



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: February 22, 2007
RE: Jasper Seating Company, Inc. / 037-22620-00041
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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Indianapolis, Indiana 46204-2251
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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Jasper Seating Company, Inc.
4582 South Cross Street
St. Anthony, Indiana 47575-0125**

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

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

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

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

Operation Permit No.: F037-22620-00041	
Issued by: Original signed by Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: February 22, 2007 Expiration Date: February 22, 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 a stationary wood furniture and fixture manufacturing plant.

Source Address:	4582 South Cross Street, St. Anthony, Indiana 47575-0125
Mailing Address:	P.O. Box 231, Jasper, Indiana 47547
General Source Phone:	(812) 326-2361
SIC Code:	2599
County Location:	Dubois
Source Location Status:	Nonattainment for PM2.5 Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD and Nonattainment NSR; Minor Source, Section 112 of the Clean Air Act; Not in 1 of 28 Source Categories

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) Seven (7) surface coating booths, identified as S1 through S7, installed in 1999. Each booth processes a maximum of twelve (12) feet of wood per minute, utilizing air-assisted airless and HVLP spray application systems, and is equipped with dry filters for particulate control.
- (b) One (1) woodworking operation, installed in 1929 and modified in 1960 and 1999, with a maximum throughput of 1,990 pounds per hour, and with particulate emissions controlled by two (2) Torit/Day wood dust collectors, each with 99% efficiency.

A.3 Specifically Regulated 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):

Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:

- (a) One (1) natural gas-fired boiler, constructed in 1989, with a maximum heat input capacity of 0.5 million British thermal units per hour; [326 IAC 6.5-1-2(b)]
- (b) One (1) natural gas-fired boiler, constructed in 1995, with a maximum heat input capacity of 0.59 million British thermal units per hour; [326 IAC 6.5-1-2(b)]
- (c) One (1) Weather-Rite Air Make Up unit with a maximum heat input capacity of 7.29 million British thermal units per hour; [326 IAC 6.5-1-2(a)]
- (d) One (1) Down Draft Booth Air Make Up unit with a maximum heat input capacity of 1.08 million British thermal units per hour; [326 IAC 6.5-1-2(a)]
- (e) Two (2) space heaters, each with a maximum heat input capacity of 0.4 million British thermal units per hour; [326 IAC 6.5-1-2(a)] and

(f) Three (3) drying ovens. [326 IAC 6.5-1-2(a)]

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, 037-22620-00041, 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 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.9 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

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

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

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

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

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

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).

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

- (a) The Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) for the source as described in 326 IAC 1-6-2. At a minimum, the PMPs shall include:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (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).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, 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 No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-0178 (ask for Compliance Section)
Facsimile No.: 317-233-6865
Telephone No. 812-380-2305 (ask for the air compliance inspector for Dubois County)
Facsimile No.: 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
Indianapolis, Indiana 46204-2251

and

Southwest Regional Office
1120 N. Vincennes Avenue

P.O. Box 128
Petersburg, Indiana 47567-0128

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 F037-22620-00041 and issued pursuant to permitting programs approved into the state implementation plan have been either
- (1) incorporated as originally stated,
 - (2) revised;
 - (3) deleted;
- (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 Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does 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).

Request for renewal shall be submitted to:

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

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

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

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

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

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

and

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

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

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

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

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

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

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
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 notice-only changes addressed in the request for a notice-only change 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

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

C.1 Overall Source Limit [326 IAC 2-8]

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

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) 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) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two-hundred and fifty (250) tons per year 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.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

C.6 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.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by 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.8 Performance Testing [326 IAC 3-6]

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by 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.9 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.10 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) day of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its

control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

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

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

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

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

C.12 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.13 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.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

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

immediately after the date of issuance of this permit.

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

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.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 and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

Stratospheric Ozone Protection

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

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

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

- (a) Seven (7) surface coating booths, identified as S1 through S7, installed in 1999. Each booth processes a maximum of twelve (12) feet of wood per minute, utilizing air-assisted airless and HVLP spray application systems, and is equipped with dry filters for particulate control.

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

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

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

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

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

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

D.1.2 FESOP and PSD Minor Limit [326 IAC 2-8] [326 IAC 2-2]

- (a) The amount of VOCs delivered to the applicators plus the amount of VOCs used for clean-up shall not exceed ninety-nine (99) tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The amount of any single HAP delivered to the applicators plus the amount of any single HAP used for clean-up shall not exceed less than nine (9) tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (c) The amount of any combination of HAPs delivered to the applicators plus the amount of any combination of HAPs used for clean-up shall not exceed less than twenty-four (24) tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (d) The coatings applied by the seven (7) spray coating booths, S1 through S7, shall be limited such that the total PM/PM10 emissions shall not exceed 90 tons per twelve consecutive month period with compliance determined at the end of each month.
- (e) The transfer efficiency of the seven (7) spray coating booths, S1 through S7, shall not be less than 10%.
- (f) The control efficiency of the dry filters used by the seven (7) spray coating booths, S1 through S7, shall not be less than 85%.

Combined with the emissions from the woodworking operation (as given in Section D.2) and insignificant activities, the VOC and PM10 emissions from the entire source are limited to less than 100 tons per year each, PM is limited to less than 250 tons per year, and the HAPs

emissions are limited to less than 10 tons per year for any single HAP, and less than 25 tons per year for any combination of HAPs. Therefore, the requirements of 326 IAC 2-7 and 326 IAC 2-2 (PSD) are not applicable.

D.1.3 Particulate Matter [326 IAC 6.5-1]

Pursuant to 326 IAC 6.5-1-2(a), particulate emissions from the surface coating booths, identified as S1 through S7, shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)] [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the surface coating booths, identified as S1 through S7, and their control devices.

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC)[326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC and HAP content and usage limitations contained in Conditions D.1.2 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.1.6 Particulate Matter (PM/PM10) Emissions Determination [326 IAC 2-2] [326 IAC 2-8]

Compliance with Condition D.1.2(d) shall be determined by calculating the PM/PM10 emissions associated with each coating applied by the seven (7) spray coating booths, S1 through S7, using the following equation:

$$PM/PM10 = CU \times D \times W\%S \times (1 - TE/100) \times (1 - CE/100) \times 1/2000$$

Where:

- PM/PM10 = The total PM/PM10 emissions (ton/month) for a given coating.
- CU = The total coating use (gal coating/month) of a given coating.
- D = The density (lb coating/gal coating) of a given coating.
- W%S = The weight percent solids (lb solids/lb coating) of a given coating.
- TE = The transfer efficiency (%) of the spray applicators. This value shall equal 10% or a value determined from the most recent valid compliance demonstration.
- CE = The control efficiency (%) of the dry filters. This value shall equal 85% or a value determined from the most recent valid compliance demonstration.

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

D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks 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 violation from this permit.
- (b) Monthly inspections shall be performed of the particulate 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 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 violation from this permit.

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

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC, and HAP usage limits and/or the VOC, HAP, and PM/PM10 emission limits established in Condition D.1.2. 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 (as applied).
 - (2) The density and weight percent solids of each coating material used (as applied).
 - (3) The amount of coating material and solvent less water used on a 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.
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC and HAP usage for each month; and
 - (6) The weight of VOCs, HAPs, and PM/PM10 emitted for each compliance period.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations and daily and monthly inspections.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "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)]:

- (b) One (1) woodworking operation, installed in 1929 and modified in 1960 and 1999, with a maximum throughput of 1,990 pounds per hour, and with particulate emissions controlled by two (2) Torit/Day wood dust collectors, each with 99% efficiency.

(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 PM10 FESOP and PSD Minor Limits [326 IAC 2-2]

PM and PM10 emissions from the woodworking operation shall each not exceed 1.83 pounds per hour. Combined with the PM and PM10 emissions from the spray booths and the insignificant activities, the emissions from the entire source are limited to less than 250 tons per year for PM and 100 tons per year for PM10, and renders the requirements of 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

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, shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)] [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the woodworking operation, and Torit/Day wood dust collector.

Compliance Determination Requirements

D.2.4 Particulate Control

- (a) In order to comply with Conditions D.2.1 and D.2.2, the two (2) Torit/Day wood dust collectors for particulate control shall be in operation and control emissions from the woodworking operation at all times that the woodworking operation is 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.

D.2.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of this FESOP, in order to demonstrate compliance with Condition D.2.1, the Permittee shall perform PM and PM10 testing for the baghouses Torit - Day #1 and Torit - Day #2, which are used to control the particulate emissions from the woodworking operation utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM10 includes filterable and condensable PM10. Testing shall be conducted in accordance with Section C- Performance Testing.

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

D.2.6 Visible Emissions Notations

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

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

D.2.7 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 months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

D.2.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have 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 baghouses controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

D.2.9 Record Keeping Requirements

- (a) To document compliance with Condition D.2.6, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhausts.
- (b) To document compliance with Condition D.2.7, the Permittee shall maintain records of the results of the inspections required under Condition D.2.7 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)]:

Insignificant Activities:

Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:

- (a) One (1) natural gas-fired boiler, constructed in 1989, with a maximum heat input capacity of 0.5 million British thermal units per hour; [326 IAC 6.5-1-2(b)]
- (b) One (1) natural gas-fired boiler, constructed in 1995, with a maximum heat input capacity of 0.59 million British thermal units per hour; [326 IAC 6.5-1-2(b)]
- (c) One (1) Weather-Rite Air Make Up unit with a maximum heat input capacity of 7.29 million British thermal units per hour; [326 IAC 6.5-1-2(a)]
- (d) One (1) Down Draft Booth Air Make Up unit with a maximum heat input capacity of 1.08 million British thermal units per hour; [326 IAC 6.5-1-2(a)]
- (e) Two (2) space heaters, each with a maximum heat input capacity of 0.4 million British thermal units per hour; [326 IAC 6.5-1-2(a)] and
- (f) Three (3) drying ovens. [326 IAC 6.5-1-2(a)]

(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 Emission Limitations [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(b)(3), particulate emissions from the two natural gas-fired boilers shall not exceed one-hundredth (0.01) grain per dry standard cubic foot (dscf).

D.3.2 Particulate Matter [326 IAC 6.5-1]

Pursuant to 326 IAC 6.5-1-2(b)(3), particulate emissions from the Weather-Rite Air Make Up Unit, Down Draft Booth Air Make Up Unit, two (2) space heaters, and three (3) drying ovens shall each not exceed one-hundredth (0.01) grain per dry standard cubic foot (dscf).

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

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

Source Name: Jasper Seating Company, Inc.
Source Address: 4582 South Cross Street, St. Anthony, Indiana 47575-0125
Mailing Address: P.O. Box 231, Jasper, Indiana 47547
FESOP No.: F037-22620-00041

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Jasper Seating Company, Inc.
Source Address: 4582 South Cross Street, St. Anthony, Indiana 47575-0125
Mailing Address: P.O. Box 231, Jasper, Indiana 47547
FESOP No.: F037-22620-00041

This form consists of 2 pages

Page 1 of 2

<p>9 This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><input type="checkbox"/> 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<input type="checkbox"/> The Permittee must submit notice in writing or by facsimile within two (2) 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: Jasper Seating Company, Inc.
Source Address: 4582 South Cross Street, St. Anthony, Indiana 47575-0125
Mailing Address: P.O. Box 231, Jasper, Indiana 47547
FESOP No.: F037-22620-00041
Facility: Surface Coating Booths, identified as S1 through S7
Parameter: VOC
Limit: The amount of VOCs delivered to the applicators plus the amount of VOCs used for clean-up shall not exceed ninety-nine (99) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

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

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

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Jasper Seating Company, Inc.
Source Address: 4582 South Cross Street, St. Anthony, Indiana 47575-0125
Mailing Address: P.O. Box 231, Jasper, Indiana 47547
FESOP No.: F037-22620-00041
Facility: Surface Coating Booths, identified as S1 through S7
Parameter: HAP
Limit: The amount of any single HAP delivered to the applicators plus the amount of any single HAP used for clean-up shall not exceed nine (9) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

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

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

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Jasper Seating Company, Inc.
 Source Address: 4582 South Cross Street, St. Anthony, Indiana 47575-0125
 Mailing Address: P.O. Box 231, Jasper, Indiana 47547
 FESOP No.: F037-22620-00041
 Facility: Surface Coating Booths, identified as S1 through S7
 Parameter: HAP
 Limit: The amount of any combination of HAPs delivered to the applicators plus the amount of any combination of HAPs used for clean-up shall not exceed twenty-four (24) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

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

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

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Jasper Seating Company, Inc.
Source Address: 4582 South Cross Street, St. Anthony, Indiana 47575-0125
Mailing Address: P.O. Box 231, Jasper, Indiana 47547
FESOP No.: F037-22620-00041
Facility: Surface Coating Booths, identified as S1 through S7
Parameter: PM/PM10
Limit: Total PM/PM10 emissions shall not exceed 90 tons per twelve consecutive month period with compliance determined at the end of each month (as calculated by Condition D.1.6).

QUARTER: _____ YEAR: _____

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

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

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

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

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

Source Name: Jasper Seating Company, Inc.
 Source Address: 4582 South Cross Street, St. Anthony, Indiana 47575-0125
 Mailing Address: P.O. Box 231, Jasper, Indiana 47547
 FESOP No.: F037-22620-00041

Months: _____ to _____ Year: _____

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name:	Jasper Seating Company, Inc.
Source Location:	4582 South Cross Street, St. Anthony, Indiana 47575-0125
County:	Dubois
SIC Code:	2599
Operation Permit No.:	F037-14148-00041
Operation Permit Issuance Date:	October 16, 2001
Permit Renewal No.:	F037-22620-00041
Permit Reviewer:	ERG/JR

The Office of Air Quality (OAQ) has reviewed a FESOP Renewal application from Jasper Seating Company, Inc. relating to the operation of a wood furniture and fixture manufacturing plant.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Seven (7) surface coating booths, identified as S1 through S7, installed in 1999. Each booth processes a maximum of twelve (12) feet of wood per minute, utilizing air-assisted airless and HVLP spray application systems, and is equipped with dry filters for particulate control.
- (b) One (1) woodworking operation, installed in 1929 and modified in 1960 and 1999, with a maximum throughput of 1,990 pounds per hour, and with particulate emissions controlled by two (2) Torit/Day wood dust collectors, each with 99% efficiency.

Unpermitted Emission Units and Pollution Control Equipment

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

Insignificant Activities

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

Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:

- (a) One (1) natural gas-fired boiler, constructed in 1989, with a maximum heat input capacity of 0.5 million British thermal units per hour; [326 IAC 6.5-1-2(b)]
- (b) One (1) natural gas-fired boiler, constructed in 1995, with a maximum heat input capacity of 0.59 million British thermal units per hour; [326 IAC 6.5-1-2(b)]
- (c) One (1) Weather-Rite Air Make Up unit with a maximum heat input capacity of 7.29 million British thermal units per hour; [326 IAC 6.5-1-2(a)]
- (d) One (1) Down Draft Booth Air Make Up unit with a maximum heat input capacity of 1.08 million British thermal units per hour; [326 IAC 6.5-1-2(a)]

- (e) Two (2) space heaters, each with a maximum heat input capacity of 0.4 million British thermal units per hour; [326 IAC 6.5-1-2(a)] and
- (f) Three (3) drying ovens. [326 IAC 6.5-1-2(a)]

Existing Approvals

The source has been operating under FESOP 037-14148-00041, issued on October 16, 2001 and the following previous approvals:

- (a) Administration Amendment 037-20047-00041 issued on January 25, 2005.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous permits are superseded by this permit.

The following terms and conditions from previous approvals have been revised in this FESOP:

- (a) Condition D.1.3 from F037-14148-00041, issued October 16, 2001:
The particulate matter (PM) from the surface coating booths shall be limited by the following:

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:

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

Revised Condition:

Pursuant to 326 IAC 6.5-1-2(a), particulate emissions from the surface coating booths, identified as S1 through S7, shall not exceed three-hundredths (0.03) grains per dry standard cubic foot (dscf).

Reason Modified:

Pursuant to 326 IAC 6-3-1(c)(3), if any limitation established by 326 IAC 6-3 is less stringent than the applicable limitations contained in 326 IAC 6.5 and 326 IAC 6.8, then the limitations contained in 326 IAC 6.5 and 326 IAC 6.8 prevail. Therefore, the surface coating booths, identified as S1 through S7, are not subject to 326 IAC 6-3-2 because the surface coating booths are subject to a more stringent limit in 326 IAC 6.5-1-2(a). The source is located in Dubois County, is not specifically listed in 326 IAC 6.5-4, and has actual emissions of ten (10) tons or more of particulate matter per year; therefore, is subject to 326 IAC 6.5-1-2(a).

- (b) Condition D.2.1 from F037-14148-00041, issued October 16, 2001:
PM10 emissions from the woodworking operation shall be limited to less than ninety (90) tons per twelve (12) consecutive month period (20.5 pounds per hour). This limit is structured such that when including the emissions from the spray booths and the insignificant combustion sources, the source total emissions of PM10 do not exceed one hundred (100) tons per twelve (12) consecutive month period. Since emissions of PM and PM10 are equal, compliance with 326 IAC 6-3-2 will ensure compliance with this limit. This will render the requirements of 326 IAC 2-7 (Part 70 Permit Program), 326 IAC 2-2 (Prevention of Significant Deterioration), and 40 CFR 52.21 not applicable.

Revised Condition:

PM10 emissions from the woodworking operation shall not exceed 1.83 pounds per hour which is equivalent to eight (8) tons per twelve (12) consecutive month period. Combined with the PM10 emissions from the spray booths and the insignificant activities, the emissions from the entire source are limited to less than 250 tons per year for PM and 100 tons per year for PM10, and renders the requirements of 326 IAC 2-7 (Part 70 Permit

Program) and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

Reason Modified:

The emissions from the woodworking operation after control are much less than originally limited; the woodworking operation emits less than 7 tons PM/PM10 per year. Therefore, the original condition was modified to give more flexibility on the amount of PM/PM10 that the seven (7) spray booths can emit.

- (c) Condition D.2.2 from F037-14148-00041, issued October 16, 2001:
The particulate matter (PM) from the woodworking operation shall be limited to 4.09 pounds per hour when operating at a process weight rate of 1,990 pounds per hour. This limitation is calculated by use of the following equation:

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

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

Revised Condition:

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

Reason Modified:

Pursuant to 326 IAC 6-3-1(c)(3), if any limitation established by 326 IAC 6-3 is less stringent than the applicable limitations contained in 326 IAC 6.5 and 326 IAC 6.8, then the limitations contained in 326 IAC 6.5 and 326 IAC 6.8 prevail. Therefore, woodworking operations, are not subject to 326 IAC 6-3-2(d) because the woodworking operations are subject to a more stringent limit in 326 IAC 6.5-1-2(a). The source is located in Dubois County, is not specifically listed in 326 IAC 6.5-4, and has actual emissions of ten (10) tons or more of particulate matter per year; therefore, is subject to 326 IAC 6.5-1-2(a).

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP renewal permit 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 February 8, 2006.

Emission Calculations

See Appendix A of this document for detailed emission calculations. The emission units are limited by the permit such that emissions from the entire source are limited to less than 100 tons per year for VOC, PM, and PM10, less than 10 tons per year for a single HAP, and less than 25 tons per year for a combination of HAPs.

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/year)
PM	643.4
PM10	643.6
SO ₂	0.03
VOC	1100
CO	3.77
NO _x	4.49

HAPs	Unrestricted Potential Emissions (tons/year)
Toluene	107.6
Methanol	8.69
Ethyl Benzene	3.99
Hexane	0.43
Formaldehyde	1.20
MIBK	2.5
Benzene	9.44E-5
Dichlorobenzene	5.39E-5
Lead	2.25E-5
Cadmium	4.94E-5
Chromium	6.29E-5
Manganese	1.71E-5
Nickel	9.44E-5
TOTAL	>25

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM₁₀ and VOC are equal to or greater than 100 tons per year. This source, which would otherwise be subject to the provisions of 326 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/ Facility	Potential to Emit After Issuance (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Surface Coating Booths ^a	90	90	--	Less than 99	--	--	Less than 9 tpy for a single HAP Less than 24 tpy for any combination of HAPs
Woodworking Operation ^b	Less than 8	Less than 8	--	--	--	--	--
Combustion units - Insignificant	0.34	0.34	0.03	0.25	3.77	4.49	0.01
Total Emissions	Less than 100	Less than 100	0.03	Less than 100	3.77	4.49	Less than 10 tpy for a single HAP Less than 25 tpy for any combination of HAPs

- ^a The amount of VOC and HAP used by the surface coating booths are limited in the permit to less than 99 tons per year VOC, less than 9 tons per year for a single HAP, and less than 24 tons per year for any combination of HAPs.
 - ^b The coatings applied by the seven (7) spray coating booths, S1 through S7, shall be limited such that the total PM/PM10 emissions shall not exceed 90 tons per twelve consecutive month period with compliance determined at the end of each month.
 - ^c The PM10 from the woodworking operations are limited in the permit to 1.83 pounds per hour which is equivalent to eight (8) tons per twelve (12) consecutive month period.
- “--“Process/facility does not emit pollutant listed.

County Attainment Status

The source is located in Dubois County.

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

Note: 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 and revoking the one-hour ozone standard in Indiana.

- (a) Dubois County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Dubois County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) Dubois County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

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	<100
PM10	<100
SO ₂	0.03
VOC	<100
CO	3.77
NO _x	4.49
Single HAP	<10
Combination HAPs	<25

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 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 100 tons per year or greater, and it is not in one of the 28 listed source categories.
- (c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

The requirements of the New Source Performance Standard, 40 CFR 60, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12) are not included in this permit for the insignificant boilers. The boilers each have a heat input less than the applicability criteria of 10 MMBtu/hr.

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

- (1) The requirements of 40 CFR 63, Subpart JJ (National Emission Standards for Wood Furniture Manufacturing Operations) are not included in this permit because the source is minor for HAPs. The operation of the paint booths identified as S1 through S7 have a potential to emit of greater than ten (10) tons per year of a single HAP, and greater than twenty-five (25) tons per year of a combination of HAPs. However, the source accepted federally enforceable limits on the amount of HAPs used such that the amount of any single HAP emitted is limited to less than ten (10) tons per year and the amount of any combination of HAPs emitted is limited to less than twenty-five (25) tons per year. This limit was written in the source's original FESOP issued on December 10, 1996 which was prior to the first compliance date for this rule of November 21, 1997. Therefore, 40 CFR 63, Subpart JJ is not included in this permit.
- (2) The requirements of 40 CFR 63, Subpart QQQQ (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products) are not included in this permit. Pursuant to 40 CFR 63.4681(c)(2), surface coating of wood furniture subject to 40 CFR 63, Subpart JJ, including finishing, gluing, cleaning, and washoff operations associated with the production of wood furniture or wood furniture components is not subject to 40 CFR 63, Subpart QQQQ.
- (3) The requirements of 40 CFR 63, Subpart RRRR (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Furniture) are not included in this permit. The source does not perform surface coating of metal furniture.
- (4) The requirements of 40 CFR 63, Subpart DDDDD (National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters) are not included in this permit for the two natural gas-fired boilers rated at 0.50 and 0.59 MMBtu/hr. The source has accepted federally enforceable limits on the amount of HAPs used such that the amount of any single HAP emitted is limited to less than ten (10) tons per year and the amount of any combination of HAPs emitted is limited to less than twenty-five (25) tons per year. This limit was written in the source's original FESOP issued on December 10, 1996, which is prior to the Subpart DDDDD compliance date of September 13, 2007.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

Jasper Seating Company, Inc. is not considered one (1) of the twenty-eight (28) source categories. The source was issued a FESOP Renewal No.: F037-14148-00041 on October 16, 2001.

This source is located in Dubois County, which is currently designated as an attainment area for ozone, NO₂, SO₂, PM₁₀, CO and Lead. The source has accepted federally enforceable limits on VOC and PM₁₀ such that the amount of VOC and PM₁₀ emitted are each limited to less than one-hundred (100) tons per year (see discussion of FESOP limits below). The coatings applied by the seven (7) spray coating booths, S1 through S7, shall be limited such that the total PM/PM₁₀ emissions shall not exceed 90 tons per twelve consecutive month period with compliance determined at the end of each month. The transfer efficiency of the seven (7) spray coating booths, S1 and S7, shall not be less than 10% and the control efficiency of the dry filters shall not be less than 85%. PM emissions for the woodworking operation shall be limited to less than 1.83 pounds per hour. Therefore, the combined PM emissions from the seven (7) spray coating booths and woodworking operation are less than two hundred fifty (250) tons per year for the entire source. The potential emissions of all other pollutants for this source are less than 100 tons per year. Therefore, this source is a minor source under 326 IAC 2-2 (PSD) for future modifications.

The source was initially constructed prior to 1979 and modified in 1999 (the previously existing seven spray booths were replaced in 1999 with seven new spray booths). The PM₁₀ and VOC emissions were limited in the previous FESOP to less than 100 tons per year. Although there was no PM limit for PSD, the source particulate emissions were less than 250 tons per year because the source was required to use baghouses and dry filters to control particulate emissions. Therefore, PSD did not apply to the modification.

326 IAC 2-1.1-5 (Nonattainment Area New Source Review)

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 100 tons per year of any nonattainment pollutant. Jasper Seating Company, Inc. has a limited potential to emit of PM₁₀ below 100 tons per year and has not made any modifications to this source after January 5, 2005. Since the PM₁₀ potential emissions are limited to less than 100 tons per year, this source is a minor source under Nonattainment Area New Source Review for any future modifications.

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

Although the paint booths were constructed after July 1, 1997, the source has accepted federally enforceable limits on the amount of HAPs used such that the amount of any single HAP emitted is limited to less than ten (10) tons per year and the amount of any combination of HAPs emitted is limited to less than twenty-five (25) tons per year. See State Rule Applicability – Entire Source 326 IAC 2-8-4 (Federally Enforceable State Operating Permit) of this TSD for a detailed discussion of the limiting restrictions. Therefore, this source is not subject to 326 IAC 2-4.1.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emissions Reporting) because it is not required to have an operating permit under 326 IAC 2-7 (Part 70 Permit Program). This source is located in Dubois County and it does not emit lead in to the ambient air at a level of 5 tons per year or greater.

326 IAC 2-8-4 (FESOP)

- (a) This source has a potential to emit VOC and HAP above the Title V applicability threshold. However, the source has agreed to accept the following VOC and HAP usage limits on the surface coating booths:

The amount of VOC delivered to the applicators of the surface coating booths, identified as S1 through S7, plus the amount of VOCs used for clean-up, shall not exceed ninety-nine (99) tons per twelve (12) consecutive month period with compliance determined at the end of each month. The amount of any single HAP delivered to the applicators plus the amount of any single HAP used for clean-up shall not exceed nine (9) tons per twelve (12) consecutive month period with compliance determined at the end of each month. The amount of any combination of HAPs delivered to the applicators plus the amount of any combination of HAPs used for clean-up shall not exceed twenty-four (24) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Combined with the VOC and HAP emissions from the insignificant activities, the emissions from the entire source are limited to less than 100 tons per year for VOC, less than 10 tons per year for a single HAP, and less than 25 tons per year for a combination of HAPs. This condition renders the requirements of 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

- (b) The source has a potential to emit PM10 above the Title V applicability threshold. However, the source has agreed to accept the following PM10 emission limits:

- (1) The coatings applied by the seven (7) spray coating booths, S1 through S7, shall be limited such that the total PM/PM10 emissions shall not exceed 90 tons per twelve consecutive month period with compliance determined at the end of each month.
- (2) The transfer efficiency of the seven (7) spray coating booths, S1 through S7, shall not be less than 10%.
- (3) The control efficiency of the dry filters used by the seven (7) spray coating booths, S1 through S7, shall not be less than 85%.
- (4) PM10 emissions from the woodworking operation shall not exceed 1.83 pounds per hour which is equivalent to eight (8) tons per twelve (12) consecutive month period.

The PM10 emissions from the spray booths, woodworking operation, and the insignificant activities, are limited to less than 100 tons per year of PM10 and renders the requirements of 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

- (c) Compliance with the PM/PM10 emission limits from the seven (7) spray coating booths, S1 through S7 shall be determined by calculating the PM/PM10 emissions associated with each coating applied by the seven (7) spray coating booths, S1 through S7, using the following equation:

$$\text{PM/PM10} = \text{CU} \times \text{D} \times \text{W\%S} \times (1 - \text{TE}/100) \times (1 - \text{CE}/100) \times 1/2000$$

Where:

- PM/PM10 = The total PM/PM10 emissions (ton/month) for a given coating.
CU = The total coating use (gal coating/month) of a given coating.
D = The density (lb coating/gal coating) of a given coating.
W%S = The weight percent solids (lb solids/lb coating) of a given coating.
TE = The transfer efficiency (%) of the spray applicators. This value shall equal 10% or a value determined from the most recent valid compliance demonstration.

CE = The control efficiency (%) of the dry filters. This value shall equal 85% or a value determined from the most recent valid compliance demonstration.

326 IAC 5-1 (Opacity Limitations)

Although the source is located in Dubois County, it is not located in Bainbridge Township. Therefore, 326 IAC 5-1-2(1) (Opacity Limitations) applies to this source. 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.

326 IAC 6-4 (Fugitive Dust)

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.

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

This source is not located in any of the counties listed in 326 IAC 6-5-1(a). Pursuant to 326 IAC 6-5-1(b), the spray booths were constructed after December 13, 1985; however, fugitive particulate emissions are expected to be minimal for the entire source. Therefore, the source is not subject to 326 IAC 6-5.

326 IAC 8-6 (Organic Solvent Emission Limitation)

This rule does not apply to this source because the surface coating operations were constructed after January 1, 1980 and are subject to another Article 8 rule.

State Rule Applicability – Surface Coating Booths

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

Pursuant to 326 IAC 6-3-1(c)(3), if any limitation established by 326 IAC 6-3 is less stringent than the applicable limitations contained in 326 IAC 6.5 and 326 IAC 6.8, then the limitations contained in 326 IAC 6.5 and 326 IAC 6.8 prevail. Therefore, the surface coating booths, identified as S1 through S7, are not subject to 326 IAC 6-3-2(d) because the surface coating booths are subject to more stringent limitation of 0.03 grains per dry standard cubic foot pursuant to 326 IAC 6.5-1-2(a). 326 IAC 6-3-2(d) only requires use of a control device and does not specify an emission limitation. Pursuant to 326 IAC 6.5-1-2(a), particulate emissions from the surface coating booths, identified as S1 through S7, shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

326 IAC 6.5-1 (Nonattainment Area Limitations)

Since this source is located in Dubois County, is not specifically listed in 326 IAC 6.5-4, and has actual emissions of ten (10) tons or more of particulate matter per year and potential emissions are greater than 100 tons per year, the source is subject to 326 IAC 6.5-1-2. Therefore, pursuant to 326 IAC 6.5-1-2(a), particulate emissions from the surface coating booths, identified as S1 through S7, shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

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

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

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

Pursuant to F037-5402-00041, issued on December 10, 1996 and 037-10682-00041, issued on April 5, 1999, 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating) applies to the surface coating booths because the booths have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls. Pursuant to this rule, the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

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

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

326 IAC 8-11 (Wood Furniture Coating)

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

State Rule Applicability - Woodworking Operations

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 6.5-1 (Nonattainment Area Limitations)

Since this source is located in Dubois County, is not specifically listed in 326 IAC 6.5-4, and has actual emissions of ten (10) tons or more of particulate matter per year, the source is subject to 326 IAC 6.5-1-2. Therefore, pursuant to 326 IAC 6.5-1-2(a), particulate emissions from the woodworking operation, shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf). Pursuant to 326 IAC 6-3-1(c)(3), if any limitation established by 326 IAC 6-3 is less stringent than the applicable limitations contained in 326 IAC 6.5 and 326 IAC 6.8, then the limitations contained in 326 IAC 6.5 and 326 IAC 6.8 prevail. Therefore, the woodworking operations are not subject to 326 IAC 6-3-2(d) because they are subject to the more stringent limit in 326 IAC 6.5-1-2(a).

State Rule Applicability - Insignificant Boilers

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) and 326 IAC 6.5-1 (Nonattainment Area Limitations)

Since this source is located in Dubois County, is not specifically listed in 326 IAC 6.5-4, and has actual emissions of ten (10) tons or more of particulate matter per year, the source is subject to 326 IAC 6.5-1-2. Therefore, pursuant to 326 IAC 6.5-1-2(b)(3), particulate emissions from the two natural gas-fired boilers shall not exceed one-hundredth (0.01) grain per dry standard cubic foot (dscf). Pursuant to 326 IAC 6-2-1(e), if any limitation established by 326 IAC 6-2 is less stringent than the applicable limitations contained in 326 IAC 6.5 and 326 IAC 6.8, then the limitations contained in 326 IAC 6.5 and 326 IAC 6.8 prevail. Therefore, the two natural gas-fired boilers are not subject to 326 IAC 6-2-4 because they are subject to the more stringent limit in 326 IAC 6.5-1-2(b)(3).

State Rule Applicability - Insignificant Combustion Sources

326 IAC 6.5-1 (Nonattainment Area Limitations)

Since this source is located in Dubois County, is not specifically listed in 326 IAC 6.5-4, and has actual emissions of ten (10) tons or more of particulate matter per year, the source is subject to

326 IAC 6.5-1-2. Therefore, pursuant to 326 IAC 6.5-1-2(b)(3), particulate emissions from the Weather-Rite Air Make Up Unit, Down Draft Booth Air Make Up Unit, two (2) space heaters, and three (3) drying ovens shall each not exceed one-hundredth (0.01) grain per dry standard cubic foot (dscf).

Testing Requirements

- (a) No stack test is required in this FESOP for VOC and HAP because compliance with the limits for VOC and HAP shall be determined using Material Data Safety Sheets (MSDS) and records of the amount of material applied.
- (b) In order to demonstrate compliance with the FESOP and PSD PM and PM10 minor limits for woodworking, during the period between 30 and 36 months after issuance of this FESOP, the Permittee shall perform PM and PM10 testing for the baghouses Torit - Day #1 and Torit - Day #2, which are used to control the particulate emissions from the woodworking operation utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM10 includes filterable and condensable PM10. Testing shall be conducted in accordance with Section C- Performance Testing.

Compliance Requirements

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

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

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

- (a) The surface coating booths 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 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 violation from this permit.
 - (2) Monthly inspections shall be performed of the particulate emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or 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 violation from this permit.

These monitoring conditions are necessary because the dry filters for the surface coating booths must operate properly to ensure compliance with 326 IAC 6.5-1 (Nonattainment Area Limitations) and 326 IAC 2-8 (FESOP).

- (b) The woodworking operation has applicable compliance monitoring conditions as specified below:

Visible Emissions Notations

- (1) Daily visible emission notations of the woodworking stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (2) 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.
- (3) 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.
- (4) 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.
- (5) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

Baghouse Inspections

- (6) 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 months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

Broken or Failed Bag Detection

- (7) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have 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).
- (8) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

- (9) 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.

These monitoring conditions are necessary because the Torit/Day wood dust collector associated with the woodworking operation must operate properly to ensure compliance with 326 IAC 6.5-1 (Nonattainment Area Limitations), 326 IAC 2-8 (FESOP), and 326 IAC 2-2 (PSD).

Conclusion

The operation of this wood furniture and fixture manufacturing plant shall be subject to the conditions of the FESOP No.: F037-22620-0041.

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

**Company Name: Jasper Seating Company, Inc
Address City IN Zip: 4582 South Cross Street, St. Anthony, Indiana 47575-0125
FESOP Renewal: F037-22620-00041
Reviewer: ERG/JR
Date: October 24, 2006**

Process Booth ID	Material	Density (lbs/gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/hour)	Maximum (units/hr)	Pounds VOC per gallon of Coating	PTE of VOC (lbs/hour)	PTE of VOC (lbs/day)	PTE of VOC (tons/year)	PTE of PM/PM10 (tons/year)	Dry Filter Control Efficiency	Transfer Efficiency
Booth 1 Spray Coat	* Washcoat	7.09	92.0%	0.0%	92.0%	0.0%	8.0%	5.50	1.00	6.52	35.9	861	157.1	1.84	85%	10%
Booth 2 Spray Coat	* Washcoat	7.09	92.0%	0.0%	92.0%	0.0%	8.0%	5.50	1.00	6.52	35.9	861	157.1	1.84	85%	10%
Booth 3 Spray Coat	* Washcoat	7.09	92.0%	0.0%	92.0%	0.0%	8.0%	5.50	1.00	6.52	35.9	861	157.1	1.84	85%	10%
Booth 4 Spray Coat	* Washcoat	7.09	92.0%	0.0%	92.0%	0.0%	8.0%	5.50	1.00	6.52	35.9	861	157.1	1.84	85%	10%
Booth 5 Spray Coat	* Washcoat	7.09	92.0%	0.0%	92.0%	0.0%	8.0%	5.50	1.00	6.52	35.9	861	157.1	1.84	85%	10%
Booth 6 Spray Coat	* Washcoat	7.09	92.0%	0.0%	92.0%	0.0%	8.0%	5.50	1.00	6.52	35.9	861	157.1	1.84	85%	10%
Booth 7 Spray Coat	* Washcoat	7.09	92.0%	0.0%	92.0%	0.0%	8.0%	5.50	1.00	6.52	35.9	861	157.1	1.84	85%	10%
													1100	12.9		

Materials in spray booths are applied using HVLP or air assisted airless spray technologies, and controlled by dry filters.
* The Vinyl Washcoat T69CH16 is the worst case coating.

METHODOLOGY

Pounds of VOC per Gallon of Coating = Density (lbs/gal) * Weight % Organics
 PTE of VOC (lbs/hour) = Pounds of VOC per Gallon of Coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hour)
 PTE of VOC (lbs/day) = Pounds of VOC per Gallon of Coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hour) * 24 hours/day
 PTE of VOC (tons/year) = Pounds of VOC per Gallon of Coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hour) * 8760 hours/year * 1 ton/2000 lbs
 PTE of PM/PM10 (tons/year)= Maximum (units/hour) * Gal of Material (gal/unit) * Density (lbs/gal) * (1- Weight % Volatiles) * (1-Dry Filter Control Efficiency) * (1-Transfer Efficiency) * 8760 hours/year * 1 ton/2000 lbs

**Appendix A: Emission Calculations
HAP Emissions
From Surface Coating Operations**

**Company Name: Jasper Seating Company, Inc
Address City IN Zip: 4582 South Cross Street, St. Anthony, Indiana 47575-0125
FESOP Renewal: F037-22620-00041
Reviewer: ERG/JR
Date: October 24, 2006**

Process Booth ID	Material	Density (lbs/gal)	Gal of Material (gal/hour)	Maximum (units/hr)	Weight % Toluene	Weight % Formaldehyde	PTE of Toluene	PTE of Formaldehyde
Booth 1 Spray Coat	* Washcoat	7.09	5.50	1.00	9.00%	0.10%	15.4	0.17
Booth 2 Spray Coat	* Washcoat	7.09	5.50	1.00	9.00%	0.10%	15.4	0.17
Booth 3 Spray Coat	* Washcoat	7.09	5.50	1.00	9.00%	0.10%	15.4	0.17
Booth 4 Spray Coat	* Washcoat	7.09	5.50	1.00	9.00%	0.10%	15.4	0.17
Booth 5 Spray Coat	* Washcoat	7.09	5.50	1.00	9.00%	0.10%	15.4	0.17
Booth 6 Spray Coat	* Washcoat	7.09	5.50	1.00	9.00%	0.10%	15.4	0.17
Booth 7 Spray Coat	* Washcoat	7.09	5.50	1.00	9.00%	0.10%	15.4	0.17

Material in the 2 Off line spray booth is applied using HVLP or air assisted airless spray technologies, and controlled by dry filters.

107.6 1.20

* The Vinyl Washcoat T69CH16 is the worst case coating.

Total PTE of HAPs (tons/year) = 108.8

METHODOLOGY

PTE of HAPs (tons/year) = Density (lb/gal) * Gal of Material (gal/hour) * Weight % HAP * 8760 hours/year * 1 ton/2000 lbs

**Appendix A: Emission Calculations
Particulate Emissions From Woodworking Operation**

Company Name: Jasper Seating Company, Inc
Address City IN Zip: 4582 South Cross Street, St. Anthony, Indiana 47575-0125
FESOP Renewal: F037-22620-00041
Reviewer: ERG/JR
Date: October 24, 2006

Woodworking Operation

Baghouse ID	Sawdust Collected (lbs/hour)	Air Flow Rate (dscfm)	Control Efficiency (%)	Uncontrolled PTE of PM/PM10 (tons/year)	Uncontrolled PTE of PM/PM10 (lbs/hour)	Controlled PTE of PM/PM10 (tons/year)	Controlled PTE of PM/PM10 (lbs/hour)	Controlled Outlet Grain Loading (gr/dscf)
Torit - Day #1	70.0	48000	99.0%	309.7	70.7	3.1	0.71	0.00172
Torit - Day #2	70.0	48000	99.0%	309.7	70.7	3.1	0.71	0.00172
TOTALS				619.4		6.19		

Assume all PM is equal to PM10. Assume all sawdust collected is PM / PM10.

Methodology

Uncontrolled PTE of PM/PM10 (tons/year) = Sawdust Collected (lbs/hour) / (Control Efficiency %) x 8760 (hours/year) x 1 ton/2000 lbs

Uncontrolled PTE of PM/PM10 (lbs/hour) = Sawdust Collected (lbs/hour) / (Control Efficiency %)

Controlled PTE of PM/PM10 (tons/year) = Uncontrolled PTE of PM/PM10 (tons/year) x (1 - Control Efficiency %)

Controlled PTE of PM/PM10 (lbs/hour) = Uncontrolled PTE of PM/PM10 (lbs/hour) x (1 - Control Efficiency %)

Grain Loading (gr/dscf) = PTE of PM/PM10 after Control (tons/yr) / [Max. Air Flow Rate (dscfm) x 60 mins/hr x 1/7000 lb/gr x 8760 hr/yr x 1 ton/2000 lbs]

**Appendix A: Emission Calculations
 Natural Gas Combustion Only
 MMBTU/HR<100
 Insignificant Natural Gas-fired Combustions Sources**

**Company Name: Jasper Seating Company, Inc
 Address City IN Zip: 4582 South Cross Street, St. Anthony, Indiana 47575-0125
 FESOP Renewal: F037-22620-00041
 Reviewer: ERG/JR
 Date: October 24, 2006**

Capacity = 0.5 + 0.594 + 7.29 + 1.075 + 0.4 + 0.4 = 10.259 MMBtu/hr

Heat Input Capacity
 MMBtu/hr

Potential Throughput
 MMSCF/yr

10.3

89.9

Emission Factor in lb/MMSCF	Pollutant					
	PM*	PM10*	SO2	NO _x	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.09	0.34	0.03	4.49	0.25	3.77

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

**Emissionfactor for NO_x: Uncontrolled = 100 lb/MMSCF

Methodology

All Emission factors are based on normal firing.
 MMBtu = 1,000,000 Btu
 MMSCF - 1,000,000 Standard Cubic Feet of Gas

Potential Throughput (MMSCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMSCF/1,000 MMBtu
 Emission Factors from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July, 1998)
 Potential to Emit (tons/yr) = Potential Throughput (MMSCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See next page for HAPs emissions calculations.

**Appendix A: Emission Calculations
Natural Gas Combustion Only
MMBTU/HR<100
Insignificant Natural Gas-fired Combustions Sources**

**Company Name: Jasper Seating Company, Inc
Address City IN Zip: 4582 South Cross Street, St. Anthony, Indiana 47575-0125
FESOP Renewal: F037-22620-00041
Reviewer: ERG/JR
Date: October 24, 2006**

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMSCF	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	9.44E-05	5.39E-05	3.37E-03	8.09E-02	1.53E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMSCF	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	2.25E-05	4.94E-05	6.29E-05	1.71E-05	9.44E-05

Methodology is the same as previous page.

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

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

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

Source Name:	Jasper Seating Company, Inc.
Source Location:	4582 South Cross Street, St. Anthony, Indiana 47575-0125
County:	Dubois
SIC Code:	2599
Operation Permit No.:	F037-14148-00041
Operation Permit Issuance Date:	October 16, 2001
Permit Renewal No.:	F037-22620-00041
Permit Reviewer:	ERG/JR

On January 11, 2007, the Office of Air Quality (OAQ) had a notice published in The Herald of Jasper, Indiana stating that Jasper Seating Company, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal to operate a stationary wood furniture and fixture manufacturing plant with air pollution control. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On January 29, 2007, Chris Berg, HR & Safety Manager for Jasper Seating Company, Inc. submitted a comment on the proposed FESOP Renewal. The summary of the comment is as follows:

Comment 1:

The TE (transfer efficiency) value in Condition D.1.6 should be revised from 10% to 45% because the industry standard is 45% and it is not true that 90% of the spray is going up the stack.

Response to Comment 1:

According to the Air Pollution Engineering Manual, Second Edition, AP-40, U.S. Environmental Protection Agency, May, 1973 (pg 859 - 861), the transfer efficiency that is expected from coating a "table leg" type surface using an airless application (HVLP) is 10%. Since the 10% transfer efficiency is the most reliable information currently available, no changes have been made to the permit. However, IDEM will revise the transfer efficiency included in Condition D.1.2(e) and D.1.6 if the source performs a valid compliance demonstration showing that they can comply with the higher transfer efficiency. However, the testing must be conducted using methods approved by the Commissioner and in accordance with 326 IAC 3-6-3 and Section C - Performance Testing.

Upon further review, IDEM, OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted):

1. In order to reduce the number of administrative amendments, IDEM, OAQ has decided to remove the identification of the Authorized Individual in Condition A.1. However, IDEM will continue to maintain records of the name, title, and contact information for the authorized individual. The following change has been made to the permit:

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

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

Authorized individual: ~~Mike J. Elliot~~
Source Address: 4582 South Cross Street, St. Anthony, Indiana 47575-0125
Mailing Address: P.O. Box 231, Jasper, Indiana 47547
General Source Phone: (812) 326-2361
SIC Code: 2599
County Location: Dubois
Source Location Status: Nonattainment for PM2.5
Source Status: Attainment for all other criteria pollutants
Federally Enforceable State Operating Permit (FESOP)
Minor Source, under PSD and Nonattainment NSR;
Minor Source, Section 112 of the Clean Air Act;
Not in 1 of 28 Source Categories

2. IDEM, OAQ has revised Condition B.12(b)(4) to reflect the correct phone number for the Southwest Regional Office. In addition, the Condition was revised to refer to the air compliance inspector for Dubois County instead of the director. The fax number for the Southwest Regional Office has also been included.

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

...

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, 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 No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,

Telephone No.: 317-233-0178 (ask for Compliance Section)

Facsimile No.: 317-233-6865

Telephone No. ~~812-380-2300~~ **812-380-2305** (ask for ~~Director of Southwest Regional Office~~ **the air compliance inspector for Dubois County**)

Facsimile No.: 812-380-2304