this source, which is not one of the twenty-eight (28) listed source categories, is a minor source pursuant to 326 IAC 2-2 (PSD).

- (b) All other remaining criteria pollutants have potential emissions less than two hundred fifty (250) tons per year.

326 IAC 2-3 (Emission Offset)

Dubois County has been designated as non-attainment for PM_{2.5} in 70 FR 943 dated January 5, 2005. According to the April 5, 2005 EPA memo titled "Implementation of New Source Review Requirements in PM_{2.5} Nonattainment Areas" authored by Steve Page, Director of OAQPS, until EPA promulgates the PM_{2.5} major NSR regulations, states should assume that a major stationary source's PM₁₀ emissions represent PM_{2.5} emissions. IDEM will use the PM₁₀ nonattainment major NSR program as a surrogate to address the requirements of nonattainment major NSR for the PM_{2.5} NAAQS. A major source in a nonattainment area is a source that emits or has the potential to emit one hundred (100) tons per year of any regulated pollutant. The uncontrolled potential to

emit PM₁₀ is greater than one hundred (100) tons per year. However, the Permittee has agreed to limit their PM₁₀ emissions to less than one hundred (100) tons per year. Therefore, the requirements of 326 IAC 2-3, Emission Offset, are not applicable.

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

Pursuant to F 037-14091-00094, issued July 27, 2001, the potential to emit HAPs of this source is limited to less than twenty-five (25) tons per year of total combined HAPs and less than ten (10) tons per year of each individual HAP in order to remain an area source of HAPs. The total HAP emissions from the surface coating booths will be limited to 24.5 tons per year and the greatest individual HAP emissions (Toluene and Xylene) will be limited to 9.91 tons per year. The unrestricted potential HAP emissions from all other facilities at this source (wood-fired boiler and natural gas combustion) are 0.423 tons of total HAPs per year and 0.084 tons of an individual HAP (hexane) per year. The aforementioned HAP usage limits for surface coating will limit the potential to emit total combined HAPs to less than twenty-five (25) tons per year and each individual HAP to less than ten (10) tons per year. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.

326 IAC 2-6 (Emission Reporting)

This source is not located in Lake or Porter County, does not emit five (5) tons per year or more of lead and does not require a Part 70 Operating Permit. Therefore, the requirements of 326 IAC 2-6 do not apply.

326 IAC 2-8 (Federally Enforceable State Operating Permit Program)

The unrestricted potential emissions of PM₁₀ and VOC are greater than one hundred (100) tons per year, unrestricted potential emissions of total combined HAPs are greater than twenty-five (25) tons per year, and the unrestricted potential emissions of individual HAPs are greater than ten (10) tons per year. Pursuant to F 037-14091-00094, issued on July 27, 2001, the potential to emit PM₁₀ and VOC is limited to less than one hundred (100) tons per year each, total combined HAPs is limited to less than twenty-five (25) tons per year, and the potential to emit individual HAPs is limited to less than ten (10) tons per year. Therefore, the requirements of 326 IAC 2-7, Part 70, are not applicable. The following limits are applicable:

- (a) The PM₁₀ emissions from the six (6) surface coating spray booths, identified as EU-01A through EU-01H, shall be limited to 0.03 grains per standard foot of outlet air, which is equivalent to the PM limit pursuant to 326 IAC 6.5-1-2(a). For the six (6) surface coating spray booths, PM emissions are used as a surrogate for PM₁₀. The potential PM₁₀ emissions after control by the dry filters are 0.0578 pounds per hour, equivalent to 0.253 tons per year, total. Therefore, the dry filters must operate and control emissions from the spray booths at all times when the spray booths are in operation.
- (b) The PM₁₀ emissions from the one (1) woodworking operation, identified as WW1, shall be limited to 3.10 pounds per hour, equivalent to 13.6 tons per year which is equivalent to the PM limit pursuant to 326 IAC 6-3-2, which is more stringent than the 0.03 grain limit required by 326 IAC 6.5. For the woodworking operation, PM emissions are used as a surrogate for PM₁₀. The potential PM₁₀ emissions after control by the baghouse are 0.717 tons per year. Therefore, the baghouse must operate and control emissions from the one (1) woodworking operation at all times when the one (1) woodworking operation is in operation.
- (c) The unrestricted potential volatile organic compound (VOC) emissions from this source are greater than one hundred (100) tons per year. Pursuant to F 037-14091-00094, issued on July 27, 2001, the total VOC delivered to the coating applicators in spray booths EU-

01A through EU-01H as well as the rollcoat area EU-01I and the brush coat area EU-01J shall be less than 98.9 tons year. The unrestricted VOC emissions from all other facilities (wood-fired boiler and natural gas combustion) are 0.375 tons per year, total. This will limit the VOC emissions from the entire source to 99.3 tons per year. Therefore, the requirements of 326 IAC 2-7 do not apply.

- (d) The worst case single HAPs (Toluene and Xylene) delivered to the spray booths EU-01A through EU-01H, the rollcoat area EU-01I and the brush coat area EU-01J, shall be limited to a total of 9.91 tons per year. The unrestricted potential to emit an individual HAP from all other facilities (wood-fired boiler and natural gas combustion) is 0.084 tons (hexane) per year. The source-wide individual HAP emissions will be limited to 9.92 tons per year.
- (e) The combination of HAPs delivered to the coating applicators in spray booths EU-01A through EU-01H as well as the rollcoat area EU-01I and the brush coat area EU-01J shall be limited to a total of 24.5 tons per year. The unrestricted potential HAP emissions from all other facilities at this source (wood-fired boiler and natural gas combustion) are 0.423 tons of total HAPs per year. The source-wide total HAP emissions will be limited to 24.9 tons per year.

326 IAC 5-1 (Opacity Limitations)

The source is not located in Bainbridge Township, therefore, pursuant to 326 IAC 5-1-2 (Opacity limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

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

326 IAC 6-4 (Fugitive Emissions)

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

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This source is located in Dubois County, but not in Bainbridge Township, and received all of the necessary preconstruction approvals before December 13, 1985. Therefore, the requirements of 326 IAC 6-5 are not applicable.

State Rule Applicability – Individual Facilities

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

The one (1) wood-fired boiler, identified as EU-B1, is limited by 326 IAC 6.5, therefore, pursuant to 326 IAC 6-2-1(e), the requirements of 326 IAC 6-2 are not applicable.

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

- (a) The one (1) wood-fired boiler, identified as EU-B1, is considered combustion for indirect heating. Therefore, pursuant to 326 IAC 6-3-1(b)(1), the one (1) wood-fired boiler, identified as EU-B1 is exempt from the requirements of 326 IAC 6-3.
- (b) Pursuant to 326 IAC 6-3-1(c)(3), 326 IAC 6-3 does not apply if a limitation established in 326 IAC 6.5 is more stringent. The particulate emission limitations in 326 IAC 6.5 are considered more stringent than the limitations in 326 IAC 6-3-2 for surface coating because 326 IAC 6.5 includes a specific emission limitation. Therefore, 326 IAC 6-3 is not applicable to the surface coating operations.
- (c) Pursuant to 326 IAC 6-3-1(b)(14), 326 IAC 6-3 does not apply to the silo, identified as SILO1, because the potential to emit of the silo is less than five hundred fifty-one thousandths (0.551) pound per hour.
- (d) The one (1) woodworking operation, identified as WW1 is subject to the requirements of 326 IAC 6-3-2. The allowable limit of because the limit of three-hundredths (0.03) grain per dry standard cubic foot (dscf) pursuant to 326 IAC 6.5, is equivalent to 11.1 pounds per hour. This allowable emission rate is less stringent than the allowable emission rate pursuant to 326 IAC 6-3-2 of 3.10 pounds per hour. Therefore, pursuant to 326 IAC 6-3-2(e), the particulate from the one (1) woodworking operation, identified as WW1, shall not exceed the allowable emissions given by the following formula:

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

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

The allowable rate of particulate emissions shall not exceed 3.10 pounds per hour when operating at a process weight rate of 0.660 tons per hour. The maximum potential to emit particulate from the one (1) woodworking operation is 78.0 pounds per hour before controls. The controlled potential to emit is 0.164 pounds per hour. Therefore, the one (1) woodworking operation can comply with this rule when operating the control device.

326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County)

This source, which is located in Dubois County, is not listed in 326 IAC 6.5-4 but has the potential to emit one hundred (100) tons or more of particulate matter per year. Therefore, it is subject to the requirements of 326 IAC 6.5-1-2. The applicable limitations are as follows:

- (a) Pursuant to 326 IAC 6.5-1-2(a), the PM emissions from the one (1) woodworking operation, identified as WW1, would be limited to 0.03 grains per dry standard cubic foot of outlet air, equivalent to 11.1 pounds per hour, equivalent to 48.5 tons per year at a flow rate of 43,030 standard cubic feet of outlet air per minute. However, the particulate emission limitation pursuant to 326 IAC 6-3-2 will limit WW1 to 3.10 pounds per hour when operating at a process weight rate of 0.660 tons per hour. Therefore, the particulate limitations in 326 IAC 6.5-1-2 are not applicable and particulate emissions are limited by the requirements of 326 IAC 6-3-2.
- (b) Pursuant to 326 IAC 6.5-1-2(b)(1)(C), the PM emissions from the one (1) wood-fired boiler, identified as EU-B1, are limited to 0.60 pounds per million British thermal units heat input.

Based on AP-42, the potential PM emissions from the wood-fired boiler are 0.40 pounds per million British thermal units heat input. Therefore, the wood-fired boiler can comply with this rule.

- (c) Pursuant to 326 IAC 6.5-1-2(a), the PM emissions from the six (6) surface coating spray booths, identified as EU-01A through EU-01F, one (1) touch-up spray booth, identified as EU-01G, and one (1) adhesive spray booth, identified as EU-01H, shall be limited to 0.03 grains per dry standard foot of outlet air. The dry filters shall be in operation and control emissions from the surface coating operations at all times when the surface coating is in operation.
- (d) Pursuant to 326 IAC 6.5-1-2(a), the PM emissions from the one (1) sawdust storage silo, identified as SILO, and the insignificant natural gas-fired combustion sources shall be limited to 0.03 grains per dry standard foot of outlet air.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The potential SO₂ emissions are less than twenty-five (25) tons per year and ten (10) pounds per hour for each of the facilities at this source. Therefore, the requirements of 326 IAC 7-1.1 are not applicable.

326 IAC 8-1-6 (New facilities; general reduction requirements)

The six (6) surface coating spray booths, identified as EU-01A through EU-01F, are regulated by 326 IAC 8-2-12. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

326 IAC 8-2-12 (Surface coating emission limitations: wood furniture and cabinet coating)

- (a) Pursuant to 326 IAC 8-2-1(a)(4), 326 IAC 8-2-12 is applicable to the following wood furniture and cabinet coating facilities which were all constructed in 1993 and have actual emissions of greater than fifteen (15) pounds of VOC per day:

The six (6) surface coating booths, identified as EU-01A, EU-01B, EU-01C, EU-01D, EU-01E and EU-01F.

- (b) Pursuant to 326 IAC 8-2-1, 326 IAC 8-2-12 is only applicable to facilities existing as of July 1, 1990, if they are located in Clark, Floyd, Lake, or Porter County. Therefore, 326 IAC 8-2-12 is not applicable to the following wood furniture and cabinet coating facilities because this source is not located in Clark, Floyd, Lake, or Porter County and were constructed prior to July 1, 1990:

The four (4) surface coating booths, identified as EU-01G, EU-01H, EU-01I and EU-01J.

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.

326 IAC 9-1 (Carbon Monoxide Emission Limitations)

This source does not include ferrous metal smelting, petroleum refining or refuse incineration. Therefore, there are no applicable requirements in 326 IAC 9-1-2 and the requirements of 326 IAC 9-1 are not applicable.

326 IAC 10-1 (Nitrogen Oxides Control in Clark and Floyd Counties)

This source is not located in Clark or Floyd County. Therefore, the requirements of 326 IAC 10-1 are not applicable.

Testing Requirements

An initial test of the one (1) woodworking operation baghouse to demonstrate compliance with the PM emission rate of 0.03 grains per dry standard cubic foot of outlet air pursuant to 326 IAC 6.5-1-2(a), and the PM₁₀ emission rate of less than 20.9 pounds per hour pursuant to 326 IAC 2-8-4 was required pursuant to condition D.2.6 of F 037-14091-00094, issued on July 27, 2001. IDEM is aware that this stack testing was not performed pursuant to 326 IAC 2-8-5 and 326 IAC 2-1.1-11. See the enforcement issue section of this document.

PM and PM₁₀ stack testing of the woodworking operation baghouse exhaust shall be performed within twelve (12) months after issuance of this permit. These tests are being required to verify compliance with the requirements of 326 IAC 6-3-2 for PM and 326 IAC 2-8-4 for PM₁₀.

Compliance Requirements

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

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

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

- (a) The eight (8) surface coating spray booths that have dry filters for overspray, identified as EU-01A through EU-01H, have applicable compliance monitoring conditions as specified below:

- (1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks S1 through S6 while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (2) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

These monitoring conditions are necessary because the coating process must operate properly to ensure compliance with 326 IAC 6.5-1-1 and 326 IAC 2-8 (FESOP).

- (b) The one (1) woodworking operation, identified as WW1, has applicable compliance monitoring conditions as specified below:
 - (1) Visible emission notations of the one (1) woodworking operation stack exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. 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. 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. 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. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
 - (2) An inspection shall be performed each calendar quarter of all bags controlling the one (1) woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.
 - (3) 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).

For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has

been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. 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 or dust traces.

These monitoring conditions are necessary because the one (1) woodworking operation must operate properly to ensure compliance with 326 IAC 6.5-1-1 and 326 IAC 2-8 (FESOP).

- (c) The wood-fired boiler has applicable compliance monitoring conditions as specified below:

Visible emission notations of the wood-fired boiler stack exhaust SB1 shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. 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. In the case of batch or continuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. 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. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

These monitoring conditions are necessary because the wood-fired boiler must operate properly to ensure compliance with 326 IAC 6.5-1-1.

Conclusion

The operation of this miscellaneous wood furniture and fixture manufacturing source shall be subject to the conditions of the FESOP 037-22469-00094

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

**Company Name: U.B. Klem Furniture Co., Inc.
Address City IN Zip: 3861 E. Schnellville Road, St. Anthony, IN 47575
Permit Number: F 037-22469-00094
Reviewer: Kyle Gregory/MES
Date: July 12, 2007**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
EU-01A (Sap Booth)																
Black Base Coat	8.2	69.72%	0.0%	69.7%	0.0%	21.00%	0.000008	1258.0	5.72	5.72	0.06	1.38	0.25	0.03	27.22	75%
Quasar Oil Oak	7.2	99.10%	0.0%	99.1%	0.0%	0.70%	0.000288	1258.0	7.14	7.14	2.59	62.04	11.32	0.03	1019.31	75%
9000 Oak Toner	7.2	96.60%	0.0%	96.6%	0.0%	2.00%	0.000092	1258.0	6.96	6.96	0.80	19.32	3.53	0.03	347.76	75%
Orange Dye Concentration	7.6	97.02%	0.0%	97.0%	0.0%	2.00%	0.000010	1258.0	7.35	7.35	0.09	2.22	0.41	0.00	367.71	75%
Durostain Binder	7.5	81.53%	0.0%	81.5%	0.0%	13.00%	0.000001	1258.0	6.15	6.15	0.01	0.19	0.03	0.00	47.29	75%
EU-01B (Wipe Stain Booth)																
Russet-Honey Wiping Stain	7.8	74.54%	0.7%	73.8%	0.7%	14.00%	0.000191	1258.0	5.80	5.76	1.38	33.21	6.06	0.52	41.14	75%
Honey Pine Nustain	7.5	92.79%	0.0%	92.8%	0.0%	4.00%	0.000036	1258.0	6.99	6.99	0.32	7.59	1.39	0.03	174.68	75%
Mahogany Dip Stain	7.7	75.68%	0.8%	74.9%	0.8%	17.00%	0.000140	1258.0	5.81	5.77	1.02	24.37	4.45	0.36	33.92	75%
Brittany Wiping Stain	7.5	82.66%	2.6%	80.1%	2.3%	11.00%	0.000124	1258.0	6.15	6.00	0.94	22.48	4.10	0.22	54.59	75%
Burnt Umber Synthetic	11.1	20.75%	0.0%	20.8%	0.0%	68.00%	0.000005	1258.0	2.29	2.29	0.01	0.35	0.06	0.06	3.37	75%
Reducer	6.8	100.00%	0.0%	100.0%	0.0%	0.00%	0.000008	1258.0	6.80	6.80	0.07	1.64	0.30	0.00	N/A	75%
EU-01C (Sealer #1 Booth)																
Vinyl Sealer	7.6	81.11%	0.0%	81.1%	0.0%	14.00%	0.000270	629.0	6.16	6.16	1.05	25.13	4.59	0.27	44.03	75%
Sealer Catalyst	8.7	40.95%	0.0%	41.0%	0.0%	47.00%	0.000001	629.0	3.56	3.56	0.00	0.03	0.01	0.00	7.58	75%
RTS	7.6	81.01%	0.0%	81.0%	0.0%	14.08%	0.000270	629.0	6.16	6.16	1.05	25.09	4.58	0.27	43.73	75%
Resistovar Sealer	7.7	74.55%	0.0%	74.6%	0.0%	19.00%	0.000610	629.0	5.70	5.70	2.19	52.52	9.58	0.82	30.02	75%
Sealer Catalyst	8.7	40.95%	0.0%	41.0%	0.0%	47.00%	0.000001	629.0	3.56	3.56	0.00	0.03	0.01	0.00	7.58	75%
RTS	7.7	74.51%	0.0%	74.5%	0.0%	19.03%	0.000610	629.0	5.70	5.70	2.19	52.49	9.58	0.82	29.95	75%
White Primer	10.1	44.28%	0.0%	44.3%	0.0%	38.00%	0.000030	629.0	4.45	4.45	0.08	2.02	0.37	0.12	11.72	75%
Low Odor Electrostatic	7.4	100.00%	0.0%	100.0%	0.0%	0.00%	0.000010	629.0	7.35	7.35	0.05	1.11	0.20	0.00	N/A	75%
RTS	9.2	62.58%	0.0%	62.6%	0.0%	25.52%	0.000040	629.0	5.74	5.74	0.14	3.47	0.63	0.09	22.49	75%
White Basecoat	9.3	57.90%	0.0%	57.9%	0.0%	18.00%	0.000010	629.0	5.38	5.38	0.03	0.81	0.15	0.03	29.92	75%
Black Basecoat	8.2	69.72%	0.0%	69.7%	0.0%	21.00%	0.000020	629.0	5.72	5.72	0.07	1.73	0.32	0.03	27.22	75%
EU-01D (Sealer #2 Booth)																
Vinyl Sealer	7.6	81.11%	0.0%	81.1%	0.0%	14.00%	0.000270	629.0	6.16	6.16	1.05	25.13	4.59	0.27	44.03	75%
Catalyst	8.7	40.95%	0.0%	41.0%	0.0%	47.00%	0.000001	629.0	3.56	3.56	0.00	0.03	0.01	0.00	7.58	75%
RTS	7.6	81.01%	0.0%	81.0%	0.0%	14.08%	0.000270	629.0	6.16	6.16	1.05	25.09	4.58	0.27	43.73	75%
Resistovar Sealer	7.7	74.55%	0.0%	74.6%	0.0%	19.00%	0.000610	629.0	5.70	5.70	2.19	52.52	9.58	0.82	30.02	75%
Catalyst	8.7	40.95%	0.0%	41.0%	0.0%	47.00%	0.000001	629.0	3.56	3.56	0.00	0.03	0.01	0.00	7.58	75%
RTS	7.7	74.51%	0.0%	74.5%	0.0%	19.03%	0.000610	629.0	5.70	5.70	2.19	52.49	9.58	0.82	29.95	75%
EU-01E (Topcoat #1 Booth)																
30 Sheen Lacquer	7.7	73.08%	0.0%	73.1%	0.0%	20.00%	0.000190	629.0	5.63	5.63	0.67	16.14	2.95	0.27	28.14	75%
Resistovar II Topcoat 30 Sheen	7.8	65.17%	0.0%	65.2%	0.0%	28.00%	0.000580	629.0	5.08	5.08	1.85	44.51	8.12	1.09	18.15	75%
Sealer Catalyst	8.7	40.95%	0.0%	41.0%	0.0%	47.00%	0.000001	629.0	3.56	3.56	0.00	0.03	0.01	0.00	7.58	75%
RTS	7.8	65.14%	0.0%	65.1%	0.0%	28.02%	0.000580	629.0	5.08	5.08	1.85	44.49	8.12	1.09	18.13	75%
Resistovar II Topcoat 60 Sheen	7.8	65.40%	0.0%	65.4%	0.0%	28.00%	0.000260	629.0	5.10	5.10	0.83	20.02	3.65	0.48	18.22	75%
Catalyst	8.7	40.95%	0.0%	41.0%	0.0%	47.00%	0.000001	629.0	3.56	3.56	0.00	0.03	0.01	0.00	7.58	75%
RTS	7.8	65.34%	0.0%	65.3%	0.0%	28.05%	0.000260	629.0	5.10	5.10	0.83	20.00	3.65	0.48	18.17	75%
Lacquer Topcoat 80 Sheen	7.6	73.77%	0.0%	73.8%	0.0%	20.00%	0.000220	629.0	5.61	5.61	0.78	18.62	3.40	0.30	28.03	75%
High Solids Lacquer Full Gloss	7.6	73.95%	0.0%	74.0%	0.0%	19.00%	0.000060	629.0	5.62	5.62	0.21	5.09	0.93	0.08	29.58	75%
Retarder	7.8	100.00%	0.0%	100.0%	0.0%	0.00%	0.000010	629.0	7.80	7.80	0.05	1.18	0.21	0.00	N/A	75%
EU-01F (Topcoat #2 Booth)																
30 Sheen Resistovar	7.9	62.86%	0.0%	62.9%	0.0%	29.00%	0.000004	629.0	4.94	4.94	0.01	0.28	0.05	0.01	17.04	75%
Resistovar Flat Base	8.1	61.38%	0.0%	61.4%	0.0%	30.00%	0.000001	629.0	4.95	4.95	0.00	0.07	0.01	0.00	16.51	75%
RTS	7.9	62.56%	0.0%	62.6%	0.0%	29.20%	0.000005	629.0	4.94	4.94	0.01	0.36	0.07	0.01	16.93	75%
Resistovar II Topcoat 30 Sheen	7.8	65.17%	0.0%	65.2%	0.0%	28.00%	0.000580	629.0	5.08	5.08	1.85	44.51	8.12	1.09	18.15	75%
Resistovar Flat Base	8.1	61.38%	0.0%	61.4%	0.0%	30.00%	0.000001	629.0	4.95	4.95	0.00	0.07	0.01	0.00	16.51	75%
RTS	7.8	65.16%	0.0%	65.2%	0.0%	28.00%	0.000580	629.0	5.08	5.08	1.85	44.50	8.12	1.09	18.15	75%
Resistovar II Topcoat 60 Sheen	7.8	65.40%	0.0%	65.4%	0.0%	28.00%	0.000260	629.0	5.10	5.10	0.83	20.02	3.65	0.48	18.22	75%
Resistovar Flat Base	8.1	61.38%	0.0%	61.4%	0.0%	30.00%	0.000001	629.0	4.95	4.95	0.00	0.07	0.01	0.00	16.51	75%
RTS	7.8	65.39%	0.0%	65.4%	0.0%	28.01%	0.000260	629.0	5.10	5.10	0.83	20.02	3.65	0.48	18.21	75%
Lacquer Topcoat 80 Sheen	7.6	73.77%	0.0%	73.8%	0.0%	20.00%	0.000220	629.0	5.61	5.61	0.78	18.62	3.40	0.30	28.03	75%
Resistovar Flat Base	8.1	61.38%	0.0%	61.4%	0.0%	30.00%	0.000001	629.0	4.95	4.95	0.00	0.07	0.01	0.00	16.51	75%
RTS	7.6	73.72%	0.0%	73.7%	0.0%	20.04%	0.000230	629.0	5.60	5.60	0.81	19.45	3.55	0.32	27.96	75%
High Solids Lacquer Full Gloss	7.6	73.95%	0.0%	74.0%	0.0%	19.00%	0.000060	629.0	5.62	5.62	0.21	5.09	0.93	0.08	29.58	75%

PM Control Efficiency: 95.00%

Add worst case coating to all solvents

Subtotal EU-01A-EU-01F (Uncontrolled)	12.1	289	52.8	4.36
Subtotal EU-01A-EU-01F (Controlled)	12.1	289	52.8	0.218

Methodology

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

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

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

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

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1-Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

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

**Company Name: U.B. Klem Furniture Co., Inc.
Address City IN Zip: 3861 E. Schnellville Road, St. Anthony, IN 47575
Permit Number: F 037-22469-00094
Reviewer: Kyle Gregory/MES
Date: July 12, 2007**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
EU-01G (Touch Up Booth)																
Clear Particleboard Filler	8.8	57.10%	0.0%	57.1%	0.0%	41.80%	0.000100	60.0	5.02	5.02	0.03	0.72	0.13	0.02	12.01	75%
EU-01H (Adhesive Booth)																
Lokweld Contact Adhesive	6.9	75.91%	0.0%	75.9%	0.0%	24.03%	0.002860	65.0	5.20	5.20	0.97	23.20	4.23	0.67	21.64	50%
EU-01I (Roll Coat Area)																
Industrial Adhesive	9.3	100.00%	0.0%	100.0%	0.0%	47.00%	0.002070	549.0	9.25	9.25	10.51	252.29	46.04	0.00	19.68	100%
Industrial Adhesive	9.2	100.00%	0.0%	100.0%	0.0%	47.00%	0.000340	549.0	9.16	9.16	1.71	41.04	7.49	0.00	19.49	100%
EU-01J (Miscellaneous)																
Neisonite Wood Stabilizer	7.2	97.77%	0.0%	97.8%	0.0%	15.00%	0.000100	1022.0	7.00	7.00	0.72	17.17	3.13	0.00	46.67	100%
EU-01J (Booth Coatings)																
Booth Coating	7.9	73.90%	0.0%	73.9%	0.0%	20.30%	0.000021	1258.0	5.83	5.83	0.15	3.70	0.67	0.00	28.72	100%
Waterbase Strip coat	8.9	47.20%	0.0%	47.2%	0.0%	43.90%	0.000004	1258.0	4.18	4.18	0.02	0.48	0.09	0.00	9.52	100%
Solvents																
Reducer	7.4	100.00%	0.0%	100.0%	0.0%	0.00%	0.000040	1258.0	7.35	7.35	0.37	8.88	1.62	0.00	N/A	100%
Wash Off Thinner	6.8	100.00%	0.0%	100.0%	0.0%	0.00%	0.000340	1258.0	6.79	6.79	2.90	69.70	12.72	0.00	N/A	100%
Lacquer Thinner	7.2	100.00%	0.0%	100.0%	0.0%	0.00%	0.000250	1258.0	7.22	7.22	2.27	54.50	9.95	0.00	N/A	100%

Add worst case coating to all solvents

PM Control Efficiency: 95.00%				
Subtotal EU-01G-EU-01J (Uncontrolled)	17.9	430	78.5	0.697
Subtotal EU-01G-EU-01J (Controlled)	17.9	430	78.5	0.035
Total Uncontrolled	30.0	719	131	5.06
Total Controlled	30.0	719	131	0.253

Methodology

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

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: U.B. Klem Furniture Co., Inc.
 Address City IN Zip: 3861 E. Schnellville Road, St. Anthony, IN 47575
 Permit Number: F 037-22469-00094
 Permit Reviewer: Kyle Gregory/MES
 Date: July 12, 2007

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Ethyl Benzene	Weight % Glycol Ethers	Weight % Toluene	Weight % Xylene	Ethyl Benzene Emissions (ton/yr)	Glycol ethers Emissions (ton/yr)	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Total Emissions (ton/yr)
EU-01A (Wipe Stain Booth)												
Black Base Coat	8.2	0.000008	1258	0.00%	0.00%	23.85%	11.90%	0.00	0.00	0.09	0.04	0.13
Quasar Oil Oak	7.2	0.000288	1258	0.00%	0.00%	50.42%	0.00%	0.00	0.00	5.76	0.00	5.76
9000 Oak Toner	7.2	0.000092	1258	0.00%	0.00%	34.60%	2.14%	0.00	0.00	1.26	0.08	1.34
Orange Dye Concentration	7.6	0.000010	1258	0.00%	97.00%	0.00%	0.00%	0.00	0.41	0.00	0.00	0.41
Durostain Binder	7.5	0.000001	1258	0.00%	0.00%	27.00%	19.00%	0.00	0.00	0.01	0.01	0.02
EU-01B (Wipe Stain Booth)												
Russet-Honey Wiping Stain	7.8	0.000191	1258	0.00%	1.06%	0.00%	7.00%	0.00	0.09	0.00	0.57	0.66
Honey Pine Nustain	7.5	0.000036	1258	0.00%	0.00%	54.00%	2.00%	0.00	0.00	0.81	0.03	0.84
Mahogany Dip Stain	7.7	0.000140	1258	0.00%	0.00%	0.00%	66.39%	0.00	0.00	0.00	3.94	3.94
Brittany Wiping Stain	7.5	0.000124	1258	0.00%	2.00%	0.00%	32.00%	0.00	0.10	0.00	1.64	1.74
Burnt Umber Synthetic	11.1	0.000005	1258	6.00%	0.00%	0.00%	14.00%	0.02	0.00	0.00	0.04	0.06
Reducer	6.8	0.000008	1258	0.00%	0.00%	3.81%	7.62%	0.00	0.00	0.01	0.02	0.03
EU-01C (Sealer #1 Booth)												
Vinyl Sealer	7.6	0.000270	629	0.00%	0.00%	3.99%	33.66%	0.00	0.00	0.23	1.90	2.13
Sealer Catalyst	8.7	0.000001	629	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Resistovar Sealer	7.7	0.000610	629	0.00%	0.00%	10.00%	27.00%	0.00	0.00	1.29	3.47	4.76
Sealer Catalyst	8.7	0.000001	629	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
White Primer	10.1	0.000030	629	0.00%	0.00%	0.00%	2.00%	0.00	0.00	0.00	0.02	0.02
Low Odor Electrostatic	7.4	0.000010	629	0.00%	9.00%	0.00%	0.00%	0.00	0.02	0.00	0.00	0.02
White Basecoat	9.3	0.000010	629	0.00%	0.00%	22.76%	10.92%	0.00	0.00	0.06	0.03	0.09
Black Basecoat	8.2	0.000020	629	0.00%	0.00%	23.85%	11.90%	0.00	0.00	0.11	0.05	0.16
EU-01D (Sealer #2 Booth)												
Vinyl Sealer	7.6	0.000270	629	0.00%	0.00%	3.99%	33.66%	0.00	0.00	0.23	1.90	2.13
Catalyst	8.7	0.000001	629	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Resistovar Sealer	7.7	0.000610	629	0.00%	0.00%	10.00%	27.00%	0.00	0.00	1.29	3.47	4.76
Catalyst	8.7	0.000001	629	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
EU-01E (Topcoat #1 Booth)												
30 Sheen Lacquer	7.7	0.000190	629	0.00%	0.00%	22.52%	8.77%	0.00	0.00	0.91	0.35	1.26
Resistovar II Topcoat 30 Sheen	7.8	0.000580	629	0.00%	0.00%	0.00%	30.79%	0.00	0.00	0.00	3.84	3.84
Sealer Catalyst	8.7	0.000001	629	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Resistovar II Topcoat 60 Sheen	7.8	0.000260	629	0.00%	0.00%	0.00%	30.72%	0.00	0.00	0.00	1.72	1.72
Catalyst	8.7	0.000001	629	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Lacquer Topcoat 80 Sheen	7.6	0.000220	629	0.00%	0.00%	22.74%	8.85%	0.00	0.00	1.05	0.41	1.46
High Solids Lacquer Full Gloss	7.6	0.000060	629	0.00%	0.00%	25.45%	6.28%	0.00	0.00	0.32	0.08	0.40
Retarder	7.8	0.000010	629	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
EU-01F (Topcoat #2 Booth)												
30 Sheen Resistovar	7.9	0.000004	629	3.00%	0.00%	0.00%	14.00%	0.00	0.00	0.00	0.01	0.01
Resistovar Flat Base	8.1	0.000001	629	0.50%	0.00%	0.00%	24.00%	0.00	0.00	0.00	0.01	0.01
Resistovar II Topcoat 30 Sheen	7.8	0.000580	629	0.00%	0.00%	0.00%	30.79%	0.00	0.00	0.00	3.84	3.84
Resistovar Flat Base	8.1	0.000001	629	0.50%	0.00%	0.00%	24.00%	0.00	0.00	0.00	0.01	0.01
Resistovar II Topcoat 60 Sheen	7.8	0.000260	629	0.00%	0.00%	0.00%	30.72%	0.00	0.00	0.00	1.72	1.72
Resistovar Flat Base	8.1	0.000001	629	0.50%	0.00%	0.00%	24.00%	0.00	0.00	0.00	0.01	0.01
Lacquer Topcoat 80 Sheen	7.6	0.000220	629	0.00%	0.00%	22.74%	8.85%	0.00	0.00	1.05	0.41	1.46
Resistovar Flat Base	8.1	0.000001	629	0.50%	0.00%	0.00%	24.00%	0.00	0.00	0.00	0.01	0.01
High Solids Lacquer Full Gloss	7.6	0.000060	629	0.00%	0.00%	25.45%	6.25%	0.00	0.00	0.32	0.08	0.40

Subtotal EU-01A-EU-01F	0.021	0.613	14.8	29.7	45.1
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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

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: U.B. Klem Furniture Co., Inc.
Address City IN Zip: 3861 E. Schnellville Road, St. Anthony, IN 47575
Permit Number: F 037-22469-00094
Permit Reviewer: Kyle Gregory/MES
Date: July 12, 2007

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Ethyl Benzene	Weight % Glycol Ethers	Weight % Toluene	Weight % Xylene	Ethyl Benzene Emissions (ton/yr)	Glycol ethers Emissions (ton/yr)	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Total Emissions (ton/yr)
Touch Up Booth												
Clear Particleboard Filler	8.8	0.000100	60	0.00%	0.00%	2.00%	3.00%	0.00	0.00	0.00	0.01	0.01
Adhesive Booth												
Lokweld Contact Adhesive	6.9	0.002860	65	0.00%	0.00%	20.00%	0.00%	0.00	0.00	1.12	0.00	1.12
Roll Coat Area												
Industrial Adhesive	9.3	0.002070	549	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Industrial Adhesive	9.2	0.000340	549	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Miscellaneous												
Nelsonite Wood Stabilizer	7.2	0.000100	1022	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Booth Coatings												
Booth Coating	7.9	0.000021	1258	0.00%	3.00%	50.10%	0.00%	0.00	0.03	0.46	0.00	0.48
Waterbase Strip coat	8.9	0.000004	1258	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Solvents												
Reducer	7.4	0.000040	1258	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Wash Off Thinner	6.8	0.000340	1258	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Lacquer Thinner	7.2	0.000250	1258	0.00%	0.00%	60.00%	0.00%	0.00	0.00	5.97	0.00	5.97

Subtotal EU-01G-EU-01J								0.000	0.027	7.54	0.007	7.58
Total								0.021	0.640	22.3	29.7	52.7

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

**Appendix A: Emission Calculations
Woodworking Operation**

**Company Name: U.B. Klem Furniture Co., Inc.
Address City IN Zip: 3861 E. Schnellville Road, St. Anthony, IN 47575
Permit Number: F 037-22469-00094
Permit Reviewer: Kyle Gregory/MES
Date: July 12, 2007**

Woodworking Operation

Woodworking Operation

Saw Dust Collected:	162000	lbs
Time Period:	2082.5	hours
Control Efficiency:	99.79	%

	Pollutant	
	PM	PM-10
Uncontrolled Emissions (lbs/hr)	78.0	78.0
Uncontrolled Emissions (tons/year)	341	341
Controlled Emissions (lbs/hr)	0.164	0.164
Controlled Emissions (tons/year)	0.717	0.717

Methodology

Uncontrolled emissions = (amount collected * (8760/2085.5)) / (control efficiency)
Controlled emissions = (uncontrolled emissions) * (1 - control efficiency)

Sawdust Storage Silo

Sawdust Storage Silo

Throughput:	180	ton/year
Control Efficiency:	0	%

	Pollutant	
	PM	PM-10
Emission Factor (lb/ton)	2.2	2.2
Uncontrolled Emissions (tons/year)	0.198	0.198
Controlled Emissions (tons/year)	0.198	0.198

Methodology

Emission factors are from AP-42 Chapter 11, Table 11.17-4 product transfer and conveying. Emission factors for raw material and product transfer for lime manufacturing are used to represent saw dust storage and transfer emissions because they provided a conservative estimate of a dry material with similar physical characteristics.

**Appendix A: Emissions Calculations
External Combustion Boiler
Wood Waste Combustion (uncontrolled)
Dry Wood**

Company Name: U.B. Klem Furniture Co., Inc.
Address City IN Zip: 3861 E. Schnellville Road, St. Anthony, IN 47575
Permit Number: F 037-22469-00094
Reviewer: Kyle Gregory/MES
Date: July 12, 2007

One (1) wood-fired boiler

Heat Input Capacity
(MMBtu/hr)

2.1

	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO**
Emission Factor in lb/MMBtu	0.4	0.377	0.327	0.025	0.49	0.013	0.6
Potential Emissions in tons/yr	3.68	3.47	3.01	0.230	4.51	0.120	5.52

	HAPs								
	Acetaldehyde	Acrolein	Benzene	Hydrogen Chloride	Carbon tetrachloride	Chlorine	Chloro-benzene	Chloroform	Ethylbenzene
Emission Factor in lb/MMcf	0.0008	0.004	0.004	0.019	0.00005	0.0008	0.00003	0.00003	0.00003
Potential Emission in tons/yr	0.008	0.037	0.039	0.175	0.0004	0.007	0.0003	0.0003	0.0003

	HAPs								Total
	Formaldehyde	Naphthalene	Phenol	Propionaldehyde	Styrene	Toluene	Vinyl Chloride	o-Xylene	
Emission Factor in lb/MMcf	0.004	0.0001	0.0001	0.0001	0.002	0.0009	0.00002	0.00003	
Potential Emission in tons/yr	0.040	0.0009	0.0005	0.0006	0.017	0.008	0.0002	0.0002	0.335

Wet wood is considered to be greater than or equal to 20% moisture content. Dry wood is considered to be less than 20% moisture content.

*The PM10 and PM2.5 emission factors include the condensable PM emission factor of 0.017 lb/MMBtu, measured by EPA Method 202 (or equivalent) and the appropriate filterable PM emission factor, measured by EPA Method 5 (or equivalent). The PM emission factor is filterable PM measured by EPA Method 5 (or equivalent).

**The CO emission factor is for stokers and dutch ovens/fuel cells. Change the emission factor to 0.17 lb/MMBtu if the calculations are for a fluidized bed

Methodology

Emission Factors are from AP-42 Chapter 1.6 (revised 3/02), SCCs #1-0X-009-YY where X = 1 for utilities, 2 for industrial, and 3 for commercial/institutional; Y =

Emissions (tons/yr) = Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8760hrs/yr x 1ton/2000lbs

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

**Company Name: U.B. Klem Furniture Co., Inc.
Address City IN Zip: 3861 E. Schnellville Road, St. Anthony, IN 47575
Permit Number: F 037-22469-00094
Permit Reviewer: Kyle Gregory/MES
Date: July 12, 2007**

Insignificant Natural Gas Combustion

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
10.595	92.8

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx 100 **see below	VOC	CO
Potential Emission in tons/yr	0.088	0.353	0.028	4.64	0.255	3.90

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Potential Emission in tons/yr	0.0001	0.00006	0.003	0.084	0.0002

Emission Factor in lb/MMcf	HAPs - Metals					Total
	Lead	Cadmium	Chromium	Manganese	Nickel	
Potential Emission in tons/yr	0.00002	0.00005	0.00006	0.00002	0.0001	0.088

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

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Appendix A: Emissions Summary

Company Name: U.B. Klem Furniture Co., Inc.
Address City IN Zip: 3861 E. Schnellville Road, St. Anthony, IN 47575
Permit Number: F 037-22469-00094
Reviewer: Kyle Gregory/MES
Date: July 12, 2007

Uncontrolled Potential to Emit

Pollutants						
Facility	PM	PM10	SO2	NOx	VOC	CO
Surface Coating Operations	5.06	5.06	0.00	0.00	131	0.00
Woodworking Operation	341	341	0.00	0.00	0.00	0.00
Sawdust Transfer	0.198	0.198	0.00	0.00	0.00	0.00
Wood-Fired Boiler	3.68	3.47	0.230	4.51	0.120	5.52
Natural Gas Combustion	0.088	0.353	0.028	4.64	0.255	3.90
Total	350	351	0.258	9.15	132	9.42

HAPs								
Facility	Acrolein	Benzene	Dichlorobenzene	Ethyl Benzene	Formaldehyde	Glycol Ethers	Hydrogen Chloride	Hexane
Surface Coating Operations	0.00	0.00	0.00	0.021	0.00	0.640	0.00	0.00
Woodworking Operation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sawdust Transfer	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Wood-Fired Boiler	0.037	0.039	0.00	0.00	0.040	0.00	0.175	0.00
Natural Gas Combustion	0.00	0.0001	0.0001	0.00	0.003	0.00	0.00	0.084
Total	0.037	0.039	0.0001	0.021	0.044	0.640	0.175	0.084

HAPs									
Facility	Styrene	Toluene	Xylene	Lead	Cadmium	Chromium	Manganese	Nickel	Total
Surface Coating Operations	0.00	22.3	29.7	0.00	0.00	0.00	0.00	0.00	52.7
Woodworking Operation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sawdust Transfer	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Wood-Fired Boiler	0.017	0.008	0.00	0.00	0.00	0.00	0.00	0.00	0.335
Natural Gas Combustion	0.00	0.0002	0.00	0.00002	0.0001	0.0001	0.00002	0.0001	0.088
Total	0.017	22.3	29.7	0.00002	0.0001	0.0001	0.00002	0.0001	53.1

Emissions Summary continued on next page

Appendix A: Emissions Summary

Company Name: U.B. Klem Furniture Co., Inc.
Address City IN Zip: 3861 E. Schnellville Road, St. Anthony, IN 47575
Permit Number: F 037-22469-00094
Reviewer: Kyle Gregory/MES
Date: July 12, 2007

Potential Emissions After Control

Facility	Pollutants					
	PM	PM10	SO2	NOx	VOC	CO
Surface Coating Booths	0.253	0.253	0.00	0.00	131	0.00
Woodworking Operation	0.717	0.717	0.00	0.00	0.00	0.00
Sawdust Transfer	0.198	0.198	0.00	0.00	0.00	0.00
Wood-Fired Boiler	3.68	3.47	0.230	4.51	0.12	5.52
Natural Gas Combustion	0.09	0.35	0.028	4.64	0.26	3.90
Total	4.94	4.99	0.258	9.15	132	9.42

Facility	HAPs							
	Acrolein	Benzene	Dichlorobenzene	Ethyl Benzene	Formaldehyde	Glycol Ethers	Hydrogen Chloride	Hexane
Surface Coating Operations	0.00	0.00	0.00	0.021	0.00	0.640	0.00	0.00
Woodworking Operation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sawdust Transfer	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Wood-Fired Boiler	0.037	0.039	0.00	0.00	0.040	0.00	0.175	0.00
Natural Gas Combustion	0.00	0.0002	0.0001	0.00	0.003	0.00	0.00	0.084
Total	0.037	0.039	0.0001	0.021	0.044	0.640	0.175	0.084

Facility	HAPs								
	Styrene	Toluene	Xylene	Lead	Cadmium	Chromium	Manganese	Nickel	Total
Surface Coating Operations	0.00	22.3	29.7	0.00	0.00	0.00	0.00	0.00	52.7
Woodworking Operation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sawdust Transfer	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Wood-Fired Boiler	0.017	0.008	0.00	0.00	0.00	0.00	0.00	0.00	0.335
Natural Gas Combustion	0.00	0.0002	0.00	0.00002	0.0001	0.0001	0.00002	0.0001	0.088
Total	0.017	22.3	29.7	0.00002	0.0001	0.0001	0.00002	0.0001	53.1

Emissions Summary continued on next page

Appendix A: Emissions Summary

Company Name: U.B. Klem Furniture Co., Inc.
 Address City IN Zip: 3861 E. Schnellville Road, St. Anthony, IN 47575
 Permit Number: F 037-22469-00094
 Reviewer: Kyle Gregory/MES
 Date: July 12, 2007

Limited Potential to Emit

Facility	PM	PM10	SO2	NOx	VOC	CO
Surface Coating Booths	0.253	0.253	0.00	0.00	98.9	0.00
Woodworking Operation	13.6	13.6	0.00	0.00	0.00	0.00
Sawdust Transfer	0.198	0.198	0.00	0.00	0.00	0.00
Wood-Fired Boiler	3.68	3.47	0.230	4.51	0.120	5.52
Natural Gas Combustion	0.088	0.353	0.028	4.64	0.255	3.90
Total	17.8	17.9	0.258	9.15	99.3	9.42

HAPs

Facility	Acrolein	Benzene	Dichlorobenzene	Ethyl Benzene	Formaldehyde	Glycol Ethers	Hydrogen Chloride	Hexane
Surface Coating Operations	0.00	0.00	0.00	0.021	0.00	0.640	0.00	0.00
Woodworking Operation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sawdust Transfer	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Wood-Fired Boiler	0.037	0.039	0.00	0.00	0.040	0.00	0.175	0.00
Natural Gas Combustion	0.00	0.0002	0.0001	0.00	0.003	0.00	0.00	0.084
Total	0.037	0.039	0.0001	0.021	0.044	0.640	0.175	0.084

HAPs

Facility	Styrene	Toluene	Xylene	Lead	Cadmium	Chromium	Manganese	Nickel	Total
Surface Coating Operations	0.00	9.91	9.91	0.00	0.00	0.00	0.00	0.00	24.5
Woodworking Operation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sawdust Transfer	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Wood-Fired Boiler	0.017	0.008	0.00	0.00	0.00	0.00	0.00	0.00	0.335
Natural Gas Combustion	0.00	0.0002	0.00	0.00002	0.0001	0.0001	0.00002	0.0001	0.088
Total	0.017	9.92	9.91	0.00002	0.0001	0.0001	0.00002	0.0001	24.9